Appendix 11 - Greater Cambridge Local Plan Regulation 19: Local Plan Consultation Statement

August 2026

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Introduction and purpose

1.1 This Consultation Statement sets out how Cambridge City Council and South Cambridgeshire District Council have undertaken consultation, and propose to undertake consultation, in preparing the Greater Cambridge Local Plan.

1.2 The Consultation Statement sets out how the Councils have involved residents and key stakeholders in preparing the Greater Cambridge Local Plan in accordance with Regulations 18 and Regulations 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This statement meets Regulation 22 (1)(c) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the Councils' jointly adopted Statement of Community Involvement (SCI) 2024. The SCI document sets out how the Council will consult and involve the public and statutory consultees in planning matters. Full details of the current adopted SCI can be viewed here.

1.3 The Councils began preparing a new Local Plan for Greater Cambridge after adoption of the previously adopted local plans in 2018. The new Local Plan will set out the strategic vision, objectives and spatial strategy for the area, as well as the planning policies which will guide future development. The Plan will now look ahead to 2045, and identify the main areas for sustainable development growth to meet development needs. It establishes policies and guidance to ensure local development is built in accordance with the principles set out in the National Planning Policy Framework (NPPF). The Local Plan will replace the adopted South Cambridgeshire Local Plan 2018 and Cambridge Local Plan 2018 that currently form the development plan, as well as adopted Area Action Plans.

1.4 At each stage of the plan-making process we check to ensure that our consultation approach meets the standards set out in the Statement of Community Involvement. The Consultation Statement is updated and re published at each stage of plan-making, capturing feedback we received at previous stages and how it has been taken into account.

1.5 This Consultation Statement supports the Submission Local Plan (Regulation 19) 2026 stage. It sets out how consultation has been undertaken up to this point, and looks ahead to the Submission Local Plan 2026 consultation stage.

Note about Duty to Cooperate

1.6 The duty to cooperate is a legal test that requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans. The Councils have published a separate Greater Cambridge Local Plan Duty to Cooperate Statement of Common Ground to set out the main areas of common and uncommon ground with relevant partners on strategic cross-boundary matters. This can be found on the Greater Cambridge Shared Planning Service website.

Overview of the Plan Making Process

Key Local Plan Stages Undertaken so Far

1.7 The preparation of a new Local Plan requires consultation and engagement, often across a number of stages. This is to enable early and ongoing engagement with the local community, businesses and organisations to develop a comprehensive plan, tailored to the needs of the area in terms of strategy and the policies required.

1.8 The following main stages of consultation have been carried out so far in the preparation and adoption of the Greater Cambridge Local Plan.

- Workshops and early stage stakeholder consultation (2019)
    - Engagement with key stakeholder to identify approaches to the start of the plan making process.
- First Conversation - Issues and Options Public Consultation - (January 2020)
    - Public consultation on issues the plan needs to address and options for addressing them.
- First Proposals - Preferred Option Consultation (Regulation 18) - Autumn 2021
    - Public consultation on direction of policy including the preferred option for policy direction for specific policy areas and sites.

- Regulation 18 Consultation (December 2027
    - Public consultation on an almost complete draft version of the Local Plan except a few areas of direction of policy.

Call for Sites

1.9 Alongside and as part of the consultation stages, there have been several opportunities for people to submit site suggestions for consideration though the plan making process.

1.10 A call for sites is a way for landowners, developers and individuals to suggest sites that might be available for development in the future, so they can be considered and tested by the Council. It is a normal part of plan making. Government planning guidance advises that, 'if the process to identify land is to be transparent and identify as many potential opportunities as possible, it is important to issue a call for sites and broad locations for development'.

1.11 There were opportunities to submit site suggestions at the following stages:

- An Initial 'Call for Sites' issued 2019
- A Call for Sites and Green Sites issues as part of the First Conversation in 2020
- A Call for Sites and Green Sites issues as part of the First Proposals consultation in 2021
- A Call for Sites and Green Sites as part of the Regulation 18 Consultation in 2025-26

1.12 All sites received were published on an interactive map on the Greater Cambridge Shared Planning Service website.

1.13 An additional 'Site Submissions Update' consultation was issued between February and March 2025, to ensure we had the most up to date information about available sites in the lead up to the draft plan consultation. The results of this call for sites has been published alongside the draft local plan.

1.14 Sites have been assessed using an agreed methodology through the Housing and Economic Land Availability Assessment, an evidence document published and updated at each stage of plan making.

Compliance with the Statement of Community Involvement

1.15 The Statement of Community Involvement (SCI) sets out how South Cambridgeshire District Council and Cambridge City Council will involve communities on a wide range of planning matters throughout the planning process. The SCI was adopted in March 2024. The SCI sets out how plan 6 making and development management processes will consult and engage with local stakeholders.

1.16 For the Local Plan process, the SCI sets out that for Local Plans at the Regulation 18 stage of plan making, which focuses on engagement and shaping the plan, there will one or more consultations undertaken for a 6 week period each. For Regulation 19, the stage where the plan the councils wish to adopt is published, there will be a pre-submission consultation for a 6 week period.

1.17 The main methods for consulting on the Local Plan include:

- Inviting representations through a notice on the Councils websites, and advertising through other methods such as social media, news releases, Council publications or press adverts.
- Consultations with specific consultation bodies and appropriate general consultation bodies and other relevant stakeholders.
- Making consultation documents viewable on the Councils websites and by request in different formats.
- Public consultation events of various kinds.

The Local Plan timetable

1.18 The Local Development Scheme (LDS) sets out agreed programme for the preparation of the Local Plan. Since plan making commenced it has been updated serval times to reflect the evolving programme and in response to events which have impacted on the programme. The latest Local Development Scheme can be found here.

1.19 During the First Proposals stage in 2021, the Councils made clear that the proposed strategy was contingent upon evidence being available that demonstrates that a sustainable water supply will be provided to support the preparation of the draft Local Plan. In addition, a number of other factors were also impacting on the programme such as planning for transport 7 infrastructure, and national reform of the planning system. The North East Cambridge Area Action Plan, being prepared ahead of the new local plan, was also delayed, awaiting the outcome of the Development Consent Order process regarding relocation of the CWWTP.

1.20 A Development Strategy update was reported to and agreed by members in 2023, but there remained uncertainty regarding the resolution of some of these issues.

1.21 When we published an update to our Local Plan timetable in March 2024 it was anticipated that changes to the national plan making system would be happening in autumn 2024 with the publication of new plan making regulations. We fully expected that the remainder of our plan making process would be carried out under a new system of plan making, and that we would need to know more about the specific regulation requirements in order to set a new timetable and move the plan forward.

1.22 In Summer/Autumn 2024, the new Government brought out a wide-ranging consultation on proposed amendments to the National Planning Policy Framework (NPPF). As a part of this consultation, the Government announced its aim of implementing a new plan-making system as set out in the Levelling-up and Regeneration Act. It identified that plans being prepared under the current plan making system would need to be submitted by December 2026. This date was confirmed when the new NPPF was published in November 2024. The government have yet to publish new regulations for the new plan making system. In January

2025 the Councils updated the Local Plan timetable to clarify our intentions to prepare to submit a Local Plan under the current plan making system by December 2026.

1.23 The current LDS was consulted on during the late 2025 Regulation 18 Local Plan consultation on a Draft Plan Local Plan.

1.24 The Proposed Submission Regulation 19 stage is taking place in Summer / Autumn 2026. This will involve consultation on the plan the councils propose to adopt.

1.25 Submission to Secretary of State for independent Examination (Regulation 22) is planned for December 2026, to meet the government's deadline for submission of plans under the current plan making system. There would then be an examination, held by an independent planning inspector into the soundness of the plan. This would include considering comments submitted at the regulation 19 stage. If the plan is found to be 'sound' the Councils would be able to proceed to adoption of the plan.

Summary of Regulation 18 Consultation

1.26 The Regulation 18 consultation on the Greater Cambridge Local Plan ran from 1st December 2025 to 30th January 2026. During this time 89 events were held to consult with residents, key stakeholders and statutory consultees from across Greater Cambridge. 8,415 representations were received from 8,415 individuals and organisations.

1.27 A summary of the events held during the consultation are set out in Appendix 1 including a summary of key discussion points. These events are plotted in Figure 1.

- 1.28 During the Draft Local Plan consultation we consulted using a range of methods, including:
    - **Standard methods including:** Email and letter notifications, promotion on our website and social media, provision of hard copies at offices, events and webinars. Other updates through public notices, press releases and e-bulletins. Printed material was distributed to homes and businesses through resident and business magazines.
    - **Innovative methods:** Youth Engagement sessions with children of schools in Greater Cambridge and encouraging their participation in the drawing competition. Appendix 1 sets out a Report, showing their engagement during this session. A Lego building competition was also held during the consultation with a range of submissions provided by children and young people in the area.

1.28 We promoted the consultation using the Greater Cambridge Shared Planning consultation platforms including our website, and through social media (Facebook, X, LinkedIn). A breakdown of the online and social media views is set out in the infographic below:



Figure 2: Infographic of breakdown of views on social media platforms

1.29 During the consultation, we also met with a number of stakeholders and groups and engaged through presentations held at the University of Cambridge and took the draft Local Plan policies to the Joint Design Review Panel (Cambridgeshire Quality Panel & Greater Cambridge Design Review Panel). A report of the findings of the Panel can be found in Appendix 2.

1.30 Overall, the consultation resulted in a significant amount of engagement with our local communities and stakeholders. As a result of the communications programme, we distributed over 3,000 leaflets, at 32 in-person public facing events, carried out 27 leaflet drops and hand out sessions, attended 15 markets including the Market and Mill Road Fair and held 15 non–public facing events, including with parishes, and a drop-in session with the Gypsy and Traveller community.

1.31 During the consultation we also hosted a series of online webinars that you are able to watch below:

- Tuesday 2 December: providing an introduction to the draft Local Plan consultation. You can watch back the recording on YouTube
- Wednesday 10 December: the Development Strategy and Site Allocations, you can watch back the recording on YouTube
- Wednesday 17 December, 6pm to 7:30pm: Our Themes. You can watch the recording back on YouTube
- Wednesday 7 January, 6pm to 7pm: Draft Greater Cambridge Local Plan: About our Plan - Refresher Session - You can watch the recording back on YouTube.

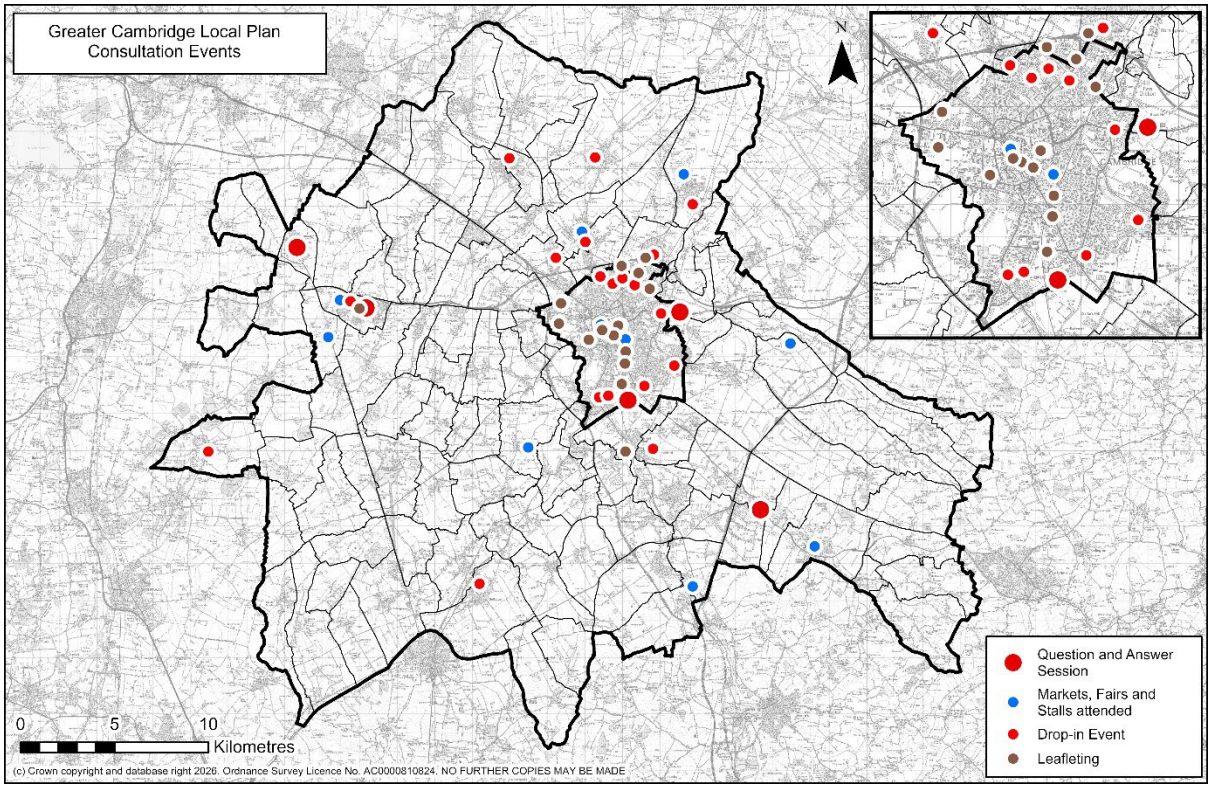


Figure 1 – Greater Cambridge Local Plan Consultation Events

1.31 As a result of the community engagement, we logged 639 new registrations to the consultation hub from 1 December 2025 to 30 January 2026. This was a positive reflection of the encouragement to use our digital platforms to submit comments on the Local Plan, whilst also still allowing representations to be submitted via email or post. 80% of the comments from the consultation were received by web, 19% from email and 1% from paper submissions.

Responses to Representations Received at the Regulation 18 Stage

1. For each policy, an executive summary of the comments received, a table summary of the representations received and he Councils' responses to these representations have been set out.
2. The Topic Paper for each chapter sets out the policy context, new or updated evidence, alternative options and the proposed approach which details the reasons for the edits to the policy.

3. These are all set out in the Appendices as follows:

- Appendix 4 – Summary of the Plan
- Appendix 5 – About the Plan
- Appendix 6 – Development strategy
- Appendix 7 – Site allocations

- Cambridge City
    - Strategic Sites in Cambridge City
    - Other Site Allocations in Cambridge City
    - Policy Areas in Cambridge City
- Edge of Cambridge
    - Strategic Sites in Edge of Cambridge
    - Other Site Allocations in the Edge of Cambridge
    - Policy Areas in the Edge of Cambridge

- New Settlements
    - Strategic Sites in New Settlements
    - Existing New Settlements

- Rural Southern Cluster
    - Strategic Sites in the Rural Southern Cluster
    - Other Site Allocations in the Rural Southern Cluster

- Rest of Rural Area
    - Strategic Sites in Rest of Rural Area
    - Other Site Allocations in the Rest of Rural Area
    - Policy Areas in the Rest of Rural Area

- Appendix 8 – Climate Change
- Appendix 9 – Biodiversity and Green Spaces
- Appendix 10 – Wellbeing and
- Appendix 11 – Great Places
- Appendix 12 – Jobs
- Appendix 13 – Homes
- Appendix 14 – Infrastructure
- Appendix 15 – Appendices
- Appendix 16 – SA/HRA

1.32 There were large amounts of comments that were received multiple times across different themes in the Plan. These issues that cross-cut between themes have been addressed in the overarching policy that the comment discusses. For example, comments submitted on the need for Cultural Infrastructure at Clifton Road, or at the Eastern Gate Public Realm Improvement Area that were submitted in response to multiple parts of the Plan, whilst noted in the policy representation summaries, are addressed in the relevant topic paper and consultation response.

1.33 A breakdown of the representations received by themes in the Plan are set out below: They are shown by chapter and policy, the number of respondents and number of representations (comments) received. We also list where these were in support for the element of the plan, or in objection, or whether the representations were neither and listed as a comment on the Plan.

Chapter / policy	Respondents	Representations	Support	Object	Comments
Development strategy	**108**	**178**	**4**	**32**	**142**
Policy S/JH: New jobs and homes	**125**	**187**	**4**	**84**	**99**
Policy S/DS: Development strategy	**189**	**314**	**9**	**116**	**189**
Policy S/SH: Settlement hierarchy	**90**	**120**	**6**	**47**	**67**
Policy S/DE: Defined development extents	**78**	**84**	**6**	**26**	**52**
Policy S/GB: The Cambridge Green Belt	**88**	**101**	**8**	**42**	**51**
Policy S/MO: Monitoring	**52**	**64**	**2**	**4**	**58**

Chapter / policy	Respondents	Representations	Support	Object	Comments
Cambridge urban area	25	39	6	2	31
Policy S/NEC: North East Cambridge	92	146	4	35	107
Policy S/LAC: Other site allocations in Cambridge	6	6	0	3	3
Policy S/C/SMS: Garages between 20 St. Matthews Street and Blue Moon Public House, Cambridge	2	2	0	1	1
Policy S/C/HTR: 137-143 Histon Road	2	2	0	1	1
Policy S/C/HGH: Henry Giles House, 73-79 Chesterton Road	4	4	1	1	2
Policy S/C/HRC: Horizon Resource Centre, 285 Coldham's Lane	2	2	2	0	0

Chapter / policy	Respondents	Representations	Support	Object	Comments
Policy S/C/PDC: Cambridge Professional Development Centre, Foster Road	3	3	2	0	1
Policy S/C/PPS: Police Station, Parkside	5	7	4	1	2
Policy S/C/NCA: North Cambridge Academy, 108, Arbury Road	10	11	2	2	7
Policy S/C/ER: 1-99 Ekin Road and 1-8 Ekin Walk	3	3	0	1	2
Policy S/C/DR: 2-28 Davy Road and Garage Blocks	3	3	1	0	2
Policy S/C/HPC: 1-78 Hanover Court, 1-49 Princess Court and Garage at Newtown Garages	2	2	0	0	2
Policy S/C/GER: Former Garage Block, East Road	3	3	0	2	1
Policy S/C/SH: 1-33 Stanton House, Christchurch Street	3	3	1	1	1
Policy S/C/SCL: Land South of Coldham's Lane, Cambridge	4	5	0	2	3
Policy S/C/BRN: Land at Barnwell Road and Newmarket Road	4	5	0	2	3
Policy S/C/TRP: Travis Perkins, Devonshire Road	1	1	0	1	0
Policy S/C/OPK: Parcel Com4, Orchard Park	2	2	1	0	1
Policy S/C/BFS: Brookfields	1	1	1	0	0
Policy S/C/CJ: Cambridge Junction	52	70	5	2	63

Chapter / policy	Respondents	Representations	Support	Object	Comments
and Cambridge Leisure, Hills Road					
Policy S/C/CLT: Clifton Road Area	10	32	3	1	28
Policy S/C/SRW: Station Road West	6	8	1	3	4
Policy S/C/BJH: Betjeman House, Hills Road	3	3	1	0	2
Policy S/C/OPM: Old Press/Mill Lane	5	10	0	7	3
Policy S/C/NMD: New Museums, Downing Street	2	2	0	1	1
Policy S/PA/CC: Cambridge City Centre	12	13	4	1	8
Policy S/AMC: Areas of Major Change	5	6	1	3	2
Policy S/AMC/AS: Abbey Stadium	8	17	0	3	14
Policy S/AMC/BC: Beehive Centre	9	11	0	6	5
Policy S/AMC/EB: East Barnwell	3	3	1	0	2
Policy S/AMC/FBG: Fitzroy/Burleigh Street/Grafton Area	5	5	1	2	2
Policy S/AMC/SCL: South of Coldham's Lane	11	17	0	4	13
Policy S/PRIA: Public Realm Improvement Areas (PRIA) in Cambridge	21	33	5	3	25
Policy S/PRIA/CRP Cambridge Retail Park	26	27	2	5	20
Policy S/PRIA/EG: Eastern Gate	96	161	34	14	113
Policy S/PRIA/HRRS: Hills Road and Regent Street Corridor	4	4	0	2	2
Policy S/PRIA/MC: Mitcham's Corner	5	5	1	1	3
Policy S/PRIA/MR: Mill Road	10	10	4	2	4

Chapter / policy	Respondents	Representations	Support	Object	Comments
Policy S/PRIA/OPML: Old Press/Mill Lane	5	6	0	4	2

Chapter / policy	Respondents	Representations	Support	Object	Comments
Edge of Cambridge	14	17	1	5	11
Policy S/CE: Cambridge East	90	116	3	8	105
Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital)	67	405	3	21	381
Policy S/NWC: Eddington, Cambridge	16	21	2	6	13
Policy S/WC: West Cambridge	15	16	1	4	11
Policy S/HHR: Land between Huntingdon Road and Histon Road	8	8	1	3	4
Policy S/EOC: Other site allocations on the edge of Cambridge	4	5	0	3	2
Policy S/EOC/NWO: Land north of Worts' Causeway	3	3	0	2	1
Policy S/EOC/SWO: Land south of Worts' Causeway	5	5	1	2	2
Policy S/EOC/BS: Bell School, Babraham Road	3	6	1	0	5
Policy S/EOC/FRE: Fulbourn Road East	7	12	0	2	10

Chapter / policy	Respondents	Representations	Support	Object	Comments
New Settlements	26	37	0	13	24
Policy S/CBN: Cambourne North	142	410	16	95	299
Policy S/CB: Cambourne	24	32	4	11	17
Policy S/GF: Land adjacent to A11 and	356	1202	54	806	342

A1307 at Grange Farm					
Existing Settlements					
Policy S/NST: Northstowe New Town	20	51	1	5	45
Policy S/WNT: Land north of Waterbeach	22	45	1	6	38
Policy S/BA: Bourn Airfield New Village	9	10	0	3	7

Chapter / policy	Respondents	Representations	Support	Object	Comments
The Rural Southern Cluster	**35**	**43**	**5**	**8**	**30**
Policy S/WGC: Wellcome Genome Campus, Hinxton	**15**	**26**	**1**	**2**	**23**
Policy S/BRC: Babraham Research Campus	10	14	1	7	6
Policy S/RSC: Other site allocations in the Rural Southern Cluster	8	10	0	2	8
Policy S/RSC/MF: Land at Maarnford Farm, Hunts Road, Duxford	4	4	0	2	2
Policy S/RSC/BR: Land south of Babraham Road, Sawston	5	5	0	2	3
Policy S/RSC/FSS: Former Spicers Site, Sawston Business Park, Sawston	8	8	0	1	7
Policy S/RSC/CC: Comfort Café, Fourwentways Little Abington	4	4	1	2	1
Policy S/SCP: Policy Areas in the Rural Southern Cluster	1	1	1	0	0
Policy S/PA/LN: South of A1307, Linton	2	2	1	0	1
Policy S/AMC: Areas of Major Change in	2	2	1	0	1

Chapter / policy	Respondents	Representations	Support	Object	Comments
the Rural Southern Cluster					
Policy S/AMC/GP: Granta Park	3	5	0	3	2
Policy S/AMC/WHD: Whittlesford Parkway Station Policy Area, Whittlesford Bridge	19	54	4	8	42

Chapter / policy	Respondents	Representations	Support	Object	Comments
Rest of the Rural Area	69	96	0	30	66
Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)	17	24	0	2	22
Policy S/RRA: Other site allocations in the rest of the rural area	35	46	1	28	17
Policy S/RRA/ML: The Moor, Moor Lane, Melbourn	3	6	0	1	5
Policy S/RRA/H: Land at Highfields (phase 2), Caldecote	5	5	1	0	4
Policy S/RRA/SCS: Land to the south of Cambridge Services, A14	39	64	4	3	57
Policy S/RRA/BBP: Land at Buckingway Business Park, Swavesey	8	8	1	1	6
Policy S/RRA/SNR: Land to the north of St Neots Road, Dry Drayton	3	3	1	0	2
Policy S/RRA/OHD: Old Highways Depot, Twenty Pence Road, Cottenham	1	1	0	1	0
Policy S/RRA/NW: Norman Way, Over	3	3	2	0	1
Policy S/RRA/CRH: Land adjacent to Cambridge Road	2	2	0	1	1

Chapter / policy	Respondents	Representations	Support	Object	Comments
(A10) and Mill Lane, Hauxton					
Policy S/RRA/CH: Land at Compass House, Chivers Way, Histon and Impington	7	7	1	1	5
Policy S/RRA/CR: Land to the west of Cambridge Road, Melbourn	3	7	1	1	5
Policy S/RRA/FID: Fulbourn and Ida Darwin Hospitals	1	1	0	1	0
Policy S/RRP: Policy Areas in the rest of the rural area	2	2	0	1	1
Policy S/AMC/IWM: Imperial War Museum, Duxford	8	19	1	1	17
Policy S/AMC/PH: Papworth Hospital	3	4	2	1	1
Policy S/AMC/FD: Fen Drayton Former Land Settlement Association Estate	3	3	0	1	2
Policy S/AMC/HIS: Mixed Use Development in Histon & Impington Station Area	6	9	1	1	7
Policy S/AMC/GT: Optimisation of Gypsy and Traveller sites	21	42	0	21	21

Chapter / policy	Respondents	Representations	Support	Object	Comments
Climate Change	76	81	10	4	67
Policy CC/SD: Sustainable development and the climate emergency	100	110	13	9	88
Policy CC/DC: Designing for a changing climate	53	60	12	11	37

Chapter / policy	Respondents	Representations	Support	Object	Comments
Policy CC/NZ: Net zero carbon new buildings	61	83	12	23	48
Policy CC/WE: Water efficiency in new developments	64	84	6	18	60
Policy CC/IW: Integrated water management, sustainable drainage and water quality	48	82	9	9	64
Policy CC/FM: Managing flood risk	32	51	7	1	43
Policy CC/RE: Renewable energy projects and infrastructure	23	27	9	2	16
Policy CC/CE: Supporting a circular economy and sustainable resource use	39	46	9	8	29
Policy CC/CS: Supporting land-based carbon sequestration and carbon sinks	18	18	5	2	11

Chapter / policy	Respondents	Representations	Support	Object	Comments
Biodiversity and green spaces	38	49	4	1	44
Policy BG/BG: Biodiversity and geodiversity	83	106	10	33	63
Policy BG/GI: Green and blue infrastructure	70	100	9	14	77
Policy BG/TC: Improving tree canopy cover and the tree population	75	89	10	19	60
Policy BG/RC: River corridors	32	39	2	3	34
Policy BG/PO: Protecting open spaces	72	90	5	14	71

Chapter / policy	Respondents	Representations	Support	Object	Comments
Policy BG/EO: Providing and enhancing open spaces	62	71	12	11	48

Chapter / policy	Respondents	Representations	Support	Object	Comments
Wellbeing and social inclusion	67	80	4	6	70
Policy WS/HD: Creating healthy new developments	42	59	7	4	48
Policy WS/NC: Meeting the needs of new and growing Communities	83	88	6	11	71
Policy WS/CF: Community, sports, and leisure facilities	35	53	10	2	41
Policy WS/CH: Cultural and creative hubs	57	83	20	2	61
Policy WS/MU: Meanwhile uses during long term redevelopments	47	48	5	0	43
Policy WS/IO: Creating inclusive employment and business opportunities through new developments	22	25	13	2	10
Policy WS/HS: Pollution, health and safety	24	29	6	3	20
Policy WS/PH: Public houses	9	9	2	0	7

Chapter / policy	Respondents	Representations	Support	Object	Comments
Great places	50	60	3	7	50
Policy GP/PP: People and place responsive design	24	25	7	3	15
Policy GP/QD: Achieving high quality development	44	50	6	3	41

Chapter / policy	Respondents	Representations	Support	Object	Comments
Policy GP/HD: Housing density	51	55	6	4	45
Policy GP/ST: Skyline and tall buildings	42	57	5	10	42
Policy GP/QP: Establishing high quality landscape and public realm	67	85	19	4	62
Policy GP/LC: Protection and enhancement of landscape character	32	37	5	6	26
Policy GP/HE: Historic environment	23	35	6	10	19
Policy GP/HA: Designated heritage assets	21	23	2	6	15
Policy GP/ND: Non-designated heritage assets	13	13	3	4	6
Policy GP/CC: Adapting heritage assets to climate change	8	11	2	1	8
Policy GP/AR: Archaeology	7	7	2	1	4
Policy GP/SF: Shopfronts	6	6	1	1	4

Chapter / policy	Respondents	Representations	Support	Object	Comments
Jobs	36	36	1	0	35
Policy J/NE: New employment development proposals	29	38	4	7	27
Policy J/RE: Supporting the rural economy	9	9	0	2	7
Policy J/AL: Protecting the best agricultural land	21	28	1	7	20
Policy J/PB: Protecting existing business space	8	8	0	1	7
Policy J/AW: Affordable	63	75	15	6	54

Chapter / policy	Respondents	Representations	Support	Object	Comments
workspace and creative industries					
Policy J/EP: Supporting a range of facilities in employment parks	10	10	5	0	5
Policy J/MS: Markets and street trading	21	21	12	5	4
Policy J/RC: Retail and other complementary town centre uses	12	13	2	3	8
Policy: J/SA: Cambridge City's Primary Shopping Area	4	4	1	1	2
Policy J/VA: Visitor accommodation, attractions and facilities	22	39	1	3	35
Policy J/FD: Faculty development and specialist/language schools	6	6	1	0	5

Chapter / policy	Respondents	Representations	Support	Object	Comments
Homes	35	37	2	2	33
Policy H/AH: Affordable housing	64	77	5	14	58
Policy H/ES: Exception sites for affordable housing	10	12	0	0	12
Policy H/HM: Housing mix	27	30	4	3	23
Policy H/GL: Garden land and subdivision of existing plots	9	10	4	3	3
Policy H/SS: Residential space standards and accessible homes	29	42	3	10	29
Policy H/SH: Specialist housing	19	19	3	2	14
Policy H/CB: Self and custom build homes	29	34	1	15	18

Chapter / policy	Respondents	Representations	Support	Object	Comments
Policy H/BR: Build to rent homes	18	20	4	3	13
Policy H/CL: Co-living	10	10	2	1	7
Policy H/MO: Houses in multiple occupation (HMOs)	15	19	2	2	15
Policy H/SA: Student accommodation	10	12	1	1	10
Policy H/DC: Dwellings in the countryside	10	10	1	1	8
Policy H/RM: Residential moorings	1	1	0	0	1
Policy H/GT: Gypsy and Traveller and Travelling Showpeople sites	13	16	2	1	13

Chapter / policy	Respondents	Representations	Support	Object	Comments
Infrastructure	81	104	2	6	96
Policy I/ST: Sustainable transport and connectivity	138	240	17	19	204
Policy I/TH: Travel hub facilities	25	31	6	3	22
Policy I/EV: Parking and electric vehicles	47	59	4	12	43
Policy I/SD: Servicing and last-mile deliveries	17	19	5	1	13
Policy I/SI: Safeguarding important infrastructure	19	24	2	3	19
Policy I/AD: Aviation development	10	10	1	1	8
Policy I/EI: Energy infrastructure masterplanning	13	14	2	1	11
Policy I/ID: Infrastructure and delivery	84	100	5	9	86
Policy I/DI: Digital and	51	53	3	2	48

Chapter / policy	Respondents	Representations	Support	Object	Comments
telecommunications infrastructure					
Policy I/CM: Construction management	10	13	2	2	9

1.33 To view the representations received during the consultation, please view our website: Draft Greater Cambridge Local Plan for consultation | Greater Cambridge Shared Planning. You are able to view responses to each chapter or policy of the Plan by clicking on the “View responses” box at the bottom of each page.

Viability

1.34 The Local Plan has also been subject to a whole plan Viability Assessment, to test that proposed policies are realistic and capable of being delivered by developers alongside the infrastructure they would need to deliver or fund. Following the Regulation 18 consultation on the Draft Plan, the assessment was revised to reflect recent proposed changes to policies, where these would have a direct impact on development viability, and test a different range of development typologies which more closely reflects the final proposed site allocations. The assessment demonstrates that developments are viable when the requirements of the Local Plan are considered, and will be able to contribute effectively to the delivery of infrastructure.

Appendices:

Appendix 1 - Events Log from consultation events at Regulation 18

December 2025

Saturday 6 December, 9am to 11am: Linton Farmers Fayres Market

Key discussion points from event records (issues discussed):

- Asked what the Plan will cover and what that means for Linton.
- Comments around the GP surgery and schools not being of sufficient capacity to meet needs of planned growth and the need for development to be appropriately phased with infrastructure. Keen to see the development of “communities” with services to support them, not just housing.
- Council and Landowner events should be located in accessible venues and in the village itself. Landowners have hosted events not in the village. Making sure that events are at times to allow as many locals as possible to attend.
- Questions around existing applications in Linton and more generally site allocations in the plan for the area.
- **Turnout:** Constant footfall through the two hours we were there. Estimate around 90-100.

Image of event:



Saturday 6 December, 10:30am to 3pm: Mill Road Winter Fair – stall outside Ditchburn Place, Mill Road

Key discussion points from event records (issues discussed):

- Mill Road bus gate and other transport and access related questions
- Questions around process and what happens next for the Local Plan
- Engagement with a range of young people and students who were interested in what the Local Plan means longer-term for Greater Cambridge
- **Turnout:** Very high footfall, but most people who took a leaflet didn't want to stop to chat. 400 leaflets were handed out at the location.

Image of event:

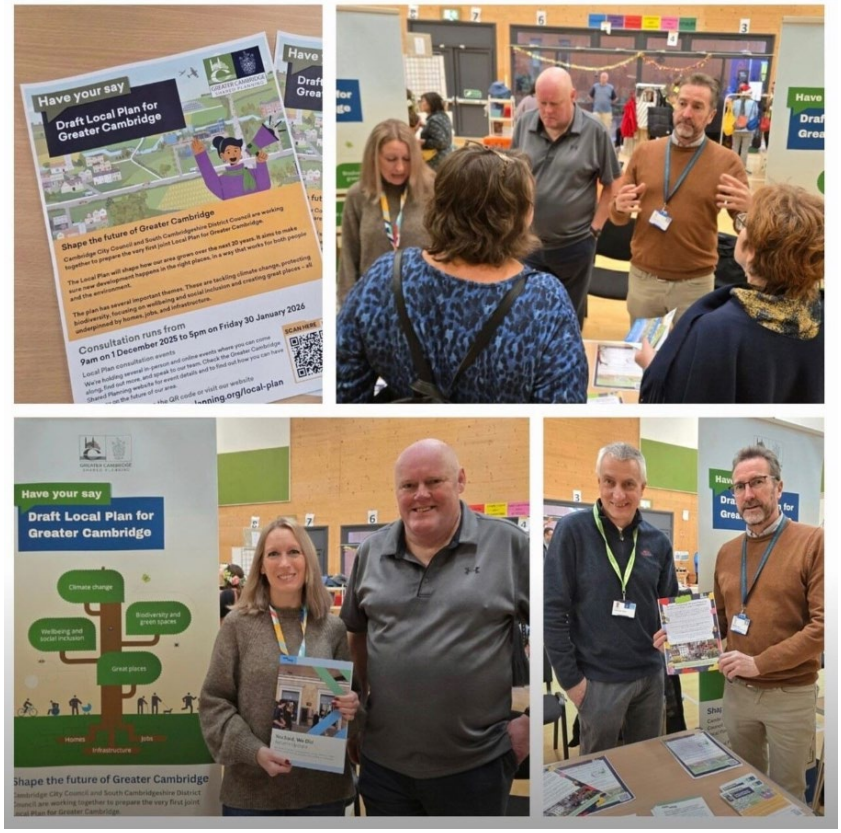


Sunday 7 December, 11am to 3pm: South Cambridgeshire Christmas Market, Cambourne

Key discussion points from event records (issues discussed):

- Lots of interest in East West Rail and when the new station would be delivered. Questions around how it would be connected to the existing Cambourne village, whether there would be parking available. On the Cambourne development, when it would happen, how it would impact on Cambourne high street and where a new village centre with shops and services would be happening.
- A range of other non-Cambourne issues were discussed, including the level of development being planned for, and site specific issues in other areas.
- **Turnout:** Over 100 people visited the stall.

Image of event:



Tuesday 9 December, 3:30pm to 6:30pm: Drop-in session at The Cabin – Northstowe Temporary Community Centre, CB24 1FD

Key discussion points from event records (issues discussed):

- Northstowe allocation, particularly its boundary and the Conservation Area in Longstanton, and the green separation between Northstowe and surrounding villages (Longstanton and Oakington). Also, the difference between the green separation mentioned in the Northstowe policy and the Protected Open Spaces shown on the Policies Map, and how the different designations and allocations layer up on the Policies Map.
- HELAA site assessment and methodology in relation to a site in Fen Drayton.
- Policy area for Fen Drayton Former LSA Estate and its wording in relation to development on Cootes Lane / Middleton Way. Also, relationship between policy area, affordable housing exception site, and self and custom build homes.
- Discussion about housing requirement and how this had been calculated, plus how we are meeting this requirement, and seeking confirmation that we are going to deliver it all.
- Experiences from a very early Northstowe resident and lessons that could be learnt for other new settlements – importance of haul roads, timing of services/facilities including playgrounds and cycle ways, and being aware of how housebuilders use solar panels and therefore issues when adding more solar panels. Also, issues relating to communication with housebuilders

(rather than the overall developer), and being aware that when developments take time to be built out areas of habitat / biodiversity can form within the construction areas, that are then lost when those areas are built out.
- Impact of Local Government Review on the Local Plan, and discussion on who is providing the funding for the development proposed in the plan.
- Question around what secured means in the Infrastructure Delivery Plan, particularly in relation to swimming pool at Northstowe having been secured.
- **Turnout:** 7 people attended the event.

Image of event:



Thursday 11 December, 4:30pm to 7pm: Drop-in session at Meadows Community Centre, CB4 2JL

Key discussion points from event records (issues discussed):

- The loss of the Beehive and the Grafton Centre and the impact of the loss of retail on the ability of Cambridge to function in the future. The potential impact of the A14 sites development on biodiversity. The effectiveness of historical materials compared to modern ones.
- **Turnout:** 14 people attended the event.

Saturday 13 December, 9:30am to 11:30am: Wilbraham Farmers Market

Key discussion points from event records (issues discussed):

- The impact of restrictions on the number of homes that can be built in Group Villages will restrict the ability of these villages to have sufficient population to maintain local facilities such as schools and shops.
- The traffic jams at the Stow cum Quy junction and the need for mitigation and very particularly the need for a cycleway to link the villages to Cambridge. Moving the P&R won't help.
- Concerns over the Beehive redevelopment.
- The Guildhall event was very good last time.
- Very positive that we had come out to the Wilbrahams.
- Concern re: a nearby solar farm.
- Positive feedback from a former district & county councillor re: the Pampisford event with GCSP representatives.
- **Turnout:** 8 people asked questions, with over 45 leaflets distributed.

Saturday 13 December, 10am to 12pm: Drop-in session at St Johns Church Room, Waterbeach, CB25 9HT

Key discussion points from event records (issues discussed):

- Discussion regarding the approach to the policies for Waterbeach new town. A lot of detailed issues were mentioned around implementation of the new town.
- Concern about waste water provision, and whether the pipeline to the Cambridge waste water treatment works would be delivered on time, or who a new works wasn't being delivered at Waterbeach for the new town instead.
- Views expressed that the current village railway station should remain open in addition to the new station at the new town.
- Questions about why the local plan still identifies housing at north east Cambridge despite the government withdrawing funding for the relocation.
- Concerns about using high quality agricultural land to meet development needs.
- **Turnout:** 12 people attended the event.

Sunday 14 December, 9:30am to 12:30pm: Caxton Farmers Market

Key discussion points from event records (issues discussed):

- Lack of public transport to Cambourne and other areas like Granta Park
- Lack of facilities within Cambourne
- Design quality of new developments and the need to move away from volume house builders
- Lack of walking and cycling facilities to Cambourne
- **Turnout:** 60-80 attendees with 50 leaflets handed out

Monday 15 December, 12pm to 6pm: Drop-in session and exhibition space at The Cambridge Room, Unit 57, The Grafton Centre, CB1 1PS

Key discussion points from event records (issues discussed):

- Affordable housing and biodiversity net gain of 20% and how achievable it was
- Design codes: support for good design and high-quality buildings, and for the approach taken in the plan, but questioned whether the policy would translate to good outcomes on the ground through design / delivery by developers.
- Issues on where the water come from to support this growth and development?; do we need more housing?; how are we going to protect biodiversity and climate if we are proposing a growth in housing and jobs? Who is this housing for – immigration?
- Looking out for Coton Road and the new busway and how it is disturbing the residents and the existing biodiversity and businesses.
- **Turnout:** 25 people attended the event.

Image of event:



Wednesday 17 December, 9am to 11am: Great Shelford Country Market, Memorial Hall, CB22 5LZ

Key discussion points from event records (issues discussed):

- CSET was a big concern – the route and the options
- Mingle Lane – shocked not to see it in the plan even though there is a planning application – Hill did a presentation on it about a month ago.
- Landowner with site in Elsworth – directed to Call for Sites process and asked questions about Cambourne, SEA, width of gaps between settlements, responsibilities
- Potholes
- Neighbourhood Plan for Great Shelford and clarification re: relationship with the Local Plan.

- Questions about Grange Farm – in terms of CSET.
- Questions about strategy and where sites are going / scale of development.
- Questions about Grey Belt / greenbelt sites and release of land.
- Concern raised by parish council that some local residents had talked about pausing the local plan due to tilted balance
- Concern about lack of boundaries between Stapleford and Great Shelford and needing to keep character and identity of both. Especially in context of green belt.
- Need more map copies and consultation modes who are unable to access meeting – expecting to see more maps etc. – will need this at Stapleford meeting.
- Consultation period is too short
- **Turnout:** 20 conversations, 60 leaflets handed out.

Wednesday 17 December, 4:30pm to 6pm: Presentation and Q&A on Cambourne, Papworth Village Hall, CB23 3RD

Key discussion points from event records (issues discussed):

- Have we considered the impacts on SSSIs/Ancient Woodlands
- How would we stop development coming up to the villages / what reassurances are there? Equally, some people were pleased that it was away from Papworth so they could benefit from the separation but be close to the facilities that would come
- Questioned whether we had the right strategy, said some development in villages would be good to support schools, shops, etc.
- The proposal is much bigger than people were assuming it would be
- Unhappy about lack of awareness of the event or the consultation in general
- Have we spoken with landowners as part of this work?
- Have we spoken with farmers about what the impact would be for them and whether they could continue to farm the land in the SEA area?
- What would the forest include and when would it be delivered.
- For EWR:
- Will the Bourn Tunnel be financially feasible?
- Is a southern route still an option?
- **Turnout:** 22 people attended the event.

Friday 19 December, 11am to 2pm: Drop-in session at Clay Farm Community Centre, Hobson Avenue, CB2 9FN

Key discussion points from event records (issues discussed):

- Housing targets, development strategy and sites, specific topic based policies on Build to Rent, renewable energy, and sustainable transport.
- Also proposals for CBC immediately next to Nine Wells residential development, and suggestions of alternative ideas for green space.
- **Turnout:** 1 person attended the event.

Saturday 20 December, 11am to 1pm: All Saints Garden Market, Cambridge, CB2 1TQ

Key discussion points from event records (issues discussed):

- None
- **Turnout:** 60 leaflets were handed out.

Image of event:



Sunday 21 December, 10am to 12:30pm: Waterbeach Community Market, Old Barracks, CB25 9PA

Key discussion points from event records (issues discussed):

- Affordability and quality of new housing
- Relocation of Waterbeach Station (not supportive)
- Traffic/A10
- Garden sizes of new homes
- **Turnout:** Close to 200 people attended, 58 leaflets handed out.

January 2026

Tuesday 6 January, 10am to 1pm: Drop-in session at Arbury Community Centre, Campkin Road, CB4 2LD

Key discussion points from event records (issues discussed):

- The Arbury Court redevelopment should be added into the Local Plan.
- Concern over the potential loss of car parking spaces at Arbury Court, and more generally, particularly for older and disabled people and their carers. Redevelopments should ensure that car parking spaces are not taken away from existing residents.
- Need to assess what is going on in the entirety of neighbourhoods before preparing policies to assess where some people are being disproportionately affected.
- Concern over the impact that the expansion of Cambourne will have on the ability of existing residents to reach destinations via public transport. There is also a need to assess and address the existing needs which aren't being met at the moment and won't be met by East West Rail and the new busway.
- **Turnout:** Around 5 people, with leaflets left at the venue.

Tuesday 6 January, 5pm to 7pm: Presentation and Q&A on Cambourne, Cambourne Hub, CB23 6GW

Key discussion points from event records (issues discussed):

- Lack of local awareness of the Local Plan's consultation within the surrounding villages of the proposal for North Cambourne.
- Transport impacts and how/when the mitigation measures will be explored and resolved.
- Concerns about the relationship between the Local Plan and the Transport Strategy, in particular the delays to the publication of the Transport Strategy.

- Proximity of Cambourne North to the north villages and the potential impacts on designated heritage assets (particularly in Elsworth).
- Flooding impacts of the Cambourne North
- **Turnout:** 7 people attended the event.

Wednesday 7 January, 4:30pm to 7pm: Drop-in session at Main Hall, Trumpington Pavillion, CB2 9JT

Key discussion points from event records (issues discussed):

- Resident wanted to know why Grange Farm had been included as a new site at this stage of the LP and had not been included at the First Proposals stage.
- **Turnout:** 3 people attended the event.

Wednesday 7 January, 4:30pm to 7pm: Drop-in session at East Barnwell Community Centre, Newmarket Rd, CB5 8RS

Key discussion points from event records (issues discussed):

- Transport and connectivity; the consultation process and how the website works; specific site issues and why certain development was not going through; safety in the streets; the difference in understanding between dwellings and bedrooms.
- **Turnout:** 4 people attended the event.

Thursday 8 January, 4:30pm to 7pm: Drop-in session at The Hall, Campkin Road Community Centre, CB4 2ZH

Key discussion points from event records (issues discussed):

- None.
- **Turnout:** None.

Thursday 8 January, 4:30pm to 6pm: Presentation and Q&A on Cambridge East, Marleigh Community Centre, The Hangar Building, 2 Jubilee Square, CB5 8BX

Key discussion points from event records (issues discussed):

<u>Wider strategy</u>

- Some concerns raised about delivery of growth and need for it, if people in Cambridge even want growth even though the Strategy has set out its the most sustainable option. In the same vein, is demand that high for life science this seems a bit woolly with AstraZeneca pulling out and what if we are left with empty buildings for commercial uses.

- Water supply questions
- Future development in the east of Cambridge including but not limited to Cambridge East
- Retail centres location and impact on trip generation – larger items require cars, smaller items do not – make sure there is a good spread of small and medium retail space to not impact on congestion.

Water Efficiency

- Water storage issues – especially in Summer is an issue
- Water butts for individual units
- SUDs – smaller scale – need for onsite water collection per unit
- Water stress concerns

Transport

- Concern about delivery / transport connection / congestion
- Need to reduce car trips
- Trip journeys and car parking space reduction needs to work alongside improved public transport. Some concerns about banning private vehicles and impact on road network – can it still be used for servicing buildings etc.

Delivery

- Marshall's - if they aren't moving – is it actually going to happen the delivery of the site.

Transport

- Location of North East Cambridge Station – does not seem sensible for residents in Fulbourn or Cherry Hinton, and does not seem a need for it where there are now going to be north and south access at main Cambridge station. It is a large site Cambridge East and it feels like the station is too high up.
- Concerns that re-location of the Park and Ride may impact on frequency of the service
- Access into city centre from Marleigh is good – but making orbital journeys around the city is much harder.
- Want to improve cycling routes over and under A14

GI in and around Cambridge East

- Greenways need to be improved / access to greenways and
- GI connection between sites

- Wicken Fen access and connectivity
- Connections from city out into nature need to be improved – locked in by A11 and A14 – living in Milton and the plans with NEC to improve connectivity to nature have now fallen away.
- **Turnout:** 4 people attended the event.

Friday 9 January, 9am to 12pm: Histon Baptist Church, Station Road, CB23, 9LQ

Key discussion points from event records (issues discussed):

- Recent/ current developments in Histon being delivered with inadequate parking spaces or contributions to wider facilities (eg. GP practices)
- Should consider introducing a policy to control height of developments near to windmills (such a policy has been introduced in Histon & Impington Neighbourhood Plan).
- Support for Cambridge Science Park North proposal. This would provide an urban country park/ recreational facilities for Histon & Impington and provide parish council with greater control over undeveloped land around the parish.
- Histon & Impington has a need for more recreational facilities in general. Land adjacent the exiting recreation ground would be ideal but is only likely to be available if CSP North goes ahead.
- **Turnout:** 2 people attended the event.

Friday 9 January, 12pm to 2pm: Drop-in session at Norbury Room, Melbourn Community Hub, SG8 6DZ

Key discussion points from event records (issues discussed):

- Specific concern around boundary of Cambourne North strategic enhancement area – sought an understanding of what the effect of the policy would be.
- Linked to the above, rationale of Elsworth defined development extent
- Lack of ambition and concern about approach of Plan towards large cultural venues / concert halls (e.g. Junction redevelopment, lack of any allocation for major concert hall)
- Support for approach to other cultural and leisure facilities (smaller venues) e.g. cinemas and bowling alleys
- Query on why Plan doesn’t allocate more land around existing railway stations and reliance on planned infrastructure (with delivery risks) - objects to Grange Farm
- Query why specific allocations not made for C2 housing for older people

- Concern around CSET scheme and questioned why the scheme is progressing
- Support for more housing allocations in small villages to increase their sustainability and better cycling infrastructure between villages
- Plan should do more to require infrastructure to be delivered up front
- Question around how emergency services factored into infrastructure planning
- Need for A505 west of Royston to be upgraded to improve safety.
- **Turnout:** 20 people attended the event.

Monday 12 January, 5pm to 7pm: Drop-in session at Storey's Field Centre, Eddington, CB3 1AA

Key discussion points from event records (issues discussed):

- Water scarcity, transport congestion, not enough car parking.
- **Turnout:** 3 people attended the event.

Wednesday 14 January, 1pm to 4pm: Drop-in session at the Marketing Suite, Cambourne, Business Park (located nearby South Cambs Hall), CB23 6DP

Key discussion points from event records (issues discussed):

- Questioning the efficacy and efficiency of our planning system, how to plan new town. Using Northstowe as a case study of how not to do it.
- Is there any political or electoral follow up after the delivery of the local plan so that the developers deliver what is promised.
- The harsh divide between north and south Cambourne via the railway line. Is there any other possibilities to do go about it differently
- Improving the local character of Cambourne, the retail, town centre.
- Excitement about the east west rail – and how it can attract major investment in the area
- **Turnout:** 4 people attended the event.

Wednesday 14 January, 7pm: Presentation and Q&A on Grange Farm, Abington Village Institute, 66 High Street, CB21 6AE

Key discussion points from event records (issues discussed):

- Concerns for overall development of the area and impact on surrounding villages.
- Concern that there is lack of public transport, lack of infrastructure capacity to support the area.
- Concerns for loss of agricultural land, impact on nature, biodiversity, water and chalk streams, landscape and visual harm.
- Discussions in relation to Call for Sites / HELAA and how we have assessed sites. Comments raised that the site was previously rejected, inadequate evidence base to demonstrate benefits.
- Focus on completing the existing new settlements and at land at NEC, not at Grange Farm.
- **Turnout:** Over 150 people – the venue was full.

Thursday 15 January, 5pm to 7pm: Drop-in session at Jubilee Pavillion, Stapleford, CB22 5BQ

Key discussion points from event records (issues discussed):

- Conversations around the level of development proposed for Stapleford and Great Shelford – Mingle Lane allocation (now deleted), settlement policies referring to unlimited development, defined development extent boundary, and Green Belt.
- Conversation about there being no reference to rights of way, other than in the glossary. Rights of way are for leisure / horse riding rather than active travel routes. Comments to be submitted with suggested changes.
- Questions relating to the Local Nature Recovery Strategy and the designations shown in that and on the Local Plan Policies Map in relation to Gog Magog Downs and Wandlebury.
- Conversations to clarify Mingle Lane no longer proposed for allocation – local mailing has provided suggested response, and suggests email directly to Stephen. Asked for any responses to also be sent to local plan mailbox.
- Query about the route for CSETs, and why this is not shown on the Local Plan Policies Map.
- Discussions in relation to Call for Sites / HELAA and how we have assessed sites and issues relating to logging in to site submissions form.
- Conversation regarding progress on the Whittlesford Neighbourhood Plan.
- Query re model used for predicting sea level rise and discussions re water pipeline / reservoir.
- **Turnout:** 8 people.

Thursday 15 January, 5pm to 7pm: Presentation and Q&A on Cambridge Biomedical Campus, 1000 Discovery Drive, CB2 0AX

Key discussion points from event records (issues discussed):

- Can we plan for less than the government housing targets?
- What would happen if the government, through the Cambridge Growth Company, push for more development than the Local Plan?
- Cost/affordability issues for housing and concern about Build to Rent and Co-Living
- We already don't have enough housing to cope with the existing number of employees in the area.
- Does the withdrawal of the HIF for NEC mean more homes have to go elsewhere?
- Do we only consider sites that have been put forward by developers/landowners?
- What are our affordable and accessible home thresholds?
- Stalled sites are an issue, do we know how many sites are stalled, how they could deliver quicker and could more be done to improve the capacity of the construction industry?
- Like the concept of the Cambourne Forest for health and well being. It would be good if it had community ownership
- Very impressed with the CBC SPD
- Lots of people have spoken about food growing spaces at CBC
- Hotels would be good but way finding is important
- Skills and training for construction is important, we need a centre on the campus to train people up
- Lots of anti-social issues that are pushed into local neighbourhoods. This needs addressing by CUH and CBC Ltd – ripple out effect
- Is the campus still being promoted by the Campus as Vision 2050?
- Is a masterplan being prepared?
- **Turnout:** 8 people attended the event.

Friday 16 January, 4:45pm to 6:45pm: Drop-in session at the Nightingale Pavillion Community Room, off Nightingale Avenue, CB1 8SG

Key discussion points from event records (issues discussed):

- A few questions about where exactly development is allocated south of the Biomedical campus how much development will there be? Are community / sports facilities in the new development? Questions about whether there would be sufficient supporting infrastructure in terms of water supply – new sources of water supply won't be available until the 2030s so will that prevent developments taking place until then? Will residents be forced to have limited water credits for their home personal use each day? Will there be traffic congestion?
- The south west area of the city is becoming very congested (on Queen Ediths Way) and would like a new road built for car users. Another resident raised concerns about pedestrians using Lime Kiln Hill which is steep and narrow road with cars and bikes traveling fast down it. They were also concerned about the former quarry chalk pits next to the nature reserve – some high 'cliffs' pose a danger for visitors.
- Advise was provided to the LPA to attend more existing local groups at their meetings and events (churches, community café) for the next stage of consultations for the LP.
- Poor connectivity for the 3 larger settlements in the LP proposals (Cambourne, Northstowe, Waterbeach).
- Support for music venues proposed in east Cambridge. He is concerned about viability of the venue
- Central government will push for the area to the north of the Cambridge Science Park to be put forward for development, despite it being in the green belt.
- Recommendation to add a college at the Marshalls airport allocation, and a secondary school in the Abbey area as this area lacks one.
- LPA should consider what different types of infrastructure require ministerial approval.
- **Turnout:** 11 people attended the event.

Friday 16 January, 11:15am to 1:30pm: Drop-in session at The Small Hall, Milton Community Centre, Coles Road, CB24 6BL

Key discussion points from event records (issues discussed):

- Transport, North East Cambridge, availability of community halls and other infrastructure. Green Spaces, and the pressure on Milton Country Park and delivery of new green space. Green Belt development vs other options, and impact on the compactness of Cambridge. Building heights.
  Transport connections to Waterbeach and Ely, and investment in transport infrastructure. Lack of retail facilities in new developments.
- **Turnout:** 4 people attended the event.

Saturday 17 January, 9:30am to 12:30pm: Histon Farmers Fayre Market, Methodist Church, 22 High Street, CB24 9JD

Key discussion points from event records (issues discussed):

- Slow build out by developers of applications
- Need for affordable housing – building too much student accommodation.
- Congestion and potholes
- Impact of Darwin Green and students travelling to - Impington over the roundabout with no clear cycle friendly route.
- **Turnout:** Handed out 50 leaflets.

Saturday 17 January, 11am to 1pm: All Saints Garden Market, Cambridge, CB2 1TQ

Key discussion points from event records (issues discussed):

- Only a few people stopped to talk to us, and the conversations were about what the Local Plan is, how we are considering sustainability particularly transport implications of new developments, and where they can see actual copies of the Local Plan / attend events.
- **Turnout:** Handed out 100 leaflets

Tuesday 20 January, 4:30pm to 7pm: Drop-in session at Gamlingay Eco Hub, Stocks Lane, SG19 3JR

Key discussion points from event records (issues discussed):

- Discussion about growth in Cambourne – getting too big, and taking in the surrounding villages. Highlighted concern with the housing need – not convinced there is that much need.
- Discussion about sites of ecological value and protecting areas of importance in villages from development – highlighted the different open space / amenity designations. Need to protect the characteristics of villages. Suggested that we have reclassified villages.
- Highlighted that only designated County Wildlife Sites are shown on the Policies Map – there are other sites that meet the criteria that are not designated by the Wildlife Trust because unwilling landowner – we should be doing more to protect these sites, and make it clear that only designated sites are shown on the Policies Map.
- Discussed the Lordsbridge consultation areas, and query about whether wind turbines should be mentioned within the second area.
- Discussion re Green Infrastructure – can the brown blob (8, Western Gateway) be extended to cover the whole of the parish? Will help with consideration of green infrastructure when proposals like Tempsford station are considered.
- Highlighted that event not well publicised.
- **Turnout:** 3

Thursday 22 January, 4:30pm to 6pm: Drop-in session at Cherry Hinton Village Leisure Centre, Colville Rd, CB1 9EJ

Key discussion points from event records (issues discussed):

- Lengthy conversation on a number of issues beyond scope of the draft Local Plan- Draft MHCLG Design and Placemaking PPG draft consultation, impact of LGR, Cambridge Growth company and transparency of communication, Major Bristow's manifesto/light rail and concert hall for Cambridge, Neighbourhood plans within Cambridge and their value).
- Comment that the direction of the draft GCLP IDP reflects that of the 1974 regional growth plan, and that the IDP recommends significant infrastructure, GCSP confirmed that the councils are working on new study to address gaps in IDP for indoor/outdoor open space/sports provision and community facilities. Sports Study in progress now (delayed) but should be published to support the next IDP for Reg 19.
- Plan has a gap in facilities for womens'/girls' sports.

- Issues with access and accessibility of sports facilities in reality (low income, public transport connections given as examples).
- Policy I/SI Safeguarding important infrastructure- queried specific reference to Lord's Bridge Restricted Area and what the consultation area was?
- **Turnout:** 2 people attended the event.

Thursday 22 January, 5pm to 7pm: Drop-in session at The Wing, Brown's Field Community Centre, 31A Green End Rd, CB4 1RU

Key discussion points from event records (issues discussed):

- We covered the transport networks, roads, the new developments in NEC, housing.
- **Turnout:** 3 people attended the event.

Friday 23 January, 11:30am to 1pm: Lichfield Hall, Coleridge, CB1 3SJ

Key discussion points from event records (issues discussed):

- Strategic planning in England
- Green Belt and effect on the spatial strategy (i.e. directing growth to new settlements rather than edge of Cambridge sites)
- Lordsbridge Consultation Area
- Cambridge Biomedical Campus allocation
- **Turnout:** 2 people attended the event.

Sunday 25 January, 10am to 12pm: Haslingfield Village Market, Village Hall, High Street, Haslingfield CB23 1JN

Key discussion points from event records (issues discussed):

- Agree need for development (housing/jobs), concern matching level of infrastructure comes with it and at the same time.
- Pot-holes
- Suffolk boundary development (Forest 1) near Balsham - Forest City 1 | Britain's Next Great City
- **Turnout:** 60 people attended the event.

Tuesday 27 January, 2pm to 6pm: Drop-in session Cottenham Village Hall, Lambs Lane, CB24 8TA

Key discussion points from event records (issues discussed)

- Smithy Fen Gypsy Traveller site, the lack of enforcement, and the impact of its inclusion as a policy area in the Draft Plan.
- Moor Drove Gypsy Traveller site, the lack of enforcement, and the fact that there isn't anything in the plan to help resolve the issues on the site.
- The key issue on both sites was the current use of individual plots by non-gypsy travellers. If enforcement took place and the plots were used by Gypsy Travellers there wouldn't be a need for a policy area in the plan.
- Concerns about the wording for the Policy Area and, in particular, reference to 'intensification'.
- Concerns over the potential implications for infrastructure and facilities provision, particularly transport infrastructure, as a result of Cottenham becoming a Minor Rural Centre
- **Turnout:** 25 people attended the event.

Wednesday 28 January, Presentation and Q&A on Grange Farm, Abington Village Institute, 66 High Street, CB21 6AE

Key discussion points from event records (issues discussed):

- Concerns for rural character and importance of open countryside.
- Concern for overall development in this location, particularly 6,000 homes that would lead to impacts on surrounding villages and transport network including the already constrained roads at A11 and A1307.
- Concern around sustainability and HELAA scoring of the site and that NEC should be the preferred location.
- Worry for impacts on social infrastructure and that the site will not be appropriate location and would put pressure on existing infrastructure.
- Worry for landscape, character and heritage of the area.
- **Turnout:** Over 85 people attended.

Thursday 29 January, Exhibition at Form the Future exhibition - Hinxton Hall

Key discussion points from event records (issues discussed):

- Was asked to provide an update on the Local Plan and that current status of EWR.

- Discussion around the Affordable Housing policy and more specifically social rented homes.
- Discussed possible work with Cambridge Science Centre
  re Councils consultations engagement “real life” examples for research work.
  Researcher may contact us (gave out main LP email to contact us by).
- **Turnout:** 200 guests at the conference, over 30 leaflets handed out.

Image of event:





Greater Cambridge Shared Planning

Youth Engagement Service YES

Youth Engagement Report

Youth Engagement Service
to support the Greater Cambridge Local Plan Public Consultation



Issued: V3 on 15.05.2026

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Executive Summary

The multi-award-winning Greater Cambridge Youth Engagement Service (YES) was commissioned by the Greater Cambridge Shared Planning Policy Team to ensure that young people had a meaningful voice in shaping the emerging Greater Cambridge Local Plan. The youth engagement workshops were designed to give both children and young people the opportunity to have a genuine input into the draft planning policies, ensuring alignment with national planning policy requirements for inclusive engagement.

Across workshops involving students from Monkfield Park Primary School and Comberton Village College, participants contributed their ideas through interactive presentations, prioritisation exercises, and creative drawing activities. The engagement process was structured around the seven key themes of the Greater Cambridge Local Plan: Climate Change, Biodiversity and Green Spaces, Wellbeing and Social Inclusion, Great Places, Homes, Jobs, and Infrastructure. Students were first introduced to the themes through a facilitated discussion and visual demonstrations, including a simple Lego illustration of how different elements of a community fit together. They were then invited to select the theme that mattered most to them through a voting exercise and subsequently represent their ideas through drawings that illustrated how their chosen priority could be reflected in real places.

Analysis of the qualitative and quantitative data from the workshops identified several key themes. First, students demonstrated a strong concern for climate change and environmental protection, frequently highlighting renewable energy and the protection of nature as important priorities. Second, housing emerged as a major issue, with many students emphasising the importance of safe, affordable homes and the need to address homelessness. Third, students expressed a clear desire for accessible green spaces and vibrant places that support recreation, community interaction, and well-being, including parks, sports areas, and spaces for relaxation and connection with nature.

These findings highlight the importance of planning for communities that balance environmental sustainability, housing provision, and high-quality public spaces. The insights gathered through the youth engagement workshops provide valuable evidence of the priorities and aspirations of younger residents, reinforcing the need for development that supports healthy environments, inclusive communities, and resilient infrastructure. The recommendations and observations presented in this report aim to ensure that the perspectives of young people are considered as the Greater Cambridge Local Plan continues to develop, helping to shape places that respond to the needs and expectations of future generations.

1.0 Introduction

This report presents the youth engagement activities delivered by the multi-award-winning Greater Cambridge Shared Planning Youth Engagement Service (YES) in support of the emerging Greater Cambridge Local Plan. The workshops were organised to provide children and young people with an opportunity to learn about planning and to share their views on the key themes shaping the future growth and development of Greater Cambridge. The sessions were delivered in collaboration with the Local Plan Policy Team and formed part of the wider engagement process to ensure that a diverse range of voices contribute to the development of planning policies. The primary aim of the workshops was to introduce students to the themes of the Local Plan and to create an accessible platform for them to express their ideas and priorities.

Recognising that children and young people are often underrepresented in traditional planning consultations, the workshops aimed to ensure that their perspectives are captured and considered within the Local Plan process. The activities provided students with an opportunity to think critically about issues such as climate change, housing, nature, infrastructure, and community wellbeing, while also encouraging creativity and discussion about the future of their local area.

This report presents the outcomes of the engagement activities undertaken with students at Monkfield Park Primary School and Comberton Village College. It summarises the approach used during the sessions and provides an overview of the insights generated through both the voting and drawing exercises. The findings offer valuable qualitative and quantitative perspectives on how young people understand the themes of the Local Plan and what they would like to see in their communities. These insights contribute to the broader evidence base supporting the preparation of the Greater Cambridge Local Plan and highlight the importance of incorporating the views of younger generations in shaping sustainable and inclusive places for the future.

1.1 An overview of the Youth Engagement Initiative

This table provides a brief overview of the YES workshops:

Project	Greater Cambridge Local Plan Consultation
Partner(s)	GCSP Policy Team
Schools	Monkfield Park Primary School & Comberton Village College
Date of Youth Engagement Workshops:	Monkfield Park Primary School - 26 January 2026 Comberton Village College - 27 January 2026

2.0 About the draft Greater Cambridge Local Plan

The draft Greater Cambridge Local Plan is a legal planning document that guides the use and development of land over time. It sets out planning policies that will shape growth and development in the Greater Cambridge region for the next 20 years. The Plan identifies the need for new homes, jobs, services, and infrastructure, and provides guidance on where development should take place and how it should be delivered. These policies are used when considering planning applications, alongside the National Planning Policy Framework (NPPF). Previously, Cambridge City Council and South Cambridgeshire District Council prepared separate Local Plans which shared a common development strategy. The current approach brings the two authorities together to produce a joint Local Plan for Greater Cambridge, ensuring a consistent and coordinated approach to planning.

The draft Local Plan is being developed through extensive engagement with communities, organisations, and stakeholders, supported by a wide range of evidence. Its overall aim is to promote sustainable development, protect and enhance the natural and built environment, support healthy and vibrant communities, and foster a strong and innovative economy. Through its policies and proposals, the plan will help shape how Greater Cambridge grows and develops in the future.

To support the Local Plan public consultation, the Greater Cambridge Youth Engagement Service (YES) was appointed to capture the perspectives of the local youth. The youth's input will be incorporated into the final version of the Local Plan, ensuring that the development reflects the needs of young people from the outset.

3.0 Relevant Planning Policies

Local and national planning policies emphasise the need for meaningful community involvement. Because children and young people will live with the effects of new developments for longer than older generations, and because public consultations often attract older adults with more available time, it is essential to actively engage groups that are typically harder to reach. Ensuring that children and young people are included helps guarantee that their perspectives genuinely shape the placemaking process.

3.1 Relevant National Planning Policies

The ‘National Planning Policy Framework’ (NPPF) (2024) sets out the central government’s expectations for community engagement in the planning and design process, to ensure local communities have meaningful input into the design of future developments that will affect them.

Paragraph 131 of the NPPF states that *“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and*

how these will be evaluated, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities, and other interests throughout the process."

Paragraph 132 states that *"Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities, so they reflect local aspirations and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play a significant role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers."*

3.2 Relevant Local Planning Policies & Guidance

Paragraph 3.36 of the 'Greater Cambridge Statement of Community Involvement SPD' (2024) states that: *"GCSP will meet the requirements of the Equality Act 2010, which aims to promote equality, eliminate discrimination and encourage good relations between different groups associated with age, disability, gender and gender reassignment, race, religion and other protected characteristics. It is recognised that some areas are under-represented young and older people, so it is important to include them in planning consultations. The Councils will work closely with relevant organisations that have experience in finding the best way to engage with these groups."*

Paragraph 3.37 of the 'Greater Cambridge Statement of Community Involvement SPD' (2024) states that: *"It is GCSP's aim to explore how innovative forms of public engagement can be further developed and refined in future consultations. In 2022 South Cambridgeshire District Council established the 'Young People Task & Finish Group' to explore how to improve youth engagement in South Cambridgeshire. A report set out the opportunities to create or develop effective youth engagement along with recommendations relating to the State Community Involvement that GCSP will use to improve planning consultation with young people.*

Paragraph 4.14 of the 'Greater Cambridge Statement of Community Involvement SPD' (2024) states that*: "There are many marginalized groups across Greater Cambridge that we aspire to engage with, including young people. Engagement with young people can ensure that the final design of developments considers the specific interests of children and young people who are often underrepresented in public consultations, particularly in relation to delivering play areas and public spaces that are child friendly and fit for purpose."*

Paragraph 4.15 and 4.16 of the 'Greater Cambridge Statement of Community Involvement' SPD (2024) states that: *"GCSP provides an award-winning youth engagement service. It aims to address the long-standing issue of young people being underrepresented in decision-making about the built environment. The service aims to enhance planning outcomes by giving young people opportunities to be involved in major planning applications our work whilst increasing diversity and inclusion."*

3.3 The Greater Cambridge Youth Engagement Service (YES) Social Value Statement

This Greater Cambridge Youth Engagement Service (YES) published its Social Value Statement in 2024. It encourages collaboration between developers and the YES team on development proposals to maximise social value and impact. As a result, the YES team, in collaboration with developers and other stakeholders, ensures that development decisions are informed by young people who are especially underrepresented in society.

3.4 The Greater Cambridge Youth Engagement Framework

The Greater Cambridge Youth Engagement Design Workshops were designed based upon a framework developed by the Council's Youth Engagement Service (YES) - *"Framework for Evaluating the Effectiveness of Youth Engagement."* This established framework, designed by Dr. Bonnie Kwok, an award-winning youth engagement researcher and practitioner, considers the following four key areas, which aim to benefit all those who take part in the workshops:

1) Impact on the plan and decision-making process
2) Process
3) Educational and social value
4) Practical factors

The activities held in both schools on the Greater Cambridge Local Plan Consultation Youth Engagement Project was designed based on the established 'Greater Cambridge Youth Engagement Evaluation Framework' and its 'Social Value Statement' to help ensure that the views of the local children and young people are adequately considered as part of the planning and design process, and the students benefit from the exercise from and education point of view. The activities also align with the adopted 4C's: 'Community', 'Connectivity', 'Climate' and 'Character'. The 4Cs is a design framework set out in the 'Cambridgeshire Quality Charter for Growth', which aims to promote sustainable and inclusive growth in the Greater Cambridge region. The main themes that were used to guide this engagement, as described in the Greater Cambridge Local Plan, include:

- Climate Change
- Biodiversity and Green Spaces
- Wellbeing and Social Inclusion

- Great Places
- Jobs
- Homes
- Infrastructure

4.0 The Youth Engagement Workshops Overview

The youth engagement initiative to support the Greater Cambridge Local Plan public consultation was led by the Youth Engagement Service (YES) team, with support from members of the policy team. The workshop took place on 26 January 2026 in Monkfield Park Primary School, and on 27 January 2026 in Comberton Village College. The sessions began with a welcome and the introduction of the facilitators, followed by a talk on the seven themes of the draft Greater Cambridge Local Plan. Through the discussion, students were encouraged to think about the role of planning in addressing important issues such as climate change, housing, infrastructure, jobs, wellbeing, biodiversity, and the creation of great places. They also had the opportunity to watch a short Lego-based demonstration to help explain planning concepts in a simple, visual way.

This was followed by writing and drawing exercises in which students were asked to select a theme that matters most to them and explain why they chose it. Afterwards, they were also asked to produce a drawing based on their chosen themes, which also formed entries of a wider drawing competition organised by the Planning Policy team. The sessions were to reinforce key learning outcomes and provide students with the opportunity to articulate these themes into future development. The workshops were carefully designed to integrate experiential learning, creativity, and reflection, ensuring that young people’s perspectives are meaningfully captured to inform the Local plan.

4.1 Details of Youth Engagement Workshops

The workshops with Monkfield Park Primary School and Comberton Village College were led by the Youth Engagement Service (YES) Lead Dr. Bonnie Kwok, and supported by Tom Davies, Maxine Ross and Lilian Boateng from the YES team. Also in attendance were partners from the Planning Policy team, including Alphie Gibbs (Policy Planner) and Alejandra Pinnacho (Planning Intern), who were co-facilitators.

The format of the workshops is as follows:

- Welcome and purpose of the workshop
- Facilitators' introduction
- Greater Cambridge Local Plan’s key themes and policy talk
- Voting and ‘Let’s Get Creative!’ drawing session/competition
- Reflection
- Feedback

1) Welcome and Purpose of Workshop

The workshops began with an introduction by the facilitators, followed by a presentation outlining the session's purpose and objectives. The presentations provided an overview of the draft Greater Cambridge Local Plan's purpose and key themes. The sessions also highlighted the importance of youth engagement in the development management and plan-making process and introduced the basic principles of good placemaking. Emphasis was placed on how these themes contribute to creating sustainable environments and supporting long-term development objectives. As part of the engagement activities, the young people also watched a short Lego-based video, illustrating how different elements of a community, such as homes, green spaces, roads, schools, and workplaces, fit together to form a well-planned place. By visualising development through the Lego video, the young people would be able to connect the themes, which would later support their thinking during the writing and drawing exercises.

2) Local Plan's Key Themes and Policy Talk

As part of the engagement activities, students were introduced to the 7 key themes of the draft Greater Cambridge Local Plan through an interactive policy talk. The sessions were led by Alfie Gibbs at Monkfield Park Primary School and by Alejandra Pinacho at Comberton Village College. They explained to the students the themes' focus (see below) and how they relate to the future of communities across Greater Cambridge.

a) Climate Change

The facilitators explained to students that the council sets policies to reduce the impact of new developments on climate change and to help communities adapt to its effects. Development should be in areas that limit carbon emissions and be designed to high energy and water efficiency standards. Students were informed that buildings and infrastructure must adapt to current and future climate risks, such as flooding, and contribute to a resilient and sustainable environment. The goal is to support Greater Cambridge's transition to net zero carbon by 2050. Young people were encouraged to think about how their communities can reduce emissions, protect nature, and remain safe as the climate changes.

b) Biodiversity and Green Spaces

The facilitators explained to students that planning policies aim to protect wildlife and improve green spaces across Greater Cambridge. These policies focus on ensuring that development does not harm the natural environment but instead leaves it better than before. Students were informed that biodiversity includes plants, animals, insects, and the habitats that support them. The facilitator highlighted the importance of creating and connecting parks, forests, rivers, and other natural areas so that wildlife can thrive and people can enjoy nature. Emphasis was also placed on ensuring that

communities have access to high-quality green spaces for recreation, relaxation, and well-being. Students were encouraged to consider how development can support nature by planting trees, protecting habitats, and creating new green spaces.

c) Wellbeing and Social Inclusion

Students were educated about the planning policies that aim to support healthy, safe, and inclusive communities where people's everyday needs can be met locally. They were told that such policies encourage development that helps create places where everyone feels welcome and able to participate in community life. The facilitators highlighted the importance of ensuring that development benefits all members of the community, including people of different ages, abilities, and backgrounds. Emphasis was also placed on improving equal access to opportunities, services, and facilities so that everyone can lead healthier and happier lives.

d) Great Places

The facilitators explained that creating great places involves protecting local landscapes and historic buildings, which help give Cambridge and South Cambridgeshire their unique identity. They also emphasised that good planning should create beautiful, safe, and interesting places where people enjoy spending time. This includes spaces for living, working, visiting, and recreation. Students were encouraged to consider how buildings, public spaces, and landscapes can work together to create attractive, welcoming environments that reflect the distinctive character of local communities.

e) Homes

The facilitators explained to students that housing policies are designed to guide how new housing developments are planned and approved in Greater Cambridge, with the aim of ensuring that enough homes are built to meet the needs of current and future residents. They were told that this includes providing a range of housing types suitable for different people, families, and life stages. It was also highlighted that delivering affordable homes, so that more people can rent or buy within the community, is important. Emphasis was placed on creating neighbourhoods where housing is well planned and supported by nearby services and facilities.

f) Jobs

Policies regarding where and how places for work and businesses are developed in Greater Cambridge are key elements of development to support a strong and diverse local economy that provides a wide range of employment opportunities for people. The facilitators highlighted that Greater Cambridge is known globally for its education, research, and innovation, and that planning helps maintain and strengthen this

reputation. The overall aim is to support a dynamic economy that benefits local communities while encouraging innovation and opportunity.

g) Infrastructure

The facilitator explained to students that infrastructure refers to the essential systems and facilities that support everyday life in communities. Planning policies ensure that when new development takes place, the necessary infrastructure is provided at the right time to support it. Students were informed that this includes transport networks, water and energy systems, digital connectivity, and public services such as schools and healthcare facilities. The facilitator highlighted that good infrastructure helps communities function effectively and improves access to services and opportunities. Students were encouraged to think about ways to easily connect people and places in their communities.

3) Voting and Let's Get Creative Drawing Session

The discussion with the Planning Policy team facilitators on the themes provided an important foundation for the activities that followed. It helped students understand the purpose of each theme and how their ideas and drawings could contribute to shaping future planning policies.

Following the talk, students were given voting exercise sheets and were asked to review all seven themes and select the one they considered most important from their perspective. This activity lasted approximately 15 minutes. After completing the writing exercise, students participated in a creative task to visually represent their chosen theme. Drawing sheets were distributed, allowing students to produce individual illustrations that showed how their priorities could be reflected in physical spaces or environments. Students were informed that their drawings will also be entered into a wider Drawing Competition organised by the Planning Policy Team. This activity lasted around 20 minutes. At the end of the session, the outputs from both exercises were collected by the YES team for further review and analysis.

4) Reflection

After the voting and creative sessions, the facilitators asked the students to share their drawings and voting responses. Many highlighted climate change as a major concern, explaining that protecting the planet through renewable energy and reducing pollution is important for their future. Others focused on homes, emphasising that everyone should have a safe and warm place to live and that homelessness should be reduced. Some students spoke about the importance of green spaces and biodiversity, describing parks, trees, and wildlife areas that support both nature and people's wellbeing. Several students also highlighted great places, suggesting more playgrounds, sports areas, and fun spaces where communities can gather. Their

reflections showed an understanding of how themes such as homes, nature, and climate are interconnected in creating healthy, liveable communities.

5) Feedback

The workshops concluded on a positive and engaging note, with students enthusiastic throughout both the voting and drawing exercises. Many participants were eager to share their ideas and explain the meaning behind their drawings. The combination of discussion, voting, and creative expression helped sustain students' interest and participation. Teachers and facilitators observed that the activities were accessible and effective in helping students understand planning concepts; they thanked the team for involving their students in such an educational and engaging workshop. The team also thanked the teachers and students for their support throughout the session.

5.0 Data Analysis

Building on the key undermining themes of the draft Greater Cambridge Local Plan, the YES team analyses students' drawings to derive both quantitative and qualitative data, producing research results. The frequency with which elements are depicted in the drawings suggests which elements matter most to the students. The analyses for both Monkfield Park Primary School and Comberton Village College were conducted separately to gain a clearer understanding of what students in Cambourne and Comberton would want to see in their neighbourhoods and the surrounding parishes.

Monkfield Park Primary School

A total of 127 responses from the 4 classes in Years 5 and 6 were analysed to identify the most important themes emerging from the voting and the 'Let's Get Creative' drawing competition. The findings indicate a clear prioritisation of issues related to housing, environmental sustainability, and place quality. Housing emerged as the most significant concern, accounting for 38 responses (29.9%). This suggests that participants place strong emphasis on the provision, quality, and suitability of homes within their community. Closely following this, climate change was identified in 27 responses (21.3%), highlighting a high level of awareness and concern regarding environmental challenges and the need for sustainable development. The theme of creating 'great places' was also prominent, with 24 responses (18.9%). This reflects the importance participants attach to the overall quality, character, and liveability of their local environment. In comparison, jobs accounted for 16 responses (12.6%), indicating a moderate level of concern for employment opportunities and local economic conditions.

Less frequently identified themes included biodiversity and green spaces, and wellbeing and social inclusion, each with 8 responses (6.3%). While these areas are recognised, they were less commonly viewed as the primary priority. Infrastructure received the fewest responses (6, 4.7%), which may suggest that it is either a less

immediate concern or implicitly considered within other themes, such as housing and place quality.

The results demonstrate that over half of the responses relate to the built environment, particularly housing and the quality of places, while environmental considerations, especially climate change, also feature strongly. Social and economic themes are present but comparatively less dominant. These findings point to the importance of delivering housing alongside high-quality, sustainable, and liveable environments in future planning and development.

Theme	**Frequency**	**Percentage**
Climate Change	27	21.30%
Biodiversity and Green Spaces	8	6.30%
Wellbeing and Social Inclusion	8	6.30%
Great Places	24	18.90%
Jobs	16	12.60%
Homes	38	29.90%
Infrastructure	6	4.70%
Total	**127**	**100%**

Thematic Results from Voting and ‘Let’s Get Creative’ Drawing Competition with Monkfield Park Primary School

Comberton Village College

A total of 32 responses were analysed to identify the most important themes from the voting and the ‘Let’s Get Creative’ drawing competition. The results indicate that environmental issues and infrastructure are key priorities among participants. Climate change emerged as the most frequently identified theme, with 8 responses (25%). This highlights a strong level of concern among participants about environmental sustainability and the long-term impacts of climate change. Infrastructure was the second most prominent theme, accounting for 6 responses (18.8%), suggesting that participants recognise the importance of supporting development with adequate transport, services, and physical systems.

Wellbeing and social inclusion were mentioned in 5 responses (15.6%), indicating a notable level of interest in ensuring that communities are inclusive, supportive, and conducive to residents’ overall quality of life. Biodiversity and green spaces received 4 responses (12.5%), reflecting recognition of their value and the need for ecological

protection. Three themes, great places, jobs, and homes, each received 3 responses (9.4%). This suggests that, while these areas remain relevant, they were less frequently prioritised as the most important issue than environmental and infrastructure-related concerns.

Overall, the findings suggest that participants place particular emphasis on environmental sustainability and supporting infrastructure, with climate change emerging as the most significant issue. Social well-being and ecological considerations also feature in the responses, while housing, employment, and place quality appear to be secondary priorities for this group.

Theme	Frequency	Percentage
Climate Change	8	25%
Biodiversity and Green Spaces	4	12.5%
Wellbeing and Social Inclusion	5	15.6%
Great Places	3	9.4%
Jobs	3	9.4%
Homes	3	9.4%
Infrastructure	6	18.8%
Total	**32**	**100%**

Thematic Results from Voting and ‘Let’s Get Creative’ Drawing Competition with Comberton Village College

5.1 Thematic Analysis

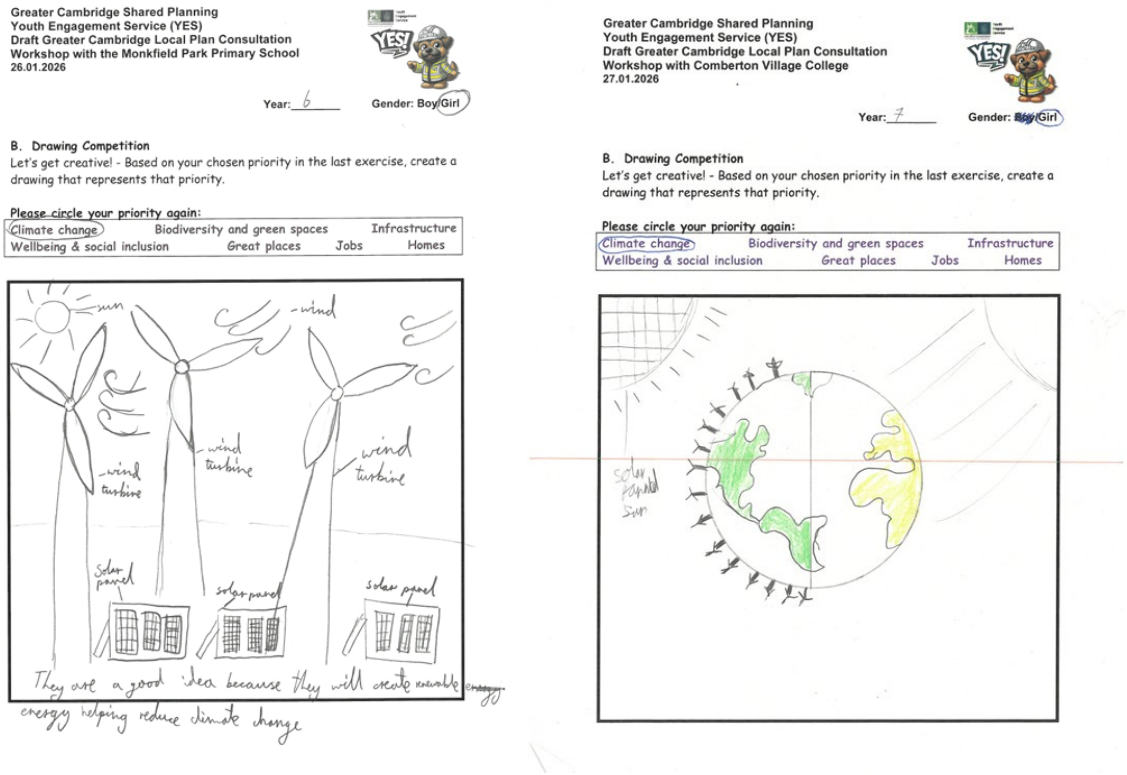
a) Climate Change

Climate change emerged as one of the most prominent themes across both schools. Many children expressed concern that it is already damaging the planet and could threaten the future if not addressed. Several responses highlighted the risks of rising temperatures and the destruction of ecosystems and wildlife. Some children emphasised that if climate change is not tackled, “the world could be destroyed” or “become difficult for future generations to live in”. The accompanying drawings often depicted contrasting scenarios: one showing a polluted or destroyed world caused by carbon emissions, and another showing a greener, healthier environment with reduced emissions. The children frequently proposed solutions centred on sustainability and renewable energy. Several children also highlighted the importance of climate action

as the foundation for all other themes, suggesting that if the planet becomes uninhabitable, other priorities such as housing and jobs would become meaningless.

Examples of ideas and solutions children proposed include:

- Introducing renewable energy sources such as solar panels, wind turbines, and geothermal systems
- Reducing pollution by using fewer fossil fuels and fewer cars
- Planting more trees and protecting forests to absorb carbon emissions
- Designing sustainable homes and infrastructure powered by renewable energy
- Protecting rivers, oceans, and wildlife habitats threatened by climate change.



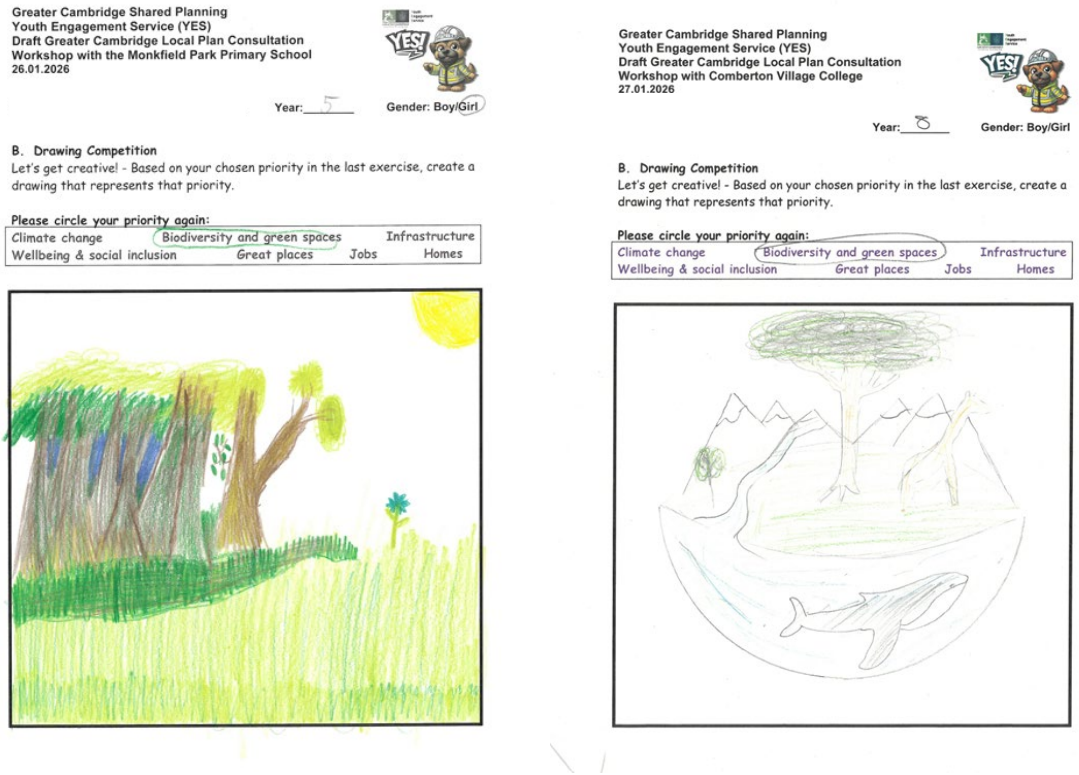
Example of drawings based on the Climate Change theme

b) Biodiversity and Green Spaces

The children strongly emphasised the importance of protecting nature and maintaining access to green spaces. Many responses highlighted nature's role in supporting animals, plants, and ecosystems, as well as benefiting human well-being. Drawings frequently depicted forests, rivers, wildlife habitats, birds, and flowers, suggesting that children associate biodiversity with vibrant natural environments. Some children also recognised a potential tension between housing development and environmental protection, suggesting that future development should balance the provision of homes with the preservation of green spaces.

Examples of improvements children would like to see include:

- More parks, forests, and nature reserves
- Green spaces with trees, flowers, and wildlife habitats
- Protected ecosystems where animals can live safely
- Outdoor spaces with rivers, ponds, and aquatic life
- Community spaces that allow people to connect with nature while protecting biodiversity.


Greater Cambridge Shared Planning
Youth Engagement Service (YES)
Draft Greater Cambridge Local Plan Consultation
Workshop with the Monkfield Park Primary School
26.01.2026

Year: 5 Gender: Boy/Girl

B. Drawing Competition
Let's get creative! - Based on your chosen priority in the last exercise, create a drawing that represents that priority.

Please circle your priority again:

Climate change	Biodiversity and green spaces		Infrastructure
Wellbeing & social inclusion	Great places	Jobs	Homes

Greater Cambridge Shared Planning
Youth Engagement Service (YES)
Draft Greater Cambridge Local Plan Consultation
Workshop with Comberton Village College
27.01.2026

Year: 8 Gender: Boy/Girl

B. Drawing Competition
Let's get creative! - Based on your chosen priority in the last exercise, create a drawing that represents that priority.

Please circle your priority again:

Climate change	Biodiversity and green spaces		Infrastructure
Wellbeing & social inclusion	Great places	Jobs	Homes

Example of drawings based on the Biodiversity & Green Spaces theme

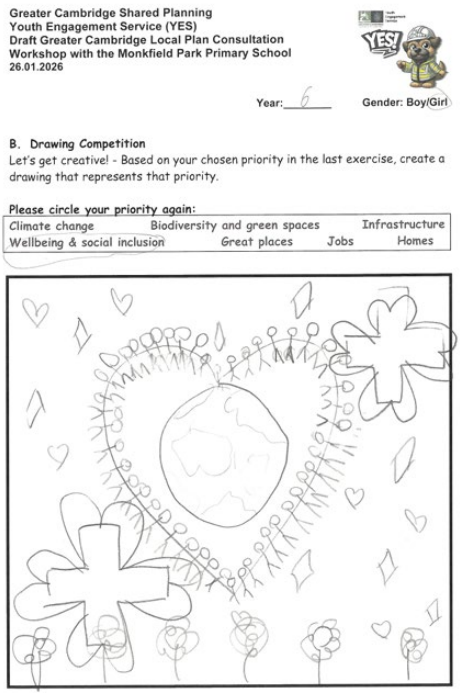
c) Wellbeing and Social Inclusion

Many responses emphasised the importance of creating communities where everyone feels safe, accepted, and supported. Children linked well-being to mental health, social connection, and opportunities for recreation and relaxation. Several drawings illustrated happy communities, peaceful environments, and inclusive spaces where people from different backgrounds come together. Others depicted people experiencing loneliness or distress in environments lacking supportive infrastructure. Some children also suggested that a strong sense of community and inclusion is essential to creating peaceful, cooperative societies.

Examples of what children would like to see include:

- Safe community spaces where everyone feels welcome
- Facilities supporting mental health and wellbeing

- Youth clubs and community centres where people can socialise
- Inclusive environments that support people with disabilities
- Public spaces that encourage friendship, cooperation, and community engagement.


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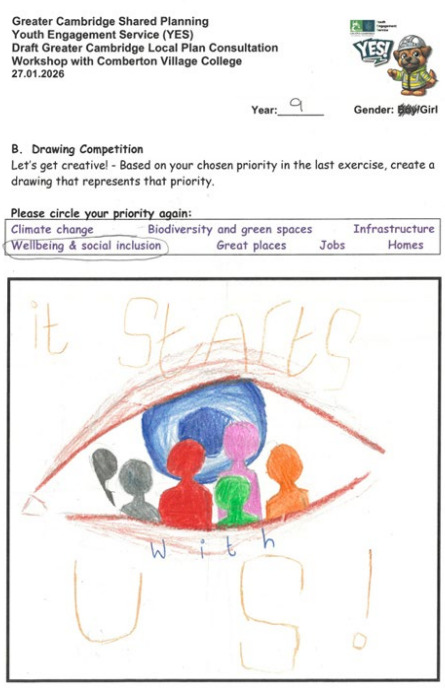
Year: 6 Gender: Boy/Girl

B. Drawing Competition

Let's get creative! - Based on your chosen priority in the last exercise, create a drawing that represents that priority.

Please circle your priority again:

Climate change | Biodiversity and green spaces | Infrastructure
Wellbeing & social inclusion | Great places | Jobs | Homes


Greater Cambridge Shared Planning
Youth Engagement Service (YES)
Draft Greater Cambridge Local Plan Consultation
Workshop with Comberton Village College
27.01.2026

Year: 9 Gender: [illegible]/Girl

B. Drawing Competition

Let's get creative! - Based on your chosen priority in the last exercise, create a drawing that represents that priority.

Please circle your priority again:

Climate change | Biodiversity and green spaces | Infrastructure
Wellbeing & social inclusion | Great places | Jobs | Homes

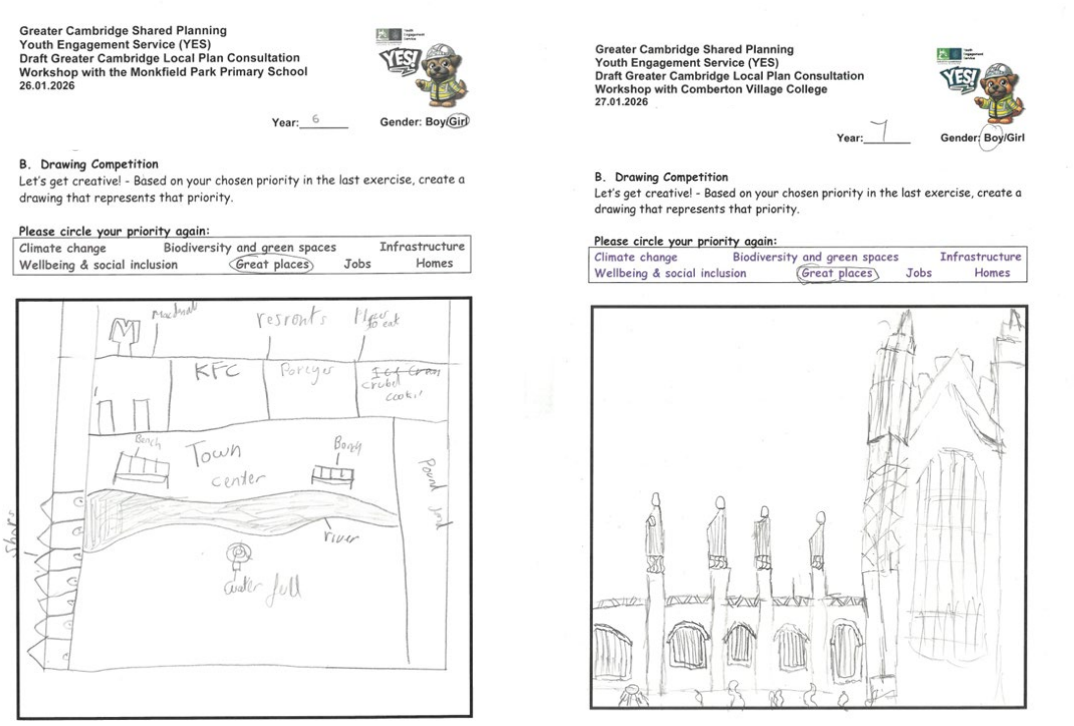
Example of drawings based on the Wellbeing & Social Inclusion theme

d) Great Places

Children frequently expressed a desire for vibrant and enjoyable environments with a variety of recreational and cultural activities. The concept of "great places" was often associated with spaces that encourage social interaction, history, exploration, and fun. Many drawings included parks, swimming pools, skateparks, museums, sports facilities, and cafés, suggesting that children want their communities to offer diverse opportunities for recreation and entertainment. Some children also expressed a desire for more activities within their vicinities, noting that many people currently travel to Cambridge for leisure and entertainment.

Examples of places children would like to see include:

- Skate parks and sports fields, including football pitches
- Swimming pools, water parks, and water-slide facilities
- Playgrounds and outdoor activity areas
- Museums, historic buildings, and cultural attractions
- Town centres with cafés, restaurants, and community gathering spaces.



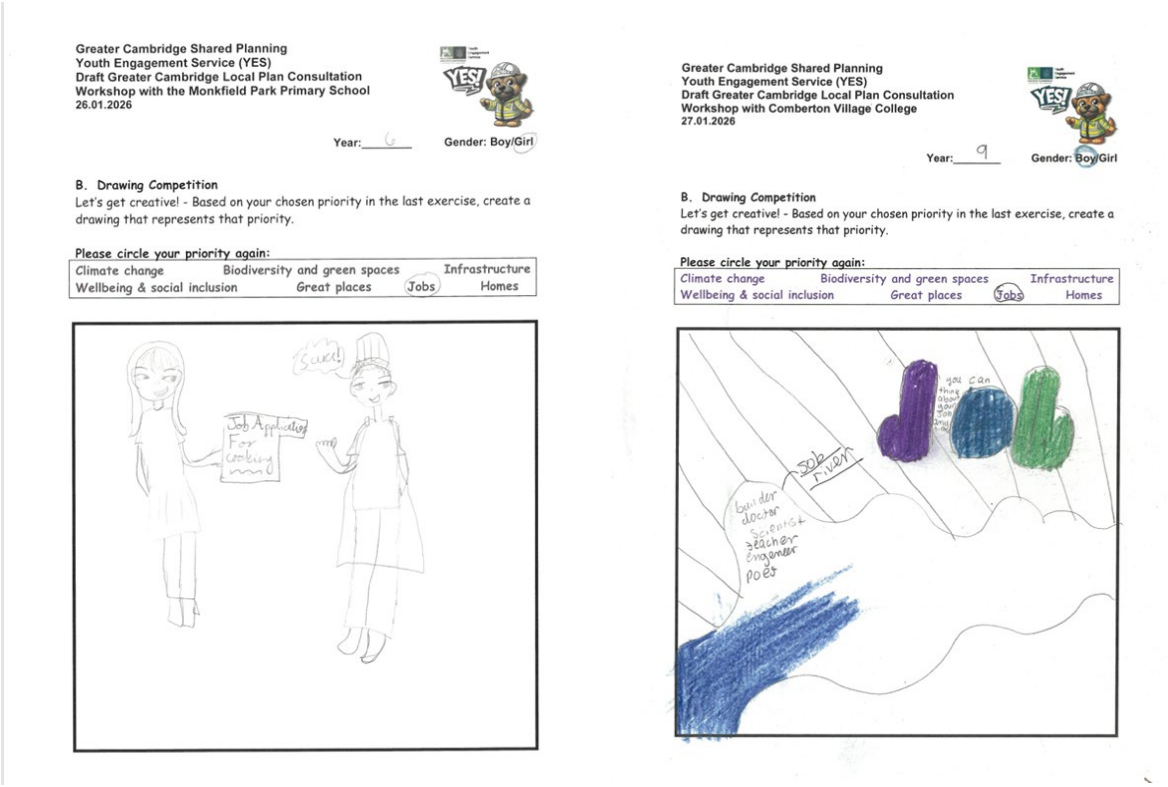
Example of drawings based on the Great Places theme

e) Jobs

Although not the most frequently prioritised theme, many children recognised the importance of employment in supporting stable and secure lives. Responses commonly linked jobs to the ability to earn money for essential needs such as housing, food, and daily expenses. Some children also expressed concerns about economic insecurity or future employment opportunities.

Examples of ideas related to jobs include:

- Providing diverse job opportunities in offices, restaurants, schools, and businesses
- Creating jobs through new businesses, construction, and community facilities
- Ensuring employment opportunities that allow people to afford housing and other necessities
- Supporting entrepreneurship and new types of work opportunities.



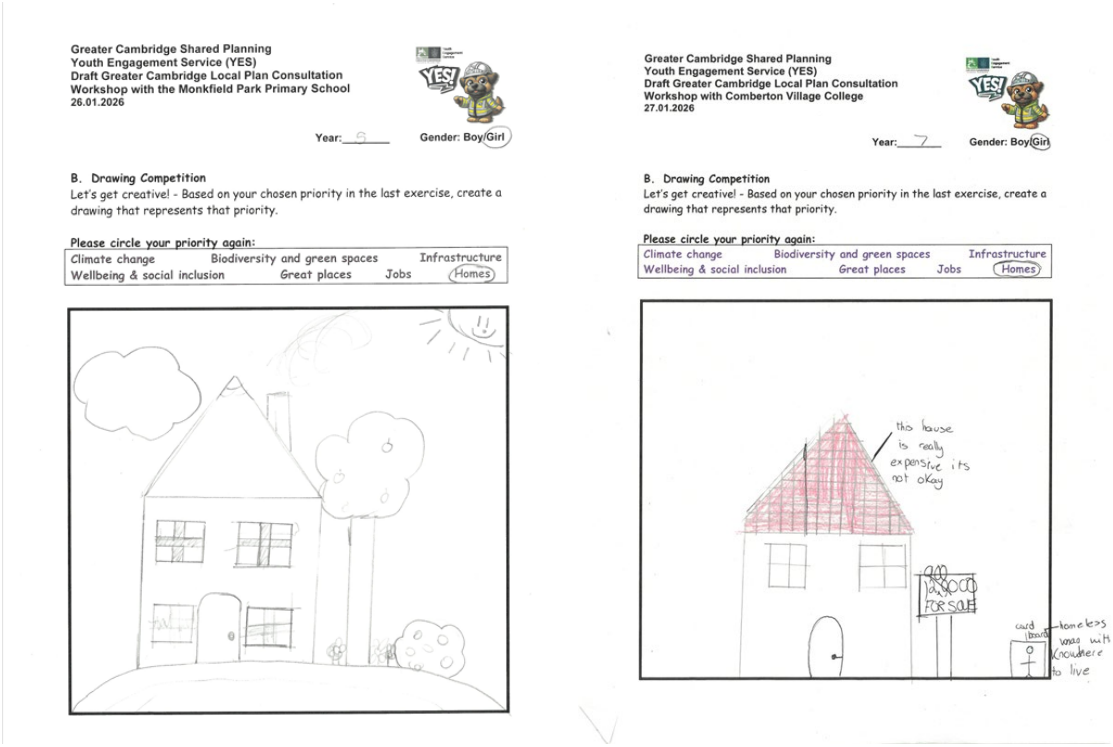
Example of drawings based on the Jobs theme

f) Homes

Housing emerged as one of the most prominent themes across the responses. Children consistently emphasised that homes are essential for safety, comfort, and well-being. Many responses highlighted the challenges of homelessness and the need to ensure everyone has a safe place to live. Some children also recognised that housing can be expensive and expressed concern that people may struggle to afford good-quality homes. Some drawings illustrated the contrast between overcrowded or deteriorating housing and well-designed, affordable homes supported by urban planning.

Examples of housing improvements children would like to see include:

- More homes to prevent homelessness
- Affordable housing so families can live comfortably
- Homes designed with gardens, green surroundings, and safe neighbourhoods
- Sustainable homes powered by renewable energy
- Housing that provides space for families, pets, and outdoor activities.



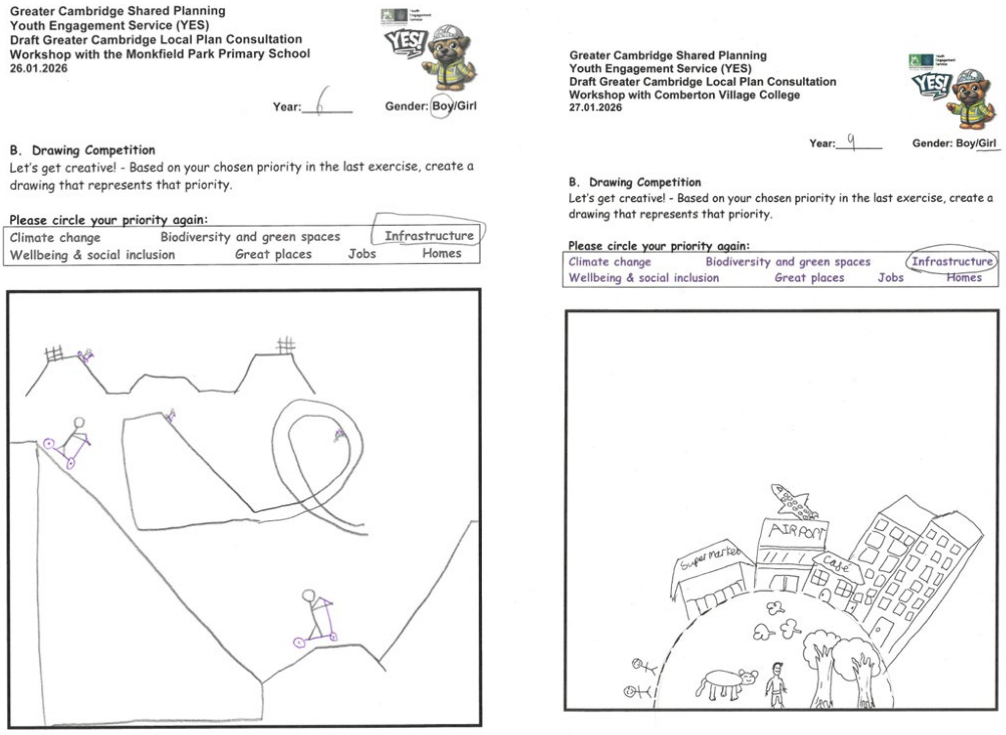
Example of drawings based on the Homes theme

g) Infrastructure

Children also demonstrated a clear understanding of how infrastructure supports communities and enables daily life. Many responses described infrastructure as the system that connects and supports other themes, such as housing, jobs, and services. Several children highlighted traffic congestion and the need for better transport systems. Others emphasised the importance of public facilities, such as schools and community services. Some drawings depicted well-planned cities with organised transport routes, buildings, and green spaces, reflecting children's interest in organised, functional urban environments.

Examples of infrastructure improvements suggested by children include:

- Better transport systems to reduce traffic congestion
- Well-designed roads and pathways for pedestrians and cyclists
- Schools, public facilities, and community buildings
- Infrastructure that integrates green spaces and tree-lined streets
- Urban environments with balanced development, including homes, shops, and public services.



Example of drawings based on the Infrastructure theme

6.0 Recommendations

The Planning Policy team is asked to have regard to the following elements as the Local Plan process further develops:

1. Strengthening Climate-Responsive Planning

The emerging Local Plan may take a stronger stance, requiring future developments to incorporate robust climate mitigation and adaptation measures. This includes integrating renewable energy technologies such as solar panels and wind power, promoting energy-efficient building design, and expanding tree planting and green infrastructure to reduce emissions and enhance environmental resilience.

2. Protecting and Enhancing Biodiversity and Green Spaces

The emerging Local Plan can be more explicit about protecting existing natural habitats while creating additional green spaces that support wildlife and biodiversity. This may include the provision of parks, community forests, tree-lined streets, and natural play areas, as well as the protection of rivers, ponds, and other ecological assets.

3. Providing Safe and Inclusive Community Spaces

Planning proposals should aim to create inclusive environments that promote wellbeing and social interaction. This could involve creating accessible public spaces,

community centres, youth clubs, and recreational areas where people of all ages and abilities feel safe, welcome, and connected.

4. Delivering Vibrant and Engaging Places

The emerging Local Plan can aim to support the creation of lively and attractive neighbourhood centres with a range of leisure and cultural opportunities. Facilities such as sports fields, skate parks, playgrounds, swimming pools, cafés, and community gathering spaces would help create places where residents can socialise, exercise, and spend time outdoors.

5. Supporting Local Employment Opportunities

Consideration should be given to creating opportunities for diverse employment within the area. This may include providing spaces for local businesses, offices, and retail activities, and community services, ensuring residents can access local jobs and support a thriving local economy.

6. Provision of Affordable and Sustainable Housing

The emerging Local Plan should ensure a sufficient supply of high-quality, affordable homes that meet the needs of current and future residents. Housing should be designed to provide safe, comfortable, and energy-efficient living environments, with access to green spaces and community facilities.

7. Planning Integrated and Sustainable Infrastructure

Infrastructure planning should support the effective functioning of communities by improving transport systems, public facilities, and connectivity. This includes designing safe walking and cycling routes, managing traffic congestion, and ensuring access to essential services, including schools, healthcare facilities, and public spaces.

8. Promoting Balanced and Sustainable Development

It is important to ensure that development achieves an appropriate balance among housing, infrastructure, employment, and environmental protection. Careful planning will be necessary to prevent the loss of green spaces while accommodating growth and maintaining high-quality living environments.

7.0 Conclusion

The youth engagement activities undertaken as part of the Greater Cambridge Local Plan consultation demonstrate the importance of involving children and young people in conversations about the future of their communities. As highlighted throughout this report, young people are rarely included in formal planning processes, despite being current and future users of the spaces being planned. The contributions gathered through the workshop activities were thoughtful, imaginative, and reflected a strong

awareness of environmental responsibility, community wellbeing, and the importance of safe and enjoyable places to live.

The sessions provided an interactive platform for students to learn about planning and the themes of the Local Plan while sharing their perspectives through writing and drawing exercises. Following an introduction to the seven themes climate change, biodiversity and green spaces, wellbeing and social inclusion, great places, homes, jobs, and infrastructure, students were encouraged to reflect on which issues mattered most to them. Their responses revealed a strong concern for climate change and environmental protection, as well as the importance of safe homes, accessible green spaces, and vibrant places where people can meet, play, and relax. Many students also recognised the connections among the themes, noting that infrastructure, jobs, housing, and environmental protection work together to create healthy and sustainable communities.

The outputs from the activities offer valuable insight into how younger residents perceive the challenges and opportunities facing Greater Cambridge. Their drawings and explanations frequently highlighted renewable energy, wildlife protection, recreational spaces, affordable housing, and community facilities. These perspectives reinforce the importance of planning for development that not only meets housing and economic needs but also prioritises environmental sustainability, inclusive communities, and high-quality public spaces. By considering the insights gathered from these engagement sessions, the Local Plan process can better reflect the aspirations of younger generations and support the creation of places that are resilient, inclusive, and environmentally responsible. Continued engagement with children and young people will be important as planning policies evolve, helping to ensure that Greater Cambridge's future development responds to the needs and ideas of all members of the community.

Disclaimer

The advice contained in this report is given without prejudice to any final decision about the Local Plan adoption process.

Appendix A

Photo of the Local Plan YES Workshop with Monkfield Park Primary School Headteacher Mrs. Annie Howell



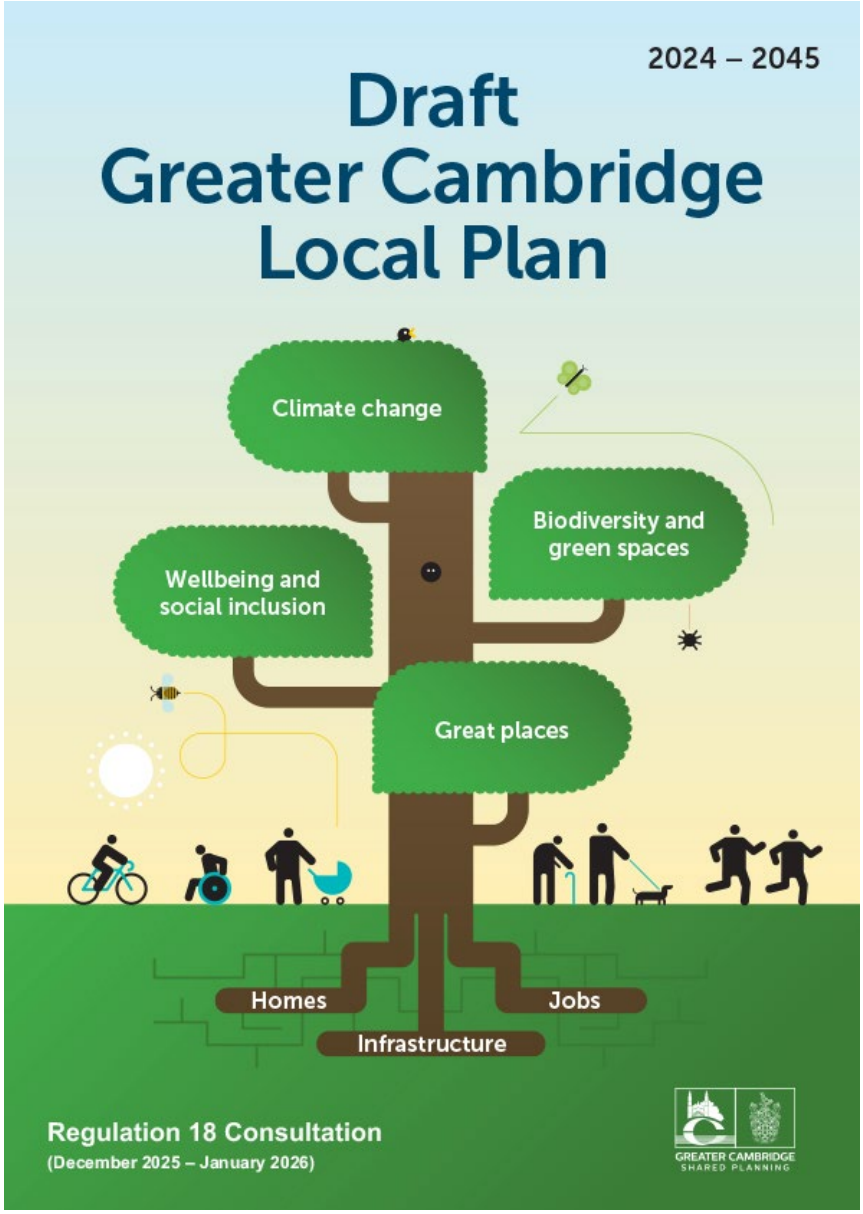
Appendix B

Photo of the Local Plan YES Workshop at Comberton Village College



Appendix C

Cover Page of the Draft Greater Cambridge Local Plan



Joint Design Review

Draft Greater Cambridge Local Plan

Cambridgeshire Quality Panel & Greater Cambridge Design Review Panel

Consultation December 2025 – January 2026

30th January 2026

Confidential

Consultations closed on 30th January 2026. This note from the Joint Panel Review serves as an *event record* and will be used alongside formal public comments. All comments captured on the day would be considered.

The Cambridgeshire Quality Charter for Growth sets out the core principles for the level of quality to be expected in new development across Cambridgeshire.

The review was conducted in three sessions. The panel jointly reviewed session 1: the Local Plan Vision and Development Strategy. In session 2: Cambridgeshire Quality Panel reviewed selected sites identified as New Settlements and at the Edge of Cambridge, whilst Greater Cambridge Design Review Panel reviewed selected sites identified within the Cambridge Urban Area and Rest of the Rural area. The panel then jointly reviewed the Development Management policies during Session 3. The comments are set out in accordance with the sessions held. The panel was chaired by Robin Nicholson.

Attendees

Panel Members:

Robin Nicholson – Chair CQP: Chaired the joint panel

Cambridgeshire Quality Panel (CQP)

Robin Nicholson – Chair CQP
David Birkbeck - Chief Executive Design for Homes – Character
Simon Carne - Architect/Urban Designer – Character
Oliver Smith - Director 5th Studio - Climate
Luke Engleback - Owner Studio Engleback – Landscape
John Dales - Director Urban Movement – Connectivity

Greater Cambridge Design Review Panel (GCDRP)

Eleanor Fawcett – Chair of GCDRP
Ian Johnson - Manager for Heritage and Compliance Bedford Borough Council
Ben Coleman - Urban Planner (transport), Associate at PJA - Connectivity
Nopi Exizidou - British Antarctic Survey, Cambridge - Climate
Vanessa Ross - Director at Arc Landscape Design and Planning Ltd - Landscape
Tahmina Begum - Support and Advice Worker, Camsight - Access

LPA Officers:

Terry De Sousa – Policy Team Leader GCSPS
Jonathon Dixon – Policy Manager, GCSPS
Trovine Montiero – Built Environment Team Lead, GCSPS
Tom Davies – Senior Urban Design Officer / Greater Cambridge Design Review Panel Manager, GCSPS
Anna Jeffery – Principal Urban Design Officer / Greater Cambridge Design Review Panel Manager, GCSPS
Maxine Ross - Greater Cambridge Design Review Panel Administrator, GCSPS

Declarations of Interest

Oliver Smith advised that his practice is now involved in some of the greenway and active projects around Cambridge.

The combined CQP/GCDRP Panel views

Summary

While recognising the rapidly developing planning environment, the upcoming Local Government Reorganisation, and consultation on establishing a Development Corporation in Greater Cambridge, the Joint Panel were generally very supportive of the Draft Plan and hugely impressed by the amount and quality of the work put into it and the extent of the public consultation. The Joint Panel felt that it establishes an ambitious and robust basis for the next generation of development and growth across Greater Cambridge.

In reviewing the Vision, members praised the quality of work and extensive consultation, while questioning how the impact and representativeness of this engagement are being assessed. Positioning the current process within the longer history of strategic planning in the area, and initiatives such as Cambridge Futures was suggested. They highlighted persistent challenges around the jobs–homes imbalance and called for a clearer, more explicit vision; showing how climate, infrastructure, community policy, connectivity, inequality, and great places themes interrelate. The Panel also encouraged a stronger articulation of the relationship between landscape and character, including varied geology, historic land uses, and “in-between” areas, and suggested bolder thinking on density, recognition of the universities’ contribution, and the affordability pressures shaped by rising incomes rather than falling housing costs.

Character - Landscape

The Panel emphasised that the landscape needs to be treated as a central organising element of the Plan. While significant work has gone into selecting allocations, members felt the Plan should more clearly explain how these sites relate to the wider landscape - particularly in terms of connectivity, movement, and future change.

They noted that the existing 2021 Landscape Character Assessment must be complemented by a forward-looking approach to managing landscape change over

the plan period. This includes considering how interventions such as wind turbines, transport infrastructure, and climate adaptation will shape future landscape character, looking at approaches to managing landscape change over the plan period.

Members also stressed the importance of understanding the landscape as a product of historic land management and its geology and soil types. The loss of trees, field boundaries, and landscape over the past 50 years was highlighted as a major challenge. The Plan should address how to restore landscape functionality, supporting water systems, cooling, and ecological resilience, especially in the driest part of the country.

The Panel encouraged stepping back from traditional landscape planning approaches and reconsidering the fundamentals. In this context, major tree planting programmes could help cool the wider landscape – aim for 30% canopy cover on bigger developments, for example, while drainage strategies need to consider not only the quantity of water but also its temperature. Evidence from largescale runoff studies in the USA suggests that buffer zones are needed to allow water to cool before entering sensitive ecological systems. In this context, major tree-planting programmes could help cool the wider landscape-scale runoff. It was recommended to review planning approaches and reconsidering the fundamentals.

Soil erosion / soil health was raised by members of the panel and could be more explicitly governed by the Plan.

Concerns were raised about relying too heavily on Biodiversity Net Gain metrics, which can oversimplify landscape functions. The Panel encouraged a broader, people-centred approach, recognising the value of shade, cooling, and water temperature regulation.

They also called for better recognition of Cambridge’s varied and stressed geology, from fenland to upper clay lands, and for attention to “in-between” areas that lie outside major strategic projects.

Character – The impact of Planning

Several members encouraged the Plan to be bolder in articulating what planning is for. While the strategy is a strong start, they felt there is more to say about long-term vision, particularly given the rapid pace of change and the likelihood of further growth pressures arising from the NPPF.

There was support for the Local Authority taking a stronger role in setting early, overarching visions for major growth locations—developing, owning and guiding masterplans, especially where multiple landowners or developers were involved in a growth location and did not have an integrated masterplan in place. This would help align landowners, developers, and communities around a shared ambition and avoid piecemeal approaches. Members noted that clear visioning also helps bring residents on board by demonstrating how infrastructure needs will be met.

The Panel urged the team to celebrate Cambridge's substantial achievements, including housing delivery, design awards, and the city's national influence, which currently receive limited recognition in the document.

Members discussed the need for a clearer position on density. While "medium density" and midrise development are referenced, the Panel felt the Plan should set firmer foundations for how and where higher densities might be accommodated in the future, particularly in response to likely transport-led growth around railway stations.

They highlighted the importance of stating upfront what greater density enables (the "quid pro quo"), so that benefits can be built into land value and design expectations from the outset. This includes explaining where higher density may be suitable, the design quality required, and how it is required to support liveability, infrastructure delivery, and Great Places ambitions.

The Panel also noted persistent tensions between public perceptions of housing design (e.g., house sizes, parking, amenity space) and the high quality of recent

Cambridge developments as recognised through awards. Better use of evidence, such as comparative dwelling size data could help shift these perceptions.

Character – Heritage

The Panel supported the Plan's commitment to safeguarding local and distinctive heritage and felt the Great Places policies broadly respond well to this aim. They agreed that directing development towards brownfield locations make sense, and locations that generally reduce heritage impacts.

Members also reinforced the need to reference the role of the universities, not just the core University but also the colleges, given their central influence on Cambridge's economy, built form, and wider development patterns.

Generally, the panel thought the heritage element is very thorough and comprehensive.

Connectivity

The Panel noted that while the Plan aspires to be vision-led, the vision for transport and movement needs clearer articulation - particularly considering recent NPPF changes that strengthen the role of sustainable transport.

Members emphasised that development locations should be chosen because they are supported by sustainable transport infrastructure, rather than retrofitting transport solutions afterward.

They also highlighted the need for stronger integration between the Infrastructure and Great Places chapters. Earlier, more consistent language aligning these sections would help reinforce how movement, place-making, and infrastructure are intended to work together within the Plan.

Community

The Panel emphasised the need for the Plan to articulate how communities and infrastructure connect beyond individual site allocations, ensuring places function as part of a wider whole.

Members highlighted Cambridge's significant inequalities and stressed that the Local Plan should weave equity throughout: across housing, jobs, connectivity, and access to opportunities, so that growth benefits those who have not historically gained from the city's economic success.

They encouraged clear links to the evidence on the causes of the persistent inequality in Greater Cambridge, to demonstrate how responses to these causes have been meaningfully embedded within the Plan. They also encouraged a balanced approach to the opportunity of the high-end economic activity, which is bringing significant investment and economic growth, recognising that often it does not provide accessible entry-level employment, and therefore they supported policies which encourage a range of measures to address this issue.

Climate

The Panel welcomed the Plan's strong climate ambition, noting that many policies reflect long-standing CQP/GCDRP priorities now embedded within the Local Plan.

Members emphasised, however, that delivery will rely on adequate supporting infrastructure, particularly electricity, water, and transport, and that the climate policies need to be more clearly grounded in all the four Cs.

They highlighted the absence of an energy generation strategy, noting that although a county level Local Energy Plan is in progress, opportunities such as wind turbines are not yet addressed. The panel recommended setting out next steps to align with the Cambridgeshire Local Energy Plan and explore wind energy zones

It was also observed that the University does not currently take full responsibility for its local power generation.

Overall, the Panel felt the direction is positive but encouraged clearer links between climate ambition, infrastructure requirements, and energy generation to ensure the policies can be delivered effectively.

End Session 1.

Session 2: Site Allocations

Cambourne North

(See Appendix Figure 1)

Officer briefing

- Allocation includes existing Cambourne (Cambourne West, business park, High Street) plus a new strategic area in North Cambourne.
- Development north of the A42, previously resisted, is now enabled by the proposed EWR station and the Cambridge to Cambourne busway.
- Major challenge: overcoming the A428 barrier to create a coherent, connected place across existing and new Cambourne, with concerns around infrastructure delivery timing.
- Updated infrastructure work supports higher densities, including up to 70 dph around the station to build critical mass.
- A well-designed station is intended to anchor the town centre; full buildout would make Cambourne the third largest settlement in the plan area with strong rail links to major destinations.
- Economic analysis indicates potential for 6,000 new jobs, though constraints include space limitations, lack of a Cambridge postcode, and weak strategic road access.
- EWR could help Cambourne develop a more independent economic identity, though further growth requires institutional investment.
- Cambourne Forest concept provides a major new strategic green space, addressing pressure on existing open spaces while maintaining separation from nearby villages.
- The forest is envisioned as a mosaic of farmland, flood management and green infrastructure rather than continuous woodland, with potential links to national forest initiatives.

CQP Panel comments

Community

The panel broadly welcomed the ambition for North Cambourne but highlighted fundamental challenges around connectivity, landscape integration, settlement identity, and the long-term evolution of the place.

The panel encouraged a more visionary approach:

- Seeing the whole of Cambourne, including the existing centre as one place.
- Designing the station as a point of connection rather than division.
- Planning for a generous, multifunctional high-quality pedestrian and cycle bridge across the A428 to physically and symbolically stitch the settlement together.
- Using the station and bridge to create new public realm and high-quality movement routes.

The panel identified risks around:

- Ambiguity in the spatial framework and how different parties might interpret it.
- Lack of specificity regarding distances or spatial relationships.

There was also a suggestion that Cambourne existing and North Cambourne could be presented as a single, more coherent allocation in the Local Plan, reflecting their functional interdependence.

Concerns were raised about competition between the proposed station area centre and Cambourne's existing High Street. Some saw this as an opportunity to "go - again" and enhance existing Cambourne, while others warned of negative impacts resulting from over-provision of the area's centre and Cambourne's existing High Street.

Questions were raised about:

- What kind of community this will be during the day?
- Whether it can support employment uses that create independent vitality?

- How existing Cambourne might need retrofitting as part of a more holistic strategy?

The panel emphasised that villages in the area strongly value their identities, suggesting the need for engagement to understand how new development can enhance their quality of life by meeting their requirements locally, rather than erode local character.

Several members stressed the importance of the development journey, not just the end state. Long delivery timescales mean that interim phases will shape residents' lives for many years. The plan should therefore:

- Be clearer about phasing expectations and triggers.
- Avoid creating fragmented or disconnected conditions during early stages.
- Acknowledge the ongoing evolution of existing Cambourne and its relationship to the new northern extension.

Character – Landscape

The significant proposed green infrastructure, particularly the northern forest, was well-received as a key strength. However, concerns included:

- Ensuring meaningful ecological connectivity, rather than disconnected "dead end" woodland fingers.
- Avoiding narrow woodland buffers close to homes that could create biodiversity conflicts (e.g., with cats and dogs).
- Designing for 15–25minute walking circuits, recognising the importance of dog walking routes in everyday use.
- Better defining the type, function and management of the proposed forest, moving from the conceptual to the practical.
- Some questioned whether the site allocation should exclude the forest for clarity to protect it from development pressure at the edges.

Connectivity

A dominant theme was the poor connectivity of existing Cambourne, described as heavily bisected by infrastructure, creating sealed off areas and rigid boundaries.

The new railway station is a welcome asset but not sufficient on its own; how the wider development is structured around it will determine whether North Cambourne becomes integrated or remains disconnected.

Panel members stressed:

- The need to address east-west links and avoid the A428 acting as a permanent barrier.
- Learning from comparable station led places, such as Ebbsfleet and Beaulieu, to ensure the station supports walkable, vibrant neighbourhoods.
- A risk that reliance on road infrastructure could make car use the default unless walking/cycling routes and local destinations are built in from the outset.

Several contributors argued that the emerging allocation should also be considered at a more strategic/sub-regional scale and the approach to North Cambourne must be understood in relation to:

- Papworth and the surrounding villages.
- Bourn Airfield.
- The transformative potential of East West Rail and C2C.

Climate

Think of it as a single allocation and consider the transition from a car-based community to a more integrated one

Site Allocations - Grange Farm

(See Appendix Figure 2)

Officer briefing

- Located in an area of strong employment growth near Babraham and the Genome Campus; intended to provide homes that reduce commuting need.
- Positioned outside the Green Belt and close to the proposed Cambridge Southeast Travel Hub, with potential for a direct busway link to the Biomedical Campus.

- Delivery depends on coordinated work with the County Council to secure a dedicated connection between the site and the travel hub.
- Proposes around 6,000 new homes plus small-scale employment space, supported by substantial open space along the site edges.
- The eastern boundary follows the historic Roman Road (SSSI), requiring careful treatment due to landscape and ecological sensitivity.
- Further work needed to refine boundaries, clarify green space functions, and respond to wider landscape impacts.
- Presents an opportunity to align housing growth with nearby employment clusters and emerging transport links.
- Ongoing technical work and public engagement will shape refinements, particularly regarding landscape, ecology, and green-space roles.

CQP Panel comments

Character – Landscape

The panel encouraged a more integrated landscape-led approach for Grange Farm, noting that the opportunity is not to place landscape around a new settlement but to create a place where landscape and built form are fully interwoven. Examples were cited of village landscape models where green infrastructure permeates the whole site rather than appearing as peripheral buffers. Concerns were raised that the current form feels insufficiently rooted in local character.

Members highlighted the importance of avoiding an overengineered approach to water management. Rather than relying heavily on underground infrastructure, the site should incorporate visible blue green systems that support cooling, biodiversity, and climate resilience. A waterwise design approach, including references to “sponge city” principles, was seen as particularly relevant to reducing embodied carbon and improving everyday environmental performance.

There was a view that the developable area may need to be adjusted to allow more meaningful green space within the layout, and that the current configuration may not yet be appropriate for this context. Some questioned whether Grange Farm sits more

logically within the rural section of the Plan, given its landscape character and relationship to the surrounding area.

Connectivity

The panel raised significant concerns about transport and connectivity at Grange Farm, noting that, in its current form, the site is poorly positioned to support active travel. Existing routes between key destinations are weak, and from a transport perspective it was observed that development here would not ordinarily be recommended. A development of this scale will need to “change the game,” particularly given the number of businesses and proposed clusters of businesses and other destinations (e.g. Duxford IWM) already emerging around the site and the need for reliable, high quality busway connections to rail stations e.g. at Whittlesford, to underpin sustainable movement.

Panel Members emphasised the importance of strengthening the strategic context within the allocation, with a clearer articulation of the site’s role within the wider place to place connections and the quality of links that will be required to make it function. Infrastructure delivery was identified as a critical challenge, with the Plan seen as an opportunity to set out the coordinated, timely and phased interventions necessary to unlock the site. It was recognised that no individual developer can deliver this level of infrastructure alone; a joint, cross agency approach will be essential to securing the movement, employment, and servicing networks needed for successful long-term growth.

Community

The panel suggested that adequate consideration be given to the number of homes required to create a self-sustaining community to deliver timely community infrastructure, considering the difficulty of getting new settlements off the ground and creating comprehensive places.

Climate

The Panel was relieved to learn that the neo-classical John Simpson scheme with huge amounts of hard surfacing has been dropped.

A water-led, surface level approach is encouraged to support climate resilience and reduce embodied carbon.

References:
The Panel recommended reviewing the forthcoming Homes England Reports on Creating Centres and Parking Typologies when they are published later in the year.

Site Allocations – Biomedical Campus

(See Appendix Figure 3)

Officer briefing

- Reallocation proposes further expansion of the Biomedical Campus, justified by its nationally significant life sciences role combining clinical care, research and academia.
- Supports continued growth in healthcare facilities, keyworker housing, R&D space, and higher education uses, reinforcing its position as a world leading cluster.
- Despite being a 24hour environment, the Campus currently lacks activation outside working hours and suffers from siloed, disconnected spaces.
- Long-term evolution will require coordinated, phased development, including opportunities for meanwhile uses during interim stages.
- Transport challenges persist, including trip budgets, peak hour pressures, and reliance on offsite facilities, underscoring the need for better internal and external connectivity.
- The overarching ambition is to create a more integrated, connected campus that functions cohesively within its wider urban context.

CQP Panel comments

Connectivity

The panel noted that the Biomedical Campus lacks a coherent masterplan, resulting in weak structure, fragmented movement networks, and a place that is difficult to understand and navigate. Despite reasonable cycling provision, the area does not function effectively, and the absence of a legible walking network was seen as a fundamental barrier to creating a successful, connected place. Members observed that development to date has been shaped by opportunism rather than coordinated planning, with social infrastructure often displaced by more commercially attractive uses.

Transport integration was highlighted as a critical weakness, with poor connections between different transport modes and cycleways described as inadequate. A coherent street and movement framework is essential if the Campus is to operate as a functional district. Concerns were also raised about recent housing schemes coming forward in isolation, with limited provision for key worker homes and no clear centre to anchor the area or link it more effectively to the hospital.

While the draft allocation includes references to a high street and mobility hub, the panel felt the policy needs to be more specific and urgent in setting out what must be delivered. At this stage, these are no longer aspirations but essential components of creating a coherent, integrated, and genuinely world-class place.

It was observed that references to CSET are currently absent from this part of the Plan, despite its critical role in making the allocation viable. The panel suggested that each site allocation would benefit from a clear list of infrastructure requirements to improve consistency and transparency. More broadly, there was a call to strengthen the strategic context, ensuring the Local Plan articulates how individual sites relate to the wider area and to one another, rather than reading as isolated developments.

Community

The panel noted several cross-cutting issues that apply across the allocation. Members highlighted the need for far greater coordination of movement networks, with concerns that the current approach lacks a clear structure for primary routes, transition points, and future connections. Accessibility challenges were also raised, with comments that the site remains difficult to navigate for all users.

Climate

Energy infrastructure emerged as another essential consideration, with a view that the site will require substantial onsite generation to support long term resilience and reduce dependence on external networks.

Character – Landscape

Managing landscape character on the Biomedical Campus presents challenges, especially given the fast paced and reactive nature of clinical care environments. The panel stressed the need for clearer policy wording and defined triggers, such as when an LVIA should be required, to avoid ambiguity in delivery expectations.

Concerns were raised about the scale and placement of substantial Phase 4 buildings, with a call for the allocation to be explicit about how large structures meet the sensitive landscape edge. Members questioned whether the abrupt interface between tall buildings and diminishing landscape should be more confidently addressed rather than softened.

The panel highlighted the need to consider light, shade, and microclimate impacts arising from clusters of taller buildings, noting that these effects may not be fully reflected in the current BNG work. The need for large canopy trees was identified as providing far greater benefit than smaller species.

The panel welcomed the policy's ambition for *world-class* buildings and spaces but noted that the Campus still feels like an emerging place rather than a fully realised environment. Terms such as *"carefully landscaped edge"* were considered too open

to interpretation, and members stressed the need for clearer, more directive language to avoid inconsistent outcomes.

A stronger blue green infrastructure vision was encouraged, with the panel emphasising that landscape should operate at multiple scales across the site. This includes setting prescriptive minimum standards, such as woodland belts of at least 20 metres, and combining different landscape elements so they are mutually supportive. Establishing a critical mass of interconnected green infrastructure was seen as essential for long term ecological resilience and to create a landscape framework capable of supporting future phases of development.

Site Allocations – Cambridge East

(See Appendix Figure 4)

Officer briefing

- Opportunity to integrate Springstead Village and Marleigh into a single, strategic site allocation.
- Area forms part of a key Green Belt corridor; important countryside transition into Cambridge should be retained and strengthened.
- Potential relocation of the Newmarket Road Park & Ride, with options currently being explored by the GCP.
- Opportunity for a dedicated busway route to run through the site, improving sustainable transport connections.
- Scope for one larger, centrally located district centre serving the wider allocation.
- Capacity to deliver a 15-minute walkable neighbourhood supported by local services and facilities.
- East West Rail has confirmed it is exploring the potential for a new station within this area, enhancing long-term connectivity.

CQP Panel Comments

Community

The panel highlighted the excellent quality of Springstead Village including a positive example of how two adjoining houses were combined to provide an early temporary community space.

Connectivity

The panel noted the importance of understanding what is planned to the north-west of the site and emphasised the need for stronger connections in that direction, particularly to the river and Cambridge North. Without consideration of these links, the site would remain significantly constrained.

Character

The panel highlighted the opportunity to balance natural wildness with recreation, drawing on examples such as Trumpington Meadows to illustrate the potential for varied landscape spaces. LNCH was commended for its strong community engagement and spatial permeability, with a view that benefits for Teversham should be clearly articulated.

Members noted that Green Belt corridors can remain accessible while retaining a rural character and encouraged clarity on the site's identity - whether as a rural-urban transition or a 'welcome to Cambridge' arrival. They also suggested exploring a gateway experience from the railway rather than the road network.

Overall, the approach was viewed as logical and well-considered, with support for continued progress. The potential East West Rail station was seen as a promising opportunity, alongside the importance of wider connections and how the Green Belt corridor links and functions.

Site Allocations – Cambridge Junction and Clifton Road

(See Appendix Figure 5)

Officer summary

Cambridge Junction and Clifton Road.

- For the first time, the area will be allocated rather than covered solely by policy areas.
- Two allocations are proposed, even though it is one area, to keep policies more legible.
- Noted that the area should be considered comprehensively as one framework plan.
- The Council aspires to redevelop the Junction, increasing the cultural offer to enhance what's there and explore what else could create a livelier area.
- Explore how to increase employment uses and leisure uses.
- 'Competitive socialising' to remain, but reimagined.
- Adopt an all-day approach to activity and uses.
- Northern parcel at Clifton Road Industrial Estate performs well; aim not to lose those uses. Consider opportunities for intensification alongside other uses.
- East West Rail is proposing a station entrance on the west side; working closely with them to understand how it could function.
- Explore how the area can become an integrated part of the city.
- Consider the relationship to the CB1 development on the other side of the station and how this area could be brought up to a similar standard, including thinking about density, mix of uses, and potential for residential.
- Opportunity to introduce open green space.
- Royal Mail site is not currently proposing to relocate; 24-hour daily movements are a constraint.
- The Chisholm Trail presents opportunities for connections and extensions.
- From a strategic point of view, there is a need to juggle the wider needs of the city.
- Employment evidence highlights that the city has lost a lot of its industrial spaces, so there is a strong need to protect the site.
- The area also accommodates leisure uses, so the challenge is finding the best use of the site without losing functions the city still needs.
- Desire to see more homes in the area; however, landowners have indicated it is more financially viable to provide non-residential uses.
- The plan sets out a higher level of housing than landowners are currently aspiring to deliver.

GCDRP Panel comments

Character

There is a strong view that the site should be taken forward as a single allocation rather than two. The policy messages relate to the distribution of uses across the whole area and dividing the site risks creating unnecessary fragmentation. The area is not so large that it requires separate allocations, and a single designation would support a clearer, more coherent framework for change.

At present, what is described in both the text and the diagram is not substantially different from the existing situation. Much of the narrative focuses on retaining the current mix of uses, and the diagrams show a similar layout to the existing, with the only notable change being the addition of 300 homes. This does not convincingly articulate a transformational vision which would justify the comprehensive redevelopment recommended. The site today is introverted and generally unsuccessful from an urban design perspective, however the business and uses appear to be thriving with little vacancy, therefore the policy should articulate a far stronger rationale for why this is a site allocation, and how development proposals should address this, and articulate the objectives and meaningful improvements sought.

Given its exceptional accessibility, the site offers significant opportunities to intensify and diversify uses. There is clear potential for a greater residential component, balanced with the need to retain key non-residential and industrial activities. However, car-based uses in such a sustainable location seem counterintuitive, and consideration should be given to relocating them to areas more suited to vehicle-dependent activities. The Junction, bowling alley and cinema provide destination uses, but the plan could better articulate what the wider spectrum of everyday community uses should be, particularly spaces for young people.

The policy should say more about the surrounding streets. Considerable effort has been made on adjacent schemes to secure active frontages along Hills Road and Cherry Hinton Road, yet this site turns its back on these important edges. Cherry Hinton Road is identified as a local centre, and there is a strong opportunity for new

development to face it, support it, and generate knock-on benefits for adjacent businesses. This should be a key driver of the strategy.

Movement through and within the site also needs clearer resolution. In particular, the Royal Mail operation introduces complexity, and the diagram does not yet show how competing movement networks: pedestrian, cycle, service, public transport, are to be reconciled. There is also a broader strategic question: if the Royal Mail use were removed and additional rail connections introduced, parts of the site might begin to function more like an extension of CB1. That could deliver benefits but also risks losing important activities that serve the city.

The area should not be seen as an industrial place, even though some industrial uses which serve local communities are important to retain. Proposals for significant change must demonstrate how what replaces the current environment will be clearly better. This may include exploring whether other allocations could accommodate relocated uses if that supports a more coherent vision here.

Due to the complexity of detailed work required to develop comprehensive masterplan/s for the overall site, for the purposes of this Local Plan it is recommended that the site allocation proposals diagram is removed, and the focus in the text is on articulating the objectives instead of describing proposals. The council is encouraged by the panel to take a pro-active role in developing more detailed guidance and a high-level masterplan/spatial principles for this combined site allocation to explore potentially conflicting objectives/uses further and enable the disparate landowners to successfully deliver a comprehensive approach to regeneration here. This would potentially form a follow-on piece of work, in collaboration with key landowners if appropriate.

Community

The Junction area, while relatively new, does not feel particularly successful today, and there is an opportunity to improve it. The policy could be more explicit about aiming for a world-class cultural hub and high-quality public open space, a place for the people of Cambridge. The concept of a green link is strong, and there is real potential for a well-used green space at the heart of the development.

This is undoubtedly a challenging site, with many interdependencies, including the railway and Royal Mail operations, but it offers one of the most significant opportunities for central Cambridge. The policy should communicate this ambition more assertively and set out a clearer approach to the place this could become.

Climate

Some panel members noted that the long-term trajectory of the area suggests that many of the existing industrial uses will eventually need to relocate, given that their business activities are rooted in car-dependent patterns that are no longer appropriate for such a central, highly accessible location.

It is important to distinguish between the existing uses within the industrial units such as garages which are purely vehicle based, and others such as DIY trade counters, food and leisure businesses which provide everyday services and are less suitable for relocation as this could create unsustainable travel patterns, forcing residents and businesses to drive farther to access essential functions.

Connectivity

It was clarified that the Post Office is likely to remain in place for now. The new station entrance is still being developed, with the active travel hub considered essential; this should not become a secondary or back-of-house entrance to Cambridge. There is an opportunity to consider what additional facilities a new entrance could provide, ensuring it complements rather than duplicates what exists on the opposite side of the station. An unpaid pedestrian link through the site is critical. Given the massive impact that a new station entrance within the site would have on movement patterns and the overall masterplanning approach including the approach to the Post Office Depot, the panel recommended an approach which avoids establishing firm proposals until the status of the station entrance is known. This could potentially be achieved by developing alternative approaches with/without the station entrance to understand its impact.

Given the high number of school children moving through the area, the plan should articulate a clear movement hierarchy that opens the site and supports safe, direct navigation. The level difference to Hills Road is an important challenge, and there is an opportunity to open the site up and make it feel more connected to the

surrounding streetscape. Reorienting buildings and shared spaces could significantly improve wayfinding, as the current layout is difficult to navigate independently and safely.

Universal design principles should underpin the approach to ensure the site is genuinely easy to use for all. While some existing uses are essential and should remain, there is scope to “stack” and co-locate some functions more efficiently. There is some precedent for this in London, where commercial uses have been successfully layered and integrated within mixed environments. Every city needs some degree of back-of-house activity, but the policy should ensure this is handled in a way that supports, rather than compromises, the overall ambition for the area.

Site Allocations – Slate Hall Farm

(See Appendix Figure 6)

Officer briefing

- Identified need to accommodate industrial uses within the area.
- Strategic road corridor includes several sites coming forward through the Local Plan.
- Two sites are allocated, with this one considered the strongest due to its proximity advantages and ability to incorporate green infrastructure.
- A more open approach is proposed for the southern end of the site.
- Allocation focused on meeting local needs.
- Site promoter is likely seeking larger units than those envisaged by policy.

GCDRP Panel Comments

Character

The emphasis on a landscape-led masterplan is excellent and should be strongly supported.

This could include thinking about campus-style environments with communal parking, with greater ambition on sustainability. This approach ought to be embedded across all comparable allocations. Given the multi-phased nature of the development, it is important that the masterplan is intended to guide and be

implemented throughout the duration of the scheme. The policy should also give clearer guidance on building heights, massing and orientation, noting that B2/B8 uses will require large, bulky buildings.

Biodiversity Net Gain offers a valuable mechanism to secure this approach and can serve as a strong hook for delivering a coherent landscape structure. Attention should be given to the south-west edge of the site, where the relationship between built form and the road will be critical; more of the infrastructure may need to address the road directly rather than relying on a landscape buffer, enabling more of a landscape buffer to the surrounding fields/open spaces.

A policy requirement for a design code would reinforce this and help ensure consistency across different phases. Care must also be taken with building placement: if large buildings are positioned too close together, the opportunity to provide meaningful green infrastructure is lost, undermining both the landscape-led intent and overall site quality.

The value of the current diagram should be reconsidered, as its ambiguity risks misinterpretation. The Panel suggest it is removed; diagrams should illustrate context, constraints and opportunities rather than imply fixed layouts.

Connectivity

Where clusters of sites sit in proximity, a simple cluster key plan would be valuable to illustrate relationships and strengthen cross-references between policies.

Ensuring strong transport links is essential to making the site genuinely accessible, supported by a clear approach to how parking is organised - particularly on multi-tenant sites where shared-space rules are needed to maintain clarity, safety, and a coherent sense of place.

The policy should also be clear about the specific outcomes sought from active travel improvements. There are opportunities to connect into Northstowe, which already benefits from good cycle links, although public transport connections remain more limited.

Strong, legible connections to surrounding residential areas are essential, supported by clearer expectations of what “good growth” and high-quality industrial design should look like for this type of development.

End Session 2.

Session 3 – Development Management Policies
Joint Panel Comments

Climate Change

Officer summary

- A major theme emerging strongly through consultation responses.
- Includes a catch-all policy outlining the overall expectations for climate-related design and performance.
- Cooling of buildings and net-zero requirements will be particularly interesting considering the new NPPF.
- The updated NPPF still enables the authority to push ambitious water-efficiency standards.
- Recent building regulations have improved standards but still fall short of what is needed in the Cambridge context.
- Strong best-practice policies included on flood risk and drainage.
- Background work on renewables provides useful guidance on scale and location opportunities.
- Circular economy principles are being advanced, including a presumption in favour of retaining and reusing existing buildings.
- Emphasis on making the best use of resources throughout the development lifecycle.
- Heat Map work provides an important evidence base for future energy planning.

Joint Panel's comments

The panel questioned whether the policies fully support a robust climate response and genuinely enable future-proofed design. They reflected on how effectively the plan promotes low-carbon construction, long-term adaptability, and the balance between design quality and viability. While they welcomed the ambition to exceed national standards, they felt there was still room to strengthen the narrative around climate emergency, particularly given both councils' 2019 declarations.

They suggested the Local Plan might go further than the 2050 net-zero target, as current science indicates the need for earlier action.

In response, officers clarified that net-zero operational standards would apply from adoption of the plan, supported by extensive carbon-budget work underpinning the spatial strategy, which steers toward the lowest-carbon development pattern. Council climate strategies also already aim to deliver net-zero earlier than 2050.

The panel noted that while the policies focus strongly on new development, they give limited attention to the existing and heritage building stock, where performance gaps remain significant. They felt the plan could more explicitly address embodied carbon, particularly opportunities to require material reuse where demolition occurs.

They also observed some inconsistency in references to heating and net-zero standards, encouraging clearer signposting to future-proof benchmarks such as the Net Zero Carbon Building Standard.

On deconstruction and circularity, they believed the plan could be more ambitious about material recovery and reuse. They also raised questions about developer responsibilities around grey-water systems and suggested the inclusion of strong practical examples to illustrate expectations.

The panel highlighted gaps in renewable-energy infrastructure planning, including the absence of references to wind power, and suggested raising ambitions for solar installations, for example, requiring solar car-ports above certain thresholds, following international precedents.

They noted potential competition between rooftop renewables and green roofs, urging a clear prioritisation framework.

The panel praised the strength of the climate-related policies but expressed concern about the practical challenges of delivery, both in relation to the constraints of the NPPF and the tendency for some housebuilders to exploit loopholes in the system.

They highlighted the persistent performance gap in achieving UK Net Zero, noting that post-occupancy monitoring often lags by 12 months, which makes enforcement difficult. From their perspective, net zero must be treated as an absolute requirement rather than an aspirational target, and strong standards will only be effective if accompanied by mechanisms that secure compliance.

They also observed that public opinion on renewables is often underestimated, citing local examples, such as Grantchester, where communities have supported wind turbines over PVs. This suggested that the plan could be more assertive about renewable-energy measures.

The panel stressed the importance of ensuring the long-term sustainability of historic buildings. Even where these buildings cannot fully meet retrofit standards, they noted that viable ongoing use is critical to preserving their value and avoiding deterioration over time.

The panel noted that the policies say little about transport, despite it being one of the largest contributors to carbon emissions. They felt the plan should include stronger, clearer messaging on decarbonising transport. They also highlighted the importance of ensuring that SuDS strategies respond directly to the character of the landscape and encouraged a more ambitious approach to carbon sequestration by linking landscape, water, and soil, recognising that hydrated soils store significantly more carbon.

They observed instances of siloed thinking across the themes and recommended a more integrated approach. On sustainable transport, the panel cautioned against over-reliance on electric vehicles, stressing that EVs should not inadvertently promote higher levels of private car use.

They also emphasised the role of large industrial or “big shed” sites, noting these sites should be selected for their connectivity to the national grid so they can function as energy generators.

Finally, they pointed out that the local authority has a responsibility to manage storage and logistics for circular-economy materials, following emerging examples such as the GLA's approach.

Biodiversity and Green Spaces

Officer briefing

- Clear GI standards are set out, though implementation of the Natural England toolkit remains challenging and ongoing.
- The plan supports a full range of Green Infrastructure, from pocket parks to wider urban-greening initiatives.
- Policies address the need to balance different uses along river corridors.
- Approaches to protecting open space have been aligned across the two previous plans.
- Open-space provision is strengthened to ensure consistency and clarity.

Joint Panel comments

The panel welcomed the ambition of the policies but emphasised that long-term management, maintenance and stewardship remain significant gaps. They felt that while the document is strong, it pays too little attention to how open spaces, biodiversity features and soils will be managed over time, noting that BNG cannot be separated from maintenance and should be linked more explicitly with open-space obligations.

Soil emerged as a major concern: current policies do not clearly address how soil should be protected, managed, or retained, despite its crucial roles in supporting planting, sustaining biodiversity, regulating hydrology and storing carbon. The panel highlighted that urban soils are often damaged yet hold substantial potential for carbon sequestration and suggested requiring soil-management strategies and exploring approaches such as mineralisation techniques used elsewhere (ref Newcastle University experiments) and the incorporation of biochar. Wet soils allow carbon sequestration.

They also noted significant overlap between SuDS and GI policies and called for stronger cross-referencing and more consistent language.

The tree-canopy policy was praised, though the panel observed tensions between canopy expansion and BNG metrics on constrained urban sites. They suggested that a broader Environmental Net Gain approach could resolve some of these conflicts.

While supportive of the direction of biodiversity and open-space policies, they felt the links between them need to be stated more clearly, including recognition of the role of non-native species and the importance of urban gardens.

The panel also encouraged more innovative thinking in relation to health and urban design, noting the benefits of diverse planting for urban microbiomes, and called for stronger integration of rain gardens and water-sensitive design in streets in support of probiotic urbanism.

Overall, they advised that policies would be stronger and more integrated rather than treated in silos, with each project required to prepare a holistic strategy combining SuDS, BNG and GI. They concluded by noting the challenge of defining policy around “protecting” versus “providing and enhancing” urban spaces, which require different levels of prescription.

Wellbeing and Social Inclusion

Officer briefing

- New developments should provide access to the full range of services and opportunities residents need.
- Health principles are embedded throughout new development to support wellbeing.
- Standards for provision are based on population needs.
- Policies address opportunities for meanwhile uses, particularly on larger strategic sites with long build-out times.

- Guidance is included on improving the quality and functionality of employment and business areas across the region.
- Policies set out how to protect health and general wellbeing, including addressing pollution.
- Consideration is given to how pubs can be protected as important community assets.

Joint Panel comments

The panel raised concerns about how accessibility issues are being picked up in the development process, noting that examples at Eddington and Darwin Green show a misalignment between approved designs and the lived experience of accessibility.

They highlighted features such as level surfaces that lack visual contrast and tapered steps that can create challenges, questioning where in the policy framework such issues should be addressed and how expectations can be more clearly defined.

They felt that while Health Impact Assessments touch on accessibility, this area needs stronger emphasis, particularly in relation to public spaces and non-residential buildings. The panel encouraged further consideration of how accessibility can be more deeply embedded in Great Places policies and suggested that this could also provide an opportunity to reflect wider equity and equality objectives.

Finally, they queried whether the Local Plan could more explicitly reference relevant design guidance to ensure that accessibility standards are consistently applied and understood across projects.

Great Places

Officer briefing

- Overarching design policy setting expectations for high-quality development.
- Framework for how high-quality development should be created and assessed.
- Housing-density policy based on clear criteria.

- Future work identified to explore areas of Cambridge where densification may be appropriate, as referenced in the draft plan.
- Tall buildings and skyline policy, building on existing Cambridge guidance.
- Policies on landscape and the public realm.
- Protection of landscape character.
- Stand-alone historic environment policy.
- Stand-alone archaeology policy.
- Policy on shopfronts.

Joint Panel comments

The panel found the heritage and design policies to be comprehensive and robust, noting that the requirement for Heritage Impact Assessments is particularly valuable for development-management purposes. They welcomed the future-proofed approach of the heritage policy, which avoids relying on terms such as “substantial” or “less than substantial harm” that may shift in future versions of the NPPF. Instead, the policy is anchored in the enduring principle that any harm must be clearly justified and assessed in line with national tests. The panel also noted the tacit but appropriate reference to statutory duties by requiring the preservation of significance and careful consideration of setting, with detailed matters varying depending on the type of proposal.

For non-designated heritage assets, the panel felt the policy could be strengthened. They recommended setting out explicit assessment criteria within the plan, rather than solely in supporting text, and clarify how many criteria must be met for an asset to qualify. Including these criteria as an appendix would, in their view, improve transparency for applicants and lead to more robust decisions at appeal, particularly given past cases where inspectors rejected asset status where evidence was limited to a Historic Environment Record (HER) entry.

The conservation policy was considered sensible and aligned with national policy direction. Regarding archaeology, the panel suggested additional guidance on when pre-determination evaluation should be required on major applications. This is a frequent point of contention between LPAs and developers, and clearer direction

could help avoid situations where decisions must be made without sufficient archaeological understanding. They also agreed that the shopfronts policy provides good protection for historic shopfronts while ensuring high-quality design for new proposals.

Turning to the wider design and placemaking elements, the panel highlighted that the skyline policy sets no minimum or maximum heights. They noted that while existing patterns will often guide appropriate scale, there are cases where breaking local norms can be justified by exceptional design quality. In these instances, the panel recommended guidance on the criteria to demonstrate this e.g. successful review from DRP, applications for tall elements must be detailed and not in outline. Where higher density developments are encouraged, the policy should strengthen the requirements to support this e.g. specific walking/cycling distances from public transport and local amenities/centres, and the requirement for a masterplan. The panel is supportive of the additional work which the council is undertaking on accommodating higher densities and would be happy to review this in due course.

They also urged stronger wording on landscape and public realm, including ensuring sufficient below-ground space for trees and fully coordinated service layouts. They recommended requiring Landscape and Visual Impact Assessments directly within policy and strengthening the integration of blue-green infrastructure and SuDS.

The panel felt that the document under-represents streets and should frame them as a foundational component of “great places,” with clearer emphasis on climate-resilient streetscapes and active travel. On density, they encouraged more explicit links between higher density and public-transport accessibility, as well as stronger expectations for site access and movement. They also advised that higher-density and tall-building proposals should be required to produce masterplans, and that schemes above certain height thresholds may merit mandatory consideration by the Design Review Panel. For such proposals, they suggested requiring detailed rather than outline applications to ensure design quality is secured upfront.

Finally, the panel welcomed the inclusion of a pedestrian-led movement hierarchy within the Great Places policies and encouraged more consistent terminology and wider embedding of this approach throughout The Plan. The panel suggested that this section should also reference the importance of schemes being subject to Design Review Panel scrutiny, and that Post Occupancy Evaluation should be undertaken on completed schemes.

Jobs

Officer briefing

- Sets out what types of jobs should be in which areas.
- Includes an affordable-workspace policy to support a diverse economy.
- Highlights the example of the Cambridge Biomedical Campus and the need for employment sites to engage more fully with surrounding communities.
- Identifies a growing need for additional hotel accommodation.
- Notes concern about the impact of Airbnb on the local housing market.
- Considers the University's significant work on student-accommodation needs.

Joint Panel comments

The panel suggested that this section could go further by incorporating design guidance specific to employment developments, ensuring clearer expectations for quality and functionality.

They noted that the affordable-workspace policy allows significant flexibility through off-site provision and emphasised the need for strong delivery mechanisms within the Council to secure meaningful outcomes. They also felt that auxiliary uses within employment parks should be actively encouraged rather than merely supported, and that policies could say more about the wider benefits employers are expected to bring, including whether applicants should provide statements on training or skills development.

The panel raised the question of whether policies should address data centres more explicitly, building on work already referenced in the energy masterplanning.
They also highlighted the need for design guidance tailored to employment schemes, particularly life-science buildings, noting concerns about long-term demand, adaptability, and modularity.

Finally, the panel queried whether the plan sufficiently discourages car-based employment parks. They recognised the value of the trip-budget model in addressing this but felt the underlying message may not yet be coming through strongly in policy.

Homes

Officer briefing

- Significant need identified for increasing the supply of affordable housing.
- Policies include space-standards requirements and expectations for private outdoor space such as backyards.
- Co-living policy set out, with further clarification work ongoing.
- Additional work is planned to strengthen policy on HMOs.
- Approach to student accommodation is considered broadly balanced.
- Traveller sites: strategic sites should meet the needs of all communities, which may include providing allocated space for Travellers.

Joint Panel comments

The panel expressed strong reservations about co-living, questioning its long-term relevance and noting that schemes delivered to date have performed poorly. They felt Cambridge should either resist co-living altogether or set standards so demanding, such as prohibiting single-aspect units, that only genuinely high-quality proposals could progress.

They also raised concerns about developments being fixed to outdated regulations at outline stage and emphasised the need for mechanisms to ensure reserved-matters schemes reflect evolving best practice.

They encouraged greater emphasis on HAPPI principles, Extra-Care and Later-Living housing, stressing that these should occupy the best locations within new developments.

The panel also supported promoting emerging approaches such as commonhold.

They highlighted the importance of cross-ventilation given increasing overheating risks, citing Great Kneighton as a positive example, and reflected on whether inspectors would support more prescriptive ventilation requirements.

They noted recent shifts in national policy language, moving from “context” to “liveability”, and encouraged policies that reflect successful local exemplars and require generous communal green space.

Further recommendations included strengthening affordable-housing wording to make tenure-blindness a clear first principle, supporting inset and semi-inset balconies, and discouraging full-height glazing in bedrooms.

The Panel supported the idea of family homes being on the ground floor of larger blocks.

The panel also noted a lack of reference to home working and discussed the difficulty of distinguishing dedicated workspaces from additional bedrooms in policy terms.

They welcomed the idea of requiring 5% of homes on larger sites for custom and self-build and explored whether links could be made to affordability, ensuring this is not limited to higher-income groups.

They also encouraged clearer support for community-led housing, potentially within the Great Places section, noting that such schemes may require more tailored criteria and policies which align with the requirements of these schemes e.g. approach to communal spaces, which are otherwise not appropriately reflected in the policies for other housing models.

On student housing, the panel suggested policies should ensure that new college accommodation releases general housing back to the wider market, drawing on Oxford's model. They also recommended that expectations for architectural quality be sharpened, including removing superfluous wording to align better with the NPPF, and queried whether design-criteria thresholds should trigger mandatory review by the DRP/CQP.

Infrastructure

Officer summary

- Sought a clearer policy on travel hubs, including whether these sites are being used to their full potential.
- Further work is required on parking standards, ensuring they are aligned with emerging density studies.
- Energy-infrastructure master planning should be addressed upfront to support coordinated delivery.
- Policies include provisions for ensuring good digital access.
- Construction-management considerations may also provide opportunities to address soil-related issues highlighted earlier.

Joint Panel comments

The panel felt that the wording around active travel and car use could be clearer and more consistent, with a stronger and more explicit hierarchy that prioritises walking, cycling and public transport.

They suggested referencing the emerging transport strategy, which could provide helpful context, and called for greater specificity on acceptable walking and cycling distances.

While they considered the travel-hub policy to be strong, they questioned what "travel hub" means in the Cambridge context and whether the policy should instead focus on park-and-ride as the core principle. They saw potential for a more strategic network of mobility hubs across site allocations, including mixed-use park-and-ride sites, and encouraged clearer support for shared mobility, noting that smaller parcels often dismiss car-club provision in isolation.

Parking policies for cars and cycles were described as confusing, and the panel advised further work to align standards with emerging density studies and the transport strategy.

They felt EV requirements may now be largely addressed through building regulations and questioned whether the Local Plan needed to duplicate them.

The panel also noted the absence of a high-quality integrated transport system and stressed the importance of establishing a clear vision, observing that past delivery has been treated as an engineering exercise rather than a public realm led process.

Additional points included the potential need for policy on drones, opportunities for construction management plans to support whole life carbon reduction (reference to PAS 2080), and the value of emerging national guidance on "streets as places" in the draft PPG, which could strengthen the plan's approach to street design.

Summary – Eleanor Fawcett, Chair

- The panel emphasised that the detailed feedback provided was only possible because the draft document is of exceptionally high quality, reflecting Cambridge's strong track record in design and planning.

- They identified four key themes. First, both panels encouraged the team to be more confident in being prescriptive on issues that truly matter, using the area's ability to attract investment to secure the best outcomes.
- Second, in a shifting governance context, it is more important than ever to set out with clarity what must happen, being explicit about when to reject proposals, defining landscape functionality, raising expectations for employment sites, and clearly identifying the infrastructure required to unlock new settlements, including water bus/cycle corridors, water and sewage.
- Third, on density and height, there is a need to articulate the specific benefits that justify greater scale in particular locations, including what "good" looks like in those cases.
- Fourth, for site allocations, the steer is to focus on clear objectives and constraints rather than indicative layouts, which risk being under-developed. Some sites, such as the Biomedical Campus, require more specificity, while others, like the Junction site, should be approached with care and held back until the specific opportunity is clearer and more detailed thinking is possible.
- Finally, despite the reduced appetite for AAPs and SPDs, the panel stressed the continued importance of the LPA leading further work to develop detailed objectives and spatial principles/masterplans for complex or strategic sites, especially where multiple landowners/stakeholders require support to secure an integrated approach.

Summary – Robin Nicholson, Chair

- The panel recommends strengthening the site allocations by providing clearer context, including relationships beyond site boundaries and cross-border connections.
- Landscape should be integrated holistically moving away from disconnected green elements toward fully coordinated landscape-led thinking.
- They commended the strong prioritisation of climate within the policies and encouraged an exemplar approach for key schemes to demonstrate best practice. The panel also advised taking a more proactive master planning role to shape outcomes effectively.

- Successes from previous projects and award-winning work should be celebrated to reinforce what “good” looks like. The plan should also include ways to measure the impact of consultation to understand how effectively feedback is being incorporated.
- Finally, while acknowledging current uncertainties, the panel emphasised that this is an excellent programme with significant potential; the team should move forward confidently and articulate a clear, ambitious vision for the future.

End Session 3.

Appendix A – Site allocation diagrams

Figure 1: Spatial Framework for Policy S/CBN: Cambourne North and Policy S/CB: Cambourne

Figure 2: Spatial Framework of Policy S/GF: Land Adjacent to A11 and A1307 at Grange Farm

Figure 3: Spatial Framework for Cambridge Biomedical Campus (including Addenbrooke's Hospital)

Figure 4: Spatial Framework for S/CE: Cambridge East

Figure 5: Spatial Framework for S/C/CJ: Cambridge Junction and Cambridge Leisure, Hills Road and Clifton Road Area

Figure 6: Spatial Framework for Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)

Figure 7: Illustrative map showing locations proposed for New housing Development from 2024 to 2045

Figure 1: Spatial Framework for Policy S/CBN: Cambourne North and Policy S/CB: Cambourne

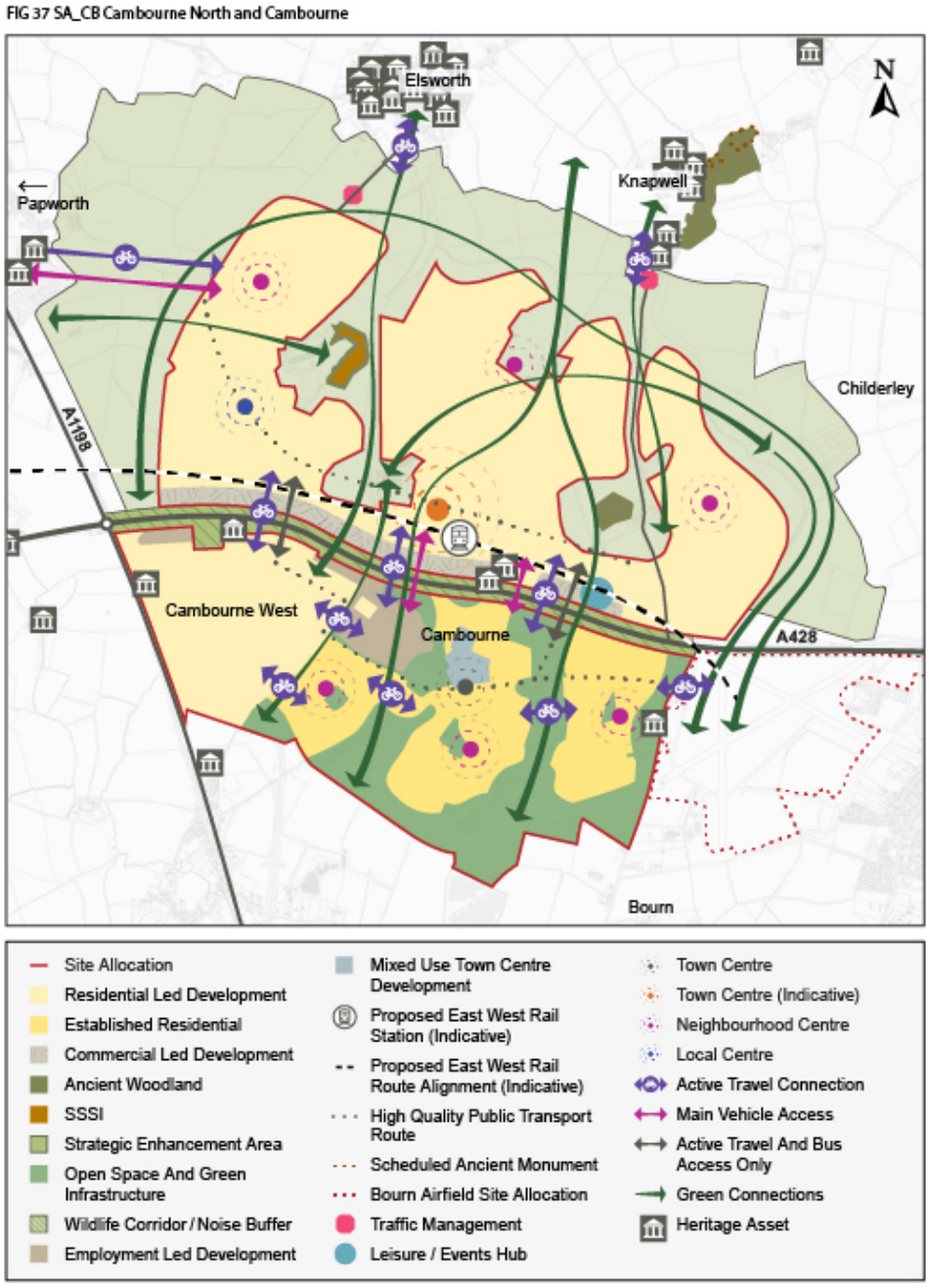


Figure 2: Spatial Framework of Policy S/GF: Land Adjacent to A11 and A1307 at Grange Farm

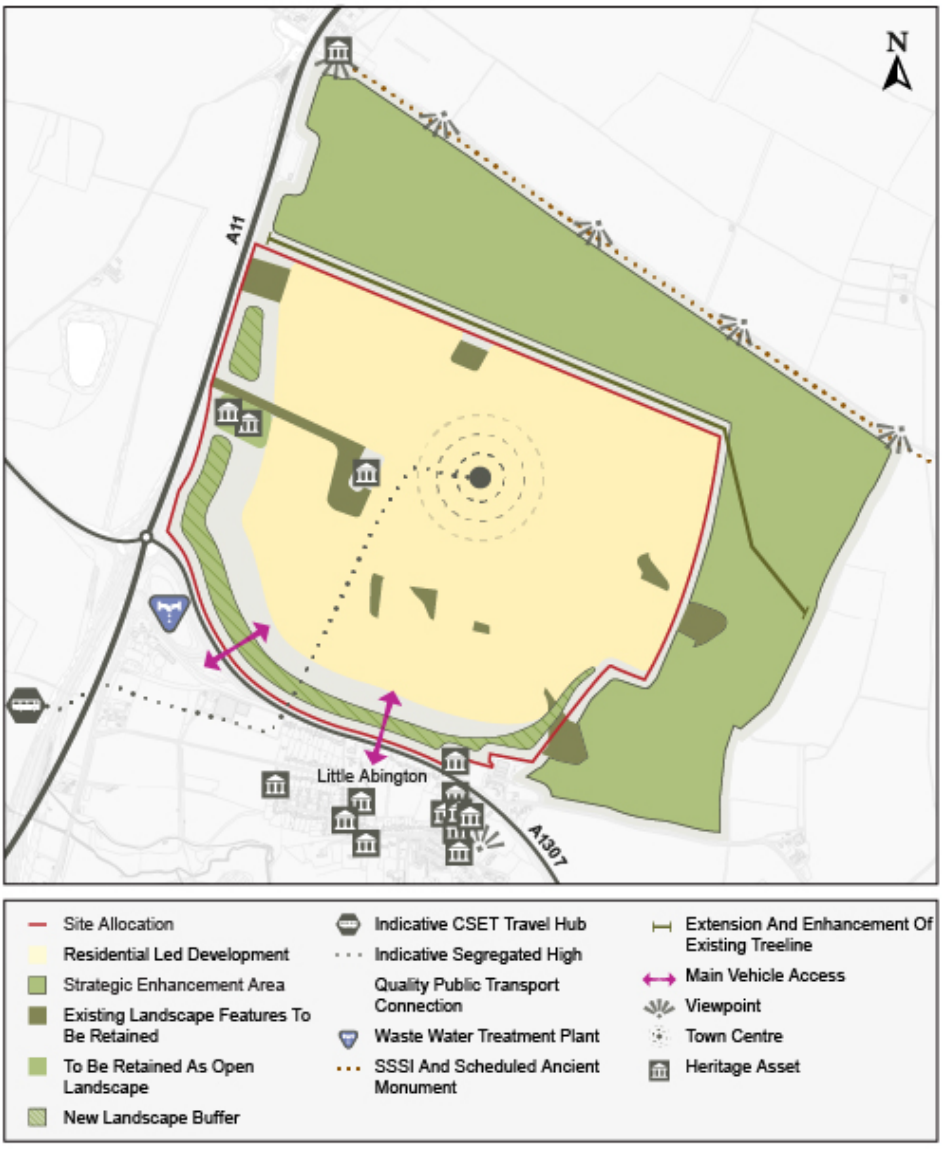


Figure 3: Spatial Framework for Cambridge Biomedical Campus (including Addenbrooke's Hospital)

FIG 31 SA_CBC Cambridge Biomedical Campus

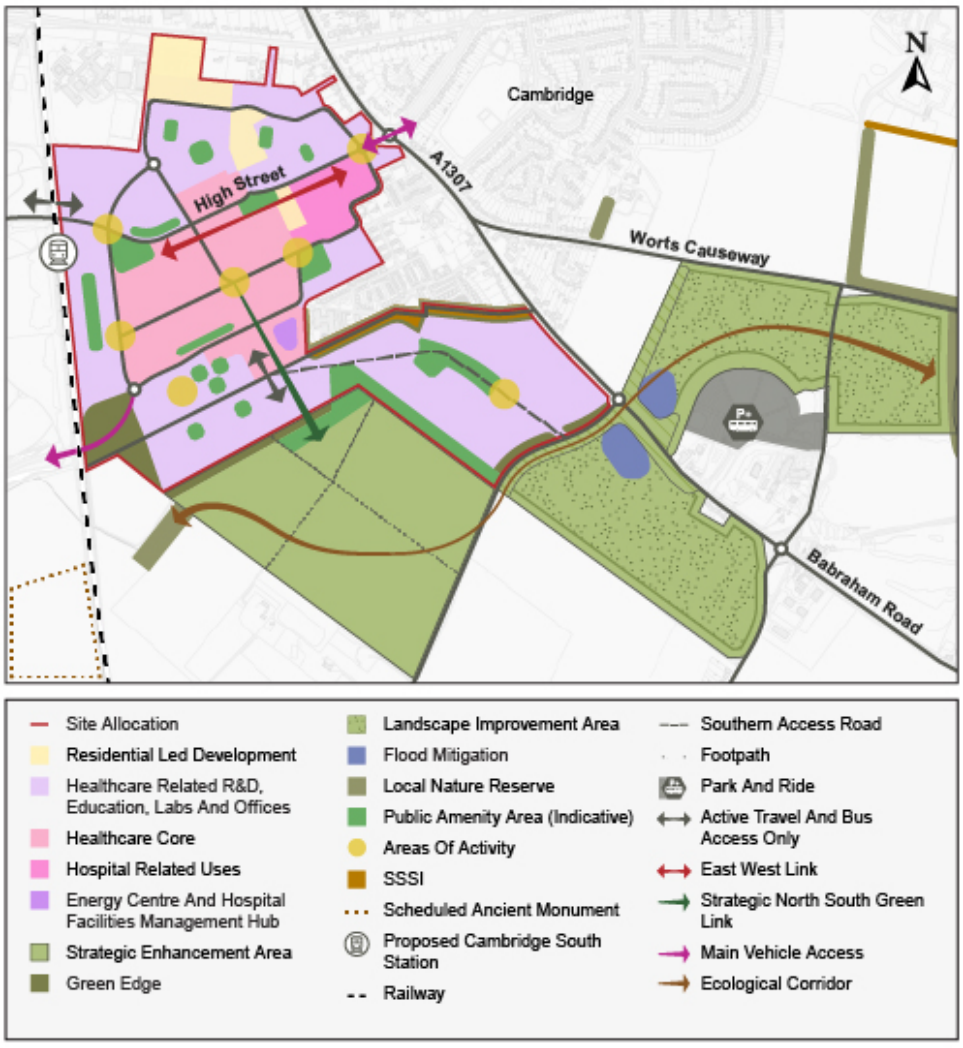


Figure 4: Spatial Framework for S/CE: Cambridge East

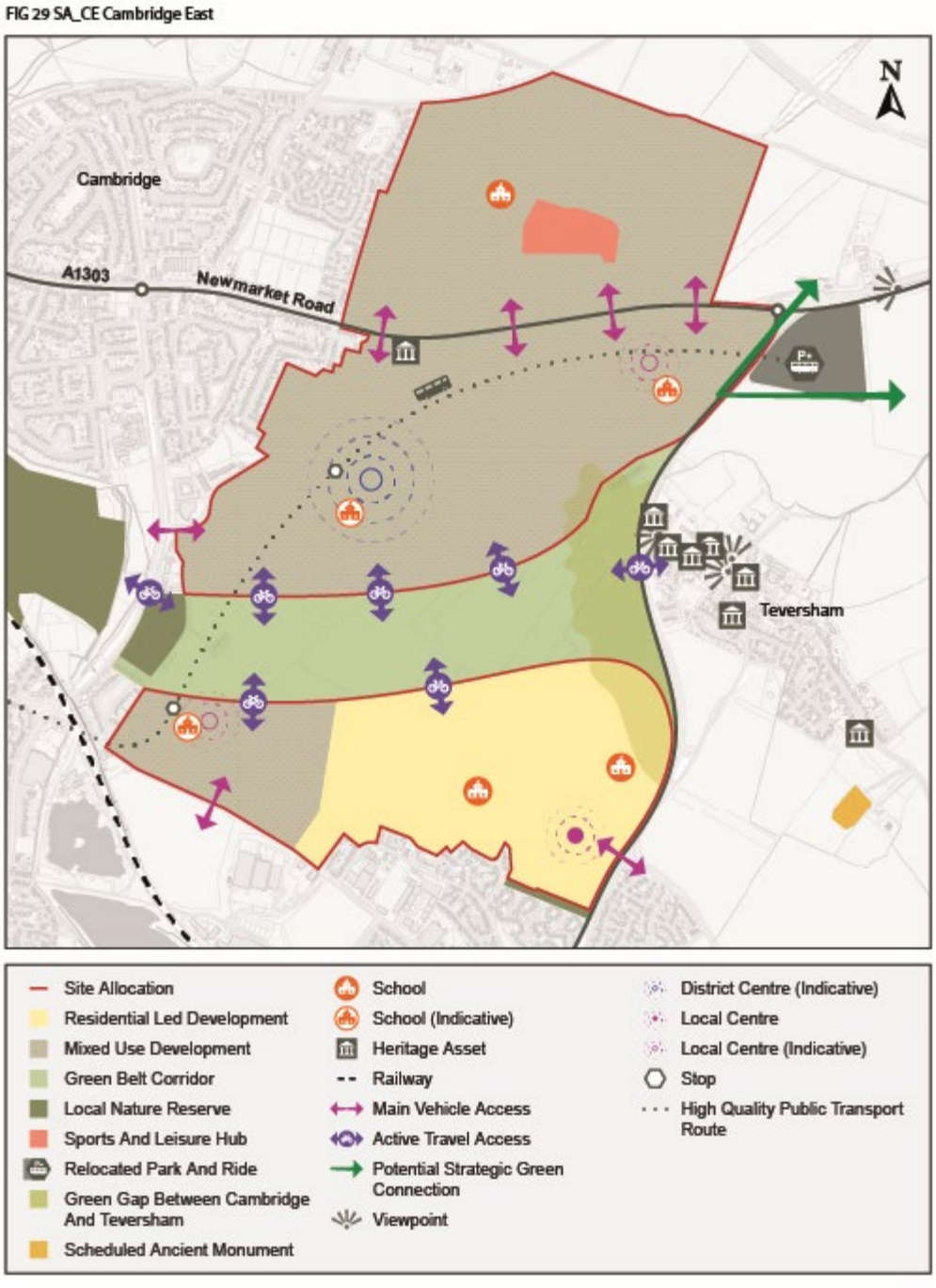


Figure 5: Spatial Framework for S/C/CJ: Cambridge Junction and Cambridge Leisure, Hills Road and Clifton Road Area

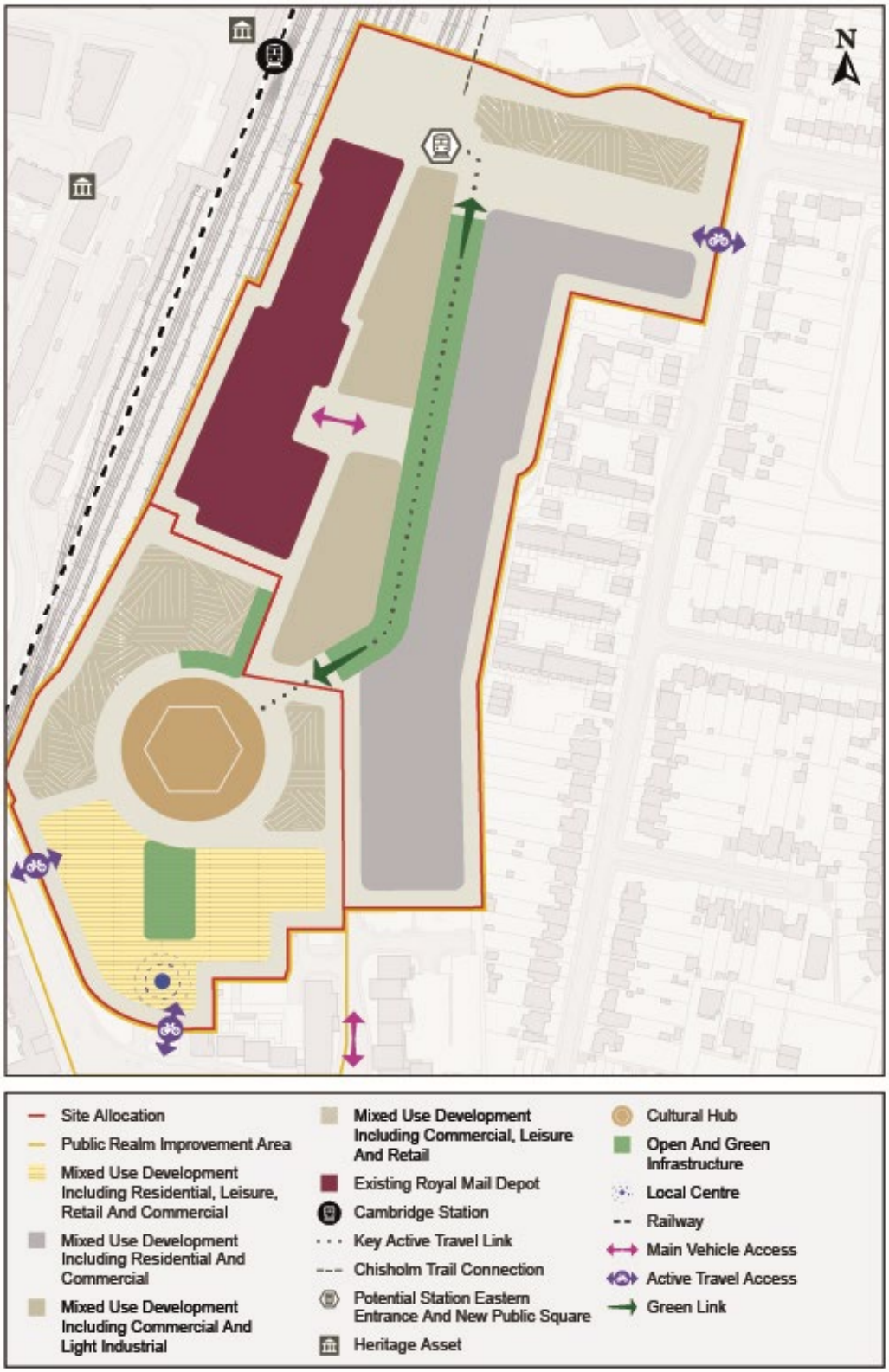


Figure 6: Spatial Framework for Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)

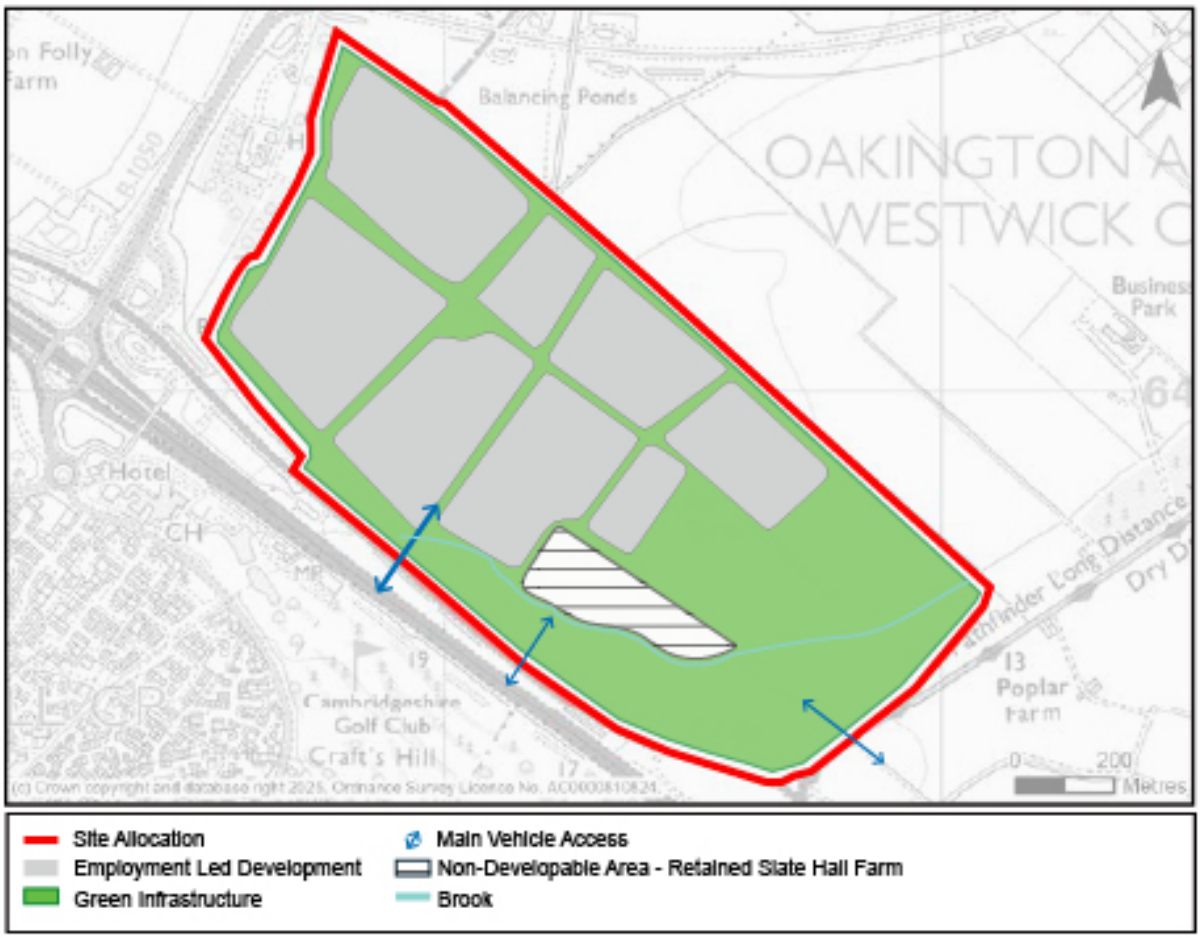


Figure 7: Illustrative map showing locations proposed for New housing Development from 2024 to 2045

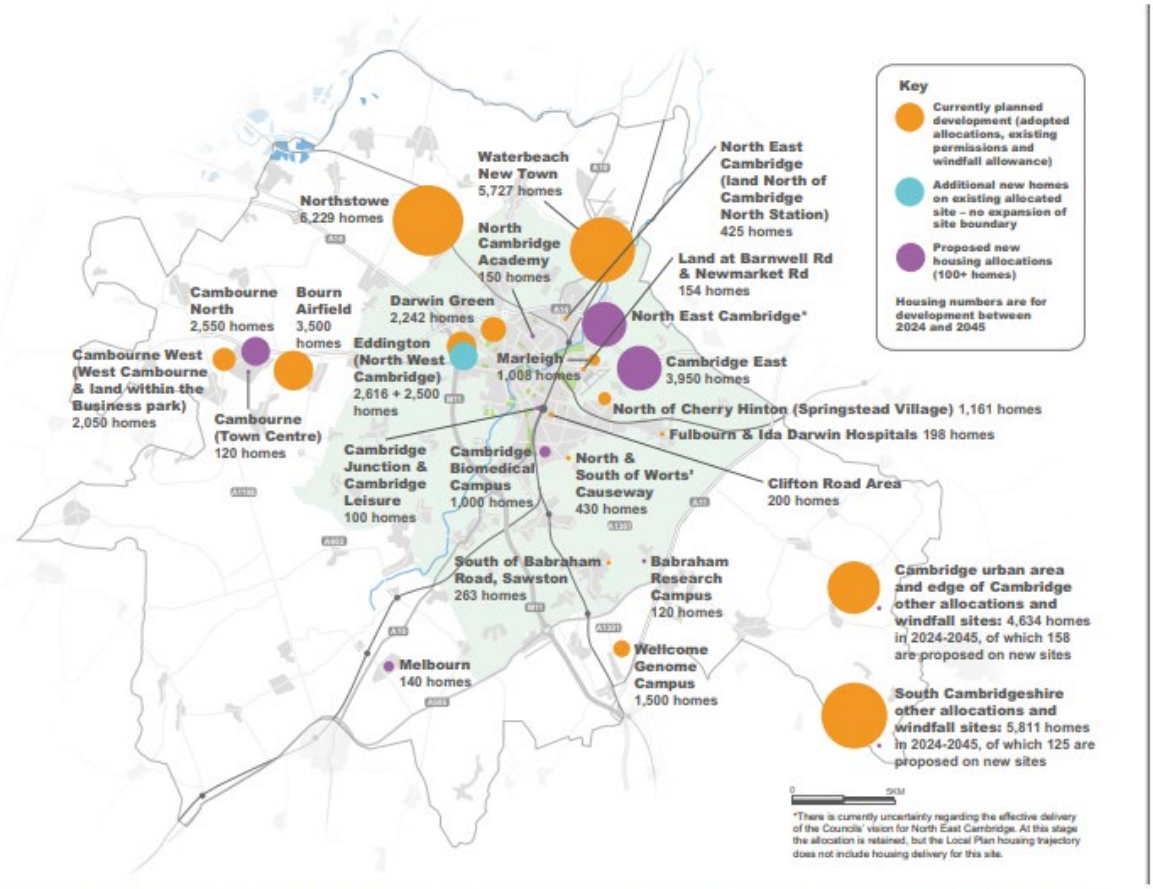


Figure 9: Illustrative map showing locations of proposed new housing development from 2024 to 2045

Joint Design Review
Cambridgeshire Quality Panel & Greater Cambridge Design Review Panel

Draft Greater Cambridge Local Plan
Consultation Dec 2025 – Jan 2026

Meeting Agenda
Meeting Rm 1, First Floor, Mandela House
Friday 30 January 2026

Panel Members*:*

Robin Nicholson: Chair Cambridgeshire Quality Panel: Chair of the Session

Members of the Greater Cambridge Design Review Panel

Eleanor Fawcett – Chair GCDRP
Ian Johnson – Manager for Heritage and Compliance\Bedford Borough Council - Conservation
Ben Coleman – Urban Planner (transport), Associate at PJA - Connectivity
Nopi Exizidou – British Antarctic Survey, Cambridge - Climate
Vanessa Ross – Director at Arc Landscape Design and Planning Ltd - Landscape
Tahmina Begum – Support and Advice Worker, Camsight - Access

Members of the Cambridgeshire Quality Panel

Simon Carne, Architect/Urban Designer – Character
Oliver Smith, Director 5th Studio - Climate
Luke Engleback, Owner Studio Engleback – Landscape
John Dales, Director Urban Movement – Connectivity
David Birkbeck, Chief Executive Design for Homes – Character

LPA Officers from Greater Cambridge Shared Planning:

Lizzie Wood – Policy Team Leader
Jonathan Dixon - Policy Manager
Terry De Souza – Policy Team Leader

Trovine Monteiro – Built Environment Team Leader
Anna Jeffery – Principal Urban Designer / Design Review Panel Manager
Tom Davies – Senior Urban Designer / Design Review Panel Manager
Maxine Ross – DRP/Support Officer

Timetable*

9.30 – Arrival and Tea

Session 1: Local Plan Vision & Development Strategy
Summary of the Greater Cambridge Local Plan | Greater Cambridge Shared Planning
About the Plan | Greater Cambridge Shared Planning
Development strategy | Greater Cambridge Shared Planning

10.00 - 10.30: Briefing on Local Plan, Development and Spatial Strategy: Presentation by Policy + Questions

10.30 - 11.30: Panel Discussion (Joint) and Chairs Summary

11.30 – 12.00: Tea Break

Session 2: Site Allocations: Key Sites
Site allocations | Greater Cambridge Shared Planning

New Settlements Sites
- Cambourne North
- Land Adjacent to A11 and A1307 at Grange Farm

Edge of Cambridge Sites
- Cambridge Biomedical Campus
- Cambridge East

Cambridge Urban Area
- Cambridge Junction and Cambridge Leisure and
- Clifton Road Area

Rest of the Rural Area
- Land north of A1307, Bar Hill (Slate Hall Farm)

12.00 – 12.30: Briefing on Site Allocations: Presentation by Policy Officers + Questions

12.30 – 13.30: Panel's Discussion and Summary on New Settlements and Edge of Cambridge Sites – Led by
CQP Chair

13.30 – 14.00: Panel's Discussion and Summary on other sites on Cambridge Urban Area and Rest of the
Rural Area - Led by GCDRP Chair

14.00 – 14.30: Lunch Break

Session 3 Development Management Policies:

Draft Greater Cambridge Local Plan for consultation | Greater Cambridge Shared Planning
- Climate change
- Biodiversity and green spaces
- Wellbeing and social inclusion
- Great places
- Jobs
- Homes

- Infrastructure

14.30 – 15.00: Briefing on the intention of the key Climate, Biodiversity, Wellbeing & inclusion, Great Places,
Jobs, Homes and Infrastructure. + Questions (Presentation by Planning officers)
15.00 – 16.30: Panels Discussions (Joint) and Chairs Summary

* *Please note that the timings allocated for the meeting are for guidance only and are subject to change.*

Consultation Statement

Appendix 4: Response to Representations - Summary of the Plan



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

Summary of the Greater Cambridge Local Plan

Abbreviations

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

Summary of Main Issues:

A number of comments offered broad support for the draft plan and its approach. Issues sited include approach to balancing support for the economy with environmental and social issues. The importance of ensuring that the policies and principes were effectively applied was mentioned in a number of the comments.

Some representors expressed concern about the level of growth that was proposed by the draft local plan. The impact of development on the area, that it was overly focused on economic development, and that government focus on Cambridge meant people had little say. Impacts of growth ion infrastructure, congestion and character of the area where mentioned, as well as concern about the impact on the heritage of the area. There was also concern that it wasn't addressing problems, such as a lack of affordable housing, and transport.

Other comments considered that the plan did not respond to the needs of the economy or to government aspirations. Some stated that plan was not delivering enough for villages, and considering how villages could be made more sustainable.

Some commentors considered the plan should have less focus on climate change and biodiversity, and more on meeting community needs. Others were concerned that the plan would not deliver its climate ambitions because of the scale of proposals.

Comments were made on the summary on particular sites. Concern was expressed about the impact of East West Rail and Cambourne North, including on wildlife, heritage, and the impact it would have on surrounding communities. Land adjacent to A11 and A1307 at Grange Farm raised a number of comments objecting to the proposal, similar to these made on the site policy itself, including questioning the choice of site, landscape, biodiversity and heritage impacts, transport access, and the impact on nearby communities. A number of other sites were referenced in comments, wither seeking their inclusion or supporting their omission from the plan.

On infrastructure, comments from emergency services bodies sought to ensure their areas were appropriately addressed by the plan. Other comments highlighted the importance of infrastructure being delivered when it is needed, and examples were sited of when this had not happened. Specific infrastructure issues were mentioned, including the need to support food growing.

Comments on cultural infrastructure stressed the importance of maintaining and funding provision, including if the Junction is redeveloped.

A wider variety of transport issues were raised. There was concern about the quality of bus services, and that they would need to be improved to accommodate growth. Light rail was suggested by some. More needed to be done to support active travel, and this should be a high priority when designing places. The quality of road infrastructure was raised, including concern about potholes.

Some representors raised concern about the format of the draft plan consultation. The level and technicality of the consultation material and the consultation platform may have discouraged participation. Some also question the difference consultation made, as the local plan hadn’t changed significantly form previous stages.

Other comments picked up a variety of issues.

Response to representations

Comments offering general support for the draft plan and the approach are noted.

The level of homes and jobs being planned for has been carefully considered, and is justified by the evidence being published alongside the Local Plan. National planning policy requires local plans to respond to the needs of the area. We

have considered the needs of the economy and likely growth in jobs, and the number of homes needed to support it. This also accords with the standard method of calculating the needs for homes set by government. We have tested a range of strategic development approaches, considering their impact on economic, social, and environmental issues, and have developed an appropriate spatial strategy to accommodate development needs whilst and protecting the environment.

The strategy for villages has allocated sites where it is sustainable to do so as part of the wider development strategy, but also included policies which would support appropriate windfall development and rural exception sites. Neighbourhood planning also remains a toll available to parishes if they wish to address local issue directly.

The development strategy proposed has been strongly driven by climate change considerations, along with a set of robust policies to ensure the form of development responds as well.

On specific sites, the issues raised on Cambourne North and Land adjacent to A11 and A1307 at Grange Farm have been carefully considered and addressed in the evidence related to site policies. They are considered to remain appropriate elements of the development strategy. Comments supporting the omission of specific sites are noted.

The plan has been informed by a significant evidence base related to infrastructure provision. This includes and Infrastructure Delivery Plan, and topic specific evidence such as related to water supply. Policies seek to ensure that the right infrastructure is provided when it is needed. This has included liaison with emergency services, healthcare and education providers. A study specifically exploring food growing was also commissioned to inform the plan. The plan has also been informed by a study exploring cultural infrastructure provision.

Cambridgeshire and Peterborough Combined Authority are producing a Greater Cambridge Transport Strategy. This identifies how transport measures will accommodate planned growth. A draft is being published alongside the Proposed Submission Local Plan. The development strategy has also been subject to transport modelling, used to identify the specific measures need to support development.

Comments on the consultation platform are noted. We endeavour to improve our consultations and learn lessons from each stage, so will take on board comments. We aim to make the consultation accessible, and offer help to anyone to make sure they can have their say. In terms of responding to the feedback, we cannot always change the plan in the way individual comments seek, but we carefully consider all comments received.

Table of representations:

Comments expressing general support for the plan

Summary of issues raised in comments	Comments highlighting this issue
Strongly support the Plan's: • Commitment to planning positively for innovation-led economic growth, informed by robust local data and an understanding of the clustered nature of the Cambridge economy. • Recognition of the need to plan for a diverse range of housing types and tenures, ensuring that housing delivery keeps pace with job growth and supports workforce retention at all stages of life. • Support for flexibility and headroom in employment space and housing provision, enabling the Plan to respond to higher-than-anticipated economic performance. • Emphasis on innovation infrastructure, including the intensification and evolution of existing clusters, campuses and science parks. • Integrated approach to infrastructure planning, including transport, utilities, digital connectivity and energy, and the recognition that delivery depends on strong system-wide alignment across multiple strategies and delivery bodies. • Support for appropriate densification to high design and environmental standards, particularly in locations well served by transport and services. • Balanced provision for "whole economy" needs, including mid-tech, industrial and logistics space.• Commitment to climate change mitigation, biodiversity net gain and high-quality placemaking, which are essential to long-term competitiveness. We also support the Plan's recognition of Greater Cambridge as the intellectual and innovation engine of the Corridor. The success of Greater Cambridge underpins growth across the wider Corridor, including in Stevenage, Harlow, London and Peterborough, supporting high-value jobs, skills pipelines and resilient supply chains.	208493 (UK Innovation Corridor)

Summary of issues raised in comments	Comments highlighting this issue
CA welcomes the vision of good growth, which balances support for the internationally significant innovation economy with improved quality of life for local communities. We support the use of robust local data and the recognition of the clustering nature of the economy, alongside flexibility to allow additional commercial space and housing where performance is strong and infrastructure constraints are addressed. The Plan's reliance on externally delivered infrastructure, particularly transport, highlights the need for system-wide alignment. Greater flexibility on high-quality densification and a more strategic approach to grey belt assessment would further support sustainability, housing delivery, and growth objectives.	203517 (Cambridge Ahead)
We are very supportive of the proposed themes and strongly support the high aspirations of this proposed local plan including the policies on Climate, biodiversity, water management, well being and social inclusion, green spaces, jobs, homes and infrastructure	202817 (Cambridge City Council Liberal Democrat Group)
Linton Parish Council (LPC) are broadly in favour of the principles included in the draft Local Plan. LPC are in favour of avoiding the spread of development throughout local villages as thus smaller scale development would fail to provide adequate infrastructure and services.	201672 (Linton PC)
Comments offering general support include: • I think this sounds good. • This sounds amazing, especially the boosted housing, public transport and access to green space in a currently enclosed Green Belt area. • Support your vision, development strategy and development specifics for the Local Plan. I understand that some of the specifics are dependent on adequate infrastructure including water, which is as it should be. • An incredibly large amount of work has clearly gone into the development of the Draft Greater Cambridge Local Plan, which residents really appreciate.	200990 (C Leach) 201000 (H Hale) 201004 (M Colville) 201161 (S Oliver) 201028 (A Harris)

Summary of issues raised in comments	Comments highlighting this issue
• The overall conclusions appear to be sensible and heading towards a valuable plan. I therefore agree with the majority of proposals, although, as ever, there is of course room for some improvements • Principles need to be adhered to - don't let developers wriggle out of provision of affordable housing, green space, contributions to infrastructure (e.g. schools, Addenbrooke's hospital, GPs); ensure developers build these things first not last. • All sounds very sensible, if can be delivered without compromising - especially around green spaces, provision of infrastructure, avoidance of reliance on cars and provision of water supplies. These are areas where corners are so often cut. • I support the goals of the plan. Wellbeing in communities is important to me. I have been active in campaigning for play spaces for children and teenagers. I see these squeezes out by the completing goals of land for housing and land for biodiversity and nature. I would like to see these specifically called out so they are not lost, and recognition that play is an appropriate activity within some green spaces. • The plan is largely broad principles/intentions, well evidenced and aligning with environmental, well-being and key planning concerns e.g. transport, housing, work and commercial. • Encourage you to find ways to discourage car use and eliminate parking on pavement. • Agree with the aims. Am concerned about university/town differences. • Congratulations to all involved for producing very good Local Plan. May the policies be implemented as clearly as stated. I particularly welcome the proposed balance of environmental and economic factors: GDP is an inadequate measure on its own. I support efforts for reduced climate change impact and development standards higher than national ones • I very much support the emphasis on environmental sustainability, especially recognising the need to ensure from the start the use of active and sustainable transport instead of reliance on cars. I support the net zero goals.	201422 (Residents Association of Old Newnham) 201817 (T McKeown) 202135 (H Lowe) 204351 (J Nelson) 203538 (P Blandford) 203861 (J Prince)

Comments on levels of development

Summary of issues raised in comments	Comments highlighting this issue
I believe the whole plan's premise about the growth of Cambridge is wrong. Being more than familiar with Silicon Valley, I shudder at the phrase Silicon Fen. I also wonder what happened to levelling-up. Why should we continue to grow at the expense of northern areas? Cambridge has neither the resources (i.e. water) nor the infrastructure to support the envisioned growth. The City is already overcrowded. It's unrealistic to believe that all these new developments won't add to the overcrowding.	200991 (R Engler)
I have very mixed feelings about this plan and feel a lot of what you are saying you would like to do is an empty promise and you are not thinking of local people. You do not have the local communities in your thoughts just profit.	201353 (D Wood)
The Government has made a great mistake in defining this area as a priority for 'sustainable economic growth'. Growth is not sustainable in this area.	201421 (S Page)
Central Government wants this development, and individuals have little say	202650 (K Leslie)
Object, I find it frustrating that the plan means even more homes for Cambridge. Having lived here for 18 years I don’t recognise the city and don’t even bother going in shopping at weekend as its too busy and cant move for people. It is sad Cambridge is over crowed and now covered on graffiti and it feels sad where the City is heading. it is a small market town and having 1000s more people means more impact on infrastructure. I think they need to really think about the amount of houses are being built. The city cannot cope with more people.	202423 (R Larkum)
Object, too many of the massive housing developments are occupied by people not from Cambridge, not conforming to Cambridge standards (in business, culture, motoring, lifestyle, tax compliance etc) which causes problem for native Cambridge residents, lowering the quality of life and creating congestion, crime, pollution, services shortages etc. Too much bland and characterless housing is	202542 (C Turner)

Summary of issues raised in comments	Comments highlighting this issue
being put forward simply to create extra council tax revenue without proper (genuine) consideration about the negative effects on life in Cambridge. Over development is also causing problems for wildlife.	
The plan is unreasonable, incomprehensible, utter madness and will create social dysfunction making a mockery of what community is about. The plan needs to be completely revised and placed where local infrastructure could accommodate such an idea. All that is happening on top of all comments above are the landowners reaping even more wealth to accommodate their utter greed and their complete indifference to what a community is about and which is so important in the very difficult world we are now living in.	204432 (S Barron)
Object as Vision is fundamentally not Sound, due to 3 major omissions: 1) It fails to recognise and protect Cambridge's world heritage significance; 2) It totally fails to recognise and manage current conflicts between current growth, let alone the proposed, and the finite physical and environmental constraints of Cambridge and its hinterland; and 3) no evidence, let alone adequate evidence, is provided to show that the proposed levels of growth are "sustainable", and the claimed vision is even remotely feasible. It is shocking that tall buildings proposals are made with no visualisations to show the potential impacts of what is proposed.	203347 (J Preston)
The draft plan is a pipe dream. New housing thus far is ugly. For example, The Marque is beyond hideous. If there no funding for a new sewage works then there is no hope for a new reservoir in the Fens. By 2045, our pot holed roads will have disintegrated and diesel pick up trucks will be needed to traverse them not EVs.	201524 (S Biggin)
You should be working on travel-to-work areas not tight bureaucratic local government boundaries. You do not seem to take into account the government's latest ambitious targets for growth. Without close collaboration with the Mayor and the Cambridge Growth Company your planning exercise is already redundant. Your reliance on the Greater Cambridge Partnership to find solutions is risible.	201267 (A Duff)

Summary of issues raised in comments	Comments highlighting this issue
Supports the Draft Greater Cambridge Local Plan, recognising the need for growth to maintain inclusivity, prosperity, and environmental responsibility. The proposed housing and employment growth is justified but advocate for a more ambitious approach to address the chronic housing shortage. Important to deliver urban regeneration, prioritising brownfield sites and high-density development near transport hubs to enhance sustainable housing delivery. Supports the plan's targeted approach to Green Belt release but suggest remaining open to further reviews to provide well-connected housing and green infrastructure.	201313 (E Munday)
Negative effects of ongoing housing development in village, including road closures and damage caused by heavy vehicles.	201932 (C Pillinger)
My main two failures of this plan are transportation and affordable (housing). Comments include public transport too expensive, developments like airport site will create gridlock. Putting labs in centre will exacerbate problems, with no decent transport proposal. Reopen Cherry Hinton station, upgrading rail links, and building manufacturing plants near railway lines to support future economic needs.	204505 (M Day)
Housing growth is too dispersed while employment remains concentrated around Cambridge.	203304 (J Day)
The plan does not achieve the government’s clearly set ambitions for Greater Cambridge, in which the Greater Cambridge area is foremost in plans for national economic growth. It also misses the specific national policy to support the expansion of the Cambridge Biomedical Campus with associated housing delivery. The Local Plan as currently drafted does not align with the ambitions set out in the Local Growth Plan which aims for a 15% increase in housing by 2035, increasing to a 54% increase by 2050. Government guidance on Local Growth Plans (July 2025) states that they should be the “guiding star” that provides direction for other relevant plans and strategies which should “align” with the Local Growth Plan.	208211 (Pigeon Land and LIH)

Summary of issues raised in comments	Comments highlighting this issue
City centre is too small and too crowded for this over expansion. Green transport is not encouraged by the state of the roads. New developments are not sympathetic in size and scale. The main arteries in and out of Cambridge are clogged already.	202560 (K Leslie)

Comments raising points around the strategy for villages

Summary of issues raised in comments	Comments highlighting this issue
Great Wilbraham Parish Council (GWPC) is concerned that the Local Plan disadvantages our residents and 60k residents in 'Group and Infill' villages in favour of those in new developments and larger, better-connected villages. SCDC is one of the most rural populations in the country, but when considering infrastructure to make communities viable and sustainable and fulfil key strategic themes we are being ignored. Great Wilbraham has close historic, social and geographic links with Little Wilbraham and Six Mile Bottom. The two Parish Councils would like to work together informally and with the Council to develop a strategy for sustainability.	203329 (Great Wilbraham PC)
Support your vision but I don't think the policies and spatial allocation that you have laid out in this Plan are strong enough to deliver on it. I'd like to see more homes near to the jobs (e.g. within the city), more homes around South Cambridgeshire villages with rail stations and more mixed-use development.	205231 (A Wiliams)
The plan clearly treats South Cambridgeshire's towns, villages, and parishes as an inconvenience. Designed and shaped exclusively by and for Cambridge and Cambridge University interests, it marginalises South Cambs. Among thousands of lines, only a brief paragraph acknowledges South Cambridgeshire, effectively dismissing it as inconvenient for delivering infrastructure you have failed to provide over the past decade. Once again, over 120,000 residents are ignored and used as cash cows to support the Cambridge economy. Many people who live and work in Cambridge actually reside in	201302 (I Koutoudis)

Summary of issues raised in comments	Comments highlighting this issue
South Cambs, yet their needs for infrastructure, healthcare, leisure, and wellbeing spaces are repeatedly overlooked.	
Much more must be done to encourage businesses to establish offices / factories / workshops (perhaps as satellites of their HQ) in the larger villages in South Cambs (e.g. Gamlingay) to give the people who live there (and the nearby smaller villages / hamlets) the opportunity to work locally. This will enable them to walk, cycle or drive a short distance to work rather than commute to London or wherever with all the benefits that will bring to the environment and their health – as well as enabling more use of local shops and other facilities sustaining the local economy. What was the village's main industrial area has been turned into a giant housing estate with, seemingly, no thought given to local employment opportunities.	201555 (P Mann)
The attention given to the rural settlement is as vital as it is for new areas. I am supportive of the goals and strategies in the main, but the tactics needed to make sure the existing grows in concert with the new cannot be overlooked. We need the same visioning exercise to take place in say Elsworth as we do Cambourne North. What is the typology of say Elsworth by 2050.	204705 (M West)
“We want our rural villages to continue to thrive and sustain their local services, but we don’t want to encourage lots of new homes in places where car travel is the easiest or only way to get around.” This approach fails to conform with Paragraph 83 of the NPPF. It also fails to recognise the changing work patterns since Covid-19, with recent ONS studies confirming that 28% of working adults in Great Britain hybrid worked between January and March 2025, representing a rise since March 2022.1 Further, the UK Government’s commitment to zero emission vehicles by 2035, which falls within the draft Plan period, promoting the change to electric vehicles.	211582 (Mr & Mrs Smith)

Comments focusing on Environment and Climate change

Summary of issues raised in comments	Comments highlighting this issue
• Object, should have less emphasis on climate change and biodiversity. • The plan has far too much on environmental issues and far too vague a commitment to providing the services needed for such an increase in the size of the community. • Object, Plan bends too much towards climate change, its theories, and its unpredictable and unproven solutions. the council has no business playing god or scientist on this issue and go back to its core duties.	205520 (P Zirngast) 202553 (S Pattinson) 202542 (C Turner)
• Object, Greenhouse gas emissions from constructing the planned 1.5m new homes will exceed interim targets for emissions, and future high emissions are built in which will break the 2050 net zero target without fixing the housing crisis as the distribution of property and its use short-term lets not homes are not dealt with. The Cambridge Plan is part of this. The vision and plan contain a lot of warm words about climate change and biodiversity, but actually in Cambridge isn't in line with these aspirations. Scale and nature of development does not support green building methods. Redeveloping Cambridge market not compatible with climate aspiration. Plan is out of line with national climate and biodiversity targets. • Summary doesn't mention the extreme water stress that Cambridge and the surrounding area suffers from. Climate change will make this worse. No development should be allowed that increases the area's need for water.	203642 (A Copping) 204762 (R Randall)
My confidence is not enhanced by a statement that a 'climate emergency' has been virtuously declared. My take-home from all this is that lots of homes are going to be built in various places whether existing residents like it or not.	201029 (C Pillinger)

Comments on specific sites

Summary of issues raised in comments	Comments highlighting this issue
Cambourne North • Question whether it will result in a genuinely well-planned town with appropriate infrastructure, services, and amenities, or whether it will simply extend an already vast housing estate with only a handful of shops and limited community facilities. • Proposed site for the EWR station and North Cambourne is located on valuable arable land, woodland, and hedgerows, could negate conservation efforts, such as those by the RSPB at Hope Farm • Tranquillity of our village, our home, will be shattered by the huge volume of traffic coursing through the narrow roads • Plans for a multi story car park and link from Cambourne adjacent to designated heritage assets are not enhancing and protecting the fragile barns and house. • Routes from Cambourne should be moved away from existing dwellings. All crossings should include NMU access (including equestrians) to link and extend the bridleway around Cambourne. A new perimeter bridleway should be made as has been in Cambourne.	203722 (G Chamberlain) 203922, 203926 (T Hegan) 201638 (C Doel)
Land adjacent to A11 and A1307 at Grange Farm Comments raising objections with points including: • A1307 is a dangerous road with a history of serious and fatal accidents, The road is severely congested so unless there is a serious transport solution this is not the right location. Access from A11 have been overlooked. • Before any additional development occurs in this area a serious review of schooling • GP practices and local services overburdened. Increased pressure on Addenbrookes and the NHS.	204947, 205621 (M Munns) 205676, 201925, 205677 (M Miles) 204109, 208515, 208516, 208517 (Z Luscombe) 203574 (J Graham) 202072 (M Barry)

Summary of issues raised in comments	Comments highlighting this issue
• Despite reassurances, indicated boundaries have been exceeded and sewage treatment plant is on opposite side of A1307 plus a transport link to the site is via Comfort Cafe land and adjoining field before crossing A1307. • On the flight path to Duxford so any housing could be at risk. • The original HELAA assessment, before the December 2025 update scored the site as RED on suitability grounds. • Damage to the Chalk Stream / aquifer, creation of flood risk • Adverse effects on the Roman Road Site of Special Scientific Interest, stopping irreparable damage. • Archaeological sites there require significant protection, • Impact on character and views, overwhelm nearby villages. • Loss of agricultural land • Other sites would be better.	203416 (D Barkataki) 207553 (C Tjen)
North East Cambridge No reliance should be placed on the council's ability to relocate the Cambridge Waste Water Treatment Plant (CWWTP) and the residential component of Hartree should not be included in prediction of housing numbers.	201314 (E Green)
Kingsway Solar and Forest City I am very concerned about the proposed Kingsway solar farm destroying the countryside. There is also the proposed Forest City how does this match with Cambridges expansion and policies? It appears here in south east Cambridgeshire we are under siege and no one is showing any concerns	201491 (S Jaques)
I strongly support withdrawal of West Fields as potential development site (a Trojan horse).	203538 (P Blandford)

Summary of issues raised in comments	Comments highlighting this issue
Sites are described as “proposed sites” when several developments are clearly already underway. Deeply concerning.	203722 (G Chamberlain)
Site reference 115524 Site would be a disaster for this community. Site 115524 was given an Overall Score of 'Red'. The exclusion of Site 115524 must be permanently enforced. That will protect our vital, extremely limited and increasingly pressurised local amenity space - noting St Matthew's Piece (Cambridge) as the only public park in North Petersfield.	201488 (E Guild)
Object, I am most worried about the traffic and Road capacity through Boxworth and the surrounding villages. There are no clear plans for additional road capacity. The character of the village setting will be completely spoilt. The access to any of the sites along the A14 should not be from Boxworth Road.	201729 (I Negus)
Walled Garden, Whittlesford Object, site should be put back in the plan.	204319 (C Forbes-Cable)
Sites ECC notes that the Plan seeks to help the Genome Campus “employment park evolve into a place, supporting delivery of local services and facilities and helping it to find its place in the network of towns and villages” (page 21). Furthermore at Granta Park the Local Plan is seeking to support its continued success. For both locations, given their proximity to Essex it is essential that the Local Planning Authorities works collaboratively with ECC and other partners, to ensure consideration is given to the cross boundary impacts within Essex in particular connectivity to similar businesses within Essex – Chesterford Research Park within Uttlesford and industries within Harlow; as well as connections to London Stansted Airport. Attention is also drawn to ECC’s role as a neighbouring infrastructure and service provider with statutory roles and responsibilities.	210460 (Essex County Council)

Comments on Infrastructure

Summary of issues raised in comments	Comments highlighting this issue
References to strategic infrastructure should include, "fire and rescue, police, ambulance".	207472 (Cambridgeshire Constabulary) 207505 (Cambridgeshire Fire and Rescue Service)
Highlights importance of adequate healthcare infrastructure for sustainable development and recommends ongoing engagement with the NHS, specifically the ICB, during the preparation of the Infrastructure Delivery Plan (IDP). Healthcare costs should be included in the Local Plan Viability Assessment for relevant development typologies to ensure developers are aware in advance of potential contributions towards healthcare infrastructure.	205178 (NHS Cambridgeshire and Peterborough Integrated Care Board)
ECC notes and welcomes that this section of the Greater Cambridge Local Plan states “development will only be allowed if it is accompanied by the right infrastructure that will deliver the range of supporting services, facilities and infrastructure that workers, visitors and residents need that deliver the goal of making it a world class campus (page 19 of summary for development strategy).	210459 (Essex County Council)
Section 106 must cover adult skills for career switchers	202356 (A Carpen)
Requests a transparent assessment of the costs associated with proposed changes and clarity on who will bear these costs.	201933 (C Pillinger)
Harston PC highlight the need for enhanced local services, such as healthcare and community spaces, to support future growth in the village. Sustainable Energy: The Parish Council supports the inclusion of local sustainable energy solutions but not at the expense of the surrounding farm land/amenity areas or the other policies in the Neighbourhood Plan.	201612 (Harston PC)

Summary of issues raised in comments	Comments highlighting this issue
Facilities provided in new developments have arrived too little too late. e.g. pupils in Darwin Green are having to go outside Cambridge and Northstowe is woeful. There is no sign that lessons have been learnt. There need to be integrated care centres that do more than just gp services. Too much development, e.g. Cambridge North area is bland, soulless, corporate and mediocre. There is no sign of this being addressed.	201722 (A Milbourn)
Build communities. Do not discriminate against one group because it isn't all of the groups. E.g., why can't my church hire the community centre regularly? Why isn't there space for a church building on site? Allow community building.	207152 (R Forder)
Food Growing • Young, passionate growers are dissuaded by the denial of access to good land; huge initial capital outlays; prohibitive planning procedures; logistical problems of parking and distribution opportunities. Missed a section on market gardening of fruit and vegetables for people to actually eat, I only saw one mention of environmentally friendly farming. • Cambridge cannot achieve its net zero ambition without a strategy to transition to a more sustainable food system. Resilience in the food supply chain also needs serious consideration. For these reasons I feel the Local Plan should do more to encourage and support a healthy and sustainable local food system.	205183 (Y Dignon) 205452 (The Cambridge Organic Food Company)

Comments on Cultural Infrastructure

Summary of issues raised in comments	Comments highlighting this issue
Support Cambridge Junction in asking that (supported by Theatres Trust): temporary provision for all cultural functions must be secured before any demolition or displacement reprovision is delivered as an early phase; no gap in provision any future Junction is at least equivalent in standard and capacity, including audience, back-of-house, technical capability, servicing long-term operational/financial viability assessed alongside spatial design delivery governed through a structured process (CJ/Council governance, RIBA stages, shared brief before developer engagement).	202799 (Cambridge Junction) 203841 (N Yeni) 204348 (J Capon) 205262 (N Oakley)
Support the recognition of the cultural and creative industries in driving employment and tourism, highlighting the role of local institutions like University Cambridge Museums, Kettle's Yard, The Junction and Cambridge Arts Theatre. They advocate for the inclusion of arts and culture in communities facilities in new settlements to help to establish and develop communities.	205037 (Arts Council England)
Wysing Arts Centre asks that Cultural Infrastructure is protected and enhanced, as a strategic civic asset; Create Cambridge is embedded in delivery, governance and phasing; artists are involved in masterplanning (RIBA Stage 2-3); Culture is treated as core infrastructure; genuinely affordable cultural production space is required (e.g. peppercorn, with rental charges well-below market rates and established based on evidence, ie Wysing Arts Centre's research on affordable artist studios); rehearsal, making and sole-use studios are prioritised over generic co-working, and that a minimum requirement (e.g., 10% in schemes over 1,000 sqm) is introduced.	204867 (Wysing Arts Centre)

Comments focused on transport

Summary of issues raised in comments	Comments highlighting this issue
Bus comments: • Concern about the lack of reliable public transport in Harston, especially to Cambridge and surrounding areas. We request that the Local Plan includes improvements to bus services. • As the population of the City grows not least with housing the role of the Bus is enhanced – some areas of the city have limited services. Bus infrastructure at Addenbrookes not suitable for disabled people. • Presently from north west Cambridge A14 corridor it takes up to TWO HOURS to get to the Biomedical Campus by bus. No direct links, you have to go into the city and change buses. If the Campus is earmarked as a location for jobs, and there is housing development planned for north west Cambridge, it is imperative that the bus service is vastly improved.	209972 (G Heathcook) 201612 (Harston PC) 201037 (P Spowart)
Light Rail comments: • The new towns need to be linked to Cambridge and each other by a new light-rail network Any light rail network needs to have light rail stops that have medium-high density housing *and* essential services/conveniences in the vicinity • Private vehicles belong the 20th Century and that public transport requires its own Vision to shape development in a strategic way with huge benefits to the quality of life which underpins true prosperity. I don't see such vision in the Plan. The answer is light rail. • There's no transit system in place once in Cambridge, we need metro, trams and other mass transit that is significantly faster and not congestion bound. • Civic welfare as well as economic growth depends on the installation of a mass rapid transit system based on light rail.	202356 (A Carpen) 204647 (P Pope) 201293 (T Roberts) 201267 (A Duff)
Active Travel comments:	202187 (R Forder)

Summary of issues raised in comments	Comments highlighting this issue
• Put it at the centre your treatment of active travel needs goals, metrics, and design intent. Give people better lives. Can they travel shorter distances? Can they travel more healthily, with less environmental impact? Can they leave the ICEV or EV at home? • "minimising...reliance on the private car" should be achieved with a focus on improving accessibility, functionality, availability, and affordability of other sustainable means of transport, rather than disincentivising private car use through financial penalties or absolute access restriction. • There are some good examples of cycle infrastructure, but there is a failure to understand that it has to be good for all journeys, not just parts of some. Despite the rhetoric there is too much car centricity in developments. The scale of development is going to add to the already massive congestion problems. • Transport is a major source of emissions and needs priority when planning and budgeting developments. Electric vehicles are not a helpful solution to congestion, and contribute to sprawling developments that put more pressure on existing road networks. Higher density development must come with much lower levels of car ownership, and parking should be an optional cost. Dense development needs strong walking, cycling and public transport to succeed. Walking and cycling connections should be required in all development designs. • Walkability, including for wheelchair and buggy users, should be a core spatial principle in the Greater Cambridge Local Plan. Supports the Plan's overall direction but walkability is not yet embedded strongly enough across the Vision, spatial strategy, design policies, transport policies, and health objectives	203558 (D Lever) 201722 (A Milbourn) 203304 (J Day) 201474 (M Reader)
Please stop making ordinary people lives difficult, stop creating congestion provide affordable housing. & don't/can't cycle 8+ miles all weathers & don't enjoy 1 1/2 hr bus journeys as opposed to 15 mins by car non peak, 25 mins peak times. leave Coton Orchard alone.	201027 (J Masterson)

Summary of issues raised in comments	Comments highlighting this issue
City centre is too small and too crowded for this over expansion. Green transport is not encouraged by the state of the roads. New developments are not sympathetic in size and scale. The main arteries in and out of Cambridge are clogged already.	202650 (K Leslie)
Current road infrastructure around Cambridge is inadequate for the existing traffic volume, leading to dangerous conditions. Public transport options have diminished, resulting in increased reliance on cars and further strain on the road network. The roads are poorly maintained, with deep potholes creating hazardous driving conditions, exemplified by the route from Elsworth to Dry Drayton. There is a pressing need to prioritise infrastructure improvements for residents before considering population growth in the area.	203919 (T Hegan)
As an east Cambridge resident I would like to emphasise attention to: Critical traffic management issues along Maids Causeway given the development of ARU. Critical need of improved cycle pathways and access.	202135 (H Lowe)
Fen Road Rail Crossing Traffic on Fen Road is heavily impacted by the extremely frequent closure of the level crossing, leading to dangerous speeding by vehicles. There are major safety concerns; someone may easily be killed by speeding traffic. To alleviate these traffic issues close the level crossing and either a) create an entry/exit to the A14 or b) build a road bridge across the railway.	202132 (R Meyer)

Comments on the Consultation

Summary of issues raised in comments	Comments highlighting this issue
Consultation format issues included: • Consultation platform is overly complicated and will put a lot of people off before they can comment suggesting that you do not really want feedback and are hiding behind IT to limit access/response. • The level of technical detail, volume of material, and time required create a significant barrier for ordinary residents. The average person will struggle to engage meaningfully, and many will simply give up. That is not inclusive engagement. • The relevance of field is not clear • The "Instructions" for the consultation on the GCSP website refer only to the use of the "OpusConsult" platform. This requires a registration process before any input. Although GCSP will accept input by post or by email, these options have been effectively concealed by failing to make this clear on the consultation website. Input from the public, particularly older people or other less "internet savvy", has been hindered and discouraged	201024 (P Zirngast) 208881 (D Smith) 201162 (D Quinn) 208634 (G Jones)
Consultation legitimacy points included: • Concern that housing developments will proceed regardless of local opposition, with insufficient attention given to the impact on existing residents and infrastructure. • Last Local Plan draft "consultation"--ZERO changes made despite 25'000+ researched comments received. Yet again, you are simply wasting taxpayers' money with this PRETENCE of democracy: yet another mere box-ticking exercise, with zero intention or legal obligation to implement changes based on public consultation. • Consultations are generally biased, on very limited predetermined options. They are generating apathy and disengagement with public affairs, they're a disgrace and waste of money.	201931 (C Pillinger) 203642 (A Copping) 202542 (C Turner) 203764 (A Wilson) 201030 (A Lindsey)

Summary of issues raised in comments	Comments highlighting this issue
• The plan is presented with deliberately obstructive questions and detours. For example, how is a citizen to know if the plan is legally correct? But the council blocks comments unless the citizen agrees with the council that it is • Process unduly prioritised those of set demographics. As a younger person in full time work I was obliged to miss work in order to attend local meetings.	

Other General Comments

Summary of issues raised in comments	Comments highlighting this issue
ECC acknowledges the national and international significance of the high tech industries, research and development and life sciences within the area. The economies of scale for such industries is also noted in their presence within West Essex, and in particular Uttlesford District and Harlow Town. In developing and shaping the existing and future economic clusters, ECC would welcome further engagement to ensure there is full consideration to the inter-relationship and importance of the industries and employment growth within western Essex. Furthermore in the identification of development needs, it is important to appreciate the role that London Stansted airport plays and will continue to play in supporting the growth and development within these key industries.	210458 (Essex County Council)
New research on neurodiversity & building facades *must* be incorporated e.g. requirement that Health Impact Assessments cover this Require post-occupancy evaluations on all large sites Poor contemporary design should not be used as a reason to repeat poor designs	202356 (A Carpen)

Summary of issues raised in comments	Comments highlighting this issue
Biodiversity and green spaces should be retitled Biodiversity, Geodiversity and Green spaces and reference should be included to geodiversity conservation and sites of geological importance.	203458 (Cambridgeshire Geological Society)
Conversion of “barns”, constructed on Green Belt, then converted to industrial buildings, should be expressly excluded.	205484 (P Meyer)
As an east Cambridge resident I would like to emphasise attention to: additional HMOs, hotels, expansion of retail eg Beehive, Newmarket Road/Elizabeth Way roundabout changes. Placing of additional HMOs to take account of other possible locations e.g. south /north Cambridge and HMO types to be reviewed.	202135 (H Lowe)
More council housing is needed, as is encouragement for downsizing. Water abstraction must be reduced. Tourism needs managing, as does the power of university colleges, to maintain the quality of Cambridge life.	203538 (P Blandford)
We are a very nature-deprived county and enhancing green spaces and biodiversity is very important, but wildlife benefits most in an area not shared with hordes of people so it is important to provide areas for outdoor recreation separately from areas supporting nature as well as places which aim to do both.	203861 (J Prince)
There are overlapping themes, such as Town Centres, Placemaking, combatting the Climate Crisis and economic applications that feature Traditional Architecture as a primary vehicle towards achieving the greatest possible positive outcomes for all of these themes.	201010 (Community Campaigner D Barton)

Consultation Statement

Appendix 5: Response to Representations - About the Plan



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

About the Plan

About the Plan Introduction

Abbreviations

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

Summary of Main Issues:

Some representors raised concern about the format of the draft plan material.

A number of neighbouring councils, statutory bodies, and infrastructure provides commented on the importance of continued liaison with them.

A number of Parish Councils raised specific comments about their village to this section of the plan. Stapleford and Great Shelford request that their neighbourhood plan is taken into account, and a number of specific comments around the policies map. Elsworth

Parish Council raise concerns about the impact of proposals that have not been fully addressed. Girton Parish comments included the need to protect the gap between Girton and Cambridge. Horseheath parish support the emphasis on biodiversity and climate change, but raise a general question about the detail of plan implementation. Histon and Impington, and Whittlesford, both raise issues around the delivery of necessary infrastructure. Boxworth Parish Meeting highlighted the need to consider impacts on exiting communities. Great Wilbraham Parish Council said they were supportive of many aspects of the local plan.

Comments challenged the level of development proposed, and that it did not take account of environmental impacts. Others considered that development targets should be more ambitious, and the approach did not and are align with the Local Growth Plan and National ambitions for the area.

Some comments on the development strategy offered general support, but others questioned whether it would deliver the homes needed, was to focused on large sites and new settlements, or did not include enough small sites or sites in villages.
Two representors suggested alternative plan periods, extending the plan period. One comment said the plan did not adequately consider the draft NPPF, which is expected to be adopted in mid-2026, necessitating alignment to avoid future revisions.
General comments raised a wide variety of issues. This includes support for policy approaches but also concern about their effective implementation. The interdependence with infrastructure delivery and wider strategies was also highlighted. Issues included measures to support affordable housing, green infrastructure, rights of way, food growing, protection of heritage, supporting Cambridge’s economic clusters, and sustainable transport. Hobsons Conduit Trust highlighted the importance of protecting the water environment. The importance of places to be creative and social setting were highlighted by a pupil from Comberton.

Cambridge United Football Club see either redevelopment of the current site or potential relocation as critical to the Club's long term viability and sustainability at a time when its current capacity is constrained, the City will grow exponentially and the financial pressures for all football clubs at every level are growing.

Comments on specific sites included concerns regarding Land adjacent to A11 and A1307 (Grange Farm), and the Cambridge Biomedical Campus. East West Rail highlighted the relationship of site proposals with their scheme.

Response to Representations:

Comments on the consultation platform are noted. We endeavour to improve our consultations and learn lessons from each stage, so will take on board comments. We aim to make the consultation accessible, and offer help to anyone to make sure they can have their say. The plan is substantial document with a large amount of supporting evidence, so we did include a nontechnical summary of the plans proposals at the beginning of the document. Technical comments on format will be considered in preparation of the proposed submission version. The consultation includes a wide range of events. We can't go everywhere, but very much sought to deliver good coverage across Graeter Cambridge. We also continuously engage with our parishes and residents associations though regular planning forums.

Officers have continued liaison with neighbouring councils, statutory bodies, and infrastructure provides throughout the plan making process. We continued this process since the draft local plan stage. And have published a record of our engagement.

The great Shelford Neighbourhood plan was adopted in October 20205, making it a part of the development plan. Detailed comments on the defined development extend and other issues have been considered separately. Comments raise concerns

regarding on delivery and infrastructure, the Councils have sought to address these by further developing the evidence base since the draft plan stage. This includes further exploration of measures to address transport challenges by the Combined Authority.

The level of homes and jobs being planned for has been carefully considered, and is justified by the evidence being published alongside the Local Plan. National planning policy requires local plans to respond to the needs of the area. We have considered the needs of the economy and likely growth in jobs, and the number of homes needed to support it. This also accords with the standard method of calculating the needs for homes set by government. We have tested a range of strategic development approaches, considering their impact on economic, social, and environmental issues, and have developed an appropriate spatial strategy to accommodate development needs whilst and protecting the environment. The plan also sets out ambitious polices to guide the form of development responding to climate change.

The strategy for villages has allocated sites where it is sustainable to do so as part of the wider development strategy, but also included policies which would support appropriate windfall development and rural exception sites. Neighbourhood planning also remains a toll available to parishes if they wish to address local issue directly.

The plan period running to 2045 remains the Councils preferred approach. It provides an appropriate length of time after adoption. The plan also identifies a longer term vision, in particular for strategic sites. At time of writing the outcome of the government consultation regarding changes to the National Planning Policy is not yet known. It would not be appropriate amend policy to reflect draft policy approaches.

The wide variety of other issues raised are noted. Rights of Way and connectivity are important, and are addressed in Policy I/ST: Sustainable Transport and Connectivity. The interdependence with the delivery of infrastructure has been recognised in the plan

and the evidence base. It would not be appropriate to add rights of way to the policies map. The county council maintains the definitive map. The councils continue to liaise with infrastructure bodies to ensure the growth needs of the area are addressed. The vision and objectives for the plan recognises the importance of the Cambridgeshire economy, but also that this must be balanced with consideration of social and environmental issues.

On specific sites, the issues raised on Land adjacent to A11 and A1307 at Grange Farm and Cambridge Biomedical Campus have been carefully considered and addressed in the evidence related to site policies. They are considered to remain appropriate elements of the development strategy. Comments supporting the omission of specific sites are noted. Proposals for new or alternative allocations have been assessed through the Housing and Economic land availability assessment and Sustainability Appraisal process.

Table of representations:

Comments on the Consultation

Summary of issues raised in comments	**Comments highlighting this issue**
Comments on the format of the local plan included: • Online version of this draft plan is different from the PDF one. • Online document presents layered information in silos, making it difficult to compare policies. • Complex to make representations. • A single whole PDF of documents would be useful. • Page numbers need to be corrected.	201222 (S Williams) 202349 (A Hall) 203274 (J Palmer) 203507 (J Neal)

Summary of issues raised in comments	Comments highlighting this issue
• It would be easier for the reader if the policies were numbered as well as/instead of having lettered codes. • Website is hard to navigate and the language is not easy for casual users, which may limit residents' understanding of the process. • Maps should be redrawn to clearly differentiate heritage assets from green-separation areas, removing the confusing pink shading.	208328 (Gladman Developments) 208329 (Gladman Developments) 208460 (Longstanton Parish Council) 210643 (Transport 2000 and W Suffolk)
Lacks a plain English summary, designed to help and support people with poor reading and comprehension skills, or indeed those whose cultural and language backgrounds may be diverse. There is a daunting amount of documentation for residents to familiarise themselves with and limited time. Detailed and complex document.	201471 (P Newton) 201901 (C Deer) 202334 (P Deer) 202324 (A Hamill) 203274 (J Palmer) 203507 (J Neal)
More regular consultation with residents is needed for the new railway bridge and station access. We would like clarification on how the Local Plan will align with other consultations and plans.	205785 (Rustat Neighbourhood Association)
I attended the Greater Cambridge Local Plan - Residents' Associations presentation via Teams on 13 January. The Greater Cambridge Local Plan is a very detailed and complex document, which makes it difficult for residents who are not expert in the whole range of areas covered to make informed	202342 (A Hamill)

Summary of issues raised in comments	Comments highlighting this issue
comment on all those areas. That said, each resident who provides comments has a valid point of view and their opinion must be taken into account.	

Comments from Duty to Cooperate Bodies, and general cooperation issues

Summary of issues raised in comments	Comments highlighting this issue
As the immediate neighbouring authority to the south, UDC shares a significant functional geography, through the M11 Innovation corridor and a landscape feature to the Northern edge of the district. The two areas are intrinsically linked by critical infrastructure corridors—including the M11 and the West Anglia Mainline and by the shared chalk aquifer that feeds chalk streams in the sub-region. Uttlesford District Council remains committed to working collaboratively to support the Greater Cambridge emerging Local Plan to address these cross-boundary challenges. The alignment of our policies on water efficiency are critical for enabling the sustainable growth the region.	204968, 204981 (Uttlesford District Council)
The delivery of new healthcare infrastructure is resource intensive, and the NHS faces funding constraints that are exacerbated by population growth from new housing developments. New developments should contribute proportionately to the healthcare needs arising from increased population due to housing growth. Access to essential healthcare services is vital for promoting good health outcomes and supporting the social and economic wellbeing of an area.	205042 (NHS Cambridgeshire & Peterborough Integrated Care Board)

Summary of issues raised in comments	Comments highlighting this issue
Residential developments significantly impact the demand for additional primary healthcare provision for future residents. Healthcare infrastructure should be a priority for infrastructure delivery, given its strategic importance in supporting housing growth and sustainable development. The healthcare estate must be continually reviewed, optimised for land use, and modernised in line with integrated NHS strategies. Planning policies should facilitate the delivery of essential healthcare infrastructure and be developed in consultation with the NHS to aid in estate transformation.	
The ECC response supports the preparation of the Plan and provides broad support. ECC is committed to working with the respective Local Plan Authorities in seeking to develop the Greater Cambridge Local Plan and understand how our representations can be addressed through modifications. Given their proximity to Essex it is essential that the Local Planning Authorities works collaboratively with ECC and other partners, to ensure consideration is given to the cross boundary impacts within Essex, in particular highways and transportation, Early Years and Child Care, Education and Adult Community Learning.	207668 (Essex County Council)
Thank you for the opportunity to comment on your Regulation 18 Draft Local Plan. We have reviewed the Local Plan in conjunction with the associated supporting documents. We have provided comments and recommendations below which align with the various constraints within our remit.	207670 (Environment Agency)
Thank you for consulting the East of England Ambulance Service NHS Trust (EEAST) regarding Draft Greater Cambridge Local Plan. Detailed comments on individual policies provided.	207671 (East of England Ambulance Service NHS Trust)

Summary of issues raised in comments	Comments highlighting this issue
Both Bedford and Greater Cambridge are located within the Ox Cam corridor and this shared geography means numerous strategic matters have a cross-boundary dimension. These include housing, socioeconomic, infrastructure and water scarcity. It is noted that there are established governance arrangements for the combined CPCA and within this area a local government reorganisation process is ongoing. It is expected that Greater Cambridge will look to the Cambridgeshire and Peterborough geography for its strategic plan making context. There will however remain an important need to ensure that the Local Plan also responds to the drivers of growth originating in the sub region to the west particularly in relation to the following national projects: Universal Studios, the proposed Milton Keynes renewed new town, Tempsford new town and East West Rail.	208223 (Bedford Borough Council)
CBC are unclear at this stage if the statement of common ground statement that there are no areas of disagreement can be supported due to our concerns over the transport implications arising from the cumulative impacts of the allocations and proposed allocations at Cambourne.	208507 (Central Bedfordshire Council)
Historic England very much welcomes the emerging plan and the considerable work undertaken to date. We can see the incorporation of many of the comments we have made in previous consultations which is appreciated. We particularly welcome the substantial effort that has been made in preparing a comprehensive evidence base including both strategic and site-specific heritage impact assessments, topic papers, skyline and tall buildings strategy, townscape characterisation study, landscape sensitivity assessment including renewable energy assessment.	208918, 208919 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
We recognise the area faces intense pressure for growth, driven by both the economic success and the attractiveness of the area, in large part a consequence of its rich architectural and cultural heritage. We are keen to support sustainable growth in the right locations, but this growth must be carefully managed to ensure that the very things that contribute to the success of the City and surrounding area are not harmed in the process. Historic England is keen to ensure that the emerging plan gives full consideration to the historic environment, both in the choice of site allocations and policy criteria for sites, as well as through a robust and clear suite of historic environment and other policies that seek to both protect but also enhance the historic environment.	
It is important that in setting the portrait of Cambridge there is acknowledgement of the cross boundary and strategic matters that must also be clearly articulated. In particular for the economy, the for the emerging Local Plan to be effective, it must appreciate the opportunity provided by international and domestic connectivity by London Stansted airport, as well as the biotech and advanced manufacturing business clusters evident within Essex (e.g. at Chesterford Research Park and Harlow). Given the "international significance" of the employment clusters, it is essential that there is appreciation of the proximity to London Stansted airport, and also seeking to ensure that surface accessibility to improve connectivity with Greater Cambridge is fully explored when developing the emerging Local Plan.	210466 (Essex County Council)
ECC recommends that the regional planning context be amended to ensure there is clarity concerning ECC's role and relevant statutory plans/strategies. Furthermore it is important that reference is explicitly	210467 (Essex County Council)

Summary of issues raised in comments	Comments highlighting this issue
made to the following plans and strategies – Essex Local Transport Plan 4. It is also important to note that ECC, will be part of a new single strategic authority for Greater Essex. It will take the form of a mayoral combined county authority. It is expected that a new mayor for Greater Essex will be directly elected by the public in 2028.	
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).	210506 (Cambridgeshire County Council)
Cambridgeshire County Council is referenced in several places, please ensure that the Council is referred to as Highway Authority where appropriate.	210524, (Cambridgeshire County Council)
While there are many areas of agreement, as far as we are aware, the Statement of Common Ground was not checked with Transport Strategy or wider CCC colleagues prior to publication. The Council would therefore welcome discussions regarding future iterations of the document Cambridgeshire County Council, was, along with a number of other organisations signatories to the North East Cambridge Area Action Plan Proposed Submission Dity to Cooperate Statement of Common Ground (November 2021). As the safeguarding of waste and minerals remains a strategic matter that	210520, 210545 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
affects more than one authority, a reaffirming or update to that statement of common ground to support this draft plan is requested.	
Public health are pleased to see that the vision for Greater Cambridge is based on the seven strategic priorities. Public health welcome the 'Draft vision' for inclusive communities that aim to provide a high quality of life with housing and social infrastructure that meets people's needs through all stages of life; food security; and that the physical and mental health and happiness of people will be prioritised; and that open spaces will be easily accessible and that large scale natural spaces will be able to be reached by active travel modes	210547 (Cambridgeshire County Council)
The influence of Cambridge on western Suffolk is acknowledged in the Suffolk Local Growth Plan and by the fact that it is part of the Cambridge-Norwich Tech Corridor, and the Cambridge Housing Market Area. The County Council would welcome strong recognition of the role of South Cambridgeshire in the wider sub-regional economy as part of this strategy, as alluded to in paragraph 1.17.	210630 (Transport 2000 and W Suffolk)
As you will be aware the new plan-making system provided by the Levelling Up and Regeneration Act 2023, and the November 2025 Commence and Update Local Plan (CULP) guidance, does not include the Duty to Co-operate. It has been advised that LPAs should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas and Inspectors should continue to examine plans in line with the policies in the NPPF on 'maintaining effective co-operation'.	207669 (Transport 2000 Cambs and West Suffolk)

Summary of issues raised in comments	Comments highlighting this issue
National Highways welcomes the opportunity to comment on the Greater Cambridge Draft Local Plan Regulation 18 Preferred Options consultation. The emerging Local Plan aims to set out the required growth and development for the period of 2024 to 2045. National Highways is a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents.	210847 (National Highways)
Strongly recommends that the engagement referred to on page 5 of the Spatial Strategy is recorded via a Statement of Common Ground ('SoCG') to evidence effective joint working on cross boundary strategic matters (as per the NPPF at paragraph 36(c). The SoCG does not require agreement between the parties, but does require evidence of constructive, active, and ongoing engagement.	208669 (Guilden Morden Developments Ltd)
The Council has included in its evidence a Duty to Cooperate Statement of Compliance and Statement of Common Ground. In principle, it is supported that these interim documents have been prepared to support the current consultation. Whilst it is recognised that there is engagement between Cambridge City Council and South Cambridgeshire District Council as this reflects the geographical and functional relationship of the area, there are wide ranging cross boundary strategic issues which the Councils will need to demonstrate a written record of the progress to the point of submission with relevant key stakeholders, particularly in relation key infrastructure bodies and whether any requests to accommodate unmet housing needs of neighbouring authorities have been received.	208895 (Nightingale Land and Hill Residential Ltd)

General Comments from Parish Councils

Summary of issues raised in comments	Comments highlighting this issue
The Stapleford & Gt Shelford Neighbourhood Plan (adopted Oct 2025) has not been incorporated into the draft greater Cambridge Local Plan and that this will need doing before the next version of the Local Plan is produced. The draft Policies Map will also need updating to reflect this For example, there is a new Important Countryside Frontage between 41 Gog Magog Way and houses at Chalk Hill, Stapleford, which is not shown and the defined development extent of Stapleford is inaccurate, as is the mapped extent of the Gog Magog Hills in documents supporting the draft Plan. Open spaces, Local Green Spaces and Protected Village Amenity Areas from this Neighbourhood Plan need to be included in the Policies Map.	201526 (Stapleford Parish Council) 208087 (Great Shelford Parish Council) 202661 (S Berridge) 202182 (A Sykes)
The proposals in the Local Plan have some potential benefits but there are also a lot of concerns which the Plan does little to allay. Plan says little or is silent on a number of critical issues, such as travel, flooding, etc, and there has been little apparent consideration of the impact of significant new housing / logistical developments beyond the immediate Cambourne area. Dissatisfaction about commenting on the Plan when there is so much yet to be done. It is noted the plan provides a framework but it is for developers to come forward with proposals and deliver them. Speed of build out has implications for delivery of community services and facilities. Concerns about the involvement of unelected bodies with which parishes have no contact and no influence, and the possibility of the appointment of a Development Corporation.	202110, 202114 (Elsworth Parish Council)

Summary of issues raised in comments	Comments highlighting this issue
Policies Map for Girton is a great step forwards from the version in the Local Plan 2018.	202170 (Girton Neighbourhood Plan Team)
GPC seeks discussions on topics such as Girton Gap protection, alignment with national policy, development extents, active travel, grey belt methodology, and community enterprise space. GPC is committed to evidence-based planning that protects Girton's identity and ensures the Local Plan accommodates the realities of a Green Belt settlement.	202278 (Girton Parish Council)
Horseheath PC agree with the aim of having a vibrant economy that also significantly reduces impacts on the environment and climate. We would like to see a defined aim to increase biodiversity as we understand this is intimately linked with mitigating climate change and environmental degradation. We support a higher level of biodiversity gain to be required for new development than the current national requirement. Support an emphasis on active travel together with enhanced cultural opportunities.	203262, 203265 (Horseheath Parish Council)
Whittlesford Parish Council supports the overall ambition to plan for growth but considers that the scale and phasing of development proposed in Rural Southern Cluster area is not currently aligned with deliverable infrastructure, particularly transport, water supply and community facilities.	203549 (Whittlesford Parish Council)
In general we support the direction of travel, but it is very difficult to fully endorse this document when in so many areas there are few details about the process of implementation and particularly the measures that will be put in place to detect and deal with non-compliance.	210708 (Horseheath Parish Council)
A critique of the plan would be that major housing development sizes are north/ northwest of the city outside the green belt and a large amount of employment sites are south. The current public transport	204741 (Histon and Impington Parish Council)

Summary of issues raised in comments	Comments highlighting this issue
model is hub and spoke with a congested spoke/city centre. These are challenging problems but bearing in mind the relative flexibility of the jobs market vs the inflexibility of public transport options it arguably designs in continued reliance on cars for the majority of south cambs residents. Aspirations for public transport ring roads or some alternative solution feel necessary.	
Boxworth Parish Meeting supports the need for Greater Cambridge to continue to develop and there is a requirement for additional housing and employment in the area. It is vital that these developments are managed in such a way that they not only provide for the future needs of a growing population but do so in a way that does not adversely affect existing communities. We welcome the opportunity to comment on the Draft Local Plan and hope that our constructive engagement can add value.	202748 (Boxworth Parish Meeting)
We are supportive of many aspirations in the Local Plan and congratulate the planners on completing this major work.	206565 (Great Wilbraham PC)

Comments on Levels of Development

Summary of issues raised in comments	Comments highlighting this issue
Plan is based on outdated perceptions of the need for, "growth" not taking into consideration climate change or AI and assuming that the previous attractions of Cambridge as a place to live and work will hold good in a changing world..	202944 (C Hills)

Summary of issues raised in comments	Comments highlighting this issue
Cambridge Friends of the Earth, yet again, cannot and will not provide a veneer of democratic accountability by participating in yet another Consultation to, effectively, enable further environmental and social destruction of our region to placate the voracious appetttes of developers and landowners and the policies of an environmentally and socially ignorant administration, who can see no further than the next election.	210709 (Cambridge Friends of the Earth)
Given the blythe assumption of the 'need' for ever increasing 'economic growth' in the region, Cambridge Friends of the Earth refuses to respond in full to this 'consultation'. We feel that doing so would, potentially, provide credibility to the edicts driving the creation of this Local Plan. Given the continual push for growth in the region, far in excess of its ecological, environmental and social limits, do we have to assume that the Local Plan is being promoted by madmen, economists or, quite possibly, mad economists?	203251 (Cambridge Friends of the Earth)
The plan makes an assumption that there is such a thing as 'sustainable development'. The climate crisis and the need for immediate and steep reductions in emissions means that most development is not sustainable and that the expression 'sustainable development' has become a contradiction in terms. Rethink the focus on development and substitute a focus on steep emissions reduction and protection of the natural environment.	204860 (R Randall)
Does not plan for enough housing. In particular, government targets should be treated as a minimum, not a maximum.	204502 (Redrow South Midlands)

Summary of issues raised in comments	Comments highlighting this issue
Future proofing Cambridge to be successful by 2050 requires the food production system to be supported and invested in as a high priority. To achieve the wellbeing of our community will require investment and support to those producing our food. Any proposed development will reduce our ability to produce our own food in this country.	205175 (Y Dignon) 2098715 (J&C Collins)
Food Security does not appear to be considered as a Strategic Priority. Any proposed development will reduce our ability to produce our own food in this country. Whilst none of know what the future may hold, the farming of any arable land in this country should, in our opinion, be preserved for future generations. Whilst it could be argued that the arable land that is proposed to be developed upon is a relatively small proportion of the country's overall arable land, more and more land is being developed upon nationally.	208715 (J & C Collins)
The vision for Greater Cambridge is supported. However, to achieving this vision it is necessary for the Plan to be based on ambitious targets for growth. It requires amendments to ensure that the level of growth and housing allocations reflect the Vision and are aligned with the Local Growth Plan and National ambitions for the area.	208395 (Ceres Property on behalf of land owner at Friesland Farm, Swavesey)
The plans are a response to Government pressure and arbitrary targets: why should 73,000 jobs and people end up here? The present large settlements are too near Cambridge and are not self-sufficient: Waterbeach, Cambourne, Northstowe. That means traffic into Cambridge. Other planned developments threaten to link nearby villages into one large conurbation. The inevitable rise of traffic and pressure on water supply and sewage disposal cannot be satisfactorily accommodated by the scale of development	D Jones (208480)

Summary of issues raised in comments	Comments highlighting this issue
that is proposed. Some vested interests will profit from the economic development, but many ordinary people will see no benefit from the 'prosperity' that is promised.	
The preferred housing target, the development strategy and the selected allocations for the draft GCLP are unlikely to fully deliver the Vision for Greater Cambridge. The housing requirement is not aligned with jobs growth, which would lead to more people commuting into Cambridge to work mostly by car.	211605, 211606 (Bloor Homes)

Comments raising general issues related to the Development Strategy

Summary of issues raised in comments	Comments highlighting this issue
Supports the Vision for Greater Cambridge, emphasising the need for sustainable and prosperous growth in the area. Development Strategy is overly reliant on new settlements and major development sites dependent on significant infrastructure projects. Overly optimistic about delivery timescales for draft allocations, risking failure to meet housing needs within the plan period. Need a more balanced approach to growth distribution, recognising the potential of villages.	203025 (Cemex UK Properties Ltd)
I support the plans for protecting the environment while trying to accommodate growth. However I live in a village in South Cambridgeshire and do not support the idea that villages should not take their share of extra houses. Our village (Haslingfield) needs extra affordable houses so that it continues to be a place that normal families can live. It also needs footpaths and cycle paths connecting it to all the	203130 (R Hatfield)

Summary of issues raised in comments	Comments highlighting this issue
villages around, where vital services (doctors, dentist, hairdresser, shops, small industries) are based, so that people can access these without cars. Stopping it from growing is not a sustainable strategy.	
The introduction recognises South Cambridgeshire villages but largely frames growth around Cambridge and major transport corridors. Focuses strongly on Cambridge's growth and innovation economy, with less emphasis on the distinct needs of rural communities. The strategy prioritises locations with high public transport accessibility, which risks limiting opportunities for rural communities unless investment in rural services, digital connectivity and community infrastructure keeps pace. There is little evidence on rural housing need, employment patterns or service access challenges. Parish councils and rural community organisations are not clearly referenced in shaping infrastructure or growth decisions. Stronger rural proofing would include clearer rural evidence, safeguards for village services, support for rural-enterprise and firm commitments to transport and digital inclusion in smaller settlements. Stronger rural proofing would include clearer rural evidence, recognition of village infrastructure constraints and a stronger commitment to inclusive engagement and place based solutions for smaller settlements.	203137, 203139 (Cambridge ACRE)
I share the aspirations of the Local Plan expressed in the Introduction: reduced climate and environmental impacts, an increase in the quality of everyday life for local people, minimising carbon emissions and car-dependence, supporting the infrastructure we need, increasing nature, wildlife and green spaces, and safeguarding our distinct local heritage. I also support the ambition to make	203275 (J Palmer)

Summary of issues raised in comments	Comments highlighting this issue
Cambridge “a place where walking, cycling and public transport is the natural choice for travel”. Further, I support the stated intentions of only very limited infill development in rural villages with little or no public transport, where car travel is the only realistic option for most people.	
The Plan’s development strategy, which underpins the Plan as a whole and its requirement to meet identified local housing and employment needs in full, is flawed.	203313 (Wilson Bowden Developments)
The plan fails to allocate sufficient small sites (1-2.5 hectares) for housing, focusing too much on large urban developments, which does not meet the needs of the wider area.	203401 (ESCO Prospect)
Broadly support the ambition to plan positively for growth across Greater Cambridge; however, I have serious concerns regarding the soundness of elements of the draft Plan, particularly in relation to transport infrastructure, cumulative impacts on the villages I represent, omissions in the spatial strategy, and deficiencies in the supporting viability evidence. (submitted in my capacity as District Councillor for Whittlesford, Thriplow & Heathfield, and Newton)	204086 (Cllr R Williams)
Does not support equality of access and opportunities or ensure everyone can benefit from development of new homes and jobs. The current strategy seeks to concentrate development in large strategic sites, which does not account for rural housing and employment needs. The lack of allocations in villages means that any new development will inevitably be smaller sale and ad-hoc, will not provide affordable housing, and will not allow for transport and community facility upgrades that would make rural communities more sustainable.	204502 (Redrow South Midlands)

Summary of issues raised in comments	Comments highlighting this issue
Plan relies on strategic sites without placing reasonable level of growth towards sustainable settlements such as Great Shelford and Stapleford.	208914 (Nightingale Land and Hill Residential Ltd)
We support many of the Draft Local Plan's strategic objectives, including meeting housing need, addressing climate change and enhancing the environment. However, our representation focuses specifically on residential development delivered by SME developers on windfall sites, small brownfield sites and sensitive urban redevelopment within existing sustainable locations, which can often be delivered more quickly and sustainably than larger strategic sites.	209704 (NP Architects)
The plan is completely unsustainable with regards sustainable transport. Focus the proposed developments sites on being as close to Cambridge city centre, in locations that do not rely on car travel. Increase the density of the proposed sites in order to allow as many people as possible to access amenities within a short walk. Design around people without cars, for example teenagers, the disabled and the elderly.	203597 (H Thomas) 203744 (W Clements)
The plan is completely unsustainable with regards sustainable transport, which will lead to both lives blighted by massive congestion on the car journeys people are forced to make, and lives removed from the amenities and relationships people actually want. People are moving here in large numbers because of the city of Cambridge, why are we forcing them to lives a half hour drive from where they want to be? Focus the proposed developments sites on being as close to Cambridge city centre, in locations that do not rely on car travel. Increase the density of the proposed sites in order to allow as	203579 (H Thomas)

Summary of issues raised in comments	Comments highlighting this issue
many people as possible to access amenities within a short walk. Design around people without cars, for example teenagers, the disabled and the elderly.	
Advisory Board of Albion City Development Corporation Ltd strongly support the Draft Greater Cambridge Local Plan. The Forest City project is a proposed self-sufficient urban settlement of 45,000 acres, located east of Cambridge and broadly aligned between Newmarket in the north and Haverhill in the south. the Greater Cambridge ecosystem; one of the world's leading centres for science, technology and innovation, with strengths in life sciences, data and digital technologies, advanced manufacturing and research-intensive industries, is a national strategic asset. Strongly supports planning that recognises and enables the continued growth of this ecosystem.	208128 (Albion City Development Corporation Ltd)
Development strategy is too focussed on the delivery of large strategic sites including an expanded Cambourne, existing new settlements at Northstowe, Waterbeach and Bourn Airfield, and a proposed new settlement at Grange Farm. The delivery timetable for infrastructure to support an expanded Cambourne and at Grange Farm is uncertain. For all of the large strategic site allocations the predicted housing delivery rates are unrealistically high, and the delivery of policy compliant levels of affordable housing is often not achieved. The development strategy avoids directing development to the larger villages, including Papworth Everard regardless of their sustainability credentials, existing services and facilities, accessibility by sustainable modes of transport, or affordable housing needs.	211605, 211606 (Bloor Homes)

Summary of issues raised in comments	Comments highlighting this issue
Approach does not support the residents or services and facilities in those villages, and would not meet the great places, homes, connectivity and infrastructure strategic priorities. Will not deliver green infrastructure.	

Comments on the Plan Period

Summary of issues raised in comments	Comments highlighting this issue
The minimum end date of the plan should be 15 years from adoption, as per paragraph 22 of the Framework. The draft plan seeks to cover the period 2024-2045, i.e. 21 years. Gladman supports this approach as it gives additional years should there be any delays in the plan-making process or during examination. However, in order to be consistent with national policy, Gladman would recommend that the plan period to starts in a more recent year – 2025, ending in 2045. The council may then want to amend the ending year to 2046 to maintain the 21-year plan period.	208330 (Gladman Developments)
The plan period should be extended to 2050. A longer plan period is considered to clearly be the most reasonable strategy, when considered against the alternatives.	208383 (NAIB Trust)
To align with the Cambridgeshire Local Plan and emerging Spatial Development Strategy, and accounting for the number of large strategic allocations in the plan, it is considered that the plan period should be extended to 2050. A longer plan period is considered to clearly be the most reasonable strategy, when considered against the alternatives	211595 (Places for People)

Comments on the relationship with National Planning Policy

Summary of issues raised in comments	Comments highlighting this issue
The plan does not adequately consider the draft NPPF, which is expected to be adopted in mid-2026, necessitating alignment to avoid future revisions. The draft NPPF aims to reduce development management policies that exceed national standards, which creates unnecessary burdens. Recommend council review local plan once new NPPF adopted deleting or amending any local plan policies that are inconsistent with the new NPPF to avoid lengthy discussions regarding their weight during application processes.	203401 (ESCO Prospect) 205096 (Home Builders Federation)
To ensure longevity of the emerging Plan, it is recommended that the Council is consistent, where possible, with the NPPF when published in its final form.	206943 (Henry Boot Developments)
We support the overall vision of creating well-designed, sustainable and resilient communities, and welcome the ambition shown in the draft policies. However, a number of the detailed requirements go beyond national standards or lack sufficient flexibility and therefore risk undermining deliverability or delaying the housing trajectory.	208958 (Persimmon Homes East Midlands)

Comments raising General Issues

Summary of issues raised in comments	Comments highlighting this issue
CPRE Cambridgeshire and Peterborough supports the ambition of the Greater Cambridge Local Plan to deliver sustainable growth. However, sustainability must include environmental protection, inclusive access, resilient infrastructure, digital connectivity, and safeguarding of water resources.	208957 (CPRE Cambs and Peterborough)
Support the principles of sustainable growth underpinning the Draft Local Plan.	211112 (Cam Valley Community Rail Partnership)
PfP supports the vision for Greater Cambridge to be a place where a big decrease in our climate and environmental impacts comes with the continued flourishing of the internationally significant innovation economy, and a big increase in the quality of everyday life for all our communities.	211596 (Places for People)
The Owners and Board see either redevelopment of the current site or potential relocation as critical to the Club's long term viability and sustainability at a time when its current capacity is constrained, the City will grow exponentially and the financial pressures for all football clubs at every level are growing given the flow of investment into all the English leagues. We hope the GCLP will prioritise the Club's needs, recognising its unique role in Cambridge	209103 (Cambridge United Football Club)
Newnham Labour ran an informal engagement event to allow the Newnham community to discuss the draft Local Plan with Cllr Katie Thornburrow. 45 people attended and their views are summarised in the report submitted below. Key points arising were 1) support for more Affordable Housing. 2) Support for the REJECTION of development on West Fields, Site ID 115681 3) Support for policies on Climate Change, Green and Open Space, and River Corridors. Widespread uncertainty about the aims of the	201344, 210676 (Newnham Labour)

Summary of issues raised in comments	Comments highlighting this issue
Cambridge Growth Company, and whether it would comply with the democratically developed policies and plans in the Local Plan. Many were also concerned about power of the University Colleges.	
Fails to adequate address the interlinked nature of so many of the issues. The holistic vision is important. It also fails to clarify the relative costs and the difficulty of enforcing the provisions. There is a risk of imbalance in the responses and expenditure. Very little mention of how provisions affecting developers and other third parties are to be enforced.	205462 (D Stoughton)
CLAF supports the overall vision of the Draft Greater Cambridge Local Plan but urges stronger, more explicit policy commitments to protect, enhance and integrate public rights of way and access networks across Greater Cambridge. Clearer policy language and delivery mechanisms will help ensure that access infrastructure contributes fully to the Plan's objectives for sustainable development, healthy communities and green infrastructure.	210965 (Cambridgeshire Local Access Forum)
CSF CIC would welcome working with Greater Cambridge Shared Planning Service, public health and developers to help shape implementable guidance (for example, a short "Healthy and Sustainable Food in New Development" note or SPD module), building on the draft policy foundations already in the Plan.	210972 (Cambridgeshire Sustainable Food) 205609 (Y Dignon)
Use Traditional Architecture Design Codes for new construction and protect all historical buildings including officially listed and non-designated heritage assets from demolition with a ban on demolition of buildings constructed prior to 1950.	130661 (D Barton)
Comments offering general support: • All looks well thought-out, balancing residents needs plus wildlife and the planet.	203443 (G Pountain) 204365 (J Nelson)

Summary of issues raised in comments	Comments highlighting this issue
• Support, if it can be delivered without compromising in the face of finance/pressure from developers etc.	
The Local Plan is interdependent with wider strategies, infrastructure delivery, and enabling services such as water, energy, and social infrastructure. As these strategies and interventions progress, it is important they are informed by consistent evidence and aligned assumptions on spatial strategy, infrastructure provision and phasing, with greater clarity on the assumptions being made where delivery relies on decisions or investment beyond the planning system. Clear recognition of these interdependencies and stronger systems alignment will be critical to ensuring coherent land-use and investment decisions to strengthen the robustness of the Plan in unlocking future growth potential of the Cambridge city region.	203518 (Cambridge Ahead)
The Local Plan broadly is a comprehensive document inclusive of relative analysis detailing the Planning Authority's intentions over the over the next 5 years for Jobs, Housing, Business Environments etc. Perhaps I have missed this, I've seen no 'Impact Assessment' on the impact of extortionate business rates and other Government non-incentivising taxes, the authors of the plan should be complemented.	201571 (Turks Head Farm)
Highlights the rich heritage of small villages in South Cambs and expresses concern over the current housing developments, noting that many houses are being bought for rental purposes, which does not benefit local infrastructure. Concern about the affordability of housing for young couples and low-wage earners, as house prices are rising beyond their reach.	202358 (E Dean)

Summary of issues raised in comments	Comments highlighting this issue
While the vision and strategy are worthy of support, details matter. The Plan assumes the infrastructure problems (primarily water and transport) will magically be solved, but does nothing to provide those solutions. What is the alternative Plan if the local infrastructure needs the Plan relies on are not delivered?	202550 (P Tribble)
Cambridge Junction's future redevelopment and reprovision, and the detailed implications of the Draft Local Plan, have only become clear at Regulation 18 stage.	202802 (Cambridge Junction)
We are supportive of the processes detailed in this section.	202818 (Cambridge City Council Liberal Democrat Group)
We welcome the Plan and recognise the extensive work and stakeholder engagement underpinning its development. We support the Plan's ambition to balance climate and environmental objectives with the continued flourishing of Cambridge's globally significant innovation economy and improved quality of life for local communities. The Local Plan is a critical lever for sustaining international competitiveness, enabling company formation, retention and scale, and attracting global investment. We particularly welcome the emphasis on building on existing clusters and campuses and the recognition of the innovation infrastructure that underpins growth. We encourage the Plan to further strengthen this system-wide approach by explicitly supporting the intensification and expansion of established innovation clusters to maximise agglomeration benefits.	204900 (Innovate Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
General comment to be consulted as the plan moves forward.	206953 (Cambridge Realty Ltd)
Railpen support the Councils' recognition throughout the draft Plan's preamble and supporting text that the region makes a substantial contribution to national economic health. However, we suggest that the growth of the Cambridgeshire economy should be specifically mentioned within the Council's 'Vision for Greater Cambridge'. We would encourage the Council to be bold, and to recognise that the region's continued growth – fuelled by both housing and jobs – is critical to delivering the environment in which future generations can flourish.	207454 (Pioneer Group Ltd Railpen)
Railfuture East Anglia welcome the plan's ambition to tackle climate change, health and create high-quality places with a strong focus on sustainability, wellbeing, good design, walking, cycling and public transport. Railfuture is a partner within the Cambridgeshire Sustainable Travel Alliance of CamCycle, Cambridge Bus Users and Cambridge Living Streets. We fully support their responses to this consultation.	208028 (Railfuture East Anglia)
The emphasis on high-quality placemaking, green infrastructure and biodiversity net gain is essential to maintaining quality of life, while the strong focus on climate change mitigation and adaptation appropriately aligns local growth with national net-zero objectives. We also welcome the integrated approach to transport, utilities and digital connectivity, which will be critical in supporting innovation-led growth at scale.	208132 (Albion City Development Corporation Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Welcome the ambition of the Greater Cambridge Plan and understand the need to plan positively for the city's future. However, I am deeply concerned that, without stronger protections, rural communities like mine are being placed at risk to accommodate growth that primarily benefits the city rather than the wider area. Cambridge's future should not be built by sacrificing the countryside that gives it its character and identity. Planning for long-term success means working in partnership with rural communities, not placing a disproportionate burden on them. I hope this Plan will stand up for places like Weston Colville, so that young people like me can look forward to a future where growth is fair, sustainable and shared.	208483 (E Hepworth)
Support the strategic direction of the Draft Greater Cambridge Local Plan. However, to deliver a genuinely inclusive, safe and sustainable transport and access network, the Plan must explicitly and consistently include equestrian users across its sustainable transport, active travel, public realm, green infrastructure and Rights of Way policies. Without clear policy direction, equestrian access will continue to be excluded at the delivery stage, undermining the Plan's objectives for health, wellbeing, equality, safety and rural economic resilience.	208662 (British Horse Society)
The Cambridge Rights of Way Improvement Plan (ROWIP) does not appear to be explicitly referenced in the Draft GCLP. The ROWIP is a statutory document that set out priorities for the management, improvement and accessibility of the public rights of way network and is directly relevant to policies on green infrastructure, sustainable transport, active travel and open space provision. The Local Plan	208660 (British Horse Society)

Summary of issues raised in comments	Comments highlighting this issue
should formally reference the ROWIP within its evidence base and policy framework to ensure alignment, consistency and effective delivery of rights of way improvements through new development.	
Putting people, places and choice first. We support the ambition of the Local Plan to address climate change, improve health and deliver high-quality places. However, this must be achieved without prioritising one transport mode over others, without unnecessary destruction of green spaces and orchards, and without policies that reduce choice, resilience, or fairness for residents. the Local Plan should: Explicitly commit to transport neutrality, not transport hierarchy. Protect orchards, green spaces and historic landscapes as strategic assets. Treat cars as part of the transition, not the enemy. Support cycling and walking without coercion or exclusion. Ensure policies work for all ages, abilities and life circumstances. Avoid road closures and restrictions that worsen congestion and emissions. Require evidence of deliverability, not aspiration. Balance climate goals with social and economic reality	208834, 208880 (D Smith)
We suggest replacing the term “people with disabilities” with “people with care and support needs” throughout the document. This terminology is more inclusive, as it encompasses a broader range of needs, including those relating to mental health, physical health, and learning disabilities. A range of other detailed wording points are also provided.	210541, 210543 (Cambridgeshire County Council)
Polices Map shows protected open spaces and nature reserves. Public rights of way are an amenity as well as providing connectivity to key sites. As such could they be included on the policy mapping.	210626 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
There are overlapping themes, such as Town Centres, Placemaking, combatting the Climate Crisis and economic applications that feature Traditional Architecture as a primary vehicle towards achieving the greatest possible positive outcomes for all of these themes.	201010 (Community Campaigner D Barton)
For four centuries the Trust and its precursors (known as the Feoffees) have been responsible for the protection and maintenance of Hobson's Brook and Conduit, with rights and obligations deriving initially from the 1610 Tripartite Indenture. The Local Plan needs to acknowledge and to state much more explicitly the extreme importance of the maintenance of water quality and the natural environment and habitats along the city's green corridors, including that from Nine Wells to the City centre formed around Hobson's Brook and Conduit.	211724 (Hobsons Conduit Trust)
I support the Local Plan as a whole. I respectfully ask that the missing information be made available for comment and that my comments are taken into account in order to make the Local Plan more robust and appropriate at a local level. These predominately concern issues about character, landscape, flooding, heights and the viability of infrastructure.	211933 (C Newell)
Note from Comberton Village college student Kids like more social settings and prefer fun activities to do with the Local Plan, with opportunities to stand and sit, less talking and more reading and doing things (drawing, making things, being creative) with multiple activities inside and outside. Interacting with different forms (joint classes) and exploring new subjects - music sounds relaxing. Allow kids to share ideas (talking or writing) and let the kids choose some ideas.	211975 (K Thornburrow)

Comments raising points on specific sites

Summary of issues raised in comments	Comments highlighting this issue
Without EWR Co's proposed amendments to policies and the policies map, development of land within the safeguarded area may conflict with, or prejudice the delivery of, EWR and be subject to an objection from EWR Co at the planning application stage or compulsory acquisition authorised as part of the EWR Development Consent Order (if granted), potentially making it undeliverable or undevelopable. EWR Co's proposed amendments would provide the necessary policy tests to ensure that all parties continue to work together to develop proposals which avoid this outcome, whilst also aligning with the safeguarding guidance.	211907 (East West Rail)
Land adjacent to A11 and A1307 (Grange Farm) • The A505 is a busy road with accident hotspots, particularly at the A1301/A505 junction, and warns that the area cannot handle more traffic without significant infrastructure improvements. The A1307 is a high traffic route, warning that increased traffic from the development will negatively affect surrounding villages. • Local services such as GPs, schools, and shops are already at capacity and cannot accommodate an influx of new residents. Opposes the proposed development on Roman Rd, citing its status as an area of local beauty. • Strong concerns about the proposed development, it should not proceed due to the availability of suitable brownfield sites, such as Cowley Road. • The scale and density of the proposed housing in a rural location are troubling, with concerns about disruption to the rural appeal and negative impacts on wellbeing due to construction noise.	202358 (E Dean) 204517, 207552, 207533, 207554 (C Tjen)

Summary of issues raised in comments	Comments highlighting this issue
• Development will harm the local environment, with doubts about the adequacy of mitigation measures for rare sites. The plan for a sewage works upwind of the respondent's property raises concerns about outdoor enjoyment and property value. • Concerns are raised about a permanent site for travellers.	
Cambridge Biomedical Campus Proposed vehicle access from Granham's Road into the Cambridge Biomedical Campus contradicts the goals of Policy BG/GI by threatening the Gog Magog Hills and chalkland fringe, which should be protected. The respondent for the 'Better Ways for Busways' alternative, suggesting a busway spur off the A1307 Hinton Way roundabout as a less invasive solution that would improve emergency access and connectivity.	204551 (E Wilson)
Land North West of Balsham Road, Linton (Site reference 115927) Promoting the site for allocation, it would support local business growth and provide facilities such as a nursery and café for residents.	204823 (Vistry Group)
St Matthews Centre, Sturton Street, Cambridge Site Reference 115524 Given an Overall HELAA Score of 'Red'. The exclusion of Site 115524 must be permanently enforced.	201277 (M McColville)

Consultation Statement

Appendix 6: Response to Representations - Development Strategy



Greater Cambridge Local Plan

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

GREATER CAMBRIDGE
SHARED PLANNING

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Development Strategy

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

Vision and Strategic Priorities

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

A number of comments supported the vision and strategic priorities.

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

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

Response to main issues raised in representations

Support for the vision and strategic priorities is noted.

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

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

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Comments on Vision include: • Vision for Greater Cambridge will result in its continued urbanisation. • Vision for Greater Cambridge would only be fully delivered with a higher housing requirement, an amended development strategy, and additional development on the edge of Cambridge and at the more sustainable villages (Willingham, Fulbourn, Sawston, Great Abington, Great Shelford, Fen Ditton, Swavesey) • Housing target and development strategy in the draft GCLP do not align with the Vision for Greater Cambridge, particularly regarding quality of life and carbon emissions. • Supports decrease in our climate and environmental impacts with a continued flourishing internationally significant innovation economy, and a big increase in the quality of everyday life for all our communities. • Need for Vision and the emerging Local Plan to be strengthened to refer to the importance of development delivery within Ox-Cam Arc and meeting Government's agenda to accelerate employment and housing growth within the arc. • Vision must recognise the internationally valued heritage and landscapes of Greater Cambridge. The vision should also recognise that there are potential conflicts	201902 (C Deer), 201940 (KG Moss Will Trust & Moss Family), 201964 (Shelford Investments), 202073 (J Francis), 202118 (Elsworth PC), 202336 (P Deer), 202433 (The CLC Trust), 202554 (Ely Diocesan Board of Finance), 202729 (Cambridge Past, Present and Future, 202897 (Cambridge Past, Present and Future), 205036 (North Barton Road Landowners Group), 203302 (J Manning), 203889 (Hill Residential (Fulbourn Site)), 203916 (Hill Residential (Sawston Site)), 204126 (Hill Residential (Hardwick Site)), 204340 (Hill Residential (Great Abington Site)), 204518 (Axis Land Partnership and Executors of Norman Winfrid Moore), 204525 (Axis Land Partnership and Executors of Norman

between economic growth and the climate, physical and environmental capacity of the area. The vision should be to explicitly manage and mitigate these conflicting aspirations. • why doesn't the Vision rely on the mix of development strategies outlined in the Spatial Strategy as a whole. There is no specific reference to the type of development or its location. Recommends the Plan Vision be updated to clarify the range of development locations to be utilised to meet demand for housing and other types of development.	Winfrid Moore), 208673 (Guilden Morden Developments Ltd)
The respondent supports the vision for Greater Cambridge, emphasising the need for a Local Plan that sets ambitious growth targets and aligns with national policy as per Paragraph 36 of the NPPF 2024.	204468 (Ceres Property)
Supports the vision and the seven strategic priorities that flow from it. Clarity would be improved if the order is changed, and the inter-relationships are explained.	203411 (Juniper)
The ordering of the development priorities contradicts the fundamental aim and purpose of the Green Belt legislation and the national planning policy framework that enshrines it. This inconsistency was noted during the planning appeal that led to the recently completed new retirement village on the Gog Magog hillside outside Stapleford. More detail is supplied in the attached document which addresses the relationship between the S/DS and S/GB policies and proposes refinements in the section starting on page 3.	203009 (M Foote)
Recommends modification of the Wellbeing and social inclusion priority to read, "Help improve equality of access and opportunities for people in Greater Cambridge to lead	201528 (Stapleford PC), 208088 (Great Shelford PC)

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

Natural England welcomes the strategic priorities of the Local Plan and are pleased to note that the Vision for Greater Cambridge, includes the aspiration for a big decrease in climate and environmental impacts, and increase in the network of nature, wildlife and multi-functional green spaces.	207600 (Natural England)
Anglian Water is supportive of the seven strategic priorities set out in the Vision, particularly those that align with our long-term strategic ambitions. We support direct reference to higher achievable standards for water use to reduce environmental impacts. Anglian Water is directly engaged with the Cambridge Water Scarcity Group, as we jointly bring forward strategic supply options with Cambridge Water - including the Grafham to Cambridge strategic pipeline (Phase 1 of the 70km Grafham to Rede pipeline) and the Fens Reservoir.	209156 (Anglian Water Services Ltd)
Responder supports – • I. Cross Boundary Matters – matters where more discussion and consideration must be given, such as ensuring connectivity is considered to key employment and international connectivity to London Stansted Airport and Chesterford Research Park • II. Growth and Infrastructure Delivery – the Plan ensures development will be accompanied by the right infrastructure. • III. Strategic Priorities – inclusion of climate change as a strategic priority, welcomes that the Plan seeks to address water supply matters.	210457 (Essex County Council)

• IV. Economic Growth – welcomes that the fast-growing economy is driven by successful partnerships between academics, business, investors and local government, and the commitment to sustainable and inclusive growth.	
Responder supportive of Local Plan, key themes and strategic priorities, and strategy directing growth to the Cambridge Urban Area, the edge of Cambridge, and new settlements, recognising that that a range of sites will be required. However, ensure that an appropriate proportion of medium scale sites are allocated, such as site at Fen Ditton, to enable a broad mix of tenures and dwelling types, including affordable housing, providing flexibility ensuring housing requirements are met within the plan period.	210219 (Vistry Group)
Requests to avoid the Plan being of “very limited weight” upon adoption, Greater Cambridge should strive for a Local Plan that is in full alignment with the emerging national policies for decision taking and positively prepared in this regard.	208255 (Ashwell & Morden Landowner Consortium)
Concern growth is in the wrong direction of travel for our fen and Riverlands, soon to be subjected to sea level rises, not factored in? Would not leave 'Paradise' for the urban sprawl of Marleigh by Marshalls, densely-packed new-build, identikit passive units, the current City Council orchestrated - with questionable pride? The Cambridge Brand will have tarnished further by 2045. Build communities where there's a real need, not here in such a trumped-up and contrived fashion.	208872 (R Lambert)

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

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

established, sustainable settlements served by existing high-quality public transport infrastructure, and which reduces the reliance on the private car. Stapleford and Great Shelford highlighted as sustainable villages.	

Policy S/JH: New Jobs and Homes

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

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

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

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

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

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

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

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

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

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

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

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

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

Response to main issues raised in representations:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Table of representations:

Summary of issues raised in comments	
Support for the identified housing need, noting that it aligns with the National Planning Policy Framework's goal to boost housing supply based on local needs.	203045 (Cemex UK Properties Ltd), 204105 (G W Balaam & Sons), 211261 (Terra Strategic)
Support for requirement of providing a minimum of 48,195 homes and need for affordable housing.	211456 (Hayfield Homes Construction Ltd)
Support for the approach to employment: • Support for draft Policy S/JH, which aims to provide 73,300 new jobs and a diverse range of local employment opportunities. • We support the Plan's commitment to sustaining and expanding globally significant research, science and technology sectors, alongside its clear recognition that housing delivery must keep pace with job growth if Greater Cambridge is to remain inclusive and competitive. The scale of employment and housing growth identified in the Plan reflects Greater Cambridge's pivotal role in the UK economy. Planning positively for this growth is essential if the full benefits of its world-leading science and innovation base are to be realised.	204649 (Jaynic), 208131 (Albion City Development)
Objections to identified housing and employment need or comments that they should be revised upwards, including for the following reasons:	202364 (CLC Trust), 203307 (J Manning), 205140 Home Builders Federation, 201945 (KG Moss Will

Summary of issues raised in comments	Comments highlighting this issue
• The Central growth scenario of 73,200 jobs is seen as conservative and not reflective of the full growth capacity of the Cambridge economy – the higher growth scenario as acknowledged in the Employment and Housing Needs Update should be used in policy revisions. • Oxford Economics evidence points to substantially higher levels of job creation • The 2025 Employment and Housing Needs Update should be recalculated to include commuting patterns adjustment as per the 2023 Greater Cambridge Employment and Housing Evidence Update Employment Land, Economic Development and Relationship with Housing report • Restricting employment growth to historical trends fails to embrace the advancement technology brings. To do so in one of the most innovative clusters in world fails to meet Government's key priority of growing the economy. • The plan's employment target of 73,330 jobs to 2045 under-estimates historic growth and therefore the required industrial floor-space of 317,000 sqm is too low	Trust & Moss Family), 201967 (Shelford Investments), 202028 (Wimpole Associates), 202077 (J Francis), 202098 (Cambridgeshire County Council (Strategic Assets)), 202309 (CALA Group Ltd), 202364 (The CLC Trust), 202534 (Granta Land Ltd - Land West of Station Road, Meldreth), 202557 (Ely Diocesan Board of Finance), 202623 (British Land), 202648 (Granta Land Ltd - Land at Sheene Farm, Meldreth), 202663 (Granta Land Ltd - Land East of Station Road, Meldreth), 202747 (Martin Grant Land Limited), 203063 (Trinity College), 203075 (Granta Land Ltd - Land North of Mingle Lane and East of Hinton Way, Stapleford), 203147 (Christ's College), 203307 (J Manning), 203380 (Jesus College), 203404 (Jesus College), 203463 (Hopkins Homes), 203891 (Hill Residential (Fulbourn Site)), 203904 (Babraham Research Campus Ltd), 203912 (Abbey Properties Cambridgeshire Limited), 203921 (Emmanuel

Summary of issues raised in comments	Comments highlighting this issue
• Concern that assumptions re larger household size and increased commuting, compared to previous assessment of need, are not sustainable; larger household sizes embed affordability issues not being able to move out of parents' home; increased commuting lacks sustainability. • There is an increasing disparity between the jobs target and the housing target. Greater Cambridge needs to plan for a corresponding increase in housing delivery, because anything else jeopardises the continued economic success of Cambridge and the delivery of the required housing in the right locations. • Using previous commuting assumptions will result in increased numbers of workers commuting into the area. • The approach to commuting assumptions is not justified. • The provision of affordable housing is considered to justify an increased housing figure, especially given recent delivery records • Affordable housing target is too low and does not reflect demand. On some strategic sites provision is reduced in favour of providing infrastructure.	College (Wilberforce Road), 203925 (Hill Residential (Sawston Site)), 204027 (E W Pepper Ltd), 204108 (Railpen), 204118 (Emmanuel College (Long Road)), 204120 (Richborough), 204136 (Hill Residential (Hardwick Site)), 204153 (Tritax Big Box Developments), 204204 (R2 Developments Ltd), 204234 (Bellway Strategic Land), 204323 (Barratt Redrow), 204353 (Hill Residential (Great Abington Site)), 204361], 204361 (Wain Estates), 204397, 204414 (Bellway Strategic Land), 204451 (Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204499 (Places for People), 204508 (Redrow South Midlands), 204536 (Axis Land Partnerships and Executors of Norman Winfrid Moore), 204599 (SmithsonHill), 204634 (Urban & Civic and Hill Residential), 204797 (Quy Tech Ltd on behalf of landowners), 204831 (Pigeon), 204833, 210221 (Vistry Group), 204896 (St John's College Cambridge), 205000 (Endurance Estates), 205080 (Axis Land

Summary of issues raised in comments	Comments highlighting this issue
• The housing target is not consistent with national policy because upward adjustments for growth and affordable housing have not been considered. • Housing target should be adjusted upwards to take proposed infrastructure developments (e.g. EW rail, new busways and stations), economic growth ambitions and affordable housing needs into consideration; inadequate housing provision could be a barrier to growth. • Incorporate the additional growth ambition of the Cambridge Growth Company and Combined Authority • The proposed figures for job and housing needs should be regarded as minimums rather than maximums • Increase the housing delivery to a minimum of 61,000 new homes which is more akin with the likely housing needs given the planned employment growth. • Objects to plan expanding villages beyond the outer Green Belt, advocating for the inclusion of Gt Shelford sites to meet housing needs sustainably. • Critical of the lack of updated HELAA assessments for site 115766, which has constrained opportunities.	Partnerships Ltd), , 05140 (Home Builders Federation), 205240 (Cambridge Realty Limited), 205000 (Endurance Estates), 205080 (Axis Land Partnerships Ltd), 205084 (North Barton Road Landowners Group), 205140 (Home Builders Federation), 206216 (Granta Land Ltd - Land at Valley Farm, Meldreth), 207436, 207437, 207438 (Pioneer Group Ltd), 208326 (PX Land Ltd), 208397 (Ceres Property on behalf of land owner at Freisland Farm, Swavesey), 208700 (Guilden Morden Developments Ltd), 208770 (Croudace Homes), 201851 (Chivers Farms Limited), 208899, 208900 (Nightingale Land and Hill Residential Ltd), 209326 (B Homent, J Tee & R Smith), 208700 (Guilden Morden Developments Ltd), 209172 (Turnstone Real Estate Ltd), 204893 (Great Shelford, Ten Acres LLP), 204904 (St John's College Cambridge), 210312, 210313 (Russell Smith Farms), 211046 (Wates Developments (and Landowners)), 209032 (Marshall Group

Summary of issues raised in comments	Comments highlighting this issue
• Concern regarding compliance with NPPF para 23, additional sites are needed to meet housing requirements by 2045 and to include a reliable buffer of at least 10% and revisit of the 'Exceptional Circumstances' case to ensure sustainable sites are not overlooked. • welcomes the commitment to updated Green Belt Study requesting publication before Regulation 19 consultation. • Concern Plan does not currently provide sufficient land to meet the housing requirement, allocate College land.	Properties), 209033 (Marshall Group Properties), 211668 (SmithsonHill), 211679 (Newlands (Cambridge) Limited)
Whilst the Local Plan identifies some level of need within the villages of the District, the current development strategy makes no attempt to meet this need. From a review of the Evidence Base, it appears no assessment of the level of affordable housing need has been made for the Villages of the District. Therefore, the Councils have failed to assess the level of both market and affordable housing need.	209709, 209710, 209714, 209715, 206787 (Endurance Estates)
Cambridge City and South Cambridgeshire administrative areas should be substantially higher number of homes delivery than the minimum of 71,586 dwellings between now and 2050 given its position role as the International Life-Science and employment driver for the County and the Government's Case for Cambridge.	208384 (NIAB Trust)

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

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

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

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

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

Summary of issues raised in comments	Comments highlighting this issue
It is not clear what use classes are proposed to be delivered at any sites referenced at para 2.72 or will deliver any of B2/B8 need that has been identified. Clarity is required through the policy allocations as to the anticipated uses each employment allocation will be seeking to deliver if the approach is to be effective in ensuring the employment needs are met.	
• Concern Plan relies on larger schemes for development, and as such recommend: 15% should be the minimum buffer if North East Cambridge is not included, and the current growth assumptions are taken forward. Requiring an uplift of at least 4,096 homes not currently allocated; • 20% should be the minimum buffer if North East Cambridge is included, requiring an uplift of at least 2,445 currently unallocated homes.	211672 (SmithsonHill)
Comments it is important that GCSP consider whether economic factors suggest that population (and therefore housing) growth is even higher than the standard method indicates is needed, particularly in the context of NPPF paras 85-86. Noting ONS's population and household projections which post-date the	211657 (SmithsonHill)

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

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

Summary of issues raised in comments	Comments highlighting this issue
• Responder comments that there is no evidence that aligning the number of homes to jobs in the way assumed by the evidence will have the impact on affordability necessary for those in the 25-44 age group currently unable to afford homes to access them. There is no evidence around the supply-price-affordability relationship to support the idea that the statistical relationship of homes will enable the needs of that particular group to be met by simply limiting the increase in supply to the specific number of additional households in that group. • Additionally, the premise of the standard method is to provide a level of housing over and above the assumed projection of households (i.e. demographic change) to improve - or at least moderate - the worsening affordability of housing. All else being equal – including housing supply and population change - affordability worsens when incomes increase. This means that in a growing economy, even if the number of homes matched the population growth linked to the number of jobs, affordability would worsen unless the supply of homes is increased further to a sufficient extent that it impacts on prices. Matching the number of homes to the number of additional households driven by economic	211659, 211660, 211661 (SmithsonHill)

Summary of issues raised in comments	Comments highlighting this issue
growth misses. GCSP's approach provides no material uplift to housing supply that might be expected to improve affordability; and is likely to create a deterioration in affordability for younger and lower income households, rather than an improvement, failing to meet need and in businesses struggling to recruit due to problems of affordability for workers. • adjustment HRRs using assumptions from 2014-based projections and to go 'halfway' to the 2008-based projections are not meeting need a That starting point from which projections look forward bakes in significant problems of affordability and a mismatch between homes and housing need in Greater Cambridge; even in 2012, Cambridge had an affordability ratio of 9,5 compared to 7.6 in East of England and 6.6 in England as a whole (Source: ONS) b There is no benchmarking of the 'as is' position in Greater Cambridge in terms of its relative position on affordability, concealed households, household formation and what this means about the level of housing required to meet needs and address the historic problems that exist.	

Summary of issues raised in comments	Comments highlighting this issue
c The adjustment to HRRs only goes ‘halfway’ to the 2008 figure. It does not explain why it does not go ‘all the way’.	
Comments that the policy should treat the economic need figures as minimum requirements: • Allow for appropriate flexibility and a level of choice for different sectors. • The job figure will likely need to evolve to align with the Government's broader growth agenda whilst ensuring the vision can be achieved sustainably. • Reflecting the need for additional jobs as indicated by the Greater Cambridge Employment and Housing Needs Update, which projects a need for between 67,600 and 90,900 additional jobs. • Historical growth trends show that the Greater Cambridge economy expanded by nearly 4,000 jobs annually during its strongest growth phase, suggesting a potential for sustained job creation. • Technological advancements in life sciences are transforming the sector, necessitating a flexible approach to employment growth that accommodates innovation rather than restricting it to historical trends.	204945 (Lolworth Developments Limited), 204462 (The Royal London Mutual Insurance Society Ltd), 204451 (Brookgate Land Ltd and Network Rail Infrastructure), 210220 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
• concerned by the apparent dismissal of the higher growth scenario despite the study itself clearly accepting that this 'could be achieved or exceeded'.	
The Draft Local Plan's underlying evidence base underestimates the need for storage and distribution floorspace in Greater Cambridge, which is not aligned with the area's ambitious growth aspirations.	205277 (Newlands (Cambridge) Limited)
Comments regarding the approach taken to jobs and homes forecasts including the following: • Employment and housing growth assumptions lack robust, up-to-date evidence, especially the forecast of 73,300 additional jobs. • Plan is working on outdated statistics of business needs, particularly labs • The plan cites the Iceni report but it doesn't mention 73,300 jobs • Support for the use of local data to best inform the modelling of jobs and housing growth • The Local Plan's approach to housing need is broadly welcomed, particularly its use of local data, headroom for growth, and commitment to a diverse mix of housing types and tenures, including affordable housing	201178 (Save Honey Hill Group), 201326 (D Lott), 201499 (C Meads), 202428 (University of Cambridge), 203520 (Cambridge Ahead)

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

Summary of issues raised in comments	Comments highlighting this issue
suggested that the policy wording allows flexibility for housing and employment growth beyond the Local Plan High Growth trajectory.	
• Statement of Common Ground does not make it clear how many houses will be built in neighbouring areas • unmet need for neighbouring authorities has not been taken into account to date.	204268 (Croudace Homes), 205140 (Home Builders Federation)
Support for aligning housing figures with the government's standard method to avoid overburdening local infrastructure and resources, and potentially needing to seek assistance from neighbouring authorities to meet a portion of the enhanced housing figure.	201656 (Huntingdonshire DC)
West Suffolk council can confirm it is not seeking to accommodate any housing need identified in Greater Cambridge.	204914 (West Suffolk Council)
Recommends that to ensure that the emerging Local Plan is positively prepared and can be found sound, the Councils must work with Huntingdonshire and North Hertfordshire to ensure there is not an unmet housing need and to ensure that strategic cross-boundary matters are considered as part of the Local Plan.	209758 (Thakeham Homes Ltd)
Concern regarding the extent of the “need” for development in Greater Cambridge and if “need” is to assist the central government in meeting their targets so that they can demonstrate that they have met at least one of their	208713 (J and C Collins)

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

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

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

Summary of issues raised in comments	Comments highlighting this issue
Concern specialist housing for older people will not all be delivered in the plan period, due to phasing and locations are located as part of wider/ larger proposals, delivery lacks certainty.	211261 (Terra Strategic)
1500 new nursing and residential care spaces is not enough for this ageing population and nothing for the needs of the pre-nursing stage elderly who live alone.	204522 (C Forbes-Cable)
Concerned that the figure for student accommodation need is misleading. More recent evidence is provided, which seeks to better reflect the plan period.	203985 (Anglia Ruskin University)
Concern regarding data inconsistencies between the housing requirement in S/JH of 2,295 dwellings per year and the housing need in Appendix D of approx. 1,600 homes. There is a discrepancy of 695 houses in these two data sets. If extrapolated across the plan period this would imply a potential discrepancy of 13,900 homes.	208714 (J and C Collins)
Comments regarding the housing requirements for neighbourhood plans element of the policy, including: • the Plan to use “indicative housing figure” for neighbourhood plans (not “requirement”) • correct the Eddington census anomaly that inflated Girton’s baseline	202217 (Girton PC)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Policy S/DS: Development strategy

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

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

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

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

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

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

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

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

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

Response to main issues raised in representations:

Support for the development strategy is noted.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Overarching

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for Development Strategy includes: • Broad support for the 7 strategic priorities. • excellent proposals and detailed intentions that are well communicated • Support for strategy, specifically the retention of the NEC allocation and policy support for employment-led development, site intensification, in a sustainable location. • We welcome this vision document with its focus on new sustainable sites on active travel routes. • For stated order of preference for future housing land-use and retaining and enhancing the Cambridge Green Belt • limited infill in rural villages where public transport is poor and car travel is the only realistic option • support for the growth ambition and strategic direction, and inclusion of additional headroom in both jobs and housing projections. • Support Cambourne North being identified as an integral part of the strategy to meet housing, employment and community needs and deliver sustainable development.	203570 (The Crown Estate), 201528 (Stapleford PC), 205079 (Y Dignon) 202820 (Cllr K Porrer), 203900 (Cambridge Growth Company), 211535 (Martin Grant Land Limited), 211103 (Hallam Land Management), 211081 (The National Trust), 211067 (Savills), 211063 (St John's College Cambridge), 211041, 211054 (Wates Developments (and Landowners)), 210222 (Vistry Group), 208937 (Cambridge Growth Company), 208380 (NIAB Trust)

• A strategy that includes a particular focus, and reliance, on strategic sites in Greater Cambridge is logical and supported in principle. • Supports the plan-led system in principle, and broadly supports the development strategy and approach to site allocations. • It is noted that the 'Overview' section of the supporting text, at para. 2.55 refers to a blended strategy to meet a variety of needs which responds to opportunities provided by different sources of supply. This general approach is supported. • It is supported that (at para. 2.55d) sites should be developed that can be well-integrated with existing communities to reinforce the distinctive character of the city, towns and villages, having regard to development at densities and in forms which make best use of land whilst creating well-designed, characterful places. • Part 1 is supported, it is considered appropriate that development should be focused within Cambridge City and on the outer edge of Cambridge, accounting for the global importance of Cambridge as the focus for growth.	
Support for the development strategy concentrating jobs and homes, within urban centres, new settlements, or in proximity to existing or proposed infrastructure: • Prioritising new homes in sustainable locations • Reduce the need to travel and enhance co-location benefits • Promoting public and active modes is the natural choice • Locations with the least climate impact • Integrating green infrastructure	201012 (M Colville), 201657 (Huntingdonshire DC), 201023 (K Mahoney), 201376 (Gamlingay PC), 208491 (Central Bedfordshire Council) 202612 (Ickleton PC), 204701 (Optimis Consulting Ltd), 202822 (Cambridge City

• Agree to developing sites at appropriate densities to optimise land use and create well designed places • Support for continued development of the Cambridge Biomedical Campus, intensification at Eddington, the Innovation District at Cambridge West, and the evolution of Cambourne with a new East West Rail station. • Support long term vision which will continue new homes, jobs and infrastructure beyond the plan period to help maintain a land supply and reduce need for development in less sustainable locations • Expresses clear support for the hierarchy of development set out in the policy. • Ickleton PC generally supports the Development Strategy for Greater Cambridge.	Council Liberal Democrat Group), 202609 (Ickleton PC), 204720 (Croudace Homes), 204139 (Richborough)
Support for spatial approach directing most new development to the northern part of the district, using brownfield sites and the A14 corridor, aligning with the jobs-led housing need and sustainable growth objectives	203256 (North Herts Council)
Supports plans to increase numbers of accessible/adaptable homes (e.g. via application of M4(2) building standards).	202079 (Great Shelford Village Charity)
Support for order of preference and approach to future land use for housing and the retention and enhancement of the Cambridge green belt.	203263 (Horseheath PC)
Allocated sites within the GCLP reflect a balanced approach to growth, ensuring that development: Is appropriately scaled to the size and function of settlements, Is supported by	205849 (Lolworth Parish Meeting)

infrastructure planning and mitigation, Responds to identified local and strategic needs, Protects the intrinsic character of rural communities. Lolworth recognises that planned development, when delivered in accordance with the Local Plan, can support sustainable growth while safeguarding the qualities that make villages such as Lolworth distinctive and viable.	
Concern that the development strategy is locating housing away from employment sites with negative consequences: • Housing growth becoming dispersed while employment remains concentrated around Cambridge, increases congestion, increasing pressure on transport corridors and making sustainable travel harder. Highlights the importance of providing safe, attractive routes for walking and cycling. • Location of housing delivery away from employment sites. Residential development to be in Cambridge close to existing infrastructure and sustainable transport options. • Highlights the need for employment and housing to be planned together to avoid increasing car trips, congestion and carbon emissions, and enable equitable access for households without cars. Supports mixed-use development and co-location of homes and jobs to enable walking and cycling and reduce the need for costly public transport extensions. Also raises concern that	201738 (T Burford), 201686 (B Le Gallez), 202506 (H Brown), 203145 (Cambridgeshire ACRE), 203335 (Great Wilbraham PC), 204500 (D Potts), 204701 (Optimis Consulting Ltd), 203663 (V Ashton), 203200 (A Hoare), 204632 (Max Fordham), 205280 (A Williams), 203311 (L Dassy), 204187 (Mr and J Johnson), 205122 (J Grantham), 202451 (A Brown), 203662 (T Preud'homme), 205028 (N Spenley), 204763 (R De Beaux), 204716 (Mothers CAN Cambridge), 204559 (R Hoadley), 204658 (R Humphrey), 205438 (A Kirchgaessner), 204506 (Redrow South Midlands), 209067, 211764 (Camcycle)

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

proofing would include clearer safeguards for rural services, investment in village transport links and a stronger role for parish councils in shaping growth. Suggests importance of enabling plan-led and organic growth in villages to support rural community vitality and local housing needs, notes affordable and specialist housing. Recommendations for emphasis on proportionate growth in rural settlements. Calls for more explicit direction on job and housing needs in rural areas. • Recommends development of approximately 65 dwellings in a sustainable rural settlement is seen as a modest and valuable contribution to housing needs. • Sustainable development not achievable unless no more growth and concerns over the environment. Suggests businesses, housing, roads, people, should be directed elsewhere.	
Much of the Plan's transport discussion, and wider transport debate, is framed around commuting into Cambridge. This commuter-led framing creates two problems. First, transport systems designed primarily around peak commuting struggle to deliver viable and attractive services. Second, it overlooks the fact that the majority of trips are not made for work, but for everyday activities such as shopping, education, healthcare and social life. Access to local amenities plays a far greater role in shaping travel behaviour than access to distant employment alone, yet this is not sufficiently reflected in the spatial strategy.	209068 (Camcycle)

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

● Remove the Grange Farm allocation from the Plan ● Avoid substituting constrained urban or edge of Cambridge sites with remote or poorly connected locations ● Prioritise development in locations where sustainable travel can be the default from day one, without reliance on speculative or uncommitted transport mitigation.	
Objections that the strategy places an overreliance on a few large strategic sites for growth: • Objects to the strategy as fundamentally flawed in meeting identified housing and employment needs. • Raises concern that the strategy is overly dependent on major new settlements and infrastructure that is not yet confirmed, including the proposed rail link. States that locations do not have sufficient infrastructure to support additional growth. Concern re feasibility of significant infrastructure need and impact on delivery. • A number of these strategic sites have significant constraints which will likely result in significant delays to delivery. • NPPF Paragraph 23 emphasises the need for a clear strategy for land delivery to meet assessed needs. • A 20% buffer is recommended instead of the proposed 6.5% to ensure robust planning and adequate housing supply	201929, 201938,, 201946, 201936 (M Asplin), 202035 (Wimpole Associates Ltd), 202328 (Granta Land Ltd), 202365 (The CLC Trust), 201854 (Chivers Farms Limited), 207537 (Horningsea PC), 207535 (Home Builders Federation), 203138 (ESCO Prospect), 203309 (J Manning), 206213 (Granta Land Ltd - Land at Valley Farm, Meldreth), 206071 (Wimpole Associates Ltd), 203892 (Hill Residential (Fulbourn Site)), 203965 (Hill Residential (Sawston Site)), 204043 (E W Pepper Ltd), 203317 (W Bowden), 204087 (M Richmond), 202450 (I Morris), 202160 (H Fordham), 202627 (British Land), 203069 (Pegasus Group), 206079 (Wimpole

• Historically lead to delays in delivery rates, raises concern that relying on the same approach will not deliver the required scale or pace of development, and risk that housing need is not met. This will impact 5 year housing land supply. • Housing trajectory is based on over-simplistic delivery rates, and is not credible. Questions the realism of delivery assumptions, noting that current build-out at major sites such as Northstowe and Waterbeach is significantly below what would be required to achieve the target of 37,865 homes by 2045. Historical data shows a consistent delay in housing delivery from strategic sites, averaging 4.1 years longer than anticipated. • Concerns with over reliance on delivery at new settlements and delivery from windfall sites, with a significant decrease in housing provision within the Cambridge Urban Area and a reduction in the rural area. • Comments on over-reliance now placed on new settlements in meeting housing needs. 93% is made up of 5 sites. 44% of the proposed distribution in housing growth is now anticipated to come forward at the new settlements, compared to 23% in the adopted Local Plan and 18% in the previous Structure Plan. • Objects to the growth of Cambridge and expresses a preference for no expansion of the city. States that while sustainability, biodiversity and climate goals are supported, it is not realistic to accommodate the proposed level of growth while simultaneously reducing traffic and enhancing biodiversity.	Associates Ltd), 204971 (Martin Grant Land Limited), 202081 (J Francis), 202763 (Martin Grant Land Limited), 202766 (P Norman), 203157 (Christ's College, Cambridge), 202906 (The Trustees of the C Y Nutt Deceased Will Trust), 202887 (Northwest Biotherapeutics Capital Limited), 203342 (The Varrier Jones Foundation), 204720, 208771 (Croudace Homes), 204376 (Hill Residential (Great Abington Site)), 204439 (Wain Estates), 204434 (Bellway Strategic Land), 204640 (Urban and Civic and Hill Residential), 202536 (Granta Land Ltd), 204241 (Bellway Strategic Land), 204139 (Richborough), 204420 (Bellway Strategic Land), 203924 (Emmanual College), 204122 (Emmanual College), 204164 (Tritax Big Box Developments), 204275 Croudace Homes), 203390 (Jesus College), 203406 (Jesus College), 201940,

• Objects that the proposed level of housing growth is unsustainable in a predominantly rural county, stating that development would erode countryside gaps and overwhelm existing settlements such as Cambourne, and the need to address connectivity. Raises concern that recent new settlements lack community cohesion and adequate infrastructure. • Objects to scale of development, creates long term disruption, harms liveability, and is driven by development pressure rather than local need. • Recommendation for a diversified strategy with proportionate growth in expanded existing settlements and development along transport corridors to accord with NPPF which encourages development to be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. • strategy should plan for a higher level of employment and housing growth with a greater supply buffer given uncertainty over delivery of key sites. • Suggested that additional smaller sites on the edge of Cambridge in sustainable locations should be considered. • Suggested that additional allocations at strategic growth scale are added to Improve the pipeline supply in sustainable less constrained locations such as to the east of the subregion and at Six Mile Bottom. • Fails to allocate appropriate levels of development within settlements. Only 205 out of 13,463 homes identified for 2024-2045 will be in rural areas, suggesting	201947 (KG Moss Will Trust & Moss Family), 201964 (Shelford Investments), 202073, (J Francis), 202433 (The CLC Trust), 202554 (Ely Diocesan Board of Finance), 203576 (Horningsea PC), 204073 (South Cambridgeshire District Council), 206076 (Wimpole Associates Ltd), 203511 (ESCO Prospect), 202156 (R Lambert), 202913 (K Trudgeon), 204106 (Richborough), 206104 (Wimpole Associates Ltd), 209328 (St John's College Cambridge), 204511 (Redrow South Midlands), 208398 (Ceres Property on behalf of landowner at Freisland Farm, Swavesey), 204043 (E W Pepper Ltd), 205011, 208363, 208364, 208365, 211536 (Endurance Estates), 204850, 204868 (Great Shelford (Ten Acres) LLT), 204506 (Redrow South Midlands), 211107, 211108 (R Raywood, A Bradney and D Unwin), 204529 (Rosconn Group), 204956, 205002,

more flexibility in allocations to mitigate delays with strategic sites. Additional small sites should be allocated (various sites are promoted), including in the more sustainable villages to ensure delivery early in plan period. • Plan leaves ongoing pressure on surrounding villages through Green Belt evidence and promoted sites, despite the absence of formal allocations. • Crucial to identify small sites, including in grey belt, to increase supply of identified sites for housing, to support small/medium housebuilders, enhance housing diversity and foster local growth. • Ensure delivery of more homes earlier in the plan period. • Allocate more medium scale sites capable of delivering 150-250 dwellings. • Concern development strategy misses the sustainability benefits of homes in rural areas for community resilience and is flawed. Further small sites be allocated to ensure delivery rates in sustainable locations early in the plan period • New settlements are expected to deliver less than 40% affordable housing. • Justification for release of land from Green Belt to direct housing to sustainable locations, as significant need for housing and affordable housing. • Infill pressures already exceed the eight-dwellings-per-site limit, creating traffic and community concerns • Figure 12 shows distribution of growth with rural areas and windfalls 16%, compared to 23% in adopted plan and 30% in 1999-2016 plan. • Plan does not confirm with NPPF requirements:	211059 (Wates Developments), 205311 (Axis Land Partnerships ltd), 206352 (Grants Land Ltd – Meldreth)), 207996 (Cambridgeshire County Council), 201968 (Shelford Investments), 202099 (Cambridgeshire County Council (Strategic Assets)), 202558 (Ely Diocesan Board of Finance), 211610, 211611 (Bloor Homes Eastern), 211584 (Terra Strategic), 211583 (Mr & Mrs Smith), 211477 (G Robinson and Partners), 211472 (Beechwood Estates Ltd), 211410, 211411 (CALA Group Ltd), 210222, 210223 Vistry Group, 208903 (Nightingale Land and Hill Residential Ltd), 208381, 208382 (NIAB Trust)

○ Paragraph 73 - failing to deliver at least 10% of homes on sites no larger than one hectare, rather than relying on windfall developments. Current approach allocates 3.5% of the housing to small sites, which is below the NPPF's 10% target. ○ Paragraph 83 - strategy does not align with requirement to enhance rural community vitality, in reliance on windfall developments not planned allocations. ○ Current Green Belt release criteria conflict with NPPF 2024 paragraph 146 ○ Contradicts Dec 2024 NPPF and Feb 2025 PPG update which require a sequential approach prioritising grey belt for release, by failing to map this land the Councils bypass a national mandate to support village vitality (NPPF 83) and small-site delivery (NPPF 73). ○ Plan is premature on the basis it fails to have regard to emerging revised NPPF, in particular 20% of allocations should be on sites of between 1 and 2.5 hectares. ○ Objects as approach is problematic, regarding delivery timeframes, and inconsistent with key principles of the NPPF. Paragraph 72 of The Framework acknowledges the importance of strategic housing land supply comprising a sufficient mix of sites, regarding availability, suitability and economic viability.	

○ Paragraph 72a states that ‘land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved’. According to this data, 94% of all new dwellings proposed between 2024 and 2045 are allocated across only 6 sites, 3 of which are new settlements. The ‘Rest of the Rural Area’ comprises rural centres and group villages, a total of 48 settlements, and has only 3 sites allocated for a total of 205 new homes. The proportion of development attributed to major, strategic sites not only carries a huge risk to deliverability but is also inconsistent with The Framework. • Housing delivery assumptions for all of the strategic sites are reassessed, taking into account realistic annual housing delivery rates and the delivery of critical infrastructure required for those sites. • To Release Land from the Green Belt to meet development needs. • Make additional allocations are made in the more sustainable villages, including Fulbourn, Great Shelford, Sheene Farm, Meldreth • Revise sequential hierarchy of types of location to account for sustainability benefits of sites adjacent to villages. • Revise housing trajectory with realistic figures for delivery on major sites.	

The Draft Plan does not provide enough housing land to meet the 48,195 home target and the 73,300 job target: • A housing land supply buffer of at least 10% (ideally 15-20 %) is required. • It is evident that the housing land identified in the Draft Local Plan is insufficient to meet the real-world need in and around Cambridge for two further key reasons: the continuing reliance on in-commuting; and the reliance on strategic sites.	207904 (Barratt Redrow), 204355 (Barratt Redrow), 204139 (Richborough), 204929 (Places for People), 203890 (Hill Residential (Fulbourn Site))
It is considered that the strategic priorities for the draft GCLP would only be fully delivered with a higher housing requirement, an amended development strategy, and additional development at the more sustainable villages including Fulbourn, Great Abington.	203890 (Hill Residential (Fulbourn Site)), 204340 (Hill Residential (Great Abington Site))
Concern the strategy will not deliver the needs of a growing population: • Green belt releases south-east of Cambridge are piecemeal and fail to represent a holistic approach to sustainable development. • Grange Farm is ill thought out, will become a car commuter settlement given its proximity to A11/M11 and ease of access towards London. It is unlikely the majority of new residents work in southern research cluster. Too small to deliver most services residents will need resulting in out-commuting. • Should deliver a comprehensive plan for south east of Cambridge, edge of Cherry Hinton, Queen Ediths, Biomedical Campus, with targeted review of inner green belt, including accessible natural greenspace.	202493, 202510, 202513, 202524 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)

• Small targeted extension of Peterhouse Business Park would deliver new accessible rich countryside to support growing city.	
Suggests removing or discounting speculative development dependent on unresolved infrastructure funding, provide distinction between allocated and non-allocated supply, and adopt a more cautious, deliverability-led approach that protects Green Belt land, water resources, village character and transport networks	207537 (Horningsea PC)
A strategy should be underpinned by simple enduring design principles. It doesn't have to be complicated, stick to the 'Keep It Simple" mantra.	201920 (A Davidson)
Suggestion there needs to be greater focus on mixed-use zoning with specifics on how to achieve hyperlocal and interconnected employment and community amenities. Cambridge already has many scattered zones with residential areas desperately needing local leisure and shopping areas	205292 (P Colledge)
Comment that the plans do not provide adequate development opportunities in villages around Cambridge, particularly where transport hubs exist that could support housing for employment areas.	205244 (L Gardner)
Objects that the Newlands proposal would dominate the rural landscape, is inappropriate in scale/height, and would add around 4,500 daily vehicle movements at an already congested junction. States the development would serve national/regional distribution needs rather than local needs.	202838 (W Nichols)
Comments proposed allocations, both existing and proposed, are in locations where the required public transport does not currently exist and the delivery of which is outside the control of the Greater Cambridge authorities.	209966 (Granta Land Ltd)

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

Land north and west of Wilbraham Road, Fulbourn is proposed as a strategic site to enhance housing supply and mitigate risks associated with delayed developments. Changes to plan: Part 1 of the policy should be revised to refer to 'Well Connected Minor Rural Centres' and include the allocation of land to the north and west of Wilbraham Road, Fulbourn as a sustainable mixed use allocation to delivery over 2,500 dwellings.	
The plan should align with the Cambridgeshire and Peterborough Spatial Development Strategy: • Combined Authority will produce a Spatial Development Strategy by 2028. Local Plan will be required to align with SDS and if not amended now will be immediately out of date. With Local Government Reorganisation this could be the last Local Plan to guide growth in Greater Cambridge area. Plan should deliver a development strategy which reflects and supports the approach being taken at both the national the regional level and ensures that the area can maximise the benefits and opportunities available at the local level. Plan period should be extended to at least 2050. • Plan period needs to be extended to 2050 to align with the Cambridgeshire and Peterborough Spatial Development Strategy and accounting for the number of strategic allocations within the plan, that will result in substantial growth after the plan period.	208396 (Ceres Property on behalf of land owner at Freisland Farm, Swavesey), 204106 (Richborough), 208377 (NIAB Trust)

• In accordance with the requirements of paragraphs 25 and 26 of the NPPF, it is critical that the emerging DLP is aligned to the Local Growth Plan and the emerging Spatial Development Plan for Cambridgeshire. • As a starting point, this should ensure that housing and employment growth is substantially increased to align with the objectives for Cambridgeshire & Peterborough.	
Comments in relation to the impact on the rural area and rural communities: • Concern that whilst increased housing and jobs are welcome regard must be given to existing landscape and infrastructure. There is a danger villages will be swamped. • Concern rural communities are not clearly visible within high level framing. Priorities around reducing car use and focusing development in well-connected locations could disadvantage villages unless matched with investment in rural transport, digital connectivity and local services. There is limited recognition of rural health inequalities, ageing populations and the role of parish councils and community organisations. Stronger rural proofing would ensure the strategic priorities explicitly address rural access, inclusion and infrastructure needs alongside urban growth. • Concern increasingly agricultural land is being taken, how that affects food production.	202282 (L Turton), 203140 (Cambridgeshire ACRE), 203336 (Great Wilbraham PC), 203617 (H Thomas), 201734 (R Stobbart), 205609 (Y Dignon)

• Concern plan sets out prioritisation for urban centres and the communities and rural communities, such as Great Wilbraham, are disenfranchised. If development in smaller villages is limited the Plan should include strategies for proactively working with villages to develop more sustainability and viability for residents, potentially services such as buses, schools or shops requiring extra support and are not, in themselves cost effective. • Concern Plan encouraging sparse rural development and so unsustainable development which increases transport related emissions, climate change, harming biodiversity, producing places far from amenities, not socially included and don't foster social inclusion. • Recommends focus on building dense human-scale developments near to the amenities people want such as in the city of Cambridge. • Concerns that development which encourages car use will harm carbon emissions, landscape and rural liveability. • Support for response submitted by Cambridge Sustainable Food	
Comments in relation to the environment, green spaces and biodiversity: • Comment that this section lacks adequate allocation for green spaces and wildlife and broadly runs contrary to that goal, leading to destruction rather than enhancement of green space within the city; this must be reconsidered with a much greater emphasis on large, healthy, biodiverse surroundings. • Suggests greater emphasis on access to nature and green spaces.	207151 (P Colledge), 202650 (S Berridge), 202156 (R Lambert), 203263 (Horseheath PC)

• Concern that development is not grounded in the environmental limits of the area, particularly the reliance on depleted chalk aquifers and associated risks to landscape, health, and environmental quality. • All development must be sustainable; we strongly support this basic tenet of the plan.	
We endorse the proposal as it strengthens Cambridge's role in the Oxford-Cambridge growth corridor, delivers mid-tech and advanced-manufacturing capacity and aligns with the employment and economic objectives set out in the Development Strategy.	203243 (Cambridgeshire Chambers of Commerce)
Comment that the Plan requires further work on critical issues such as travel and flooding, which have not been adequately addressed	207525 (P Deer)
Support for use of development of brown field sites and repurposing of empty buildings, less development of green belt and green spaces.	201156 (G Briscoe), 201682 (S Smith)
Comments that the strategy omits provision for attitudinal change towards affordable, sustainable, healthy, local food.	205079 (Y Dignon)
Comment highlights the long-term strategic potential of the Ashwell and Morden area, outside the Green Belt, well-connected by rail and suitable for sustainable growth and suggest it be explored for future housing provision	203257 (North Herts Council)
The general strategic approach of the Plan to develop new settlements and significant extensions to the largest settlements is consistent with NPPF and specifically NPPF 77, provided the development is supported by the necessary infrastructure and facilities	210982 (C Newell)

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

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

evidence shows deliver more slowly in this geography. It also notable that the GCLP carries forward allocations in the urban area which have not delivered since the adoption of the previous local plans. There are well documented difficulties around the viable delivery of brownfield sites in the current economic climate so assumptions about their delivery should be realistic in this context.	
Greater Cambridge is vital to the economic aspirations of the UK, both now and in the future. However, to ensure that continues, the GCLP needs to respond positively to the concerns raised by a range of stakeholders which would threaten the delivery of sustainable growth in the area, which include: 1) the delivery of a quantum of housing that will enable the job growth expected across the wider Greater Cambridge region, including a wide range of sizes and tenures, to ensure that businesses can draw upon the necessary labour pool; and 2) the location of houses in areas which are accessible to and well supported by public transport links and can take advantage of the significant investment that is going into improving local infrastructure such as the delivery of Cambridge South station, East West rail and new guided busways.	209691 (CEG Land Promotions Ltd)
• Concern Policy S/2 (Spatial Strategy) should demonstrate a clear “brownfield first” approach, consistent with NPPF paragraphs 11 and 119, prioritising the reuse of previously developed land, empty homes, and under-used buildings. • Growth should not be directed to locations where inclusive access cannot be delivered.	208948 (CPRE Cambridgeshire and Peterborough)

• Development in areas lacking accessible pavements, crossings, or step-free routes risks excluding disabled people and conflicts with the Public Sector Equality Duty (Section 149, Equality Act 2010).	
Edge of Cambridge should be lower in the order of preference than Cambourne and new settlements.	201012 (M Colville)
S/PRIA/EG and EW Bridge and Underpass(es) cultural hub Project: • I support development within the designated PRIA of a Cultural Hub offering accessible programme. • The area surrounding the bridge and underpasses is lacking a sense of place. • Introduce community, sports and cultural programme and upgrades to the public realm to promote safety and identity. • Strengthen active transport N/S and E/W connections around the infrastructure for better connectivity, prioritising residents and visitors.	205237 (University of Cambridge)

Jobs and homes

Table of representations:

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

where these can be supported in transport, landscape, and in green and other infrastructure terms.	
Supports target of 48,195 houses, with headroom of 30-69% above the incremental target of 10,330 homes, likely probability of meeting or exceeding the target.	201012 (M Colville)
Comments planned developments resulting in additional 17,950 homes after 2045, will help meet future expansion requirements and provides additional headroom.	201012 (M Colville)
Comments housing requirement is not aligned with jobs growth, increasing car commuting into Cambridge, and not meeting climate change strategic priority.	201941 (KG Moss Will Trust & Moss Family), 201966 (Shelford Investments), 202075 (J Francis), 202433 (The CLC Trust), 202555 (Ely Diocesan Board of Finance)
Concern over amount and location of jobs and homes: • Concerns over increased number of jobs and homes in Cambridge. Jobs needed elsewhere. • Concern over number of housing numbers. You say you want an additional 48,195 homes, Northstowe and Waterbeach provide 37,865 homes, and additional sites 13,460 homes. These add to 51,325 homes not 48,195. Cambourne North will provide 13,000 new homes, Cambourne 2350 and Grange Farm 6000. This is way more than 13,460. • Concern Plan does not provide analysis of employment growth to match its housing evidence, are homes and jobs are being planned together. Growth in	201223 (S Williams), 201500 (C Meads), 201699 (R MacDonald), 201992 (D Langley), 202861 (J Williams), 203197 (G Orwell), 204043 (E W Pepper Ltd), 204160 (Mr and Mrs J Johnson), 204908 (K Brightwell), 201499 (C Meads),

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

• Travel to work when settlement is dispersed but employment is all within the city is an issue. • Dispersed growth increases pressure on transport corridors and reduces sustainability • Detail of where employment is planned across the geography requested • The report by Iceni (Greater Cambridge Employment and Housing Evidence Update) considers the central employment scenario was the best option, suggesting 66,600 new jobs. Yet your plan is for 73,300 new jobs. This is incorrect. You cite the Iceni report but it doesn't mention 73,300 jobs. Its higher growth scenario suggested 76,700 jobs, but says it's unlikely. Their range was from ~30k-78k and you do not explain why you've mis-cited the report and taken a very high estimate incorrectly. The number of houses needed is based on the number of jobs, so you have over-estimated the number of houses needed.	
Housing and employment supply figures are overstated and insufficiently robust.	203576 (Horningsea PC)
Concern on reliance on windfall sites for housing delivery, declining numbers suggest need for certainty in small and medium-sized site allocations.	201854 (Chivers Farms Limited)
Consider the undesirability of maintaining high windfall assumptions and instead allocate a greater number of sites. Promoting greater levels of delivery on allocations and lower levels on windfall sites would give Councils a greater level of control over development coming forward and would encourage plan-led development in line with the NPPF's ambitions. Windfalls are inherently uncertain, it is hard to plan the	211674 (SmithsonHill), 211045, 211046, 211058 (Wates Developments (and Landowners))

necessary infrastructure around such a significant scale of windfall development, especially if it comes forward in a piecemeal nature. High reliance on windfall sites is much more likely to lead to unsustainable village development than a strategy where the Council has control over ensuring village development is located where there is good access to a high quality public transport network and provides the required infrastructure.	
Objection that Policy S/DS identified housing and job needs are too conservative: • The allocation of 10,330 homes from 2024 to 2045 is insufficient for sustainable growth in Cambridge. • Do not align with the government's growth agenda for Greater Cambridge. • To match Oxford-Cambridge corridor. • Supporting text at Para 2.64 does not consider that development needs alone provide the exceptional circumstances to justify removing land from the Green Belt, however the ambitious growth context for Cambridge means that the Council needs to consider the potential release of Green Belt land. • Supporting text in paragraph 2.64 does not consider the potential for Green Belt land release, despite the possibility of new evidence changing this context. • Do not reflect the higher growth scenarios identified in the latest employment and housing needs update. • Requests site allocated to meet the increased demand.	203157 (Christ's College, Cambridge), 203390 (Jesus College), 203406 (Jesus College), 202035 (Wimpole Associates Ltd), 204043 (E W Pepper Ltd), 206075, 206103, 206095, 206092, 206070, 206100 (Wimpole Associates Ltd), 210311 (Russell Smith Farms)

• Plan assumes a 'central' rather than a 'high' scenario aligning more with a growth trend over the last 20 years than the higher growth of the last 10 years despite national aspirations for sustained economic growth in the area. • Needs identified through the draft Local Plan do not reflect Cambridge's potential and are not sufficiently ambitious.	
Comments strategic priorities of the Plan delivered only with higher housing requirement, an amended development strategy, and additional development on the edge of Cambridge.	205046 (North Barton Road Landowners Group)
Concern that the Plan does not address local housing needs adequately, particularly in terms of affordable housing, potentially exacerbating affordability issues in communities like Histon and Impington	207589 (Chivers Farms Limited)
Comment that Plan does not provide a clear spatial analysis of employment growth to match its housing evidence, making it difficult to assess whether homes and jobs are being planned together. Without either a better balance between housing and employment or a step change in direct, high-quality active travel and public transport connectivity, the spatial strategy risks locking in long-distance travel and car dependency for decades.	205229 (J Thomas)
Concerns as no recognition of self-and-custom-build housing as a strategic requirement, (statutory duty under the Self-Build and Custom Housebuilding Act 2015 and supporting national policy). As placed in policy (H/CB) and not spatial strategy, plan	201936 (M Asplin), 202086 (M Asplin)

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

Employment provision

Table of representations:

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

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

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

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

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

opportunities exist in the right location to rehouse these employment uses to ensure that they continue to meet the needs of the local resident population, but that they do so in an efficient and sustainable manner that does not result in increased vehicular trips by the private car.	
The proposed Tritax development does not form part of the GCLP's spatial strategy and has not been identified as a suitable or necessary allocation through the plan-making process. Allowing a speculative, large-scale logistics development outside of the adopted or emerging plan framework would fundamentally undermine the integrity of the Local Plan system. The GCLP directs major employment and logistics development to locations that are: - Strategically planned - Well connected by appropriate transport infrastructure - Capable of accommodating such uses without unacceptable harm. The Tritax proposal does not meet these criteria in the context of Lolworth.	205850 (Lolworth Parish Meeting)
BRC object to the policy and request that point ii is reworded as below: Babraham Research Campus – a new employment-led mixed use allocation to support further growth of this existing world leading bioscience research and innovation campus and improve the health and wellbeing of future employees, residents and the local community through targeted environmental enhancements: including approximately	203462 (Babraham Research Campus)

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

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

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

Strategic and smaller scale development

Table of representations:

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

The plan should include a greater mix of smaller and medium sized sites: • Agrees identifying numerous small sites for development is impractical due to inadequate infrastructure in rural areas and potential negative impacts on green belt. • Concern plan does not allocate small and medium-sized sites needed for housing delivery and supporting small builders, despite their importance highlighted in the NPPF. The focus on large developments limits choice for prospective homeowners, and local residents to remain in communities. • To provide a realistic five year housing land supply, as these sites come forwards quicker • To enable a wide range of house builders to enter the market and provide a wider range of product and increase in local employment • Suggests a balanced approach including more allocations in rural villages to support local housing needs and prevent population imbalance. • Allows the SME sector to grown, delivering homes to increase the range of new homes available, and aligns with paragraph 73 of the NPPF.	201547 (Stapleford PC), 201854 (Chivers Farms Limited), 206215 (Granta Land Ltd - Land at Valley Farm, Meldreth), 204043 (E W Pepper Ltd), 211457 (Hayfield Homes Construction Ltd), 211518 (Endurance Estates), 211105 (Hallam Land Management), 211473 (Beechwood Estates Ltd), 211478 (G Robinson and Partners), 211532 (Hopkins Homes), 211231, 211579 (Living Space Housing), 201854 (Chivers Farms Limited), 211262 (Terra Strategic), 204102, 204144, 204145 (GW Balaam & Son)
The Development Strategy fails to accurately provide for rural and village growth to ensure sustainability and vitality of settlements, particularly sustainable large villages: • Minor Rural Centres are referred to as part of the development strategy but there are limited allocations – add growth at the more sustainable villages with a very good range of services and facilities, accessible by a range of modes of	211612 (Bloor Homes Eastern), 211604 (LGH Hotels Management Limited), 211584 (Terra Strategic), 211534 (Hopkins Homes), 211516 (Endurance Estates), 211415 (CALA Group Ltd), 211068 (Savills)

transport, and where there is an identified need for affordable housing for those with a local connection to the village. • Additional population helps in sustaining and improving the viability of existing services. • Growth within villages, including villages within the Green Belt, is essential to ensure they continue to be vibrant, inclusive communities with new opportunities for residents to stay in those communities. • Growth in villages should be better prioritised to ensure that those who wish to live in the rural areas are able to do so and that there is a variety of choice for the rural community. It is important that villages have adequate incremental growth to sustain the services they currently offer as well as offering appropriate additionality of services to avoid them becoming “sleeper villages". Plan makes allocations for just 265 homes on four sites adjacent to existing villages (Duxford, Highfields, and Melbourn). This is the outcome of a fundamental flaw in the framing of the hierarchy of locations within this policy, which reflects an approach to sustainability that gives predominant weight to environmental factors, notably transport emissions, to the detriment of the social sustainability of existing settlements.	
Supports rural area at the bottom of the preference list.	201012 (M Colville)
The proposed development strategy sets out where new homes and jobs identified in Draft Policy S/JH are to be provided to meet the visions and strategic priorities of the Plan. The strategy is reliant on previous allocations from the adopted Plans. New	211218 (Terra Strategic)

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

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

Concern North East Cambridge is retained, as should no alternative funding become available ahead of the Regulation 19 stage later in 2026, it would be unsound to continue to include the site for allocation in the Plan.	203069 (Pegasus Group)
Support for Strategy for Cambridge Business Park at the heart of NEC and TCE is advancing proposals to comprehensively re-develop the site to deliver significant employment-led development and intensification of the site and is clearly aligned with the Development Strategy. Policy criteria 2(a)(i) sufficiently supports development in NEC in the event the CWWTP is not relocated away from the site, which is uncertain during the plan period.	203570 (The Crown Estate)
Concern Cambridge East allocation is it realistic given Marshalls has cancelled its planned move from Cambridge Airport, delivery trajectory is considered to be uncertain.	203069 (Pegasus Group)
Concern over omission of land at South West Cambridge, include to enhance strategic transport connections and support sustainable mixed use development	202440 (University of Cambridge),
Comments on the Cambourne Expansion: • Support the aspirations to substantially expand Cambourne. Concerns regarding accessibility along the A428 from southern Huntingdonshire, particularly St Neots, into Cambridge and its surroundings. • Concern of impact on the small villages north of Cambourne or the farming land which provides food for the existing population. • Concern that Cambourne and Northstowe have been unsuccessful at fostering sustainable communities with real centres and amenities.	201657 (Huntingdonshire DC), 201682 (S Smith), 205673 (M Meyer-Kelly), 202122 (Elsworth PC)

• Cambourne North is a new settlement, separated from the existing town by a trunk road and railway, and not an organic outgrowth of existing Cambourne. • There is also perhaps a sense of rectifying things that were not got right originally (e.g. the lack of a town centre). • Whether integration will be “supporting services and facilities” in anything but the long term seems unlikely.	
Comments on Grange Farm include: • Concern Grange Farm will provide homes with good transport links to London, encouraging commuters to take a large proportion of the accommodation, negating the intended good environmental outcomes. • Concerns in scale of delivery where the planned sustainable development of the south-east edge of Cambridge could replace some of what is proposed at Grange Farm, Abington to achieve a smaller and more appropriately sized development. • Concern site location and setting is within the least spoilt and most attractive landscape surrounding Cambridge and issues with development density and lack of identity. Recommends site be rejected from Development Strategy as alternate sites in far less sensitive landscape that are better suited to a 6000 house development. • Objects as development in/around Rural Centres is more sustainable than at Grange Farm (existing infrastructure, amenities, etc).	201894 (R Pargeter), 202526 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 203405 (B Reeve), 204160 (Mr and Mrs J Johnson), 203069 (Pegasus Group)

• objection to the proposed allocation under Policy S/DS at point “2.c. new settlements”, “ii. Land adjacent to the A11 and A1307 at Grange Farm • predicated on the Cambridge South East Transport (CSET) busway coming forward to make sustainable • questioned whether Grange Farm will be capable of delivering any new homes within the plan period • comments more appropriate to adopt an alternative Development Strategy which offers a more balanced approach to the distribution of growth, which recognises the role of existing sustainable settlements. • Comments significant doubt over the ability of the proposed allocations to deliver new homes within a timely manner and challenges the justification for the inclusion of Grange Farm within the Plan. Not planning positively to meet its identified needs as required by national planning policy (para 36).	
Concern the policy limits the size of development at ‘minor rural centres’ and lower tiers. The policy should not restrict the scale of growth for rural settlements, as this may affect the settlement's ability to maintain its existing facilities and support necessary growth. The Council should therefore consider the delivery of services and facilities alongside the planned strategic growth of settlements.	208340 (Thakeham Homes Ltd)
The strategy lacks justification and consistency with national planning policy, failing to consider suitable alternatives or deliver sustainable development. Support for the expansion of Cambourne, but the development framework should	203963 (Abbey Properties Cambridgeshire Limited)

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

delivered alongside high levels of private parking, which consumes land, dominates streets and undermines walking and cycling. This also pushes up housing costs, forcing households without cars to subsidise parking through higher prices. The Plan should explicitly link higher density development to lower car ownership, avoid assuming one car per home, and require parking to be optional, generally separated from housing, and transparently priced. Without this, density will continue to be experienced as a problem rather than an opportunity	
The plan predominantly focuses on Cambridge, neglecting over 100 areas in South Cambridge, lacking a clear explanation of how growth in new towns and Cambridge will benefit South Cambs communities. There is no clarity on funding opportunities for infrastructure improvements, including the construction of new schools, doctors' facilities, and road repairs in the SC villages, despite recent big developments in Cottenham for instance	202784 (I Koutoudis)
Comments regarding The Wilbraham's: • Concern lack of development opportunities around the Wilbraham's. Residents would support land release from greenbelt, if enables refresh the population and try to protect the school from closure. Not opposed to high quality development and community led development schemes such as Community Land Trusts could be used. See having a funding stream and professional support for these types of projects as ways of providing new housing.	208725, 208726, 208727 (Cllr Matthew Morgan)

• Concern The Wilbraham's have been ignored in the Local Plan. Support for CIL to spread land value uplift more widely from the large developments favoured by the draft plan. Notes a cycle route to Fulbourn might be a very useful 106, or CIL project for the future for the Wilbraham's. Concern for small villages ability to refresh themselves and draw in new people or allow older residents to downsize and are not adequately reflected in the current local plan.	
Concern proposed green infrastructure opportunity areas unrelated to strategic development allocations that could support their delivery are unlikely to be delivered.	201941 (KG Moss Will Trust & Moss Family), 201966 (Shelford Investments), 202075 (J Francis)
The Housing Delivery Study Addendum (2025) cites particularly high annual build out rates, noting these have previously been achieved due to the continued economic growth within Greater Cambridge. However, it fails to advance any evidence that policy changes will have a material impact on the delivery of windfall sites and therefore it is unclear how this aligns with the requirements of the NPPF. The Councils should consider the potential of omission sites which could facilitate a more joined-up approach to development for the 7,225 homes currently anticipated on windfall sites.	209697 (CEG Land Promotions Ltd)
Land South of New Road, Guilden Morden (site reference 40563), Responder suggests the site should be deemed suitable, available and achievable for the preferred development type.	208672, 208668 (Guilden Morden Developments Ltd)

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

Green Belt, Grey Belt

Table of representations:

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

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

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

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

Policy fails to recognise role of that Grey Belt land could play in assisting to meet employment needs. The Development Strategy Topic Paper (December 2025), in particular Appendix 4, explains why GCSP does not consider exceptional circumstances exist in this instance. However, the evidence base and Sustainability Appraisal consider a series of alternative development strategy approaches to meet identified needs, including use of Green Belt land on the edge of Cambridge. The Topic Paper concludes that Green Belt sites on the edge of the urban area could perform well, but explains that the main disadvantage of such an approach would likely be the significant harm to the Green Belt. However, this conclusion pre-supposes that such sites are Green Belt, rather than Grey Belt land.	211589 (Turnstone Real Estate Limited)
However, there is a danger that in some places the green belt is drawn too tightly around the edges of some villages and thus prevents small-scale appropriate developments that would enhance the environment and provide long-term rural resilience. A sensible, measured engagement should take place over the role of the green belt in relation to smaller village developments.	203071 (Little Wilbraham and Six Mile Bottom PC)
Comments on Green Belt release include: • Plan correctly states that development needs do not justify further Green Belt release, even with the existing headroom and post-2045 developments.	201012 (M Colville), 201184 (M Foote), 204642 (C Forbes-Cable),

• Two identified sites with exceptional circumstances for Green Belt release are unique and should not lower the bar for future releases. • Supports limited Green Belt release land on the edge of Cambridge to meet the general development needs identified in this plan and it is not necessary for you to identify grey belt land. • Supports conclusion it is not necessary to release Green Belt land on the edge of Cambridge to meet the general development needs identified in this plan and it is not necessary for you to identify grey belt land. • Support the idea of the green belt and your points regarding what the green belt is. However, there are sites that are allocated as green belt that are not in fact but already in the village envelope. These areas of green belt do not tick the boxes of your description of green belt, so I suggest they are released. We have one such site in the middle of a village. It was to be released in earlier stages of this plan but has been removed in this stage. The Walled Garden, Whittlesford CB22 CB280901. Please release it from greenbelt.	
Responder objects to approach to Green Belt release. CEG highlight that they support the expansion of the Biomedical Campus, but Cambridge has both a booming life sciences sector and tech sector and restricting the release of Green Belt to just enabling the expansion of one existing life sciences operator feels restrictive, and a limiting option in facilitating and realising the undoubted economic growth.	209693 (CEG Land Promotions Ltd)

Green Belt comments at Mingle Lane site: • Comments insufficient exceptional circumstances to justify releasing land behind Mingle Lane from the greenbelt. • Support for not including Mingle Lane (S/RHC/HW) in Plan. Housing need can be met by other new substantial developments proposed such as that at Cambourne together with new rural Southern Cluster sites such as those at Spicers, Hinxton and Babraham. • GCLP suggests at para 2.64 that the identified development needs alone are not considered to provide the 'exceptional circumstances' required in national planning policy to justify removing land from the Green Belt, this is based on the presumption that the proposed allocations will deliver as anticipated. • Strong support for retention of land between Mingle Lane, Stapleford and Hinton Way Great Shelford (S/RSC/HW) within the Green Belt, as it is important for the visual and social benefit to the community of both villages. There is no justification to release this land for development. • Concern that land at Hinton Way (Policy S/RSC/HW) is potentially being removed from Green Belt as this would cause irreversible damage and leave the neighbourhood open for developments which could ruin the quality of life.	201547 (Stapleford PC), 201579 (J Sennitt), 203069 (Pegasus Group), 207497 (A Scott)
NLHRL contend that the site S/RSC/HW is Grey Belt and given the Government's emphasis of directing homes where they are well related to rail services it should be reallocated for development. The Site Allocations Topic Paper states the Housing Land	208904 (Nightingale Land and Hill Residential Ltd)

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

The proposed development meets the criteria for existing infrastructure and transport networks without encroaching on rural green areas. It is a small-scale development that addresses current housing can be quickly built to meet current needs, while preserving the heritage environment with sensitive planning. The development would enhance access to green space for local residents.	
Comments on Parcel H05 include: • weak physical distinction from Horningsea, showing site is functionally part of the settlement rather than the open countryside. • backland garden enclosed by residential dwellings, with limited countryside views and dominant urbanising influences, making it unsuitable for Green Belt protection. • a limited or no contribution to Green Belt Purposes 1-3, release would have a minor impact on the adjacent Green Belt. • current Green Belt boundary is arbitrary, bisecting a single planning unit and lacking permanent, recognisable features as required by NPPF 149(e)-(f). • Aligning Green Belt boundary with Defined Development Extent would resolve the policy tension noted in paragraph 2.136 of Policy S/DE.	206080, 206081, 206082, 206083, 206084, 206085, 206086, 206087 (M Asplin)

• Sustainable location with active-travel links, a suitable small-site that could help meet the Council's 6.5 % shortfall in small sites. • Removing the parcel from the Green Belt would support the vitality of Horningsea village, aligning with NPPF paragraph 83 which the current Development Strategy fails to address.	
The Consultation Draft NPPF (2025) sets a clear intended direction of travel within Policy GB3(1a) which notes Green Belt boundaries should be altered through the preparation of Local Plans where this would enable the development of land around stations. Whilst until the Draft NPPF (2025) is adopted it will carry limited weight and the Greater Cambridge Local Plan is to be examined against the NPPF (2024), GCSP should consider the intended direction of travel for future policy and consider land (including Green Belt land) for allocation that is well connected to train stations.	211531 (Corpus Christi College, Cambridge)

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

Table of representations:

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

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

Infrastructure

Table of representations:

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

infrastructure that workers, visitors and residents need is crucial to protect the three strands of sustainability	
Concern over the lack of infrastructure to support the proposed development: • Especially schools, medical facilities and qualified medics, community facilities, transport, and increase in people, vehicles, pollution. • Lacks clarity on the infrastructure required to support development on the edge of Cambridge (CSET and Busway identified as critical infrastructure in the Infrastructure Delivery Plan but not explicitly referenced within Grange Farm and the Cambridge Biomedical Campus expansion policies.	201172 (J Lambert), 207533 (S Berridge), 203894 (KWA Architects)
Notes the key importance of infrastructure coming forward in time to support new communities and being rigorously enforced.	202820 (Cllr K Porrer)
Concerns plan appears overly optimistic about infrastructure project timelines and lacks a clear funding strategy for necessary water infrastructure.	202214 (A Sykes)
Concern infrastructure required to support population growth may not be deliverable through the development process alone and will need significant additional investment from external sources. Such as healthcare infrastructure, noting that a replacement for Addenbrookes Hospital could require £2.2 billion. There is a concern that without adequate capacity, economic growth could lead to social and environmental decline, resulting in unsustainable development.	202897 (Cambridge Past, Present and Future)
Section 4.3 of the Infrastructure Delivery Plan (‘IDP’) sets out the priority projects. The Cambourne to Cambridge ('CtoC') bus link is identified in Table 4-1 as a strategic	203440 (Juniper Propco)

transport measure. It is unclear in its wording whether it is anticipated it will be delivered by 2035. Clarification should be provided regarding the anticipated timescales within which CtoC will be delivered. This may become clearer prior to the Regulation 19 version of the plan being produced	
Recommends Grampian conditions should be considered to ensure healthcare infrastructure is built in a timely manner.	202214 (A Sykes)
Concern Plan overlooks the post-16 education system that sustains that workforce. Families drawn by opportunity also prioritise high-quality 16–19 provision, and Cambridgeshire's specialist tertiary model—including institutions such as Hills Road Sixth Form College—needs to be brought into scope. Post-16 places require long lead-in times, suitable sites and coordination with the Department for Education therefore capacity cannot be flexed quickly. Without explicit recognition in policy, site safeguarding and proactive planning with providers, the proposed housing and jobs growth will become unbalanced, constrain parental choice and weaken the skills pipeline. To be deliverable, the Plan must treat post-16 education as critical infrastructure.	202854 (Hills Road Sixth Form College)
Comments regarding the Infrastructure Delivery Plan include: • Comments transport inadequate in South Cambridgeshire, noting Great Shelford, requires improvement alongside new projects, as highlighted in the draft Infrastructure Delivery Plan.	202214 (A Sykes), 202433 (The CLC Trust)

• Concerns that the draft Infrastructure Delivery Plan fails to mention need for a new acute hospital to meet the healthcare demands of the growing population. • Concerns over uncertainty in the infrastructure delivery timetable for expanded developments like Cambourne and Grange Farm	
Some flexibility will be needed to meet unexpected events, outcomes or dependencies on infrastructure projects which may or may not be delivered. Most notably, in August 2025 the Government announced that it will not be funding the relocation of the Cambridge Waste Water Treatment Plant (CWWTP) creating uncertainty as to whether Councils' vision for North East Cambridge can be taken forward. We appreciate the purpose of plan making is to have a "plan-led" system, building in as much certainty as possible as to where development and infrastructure should take place over the plan period. However, as the GCLP has already witnessed unforeseen events along the way can impact on the development strategy, and some key sites are dependent on major infrastructure being funded and implemented.	211423 (Gonville & Caius College)
The Plan's housing supply position indicates that, excluding the North East Cambridge allocation (which is surrounded by uncertainty given its reliance on the relocation of the Cambridge Waste Water Treatment Plant (CWWTP) and funding to do so which was withdrawn by Government in August 2025), the Councils are planning for only a modest level of flexibility above the identified housing requirement.	210224 (Vistry Group)

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

Water supply, drainage, waste water and flood risk

Table of representations:

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

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

the type of development indicated for this site, as a result of the Government's withdrawal of funding for the Cambridge Waste Water Treatment Plant Relocation (CWWTPR) in August 2025, following Development Consent Order approval for the scheme in April 2025. Anglian Water considers that this flexibility for development of the site is important, because of the investment now required to address capacity at the existing Cambridge WRC. i./iii/v For new settlements, there is a considerable expansion at Cambourne North to link with a new proposed East West Rail station and the carried forward allocations at Bourn Airfield and Northstowe. The growth at Cambourne, has and continues to be considerable. Both Cambourne and Northstowe are within the Uttons Drove WRC catchment, which is being considered as part of our longer-term planning for the 2025–2030 asset management period (AMP8) and beyond. In line with PR24 adaptive planning principles and our ongoing discussions with Ofwat, we are reviewing growth forecasts across our operating areas and developing options on how to approach investment that can respond to uncertainty in the scale and timing of development. Any future investment at Uttons Drove would contribute to additional capacity and resilience within the catchment; however, it is unlikely that this alone would accommodate the full scale of growth currently proposed. Supporting later phases of development at these locations will therefore require a longer-term strategy, progressed through future	

planning and price review cycles as growth assumptions are refined and investment needs are confirmed.	
Comments that growth cannot happen until there is a water supply solution: • Assertion that there will be enough water for the expanded population is a joke. • New reservoirs are being built but there is uncertainty how these will be filled. • Concern the scale of growth is placing further unsustainable demands on water resources to detriment of already depleted chalk aquifer and degraded chalk streams, until Fens reservoir (late 2030s) and pipeline (2032) are in place.	201223 (S Williams), 202438 (A Fisher), 202484 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)
Environment Agency notes: • in the policy's Supporting Information on "Ensuring a deliverable plan" mentions "is not anticipated to be completed in the housing trajectory accompanying the Local Plan until 2032" - We would recommend the statement "is not anticipated to" to be improved by including further information from developers of the strategic sites on their planned phasing. • Environment Agency recommends in table 2 highlights Allocations for the periods 'Homes 2024-2025' and 'Homes Post 2045'. We recommend this table be revisited and an additional column be added which details new local plan allocations for 'Homes 2024/25-2031/32' and 'Homes 2032/33-2045' (or any further breakdown, that reflects when water supply is planned to be available from other strategic schemes like the Fens Reservoir).	211127, 211128, 211129, 211130 (Environment Agency)

• Environment Agency are encouraged by the statement “Delivery and phasing plans will need to demonstrate engagement with the water industry, and respond the availability of water supply improvements.” and would recommend including this wording to this policy or to policy CC/WE. • Environment Agency recommends in paragraph 2.86 appears to be missing the word ‘waste’ before ‘water treatment works’, in the first sentence. We recommend being clear throughout the Plan when referring to Waste Water Treatment Works, to avoid confusion with Water Supply Treatment Works, which are commonly referred to as just water treatment works.	
We note the proposed new pipelines to alleviate the shortage of drinking water and the proposal to reduce extraction from the aquifer and particularly chalk streams, both of which we strongly endorse. However, it is our understanding that there is a delay in the availability of water from Lincolnshire using the new pipeline until after 2030. How will this gap be manged and what is the impact of this on the plan period?	203264 (Horseheath PC)
Questions where sewage works are to support this plan?	202282 (L Turton)
Concern over both lack of water and flooding which made worse by development over fields and flood plains.	202282 (L Turton)
Concern any increase in flooding due to A428 is being widened is taken into account.	201682 (S Smith)
Comments on environmental resources (green spaces and water) are at their limit. No credible solutions provided where the resources will come from, and what will be done to restrict demand and usage.	205438 (A Kirchgaessner)

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

Transport

Table of representations:

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

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

• Helpfully shows that development in Cambridge and on the edge of Cambridge generates far fewer additional car trips per home or job than remote new settlements, and has dramatically lower car mode share. • largely relies on 'predict and provide' modelling, testing conservative assumptions and then seeking mitigation, rather than exploring what could be achieved through stronger policy requirements and place-based design. • makes comparisons between sites such as Grange Farm, Waterbeach and Northstowe that do not reflect the different delivery mechanisms and constraints that will shape real-world travel behaviour	
EWR Co strongly support the Council's growth strategy (Policy S/DS) which is 'heavily informed' by the location of existing and proposed public transport schemes, including EWR. The EWR project will play a major role in helping the Councils achieve their ambitions for Greater Cambridge by 2045.	209085 (East West Rail Company)
Comments not sensible on the plan ahead of the Combined Authority's Travel Strategy	201902 (C Deer), 202118 (Elsworth PC)
Concern Plan cannot be properly considered without the Greater Cambridge Transport Strategy, given implications of substantially higher levels of commercial and private transport journeys and condition of local roads, and the Infrastructure Delivery Plan.	201913 (R Baker)
Recommendation for appropriate transport and travel modelling to mitigate potential negative impacts on travel towards Cambridge from Huntingdonshire.	201657 (Huntingdonshire DC)

Mitigation proposals should encompass various travel modes and maximise opportunities for Huntingdonshire residents and businesses to access public and active transport.	201657 (Huntingdonshire DC)
Ultra-fast and efficient public transport links from 'spokes' into the Cambridge (the hub) would minimise congestion and journey times.	201920 (A Davidson)
Recommends a future light rail network linking up larger villages and new towns with Cambridge and each other. Locating facilities close to stations.	202362 (A Carpen)
Concern at over-expansion of local economy and move toward sustainable transport.	201223 (S Williams)
Argues that public transport and active travel must be the starting point for all development, with properly designed, networked routes to avoid car dependency and ensure use.	201734 (R Stobbart)
Comments as new housing is out of Cambridge, but people work mostly in Cambridge, transport will be more stressed, and sustainable travel modes have not been consistently included. • The Plan should map where homes are built and where employment is located, to see the needs for transport. • Included more detail on supporting public and active transport between settlements and the city, between settlements and Policy for local amenity within settlements to assist with day-to-day travel within the communities • Add policy to support active travel within new communities and retrofitting to existing settlements.	201812 (J Baumberg), 201826 (T McKoewn)

The plan should have binding targets for the proportion of journeys walked/cycled and by public transport and for reduction in car ownership (and car dependency). Major developments should have targets for mode share and permeability.	202283 (A Lawrence)
Higher-density development should be linked to lower car ownership and strong alternatives to driving to support sustainable travel. Current dense developments often include high levels of private parking, which affects land use and increases housing costs for non-car owning households. The Local Plan should require parking to be optional, separated from housing, and transparently priced to ensure density is viewed positively.	204632 (M Fordham)
Reduce reliance on the private car: • Reduce the dependence on cars for village residents • Public transport to villages needs to be significantly improved	201894 (R Pargeter), 201023 (K Mahoney)
Recommends increased importance on sustainable transport. Privately-owned electric vehicles do not solve other problems; are expensive way to reduce carbon; are not a sustainable solution.	202283 (A Lawrence)
Comments strategy underplays the role that the existing public transport network can and should play in delivering sustainable development.	203069 (Pegasus Group)

States that the planned Cambourne rail station will adversely impact Boxworth, with inadequate road infrastructure likely to turn the village into a major access route, causing significant detriment.	202838 (W Nichols)
Comments in relation to the CSETS transport corridor scheme: • Supports improvements to transport corridors, pivotal to transport strategy, but concerns over the proposed CSET route, failing to use existing transport corridors and for cutting through Green Belt land. • Comment that the Better Ways for Busways has proposed an alternative to the CSET scheme utilising the existing transport corridor, with less environmental impacts, more accessible, and more cost efficient. • Proposed CSET busway is not compliant with upgrading EXISTING transport corridors. Abandon this hugely destructive and unnecessary scheme, instead improve the frequency and affordability of buses running on the existing roads. • Objection to CSET route and questions if multi-modal access road is needed if the Better Ways for Busways' alternative for a busway spur off the A1307 Hinton Way roundabout was adopted. • Figure 13: is potentially misleading. CSET proposals are still at Inquiry, it is not a committed scheme but a proposed scheme.	203087 (N Campbell), 210184 (Historic England), 204099 (A Baker), 207656 (K Foreman), 202617 (P Waters), 201547 (Stapleford PC), 203174 (D Morgan), 207533 (S Berridge), 204944 (C Arthurs), 204942 (O Arthurs), 204758 (M Fyfe), 204448 (N Pond), 203180 (D Morgan), 209022 (Hobson's Conduit Trust)
Questions proposed multi-modal access road from Granham's Road to the Cambridge Biomedical Campus (CBC), suggesting alternative busway spur from the A1307 Hinton Way roundabout be considered.	204107 (A Baker)

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

• Highlights problem areas: (A1301), level crossings, and poor road surfaces to enhance transport safety and accessibility for cycling. Concern over capacity of rural and major roads with increased usage.	
Concern for A14 congestion at peak times at M11 pinch point, and limited input from highways agencies on traffic impact of developments?	201322 (R Morley)
Concern no indication of the East/West railway is included as line of it is incorrect and therefore the local plan.	201682 (S Smith)
Concerns the environmental impact of the East West Rail's southern approach, regarding local wildlife and the Mullard Radio Astronomy Observatory.	202214 (A Sykes)
Concern that in villages car transport will have to remain a mainstay of local transport, and with move to electric vehicles, the plan needs to ensure that the electricity supply infrastructure is sufficient to meet this need.	201894 (R Pargeter)
Comments regarding CSET include: • Objection to CSET route as not within a public transport corridor. • Better Ways for Busways proposed an alternative route along A1307, which does not cross greenbelt land. • Offers additional evidence supporting the benefits of the proposed on-road route. Alternative route would be less environmentally destructive, improve accessibility for a range of users, and cost-efficient. Plan should be scrapped and a new plan created which looks at taking the busway alongside the road.	202620 (I Smith), 202684 (J Hunting), 203051 (C Schofield), 203126 (J Jasiewicz), 204085 (J Robinson), 208405 (M Cooper)

Strategic cross boundary matters

Table of representations:

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

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

Document presentation / content

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

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

Objection sites

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

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

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

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

Comments on the Housing and Economic Land Availability Assessment

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

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

Policy S/SH: Settlement Hierarchy

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

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

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

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

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

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

Response to main issues:

Comments supporting the policy approach are noted.

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

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

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

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

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

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Comments supporting the policy includes: • broad support for policy	202613 (Ickleton PC), 201377 (Gamlingay PC), 202734 (Cambridge Past, Present and Future),

• provides a clear structure for directing development • helps prevent speculative development in the least sustainable places. • for group villages to have no more than 8 houses per scheme • appropriate Cambridge identified at top of the hierarchy • support for the Towns to have own position in the hierarchy • support for Cambourne defined as a town, along with Waterbeach New Town and Northstowe • inclusion of Great Abington and Little Abington in Group Villages • appropriate for Swavesey to be defined as a Minor Rural Centre • support for designation of Ickleton as an Infill Village. • growth to be directed to Great Shelford and Stapleford recognising position in hierarchy and the number of services and facilities within the settlement. • support for Willingham defined as a Minor rural centre • proportionate distribution of growth is important to ensure that settlements – both large and small – remain sustainable and that growth takes place in locations which can support it • support for Meldreth defined as a Group Village • support the proposed overall policy for minimal development in small villages in rural South Cambridgeshire in preference for larger new centres that are already being established	204142 (Richborough), 204167 (Tritax), 205121 (North Barton Road Landowners Group), 204577 (C Forbes-Cable), 201767 (C Blakeley), 203315 (J Manning), 210666 (Gladman Developments), 209134 (Meldreth PC), 208905 (Nightingale Land and Hill Residential Ltd), 203267 (Horseheath PC)

• Anglian Water is generally supportive of the approach set out in the policy, and the provisions setting out the parameters for growth in each settlement category. It is noted that for Cambridge, Towns and Rural Centres the policy is clear that development should come forward (without any limit imposed) "provided that adequate services, facilities, and infrastructure are available or can be made available as a result of the development". However, this same requirement is not included for growth at smaller settlements including Minor Rural Centres, Group Villages, and Infill Villages. • Anglian Water requests that this qualifying statement to demonstrate that adequate infrastructure is available, should be applied to all the settlement categories within the settlement hierarchy, so development proposals clearly address infrastructure capacity - this includes wastewater treatment capacity in the network and the receiving WRC (as evidenced by the Stage 2 Detailed Water Cycle Study). For small settlements (e.g. Tadlow) where we have WRCs with a descriptive permit i.e. Descriptive Works - our position statement indicates that proposals that seek to connect to our network will be objected to unless the developer can demonstrate there is sufficient capacity at the works, OR an onsite solution such as a package treatment plant is approved.	209162 (Anglian Water Services Ltd)

Alternatively, similar wording to Policy S/DE clause 1.c could be used for the smaller settlement categories to ensure "There is the necessary infrastructure capacity to support the development".	
Environment Agency requests changes to policy wording at the end of points 1 and 3: 'Residential development and redevelopment…. provided that adequate services, facilities and infrastructure are available or can be made available as a result of the development *and areas of flood risk are avoided.'*	211131 (Environment Agency)
Comments objecting to the policy include: • suggests policy classification lacks currency and, when combined with other draft plan policies, risks excluding sustainable small sites under one hectare, contrary to NPPF paragraphs 73 and 83 • argues policy sections (9) and (10) impose limitations on growth, policy is unjustified and ineffective, failing to deliver necessary growth and contradicting paragraph 36 of the NPPF. • inconsistent with key principles of the NPPF. Paragraph 72 acknowledges the importance of strategic housing land supply comprising a sufficient mix of sites. • NPPF (2026) directs development to sustainable locations, the current hierarchy fails to support.	201856 (Chivers Farms Ltd), 204454 (Cottenham PC), 204557 (Axis Land Partnerships and Executors of Norman Winfrid Moore), 204618 (Papworth Everard PC), 202331 (Granta Land Ltd - Land at Valley Farm, Meldreth), 201948 (KG Moss Trust & Moss Family), 202366 (The CLC Trust), 201969 (Shelford Investments), 202538 (Granta Land Ltd - Land West of Station Road, Meldreth), 202651 (Granta Land Ltd - Land at Sheene Farm, Meldreth), 202667 (Granta Land Ltd - Land East of Station Road, Meldreth), 204056 (E W Pepper), 208680 (Guilden Morden Developments Ltd), 208773 (Croudace Homes),

• recommends change to policy reflecting the role of railway stations to reflect Government policy. Upgrade settlements with direct connections to high-quality public transport. • reassess hierarchy, include a new category for 'Well Connected Minor Rural Centres' including Fulbourn, Milton, Melbourn, and Waterbeach prioritising growth over less sustainable options • states potential to undermine the growth of rural communities • recommendations to assess settlements individually on sustainability, connectivity, and functional integration and then review hierarchy • indicative maximum scheme sizes are arbitrary and should be removed. Should be assessed on site context rather than fixed thresholds. • suggests removal of development without limitation on sites within the three Rural centres • requests limits on individual schemes in line with those specified in adopted Neighbourhood plan • states policy neglects sustainable opportunities at the Edge of Cambridge • states policy applies only to land within defined development extents creating ambiguity regarding the assessment of sites with strong ties to Cambridge	208785 (Granta Land Ltd – Land East of Station Road, Meldreth) 208809 (Granta Land Ltd – Land West of Station Road, Meldreth), 201955 (M Asplin), 201958 (M Asplin), 201963 (M Asplin), 202103 (Cambridgeshire County Council), 202559 (Ely Diocesan Board of Finance), 203049 (Cemex UK Properties), 203163 (Christ's College), 203315 (J Manning), 203393 (Jesus College), 204103 (G W Balaam & Son), 204125 (Emmanuel College), 204143 (G W Balaam & Son), 204173 (J Johnson), 204445 (Bellway Strategic Land), 204459 (Wain Estates), 204514 (Redrow Homes South Midlands), 204949 (Places for People), 205132 (Axis Land Partnerships Ltd), 203408 (Jesus College), 204244 (Bellway Strategic Land), 204398 (Hill Residential (Great Abington Site), 204566 (Rosconn Group), 204858 (Pigeon), 203982 (Abbey Properties Cambridgeshire Ltd), 201006 (M Colville), 202366 (The CLC Trust), 205024, 209746, 209747, 211523, 211522,

• revise the settlement hierarchy methodology to ensure consistent and transparent comparison between Group Villages. • considers the hierarchy inconsistent with the distribution of growth set out within the Development Strategy • Group villages not in the green belt should be elevated in the hierarchy • Permitting windfall development inside development extents disregards the sustainability of Rural Centres and prevents their growth. • discrepancy between draft Policy S/SH and the housing requirements outlined in Figure D1 of Appendix D • Local residents should have input • development adjacent to settlement boundaries should be allocated for • quantum of development which a settlement can support should consider the wider proximity to services not just services in Central Cambridge and Market Towns • Instead of the arbitrary 8km cycle distance, points should be awarded to settlements which benefit from the Greenways; their purpose is to allow non-motorised commuting to services and employment including in Central Cambridge • fails to recognise that there are services and job opportunities outside of Central Cambridge and the Market Towns	211521, 211520 (Endurance Estates), 211198, 211208 (R Raywood, A Bradney and D Unwin), 211586 (Terra Strategic), 211458 (Hayfield Homes Construction Ltd), 211048, 211060 (Wates Developments Ltd), 207022 (Mac Mic Land)

• suggests Waterbeach new town and Waterbeach to be considered as one complete settlement and (both) be at Town tier. • Papworth Everard should be a Group village as is no longer on a par with other Minor rural centres. • Horningsea should be reclassified as a Group village to reflect scale, characteristics and sustainability. • queries identification of Linton as a Minor rural centre • lacks evidence to support Over as a Group Village and not elevate to a Minor Rural Centre	
Objects to the settlement hierarchy on the basis that it restricts growth in villages such as Great Wilbraham, undermining their ability to remain viable and meet local needs. States this approach risks turning smaller villages into dormitory settlements, increases dependence on private cars and reduces freedom for non-drivers including children and older residents.	203338 (Great Wilbraham PC)
Suggests policy could set out how new and emerging settlements will be addressed during a future review	203414 (Lichfields)
Comments regarding lack of review of the capacity of settlements to accommodate additional development or development threshold limits remain relevant if no sites are available	203895 (Hill Residential (Fulbourn Site)), 203935 (Hill Residential (Sawston Site)), 202083 (J Francis), 211622 (Bloor Homes Eastern), 211613 (Bloor Homes Eastern), 204161 (Hill Residential (Hardwick Site))

States in naming the largest villages ‘Rural centres’ it’s unhelpful, they are not rural and this locks people out of planning discussions as is counterintuitive. Whereas Minor rural centres are rural in character.	203888 (Histon and Impington PC)
Concern infill villages not located on major transport corridors will remain without reliable and frequent public transport opportunities, affecting numerous villages.	203888 (Histon and Impington PC)
Suggests consideration of sustainability measures and infrastructure investments associated with the wider growth location should be more fully acknowledged in the settlement hierarchy assessment. (Linton site)	204837 (Vistry Group)
Redrow requests an assessment of the sustainability credentials of each settlement in the District, undertake a review of the capacity of the most sustainable villages in South Cambridgeshire—including Group Villages located close to Cambridge with strong transport links (Hauxton) - to determine whether additional development can be accommodated within existing development framework boundaries, allocate additional land at the edges of these settlements to ensure that growth is appropriately directed, sustainably delivered, and consistent with the Plan’s stated objectives.	204514 (Redrow South Midlands)
The respondent supports the proposed Policy wording • Bar Hill is designated as a 'rural minor settlement' with a role in providing services for a small rural area, having more facilities than most other settlements in Greater Cambridge. • Bar Hill's as a MRC, strategic location on the A14 is beneficial for the logistics sector, suitable location for industrial and logistics growth in	204167 (Tritax Big Box Developments)

Greater Cambridge, being outside the Green Belt and close to the city, unlike Histon and Impington and access to a local workforce and necessary infrastructure for industrial and logistics uses. • The respondent references key paragraphs from the NPPF 2024 and NPPF 2026 that align with the operational needs of the freight and logistics sector.	
Comments on the policy approach include • Suggests current approach does not align with the NPPF's direction to boost new housing supply, as noted in paragraph 61 and amending part 5 of Policy to allow residential development within defined extents and on adjacent land, provided adequate services and infrastructure are available • restrictive approach in smaller villages risks limiting opportunities to sustain rural communities. • policy focuses on limiting growth rather than enabling rural sustainability • scheme sizes make affordable housing delivery harder, support of local services or responding flexibly to local need. • Little reference to rural transport gaps, digital connectivity or the cumulative impact of small developments.	203149 (Cambridgeshire ACRE), 203149 (Cambridgeshire ACRE), 204708 (Croudace Homes), 204976 (Martin Grant Land), 211614 (Bloor Homes Eastern)

• Stronger rural proofing would allow more flexibility where schemes support affordable homes, local services and community led development.	
“Rural Centres” is a misleading term. These are among the least rural villages: they do not feel remote, lack strong rural characteristics, are close to Cambridge, benefit from good transport links, and are not shaped by a rural economy. The label is therefore unhelpful and should not be applied to the largest hub villages. “Minor rural centres” are more genuinely rural, although many function economically as suburban settlements, with high levels of commuting and, in some cases, their own science parks. Describing these places as rural introduces bias into policy discussions and planning decisions, obscuring their hybrid or suburban character. “Smaller villages”, by contrast, are distinctly rural, facing traditional rural challenges and displaying classic rural characteristics, yet they are not classified as rural under the current terminology.	211000 (Cambridgeshire County Council)
Settlement Hierarchy Study Update represents a proportionate review of the earlier assessment rather than a comprehensive reassessment of settlement roles and relationships between settlements. As such, it provides limited analysis of how committed and proposed growth, improved connectivity and changing functional relationships may influence the suitability of settlements.	210227 (Vistry Group)

It is considered that the approach taken through the update remains overly focused on existing services and facilities and does not sufficiently account for committed growth, proposed allocations, or the dynamic role that some settlements play within the wider spatial strategy. In particular, the assessment gives limited weight to the strong functional relationship between certain Group Villages and Cambridge itself. (Land at Fen Ditton)	
Concerns that new evidence and site-specific information only became available at Regulation 18, affecting the ability to comment earlier on settlement hierarchy implications.	204808 (G Shaw)
Comments on classification of Melbourn and Meldreth include: • suggests Melbourn and Meldreth to be considered as one settlement. • railway station serves both villages • villages of Melbourn and Meldreth should be designated as a Rural Centre • reiterates Melbourn and Meldreth function as a combined settlement with shared services, facilities and schools. Notes recent active travel upgrades strengthen links. • argues a combined or re-scored settlement should be designated as a Rural centre	206217 (Granta Land Ltd - Land at Valley Farm, Meldreth), 202331 (Lanpro)

Comments on classification of Melbourn: • Melbourn could be re-designated as a Rural Centre • Settlement Hierarchy Paper (2021) allocates 14 points, with high scores for shops and services and secondary school • Melbourn is the largest village in the south-west of the district • Greenway Scheme will provide better accessibility to Cambridge by sustainable modes • higher score than Rural Centres in terms of secondary school provision than Great Shelford and Stapleford, designated as a Rural Centre	211417 (CALA Group Ltd), 211061 (Wates Developments)
Comments for classification Great Shelford and Stapleford include: • Argues the classification as a single Rural centre undermines the distinct identities of the two villages and contravenes clause 1a of Policy S&GS 12 Neighbourhood Plan • Concerns raised regarding implications of permitting unrestricted residential development in a combined rural centre • They have a very different range of amenities and services; highlights a lack of amenities in Stapleford • Suggests that minor rural centre is a more appropriate classification for Great Shelford	201549 (Stapleford PC), 202674 (S Berridge), 2010894 (Great Shelford PC)
Comments regarding re-classification of Cottenham: • size suggests Rural Centre not Minor Rural Centre	207654 (Cottenham PC), 204454 (Cottenham PC), 211219 (Terra Strategic), 211232, 211580

• need for delivery of services and infrastructure due to Significant increase in housing. • concern of impact for long-term sustainability of the village • proposed change in settlement status is contrary to the level of services and facilities within Cottenham. • At appendix 11 Cottenham scored 15 points, higher than Gamlingay (scored 7) and Willingham (scored 9). Both of these settlements are also identified as minor rural centres. Settlements with varied scores and are identified as the same category village should not be the case.	(Living Space Housing), 211246 (Manor Oak Homes)
Comments regarding housing limits in Cottenham: Responder objects to indicative maximum scheme size of 30 dwellings, noting identified housing requirements for neighbourhood areas of 130 dwellings identified to be delivered at Cottenham between 2024-2045. How will this number of dwellings be delivered. The defined development extent for Cottenham as being drawn tightly around existing development at the settlement, with no development opportunities within the defined developed extent that would be sufficient to deliver the 130 dwelling neighbourhood area requirement identified by the Draft Plan.	211277 (Woolsington One Ltd)
Comments on classification of Willingham as a Minor Rural Centre. • There is no justification for the arbitrary figure of a maximum of 30 dwellings in MRC.	211263 (Terra Strategic)

• This limits the level of growth that the Minor Rural Centre and less efficient use of land contrary to national planning policy which requires proposals to make the most efficient use of land.	
It is strongly considered that the failure of the evidence base to consider all modes of transport and bus services within Fowlmere and its connectivity to the surrounding settlements represents a flaw in the overall settlement assessment. This has subsequently resulted in sites that are being promoted within Fowlmere not being properly considered for development and not being subject to an independent site assessment.	211048 (Wates Development Ltd)
Suggests review Fulbourn, a Minor rural centre, and include as a Rural centre due to its facilities and transport links.	204962 (Miller Homes)
Notes the inconsistency of retaining Group village development restrictions for Elsworth while a major development of over 13,000 homes is proposed within close by.	202123 (Elsworth PC), 202346 (P Deer), 201906 (C Deer)
Suggests designation of Bourn Airfield as a Rural Centre	203414 (Juniper Propco (Bourn) Limited)
Suggests Bassingbourn and Kneesworth should not be 2 settlement types as they are one settlement.	201373 (Gentian Development Ltd)
It is important that the hierarchy is applied flexibly and in a manner that supports the effective delivery of the development strategy. Opportunities such as Fen Ditton, which are capable of accommodating additional growth in a sustainable manner, can play an important role in contributing to housing delivery, particularly where they are of a scale that complements existing	210228 (Vistry Group)

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

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

A detailed assessment of smaller sites, including North of Willingham Road, Over, should be conducted to ensure at least 20% of allocations in the Local Plan are on sites of the appropriate size. Due to the significant size constraints placed on settlements it is not possible to deliver these as windfall sites.	
Land at Prospects Royston, previously Three Prospects Farm, land east of Royston, (HELAA ID 40511). Policy S/SH should be revised to identify land beyond the A505 at Royston as being in the second tier of the hierarchy, below the Cambridge urban area itself but above Cambourne and the other new settlements and on a par with sites on the edge of Cambridge as a location for strategic and sustainable housing and employment growth.	203331 (Wilson Bowden Developments Ltd)
Land at Girton Road, Girton (site ID 115170) • Responder states the higher growth scenario from the Greater Cambridge Employment and Housing Needs Update should be used in future policy revisions. • Allocation of small and medium sized sites is essential to meet housing requirements, as over-reliance on windfall sites is not a sound planning approach.	204361 (Wain Estates)

• site ID 115170, is one such site which is well-situated and well-connected to support sustainable transport, aligning with the Local Plan's ambitions for knowledge-intensive sectors.	
Land North of Pampisford Road is situated on the edge of Great Abington (Site Id: 115179) • Respondent requests removal of arbitrary limitations for the scale of development that might take place in Group Villages. • Or limits increased, as 8 is not justified and limitations applied to other settlements in the hierarchy removed also with all sites evaluated on their own merit against sustainability and the capacity of existing facilities and services to accommodate growth. • Limits on development are inconsistent with Government policy on promoting a step change in growth. • Where there is no neighbourhood area, the plan examines growth in those villages and directly allocates sites for development. Great Abington is a Group Village but not a Neighbourhood Area, and yet it sits adjacent to Granta Park, a major employment area, a sustainable location, can support economic growth at this employment site. The site is an ideal candidate for allocation through a change in policy.	204566 (Rosconn Group)
Land south of Hauxton Road in Little Shelford	211254 (R Harvey)

• The responder has promoted a site in Little Shelford. Little Shelford is defined as an Infill Village in the settlement hierarchy and has a reasonable level of services and facilities. Given the sustainability credentials of Little Shelford, it is felt that it would be more appropriate for it to be defined as a Group Village. • Concern there is no review of the capacity of settlements to determine available land within the development framework boundary, or the development threshold limits remain relevant. • Concern no major residential development opportunities within the development framework boundary of Little Shelford. Small scale would not deliver affordable housing or provide any meaningful support to existing services and facilities. Little Shelford affordable housing needs are not being met. • Amendments should be made to the development strategy to direct development to the more sustainable infill villages including Little Shelford to support existing services and facilities, deliver additional facilities, and meets identified affordable needs of villages.	
Land at west of North End, Bassingbourn (HELAA ID: 200809). • Important that small and medium size sites such as the site proposed, to meet the housing requirement of the area, compared to major sites and new settlements.	

A one size fits all approach to site allocation is inappropriate and does not allow individual characteristics and benefits of a site. The Framework is clear that sufficient allocations should be included in Local Plans, and the Plan fails to facilitate sufficient allocations in a range of sustainable settlement.	211201, 211200, 211210 (Rainier Developments & Strategic Land)
Concern the level of windfall allowance within the overall housing delivery figure for the Plan. Represents a significant proportion of the total housing to be delivered and is not guaranteed. Given the housing need figure for Greater Cambridge and reliance on large sites and new settlements to deliver the majority of the residual housing need, the Plan should allocate additional smaller sites to ensure the housing need is met and particularly within the short term.	211272 (Mr & Mrs Smith)
Support Cambridge Junction and Create Cambridge in asking that: • cultural infrastructure's ongoing revenue and organisational capacity needs are recognised, not just physical buildings • culture is embedded in cross-cutting outcomes (innovation, health, education, community resilience) • partnership frameworks between councils, cultural organisations and communities are referenced as delivery mechanisms aligning community infrastructure with lived cultural use.	204830 (G Shaw)

Concern ‘Rest of the Rural Area’ comprises rural centres and group villages, a total of 48 settlements, have only 3 sites allocated for a total of 205 new homes. • The proportion of development attributed to major strategic sites is a risk to deliverability and inconsistent with the Framework. • Regarding draft allocations, a ‘blanket approach’ has been taken, with maximum dwelling numbers given to all settlements below Rural centres.	211209 (Rainier Developments & Strategic Land)

Policy S/DE: Defined development Extent

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

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

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

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

Response to main issues:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for Policy includes: • High bar for development outside of villages/rural centres • protection of open countryside • Protection from encroachment • prevents unsuitable development inside and outside of development extents. • Without policy small rural communities could quickly lose their character. • no new housing developments outside defined development areas, except for Parish-led Neighbourhood Plan allocations. • Intent to ensure development located in the most sustainable places • essential for controlling development around villages • principle of defining settlement boundaries around villages	201013 (M Colville), 201769 (C Blakeley), 201896 (R Pargeter), 202615 (Ickleton PC), 204974 (D Davies)

• potential rural exception sites would dry up as parcels of land at village edges would offer the prospect of making large profits if developed and proposals based on maximising developer profits would predominate. • should be no exceptions for green belt land	
Cambridge Science Park, Cambridge Support for inclusion of site within the Defined development extent.	203070 (Trinity College, Cambridge),
Protect rural views.	209678 (H Hale)
Welcome the reference to heritage in criterion 1b.	210086 (Historic England)
Hay Street, Steeple Morden Objection to boundary in Steeple Morden. Should follow a consistent settlement edge aligned with adjacent built form and include the application site.	202095 (R Wright)
Horseheath Road and Bartlow Road Linton Object, amend to NOT include the Horseheath Road and Bartlow Road developments as resulted from the lack of a Local Plan being in place in 2015-2018	201670 (Linton PC)
South of Thompsons Meadow, Guilden Morden Object as DDE should be extended to reflect development south eastern part of the settlement (planning permissions S/3077/16/OL and 20/03151/REM)	201811 (Peter David Homes Ltd)
Caxton Gibbet food retail site, Cambourne Objection to boundary extent at Cambourne, extend to include land up to the A428, encompassing the Caxton Gibbet food retail site and the EV car charging area.	204011 (Abbey Properties Cambridgeshire Ltd)

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

Land at Gog Magag Way and Haverhill Road Stapleford Built up area of the village was extended to the east of Stapleford in the early 2000s by residential development at Chalk Hill and again in the 2020s by development of the Strawberry Fields residential care village.	201550 (Stapleford PC), 210895 (Great Shelford PC)
Between Brook Street and Brockley Road, Elsworth Questions Defined Development Extent in Elsworth not embracing parcel of my land where historically there was residential housing. This would entail a movement of the DDE nominally to the west.	201431 (R Woolf)
The Walled Garden, Whittlesford Should not be in the green belt as it is village central and surrounded by houses) has been taken out of this latest plan having been in earlier stages.	204628 (C. Forbes Cable), 205412 (L Gardner)
Site Allocation S/RRA/CR, Land to the west of Cambridge Road, Melbourn Object as Site Allocation S/RRA/CR is shown outside the settlement boundary, inconsistent with other areas such as Waterbeach New Town. It should be within the defined development extent.	204641 (Vistry)
Objections to policy include: • reformed NPPF (2026) emphasis for development in sustainable, well connected locations, which the current policy contradicts by restricting growth to defined boundaries. • minimal allocations, tightly drawn development boundaries and prescriptive limits on scheme size will constrain organic growth	202927 (The Trustees of the C Y Nutt Deceased Will Trust), 204129 (Emmanuel College (Long Road)), 204520 (Redrow South Midlands), 211524 (Endurance Estates)

• largely unchanged since the 2004 Local Plan, with minor adjustments • stagnation and potential loss of local services • regarding all countryside sites equally is unjustified • flexible, criteria-based approach is sought to support appropriate rural growth and a balanced distribution of housing across Greater Cambridge • boundary-based approach inflexible • fails to acknowledge sustainable sites that are functionally part of the urban area. • policy lacks a mechanism for positively assessing sites based on accessibility and their potential to support sustainable development • lack of review to consider whether boundaries remain appropriate or capable of accommodating future development needs of individual settlements. • Where constrained by the Green Belt current approach prevents any meaningful outward expansion, even in sustainable locations. • should be subject to a full review to accurately reflect the development potential and sustainability of individual settlements and where no capacity within existing boundaries, the Local Plan should allocate appropriate village edge sites in the most sustainable locations • fails to allow for well-connected windfall growth in villages on the basis set out above in relation to policy S/SH	
Anglian Water supports the policy requirement 1.c to ensure that there is the necessary infrastructure to support the development within defined settlement extents. However, it	209163 (Anglian Water Services Ltd)

is considered that this should be equally applicable to developments outside defined settlement extents but may still be adjacent to the settlement and/or our WRC catchments - e.g. Rural exception sites. The policy does not specifically reference the delivery of utility services /infrastructure in the countryside, which would include critical water and wastewater infrastructure to serve existing and future communities.	
Responder requests changes to policy wording at the end of points 1 and 3: 'Residential development and redevelopment…..provided that adequate services, facilities and infrastructure are available or can be made available as a result of the development *and areas of flood risk are avoided.'*	Anglian Water Services
Objects to policy and appendix are unsound as they (para 2.138) limit boundary changes largely to completed development. • This creates a circular methodology that constrains the identification of sustainable small sites, contrary to the NPPF requirement to proactively identify land to boost supply (paragraph 73) and support thriving villages (paragraph 83). • The blanket treatment of residential gardens is overly rigid, and the approach is premature in the absence of updated Green Belt and "grey belt" evidence, reducing flexibility and clarity at plan-making stage.	202005 (M Asplin), 204272 (R2 Developments Ltd)
Objection to Policy includes: • focusing development solely within DDEs is inconsistent with draft Policy S5 of the NPPF, which advocates for a more flexible approach to development locations	204272 (Pegasus Group), 204292 (R2 Developments Ltd), 211479 (G Robinson and Partners),

• hinder sustainable growth by restricting new homes in locations just outside these extents, despite their proximity to public transport. • approach does not align with the government's direction to boost housing supply as outlined in paragraph 61 of the NPPF • approach contradicts the NPPF's pragmatic direction towards allowing suitable development near existing settlements and transport infrastructure. • Locations near Foxton Railway Station cited	
Comments on the policy raise concerns that: • Boundary largely unchanged since 2004 boundary • inconsistent with proposed NPPF changes that advocate for a more flexible approach, allowing development on well-related sites. • suggests part 1 of policy to allow development on unallocated land well-related to defined development extents, aligning with the NPPF's pragmatic approach. • boundaries limit the opportunities for any development in villages • housing and affordable housing needs of these villages would not be met. • no support for existing services and facilities, or the delivery of additional facilities	202570 (Ely Diocesan Board of Finance), 203318 (J Manning), 204171 (Hill Residential (Hardwick Site)), 204411 (Hill Residential (Great Abington Site)), 204711 (Beechwood Estates Ltd), 204728 (Croudace Homes), 204985 (Martin Grant Land), 211247 (Manor Oak Homes), 211255 (R Harvey), 211615 (Bloor Homes)
Comments existing boundaries have largely not changed significantly since 2004. The current extent restricts development, not supporting existing services or allow for the delivery of additional facilities (noted Whittlesford, Swavesey, Fulbourn).	202368 (The CLC Trust), 204567 (Axis Land Partnerships and Executors of Norman Winfrid Moore), 203897 (Hill Residential (Fulbourn Site))

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

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

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

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

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

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

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

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

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

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

Policy S/GB: The Cambridge Green Belt

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

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

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

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

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

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

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

Response to main issues raised in representations:

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

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

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

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

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

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

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

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

Table of representations:

General

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

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

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

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

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

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

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

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

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

Areas of Green Belt

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

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

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

Sites

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Policies Map

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

Green Belt Assessment

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

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

It is understood that a revised Green Belt Assessment will be published after the Regulation 18 Consultation closes, however this should have informed the Draft Local Plan and been published as part of the Regulation 18 Consultation. Also, the omission of any reference to 'Grey Belt' within the Draft Policy S/GB is challenged. The NPPF (2024) introduced a clear duty for Grey Belt land to be identified when undertaking Green Belt Assessments for the purposes of determining applications; reinforced within the Planning Practice Guidance (PPG) (Para 001 ref.001 64-001-20250225). Identifying Grey Belt land within the revised Green Belt Assessment and Draft Local Plan is hence both a policy requirement and crucial to ensuring the Local Plan promotes sustainable patterns of growth (as required by the NPPF). The Council needs to properly consider the inclusion of well-performing sites in the Grey Belt. For example, Land to the South of Station Road, Harston (ref: 115742) was assessed within the Council's Green Belt Assessment (2021) which supported First Proposals (2021) Draft Local Plan (Parcel HS9). Changes to plan: To ensure that the Plan is sound will require: - The publication of a revised Green Belt Assessment to support the Local Plan - A consideration of higher growth targets and subsequent review of the Green Belt / Grey Belt where necessary. - The identification and inclusion of the Cambridge Grey Belt within the Local Plan to guide development to sustainable Grey Belt sites.	203419, 203397 (Jesus College)
LSH agrees with this Policies alignment with National Policy within the NPPF relating to Green Belt release on sites that accord with the Golden Rules. As previously stated above, the Greater Cambridge Green Belt Assessment Final Report August 2021	211233 (Living Space Housing)

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

Policy S/MO: Monitoring

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There was broad support for the need to monitor annually.

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

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

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

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

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

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

Response to the main issues raised in representations

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

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

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

  Windfall housing is monitored through the annual update to the housing trajectory which informs the number of completions of homes which is monitored in the monitoring framework.

Table of representations:

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

	202467 (K Jones), 202691 (T Altmann), 202721 (W Townsend), 202764 (Cambridge Junction / Create Cambridge), 202790 (S Lee), 202889 (Cambridge Junction), 202892 (Cambridge Junction), 202942 (R Terry), 202966 (T Flinders), 203367 (N Ellis), 203447 (S Ashworth), 203479 (L Heap), 203548 (D Lever), 203637 (University of Cambridge), 203856 (N Yeni), 203877 (University of Cambridge), 204416 (New International Encounter), 204719 (A Giarlis), 204856 (L Matthews), 205007 (Wysing Arts Centre), 205068 (University of

	Cambridge), 205128 (H Paterson), 205217 (J Walsh), 205329 (A C de Azevedo Lamha), 205366 (L Howse), 205372 (N Oakley), 205419 (Cambridge Junction / Create Cambridge), 205427 (A Seiglow), 203121 (The Arts Theatre Cambridge), 204188 (Cambridge Junction/Create Cambridge), 204188 (Cambridge Junction / Create Cambridge), 202330 (Cambridge Junction / Create Cambridge) 202892 (Cambridge Junction)
Timely provision of infrastructure, usually available before dwellings are occupied, is critical to successful placemaking and should be a priority. Monitoring must be backed up with resourced enforcement if infrastructure is not brought forward as agreed.	202826 (Cambridge City Council Liberal Democrat Group)

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

S/MO insufficiently specific regarding triggers and consequences for policies not being achieved. The respondent criticises the current wording as subjective, and it implies a judgement from the Council on the timeliness of policy implementation.	
How can we avoid developers rowing back on environmental standards? The council has strict monitoring and policy control standards and environmental standards are central to that.	210303 (Rustat Neighbourhood Association)
• The respondent objects to the policy wording, stating it requires modifications to ensure effectiveness and adaptability to changing circumstances. • The respondent cites NPPF 2024 Paragraph 86 (e) and NPPF 2026 Policy E1, emphasising the need for flexibility in planning policies or commitment to action when development delivery falls behind anticipated trajectories or relies on limited large sites. • Policy lacks clarity on how monitoring outcomes will inform decision-making • The absence of a clear mechanism for responding to delivery issues may hinder development, risking the Local Plan's objectives and economic growth. • The respondent argues that Policy does not adequately link monitoring outcomes to corrective actions, undermining effectiveness. • requests Policy be modified to clarify the use of monitoring outcomes in decision-making and to acknowledge the need for flexibility in response to delivery risks.	204183 (Tritax Big Box Development)
• Requests the Monitoring Framework includes specific indicators related to rights of way condition, connectivity and user satisfaction. • Delivery mechanisms are clearly identified for the implementation of access improvements, including collaboration with parish councils, landowners and user groups.	208170 (Cambridgeshire Local Access Forum)

Food access and affordability ● % of households within a 10-minute walk of a “healthy food retailer” (define locally: e.g., supermarket, greengrocer, community food hub, market at least weekly). ● Number of neighbourhood centres with a weekly fresh-food offer (street market, community market or equivalent). ● Change in density of hot food takeaways within 400m of schools (or other agreed buffer), and net change in A5 uses in priority areas. ● % of major developments delivering “affordable food space” (e.g., low-rent unit(s) or peppercorn concession for social enterprise/community food).	208196 (Cambridge Sustainable Food)
Community food infrastructure and resilience ● Number and floorspace (sqm) of community food assets delivered (community kitchens, food hubs, social supermarkets/co-ops, shared storage/cold chain). ● Number of community kitchens with certified/compliant fit-out suitable for training/enterprise (food hygiene compliant, accessible).	210966 (Cambridge Sustainable Food)
Local production and land ● Area of BMV agricultural land (Grades 1, 2, 3a) safeguarded vs lost (net). ● Hectares of peri-urban land under active food production (commercial or community-supported) within Greater Cambridge (net change). ● Area of edible/fruit tree planting delivered (e.g., number of fruit/nut trees).	210967 (Cambridge Sustainable Food)
Skills, health and inclusion ● Number of school/community settings with food growing + cooking facilities delivered through	210968 (Cambridge Sustainable Food)

development contributions. ● Accessibility KPI for growing spaces: % of new food-growing sites meeting inclusive design standards (accessible paths, raised beds provision, adapted plots).	
Circular economy: waste prevention and redistribution ● % of new non-residential food premises with compliant food-waste separation and storage (designed-in, not retrofitted). ● Tonnes of edible surplus redistributed locally per year (through accredited/community partners), and/or number of redistribution partnerships enabled by plan-led space. ● % of major developments providing on-site or neighbourhood-scale composting provision (where appropriate), with a management plan	210969 (Cambridge Sustainable Food)
Local economy and enterprise ● Number of food enterprises supported in neighbourhood centres (start-ups, co-ops, social enterprises) and survival rate at 24 months where the Plan provides affordable workspace. ● Proportion of public-sector/community anchor procurement spent locally or a proxy such as number of anchor institutions participating in local/sustainable food procurement initiatives.	210970 (Cambridge Sustainable Food)
“Systems” Indicator - to prove the Plan is delivering a joined-up food offer. ● % of strategic sites / major allocations delivering a Food Systems Delivery Plan (a short, standardised plan covering access, community assets, growing space, waste, and local enterprise), secured through condition/S106.	210971 (Cambridge Sustainable Food), 210977 (Y Dignon)
Food access and affordability ● % of households within a 10-minute walk of a “healthy food retailer” (define locally: e.g., supermarket,	206966 (Y Dignon)

greengrocer, community food hub, market at least weekly). ● Number of neighbourhood centres with a weekly fresh-food offer (street market, community market or equivalent). ● Change in density of hot food takeaways within 400m of schools (or other agreed buffer), and net change in A5 uses in priority areas. ● % of major developments delivering “affordable food space” (e.g., low-rent unit(s) or peppercorn concession for social enterprise/community food).	
Community food infrastructure and resilience ● Number and floorspace (sqm) of community food assets delivered (community kitchens, food hubs, social supermarkets/co-ops, shared storage/cold chain). ● Number of community kitchens with certified/compliant fit-out suitable for training/enterprise (food hygiene compliant, accessible).	206967 (Y Dignon)
Local production and land ● Area of BMV agricultural land (Grades 1, 2, 3a) safeguarded vs lost (net). ● Hectares of peri-urban land under active food production (commercial or community-supported) within Greater Cambridge (net change). ● Area of edible/fruit tree planting delivered (e.g., number of fruit/nut trees).	210973 (Y Dignon)
Skills, health and inclusion ● Number of school/community settings with food growing + cooking facilities delivered through development contributions.	210974 (Y Dignon)

● Accessibility KPI for growing spaces: % of new food-growing sites meeting inclusive design standards (accessible paths, raised beds provision, adapted plots).	
Circular economy: waste prevention and redistribution ● % of new non-residential food premises with compliant food-waste separation and storage (designed-in, not retrofitted). ● Tonnes of edible surplus redistributed locally per year (through accredited/community partners), and/or number of redistribution partnerships enabled by plan-led space. ● % of major developments providing on-site or neighbourhood-scale composting provision (where appropriate), with a management plan	210975 (Y Dignon)
Local economy and enterprise ● Number of food enterprises supported in neighbourhood centres (start-ups, co-ops, social enterprises) and survival rate at 24 months where the Plan provides affordable workspace. ● Proportion of public-sector/community anchor procurement spent locally or a proxy such as number of anchor institutions participating in local/sustainable food procurement initiatives.	210976 (Y Dignon)
Appendix F – Monitoring Framework The actions set out in Appendix E are not quick delivery options, unlike allocating more sites which fall under the SUE threshold.	208367 (Endurance Estates)
While the monitoring monitors specialist housing uses, the monitoring also fails to monitor the delivery of affordable housing which should be rectified. Again, there should be levers in the local plan which can be pulled to create a timely difference in housing delivery. Sites which are in the Green Belt which come forward as Grey Belt sites have to have a higher percentage of affordable housing and therefore	208368 (Endurance Estates)

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

Consultation Statement

Appendix 4: Response to Representations - Summary of the Plan



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

Summary of the Greater Cambridge Local Plan

Abbreviations

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

Summary of Main Issues:

A number of comments offered broad support for the draft plan and its approach. Issues sited include approach to balancing support for the economy with environmental and social issues. The importance of ensuring that the policies and principes were effectively applied was mentioned in a number of the comments.

Some representors expressed concern about the level of growth that was proposed by the draft local plan. The impact of development on the area, that it was overly focused on economic development, and that government focus on Cambridge meant people had little say. Impacts of growth ion infrastructure, congestion and character of the area where mentioned, as well as concern about the impact on the heritage of the area. There was also concern that it wasn't addressing problems, such as a lack of affordable housing, and transport.

Other comments considered that the plan did not respond to the needs of the economy or to government aspirations. Some stated that plan was not delivering enough for villages, and considering how villages could be made more sustainable.

Some commentors considered the plan should have less focus on climate change and biodiversity, and more on meeting community needs. Others were concerned that the plan would not deliver its climate ambitions because of the scale of proposals.

Comments were made on the summary on particular sites. Concern was expressed about the impact of East West Rail and Cambourne North, including on wildlife, heritage, and the impact it would have on surrounding communities. Land adjacent to A11 and A1307 at Grange Farm raised a number of comments objecting to the proposal, similar to these made on the site policy itself, including questioning the choice of site, landscape, biodiversity and heritage impacts, transport access, and the impact on nearby communities. A number of other sites were referenced in comments, wither seeking their inclusion or supporting their omission from the plan.

On infrastructure, comments from emergency services bodies sought to ensure their areas were appropriately addressed by the plan. Other comments highlighted the importance of infrastructure being delivered when it is needed, and examples were sited of when this had not happened. Specific infrastructure issues were mentioned, including the need to support food growing.

Comments on cultural infrastructure stressed the importance of maintaining and funding provision, including if the Junction is redeveloped.

A wider variety of transport issues were raised. There was concern about the quality of bus services, and that they would need to be improved to accommodate growth. Light rail was suggested by some. More needed to be done to support active travel, and this should be a high priority when designing places. The quality of road infrastructure was raised, including concern about potholes.

Some representors raised concern about the format of the draft plan consultation. The level and technicality of the consultation material and the consultation platform may have discouraged participation. Some also question the difference consultation made, as the local plan hadn’t changed significantly form previous stages.

Other comments picked up a variety of issues.

Response to representations

Comments offering general support for the draft plan and the approach are noted.

The level of homes and jobs being planned for has been carefully considered, and is justified by the evidence being published alongside the Local Plan. National planning policy requires local plans to respond to the needs of the area. We

have considered the needs of the economy and likely growth in jobs, and the number of homes needed to support it. This also accords with the standard method of calculating the needs for homes set by government. We have tested a range of strategic development approaches, considering their impact on economic, social, and environmental issues, and have developed an appropriate spatial strategy to accommodate development needs whilst and protecting the environment.

The strategy for villages has allocated sites where it is sustainable to do so as part of the wider development strategy, but also included policies which would support appropriate windfall development and rural exception sites. Neighbourhood planning also remains a toll available to parishes if they wish to address local issue directly.

The development strategy proposed has been strongly driven by climate change considerations, along with a set of robust policies to ensure the form of development responds as well.

On specific sites, the issues raised on Cambourne North and Land adjacent to A11 and A1307 at Grange Farm have been carefully considered and addressed in the evidence related to site policies. They are considered to remain appropriate elements of the development strategy. Comments supporting the omission of specific sites are noted.

The plan has been informed by a significant evidence base related to infrastructure provision. This includes and Infrastructure Delivery Plan, and topic specific evidence such as related to water supply. Policies seek to ensure that the right infrastructure is provided when it is needed. This has included liaison with emergency services, healthcare and education providers. A study specifically exploring food growing was also commissioned to inform the plan. The plan has also been informed by a study exploring cultural infrastructure provision.

Cambridgeshire and Peterborough Combined Authority are producing a Greater Cambridge Transport Strategy. This identifies how transport measures will accommodate planned growth. A draft is being published alongside the Proposed Submission Local Plan. The development strategy has also been subject to transport modelling, used to identify the specific measures need to support development.

Comments on the consultation platform are noted. We endeavour to improve our consultations and learn lessons from each stage, so will take on board comments. We aim to make the consultation accessible, and offer help to anyone to make sure they can have their say. In terms of responding to the feedback, we cannot always change the plan in the way individual comments seek, but we carefully consider all comments received.

Table of representations:

Comments expressing general support for the plan

Summary of issues raised in comments	Comments highlighting this issue
Strongly support the Plan's: • Commitment to planning positively for innovation-led economic growth, informed by robust local data and an understanding of the clustered nature of the Cambridge economy. • Recognition of the need to plan for a diverse range of housing types and tenures, ensuring that housing delivery keeps pace with job growth and supports workforce retention at all stages of life. • Support for flexibility and headroom in employment space and housing provision, enabling the Plan to respond to higher-than-anticipated economic performance. • Emphasis on innovation infrastructure, including the intensification and evolution of existing clusters, campuses and science parks. • Integrated approach to infrastructure planning, including transport, utilities, digital connectivity and energy, and the recognition that delivery depends on strong system-wide alignment across multiple strategies and delivery bodies. • Support for appropriate densification to high design and environmental standards, particularly in locations well served by transport and services. • Balanced provision for "whole economy" needs, including mid-tech, industrial and logistics space.• Commitment to climate change mitigation, biodiversity net gain and high-quality placemaking, which are essential to long-term competitiveness. We also support the Plan's recognition of Greater Cambridge as the intellectual and innovation engine of the Corridor. The success of Greater Cambridge underpins growth across the wider Corridor, including in Stevenage, Harlow, London and Peterborough, supporting high-value jobs, skills pipelines and resilient supply chains.	208493 (UK Innovation Corridor)

Summary of issues raised in comments	Comments highlighting this issue
CA welcomes the vision of good growth, which balances support for the internationally significant innovation economy with improved quality of life for local communities. We support the use of robust local data and the recognition of the clustering nature of the economy, alongside flexibility to allow additional commercial space and housing where performance is strong and infrastructure constraints are addressed. The Plan's reliance on externally delivered infrastructure, particularly transport, highlights the need for system-wide alignment. Greater flexibility on high-quality densification and a more strategic approach to grey belt assessment would further support sustainability, housing delivery, and growth objectives.	203517 (Cambridge Ahead)
We are very supportive of the proposed themes and strongly support the high aspirations of this proposed local plan including the policies on Climate, biodiversity, water management, well being and social inclusion, green spaces, jobs, homes and infrastructure	202817 (Cambridge City Council Liberal Democrat Group)
Linton Parish Council (LPC) are broadly in favour of the principles included in the draft Local Plan. LPC are in favour of avoiding the spread of development throughout local villages as thus smaller scale development would fail to provide adequate infrastructure and services.	201672 (Linton PC)
Comments offering general support include: • I think this sounds good. • This sounds amazing, especially the boosted housing, public transport and access to green space in a currently enclosed Green Belt area. • Support your vision, development strategy and development specifics for the Local Plan. I understand that some of the specifics are dependent on adequate infrastructure including water, which is as it should be. • An incredibly large amount of work has clearly gone into the development of the Draft Greater Cambridge Local Plan, which residents really appreciate.	200990 (C Leach) 201000 (H Hale) 201004 (M Colville) 201161 (S Oliver) 201028 (A Harris)

Summary of issues raised in comments	Comments highlighting this issue
• The overall conclusions appear to be sensible and heading towards a valuable plan. I therefore agree with the majority of proposals, although, as ever, there is of course room for some improvements • Principles need to be adhered to - don't let developers wriggle out of provision of affordable housing, green space, contributions to infrastructure (e.g. schools, Addenbrooke's hospital, GPs); ensure developers build these things first not last. • All sounds very sensible, if can be delivered without compromising - especially around green spaces, provision of infrastructure, avoidance of reliance on cars and provision of water supplies. These are areas where corners are so often cut. • I support the goals of the plan. Wellbeing in communities is important to me. I have been active in campaigning for play spaces for children and teenagers. I see these squeezes out by the completing goals of land for housing and land for biodiversity and nature. I would like to see these specifically called out so they are not lost, and recognition that play is an appropriate activity within some green spaces. • The plan is largely broad principles/intentions, well evidenced and aligning with environmental, well-being and key planning concerns e.g. transport, housing, work and commercial. • Encourage you to find ways to discourage car use and eliminate parking on pavement. • Agree with the aims. Am concerned about university/town differences. • Congratulations to all involved for producing very good Local Plan. May the policies be implemented as clearly as stated. I particularly welcome the proposed balance of environmental and economic factors: GDP is an inadequate measure on its own. I support efforts for reduced climate change impact and development standards higher than national ones • I very much support the emphasis on environmental sustainability, especially recognising the need to ensure from the start the use of active and sustainable transport instead of reliance on cars. I support the net zero goals.	201422 (Residents Association of Old Newnham) 201817 (T McKeown) 202135 (H Lowe) 204351 (J Nelson) 203538 (P Blandford) 203861 (J Prince)

Comments on levels of development

Summary of issues raised in comments	Comments highlighting this issue
I believe the whole plan's premise about the growth of Cambridge is wrong. Being more than familiar with Silicon Valley, I shudder at the phrase Silicon Fen. I also wonder what happened to levelling-up. Why should we continue to grow at the expense of northern areas? Cambridge has neither the resources (i.e. water) nor the infrastructure to support the envisioned growth. The City is already overcrowded. It's unrealistic to believe that all these new developments won't add to the overcrowding.	200991 (R Engler)
I have very mixed feelings about this plan and feel a lot of what you are saying you would like to do is an empty promise and you are not thinking of local people. You do not have the local communities in your thoughts just profit.	201353 (D Wood)
The Government has made a great mistake in defining this area as a priority for 'sustainable economic growth'. Growth is not sustainable in this area.	201421 (S Page)
Central Government wants this development, and individuals have little say	202650 (K Leslie)
Object, I find it frustrating that the plan means even more homes for Cambridge. Having lived here for 18 years I don’t recognise the city and don’t even bother going in shopping at weekend as its too busy and cant move for people. It is sad Cambridge is over crowed and now covered on graffiti and it feels sad where the City is heading. it is a small market town and having 1000s more people means more impact on infrastructure. I think they need to really think about the amount of houses are being built. The city cannot cope with more people.	202423 (R Larkum)
Object, too many of the massive housing developments are occupied by people not from Cambridge, not conforming to Cambridge standards (in business, culture, motoring, lifestyle, tax compliance etc) which causes problem for native Cambridge residents, lowering the quality of life and creating congestion, crime, pollution, services shortages etc. Too much bland and characterless housing is	202542 (C Turner)

Summary of issues raised in comments	Comments highlighting this issue
being put forward simply to create extra council tax revenue without proper (genuine) consideration about the negative effects on life in Cambridge. Over development is also causing problems for wildlife.	
The plan is unreasonable, incomprehensible, utter madness and will create social dysfunction making a mockery of what community is about. The plan needs to be completely revised and placed where local infrastructure could accommodate such an idea. All that is happening on top of all comments above are the landowners reaping even more wealth to accommodate their utter greed and their complete indifference to what a community is about and which is so important in the very difficult world we are now living in.	204432 (S Barron)
Object as Vision is fundamentally not Sound, due to 3 major omissions: 1) It fails to recognise and protect Cambridge's world heritage significance; 2) It totally fails to recognise and manage current conflicts between current growth, let alone the proposed, and the finite physical and environmental constraints of Cambridge and its hinterland; and 3) no evidence, let alone adequate evidence, is provided to show that the proposed levels of growth are "sustainable", and the claimed vision is even remotely feasible. It is shocking that tall buildings proposals are made with no visualisations to show the potential impacts of what is proposed.	203347 (J Preston)
The draft plan is a pipe dream. New housing thus far is ugly. For example, The Marque is beyond hideous. If there no funding for a new sewage works then there is no hope for a new reservoir in the Fens. By 2045, our pot holed roads will have disintegrated and diesel pick up trucks will be needed to traverse them not EVs.	201524 (S Biggin)
You should be working on travel-to-work areas not tight bureaucratic local government boundaries. You do not seem to take into account the government's latest ambitious targets for growth. Without close collaboration with the Mayor and the Cambridge Growth Company your planning exercise is already redundant. Your reliance on the Greater Cambridge Partnership to find solutions is risible.	201267 (A Duff)

Summary of issues raised in comments	Comments highlighting this issue
Supports the Draft Greater Cambridge Local Plan, recognising the need for growth to maintain inclusivity, prosperity, and environmental responsibility. The proposed housing and employment growth is justified but advocate for a more ambitious approach to address the chronic housing shortage. Important to deliver urban regeneration, prioritising brownfield sites and high-density development near transport hubs to enhance sustainable housing delivery. Supports the plan's targeted approach to Green Belt release but suggest remaining open to further reviews to provide well-connected housing and green infrastructure.	201313 (E Munday)
Negative effects of ongoing housing development in village, including road closures and damage caused by heavy vehicles.	201932 (C Pillinger)
My main two failures of this plan are transportation and affordable (housing). Comments include public transport too expensive, developments like airport site will create gridlock. Putting labs in centre will exacerbate problems, with no decent transport proposal. Reopen Cherry Hinton station, upgrading rail links, and building manufacturing plants near railway lines to support future economic needs.	204505 (M Day)
Housing growth is too dispersed while employment remains concentrated around Cambridge.	203304 (J Day)
The plan does not achieve the government’s clearly set ambitions for Greater Cambridge, in which the Greater Cambridge area is foremost in plans for national economic growth. It also misses the specific national policy to support the expansion of the Cambridge Biomedical Campus with associated housing delivery. The Local Plan as currently drafted does not align with the ambitions set out in the Local Growth Plan which aims for a 15% increase in housing by 2035, increasing to a 54% increase by 2050. Government guidance on Local Growth Plans (July 2025) states that they should be the “guiding star” that provides direction for other relevant plans and strategies which should “align” with the Local Growth Plan.	208211 (Pigeon Land and LIH)

Summary of issues raised in comments	Comments highlighting this issue
City centre is too small and too crowded for this over expansion. Green transport is not encouraged by the state of the roads. New developments are not sympathetic in size and scale. The main arteries in and out of Cambridge are clogged already.	202560 (K Leslie)

Comments raising points around the strategy for villages

Summary of issues raised in comments	Comments highlighting this issue
Great Wilbraham Parish Council (GWPC) is concerned that the Local Plan disadvantages our residents and 60k residents in 'Group and Infill' villages in favour of those in new developments and larger, better-connected villages. SCDC is one of the most rural populations in the country, but when considering infrastructure to make communities viable and sustainable and fulfil key strategic themes we are being ignored. Great Wilbraham has close historic, social and geographic links with Little Wilbraham and Six Mile Bottom. The two Parish Councils would like to work together informally and with the Council to develop a strategy for sustainability.	203329 (Great Wilbraham PC)
Support your vision but I don't think the policies and spatial allocation that you have laid out in this Plan are strong enough to deliver on it. I'd like to see more homes near to the jobs (e.g. within the city), more homes around South Cambridgeshire villages with rail stations and more mixed-use development.	205231 (A Wiliams)
The plan clearly treats South Cambridgeshire's towns, villages, and parishes as an inconvenience. Designed and shaped exclusively by and for Cambridge and Cambridge University interests, it marginalises South Cambs. Among thousands of lines, only a brief paragraph acknowledges South Cambridgeshire, effectively dismissing it as inconvenient for delivering infrastructure you have failed to provide over the past decade. Once again, over 120,000 residents are ignored and used as cash cows to support the Cambridge economy. Many people who live and work in Cambridge actually reside in	201302 (I Koutoudis)

Summary of issues raised in comments	Comments highlighting this issue
South Cambs, yet their needs for infrastructure, healthcare, leisure, and wellbeing spaces are repeatedly overlooked.	
Much more must be done to encourage businesses to establish offices / factories / workshops (perhaps as satellites of their HQ) in the larger villages in South Cambs (e.g. Gamlingay) to give the people who live there (and the nearby smaller villages / hamlets) the opportunity to work locally. This will enable them to walk, cycle or drive a short distance to work rather than commute to London or wherever with all the benefits that will bring to the environment and their health – as well as enabling more use of local shops and other facilities sustaining the local economy. What was the village's main industrial area has been turned into a giant housing estate with, seemingly, no thought given to local employment opportunities.	201555 (P Mann)
The attention given to the rural settlement is as vital as it is for new areas. I am supportive of the goals and strategies in the main, but the tactics needed to make sure the existing grows in concert with the new cannot be overlooked. We need the same visioning exercise to take place in say Elsworth as we do Cambourne North. What is the typology of say Elsworth by 2050.	204705 (M West)
“We want our rural villages to continue to thrive and sustain their local services, but we don’t want to encourage lots of new homes in places where car travel is the easiest or only way to get around.” This approach fails to conform with Paragraph 83 of the NPPF. It also fails to recognise the changing work patterns since Covid-19, with recent ONS studies confirming that 28% of working adults in Great Britain hybrid worked between January and March 2025, representing a rise since March 2022.1 Further, the UK Government’s commitment to zero emission vehicles by 2035, which falls within the draft Plan period, promoting the change to electric vehicles.	211582 (Mr & Mrs Smith)

Comments focusing on Environment and Climate change

Summary of issues raised in comments	Comments highlighting this issue
• Object, should have less emphasis on climate change and biodiversity. • The plan has far too much on environmental issues and far too vague a commitment to providing the services needed for such an increase in the size of the community. • Object, Plan bends too much towards climate change, its theories, and its unpredictable and unproven solutions. the council has no business playing god or scientist on this issue and go back to its core duties.	205520 (P Zirngast) 202553 (S Pattinson) 202542 (C Turner)
• Object, Greenhouse gas emissions from constructing the planned 1.5m new homes will exceed interim targets for emissions, and future high emissions are built in which will break the 2050 net zero target without fixing the housing crisis as the distribution of property and its use short-term lets not homes are not dealt with. The Cambridge Plan is part of this. The vision and plan contain a lot of warm words about climate change and biodiversity, but actually in Cambridge isn't in line with these aspirations. Scale and nature of development does not support green building methods. Redeveloping Cambridge market not compatible with climate aspiration. Plan is out of line with national climate and biodiversity targets. • Summary doesn't mention the extreme water stress that Cambridge and the surrounding area suffers from. Climate change will make this worse. No development should be allowed that increases the area's need for water.	203642 (A Copping) 204762 (R Randall)
My confidence is not enhanced by a statement that a 'climate emergency' has been virtuously declared. My take-home from all this is that lots of homes are going to be built in various places whether existing residents like it or not.	201029 (C Pillinger)

Comments on specific sites

Summary of issues raised in comments	Comments highlighting this issue
Cambourne North • Question whether it will result in a genuinely well-planned town with appropriate infrastructure, services, and amenities, or whether it will simply extend an already vast housing estate with only a handful of shops and limited community facilities. • Proposed site for the EWR station and North Cambourne is located on valuable arable land, woodland, and hedgerows, could negate conservation efforts, such as those by the RSPB at Hope Farm • Tranquillity of our village, our home, will be shattered by the huge volume of traffic coursing through the narrow roads • Plans for a multi story car park and link from Cambourne adjacent to designated heritage assets are not enhancing and protecting the fragile barns and house. • Routes from Cambourne should be moved away from existing dwellings. All crossings should include NMU access (including equestrians) to link and extend the bridleway around Cambourne. A new perimeter bridleway should be made as has been in Cambourne.	203722 (G Chamberlain) 203922, 203926 (T Hegan) 201638 (C Doel)
Land adjacent to A11 and A1307 at Grange Farm Comments raising objections with points including: • A1307 is a dangerous road with a history of serious and fatal accidents, The road is severely congested so unless there is a serious transport solution this is not the right location. Access from A11 have been overlooked. • Before any additional development occurs in this area a serious review of schooling • GP practices and local services overburdened. Increased pressure on Addenbrookes and the NHS.	204947, 205621 (M Munns) 205676, 201925, 205677 (M Miles) 204109, 208515, 208516, 208517 (Z Luscombe) 203574 (J Graham) 202072 (M Barry)

Summary of issues raised in comments	Comments highlighting this issue
• Despite reassurances, indicated boundaries have been exceeded and sewage treatment plant is on opposite side of A1307 plus a transport link to the site is via Comfort Cafe land and adjoining field before crossing A1307. • On the flight path to Duxford so any housing could be at risk. • The original HELAA assessment, before the December 2025 update scored the site as RED on suitability grounds. • Damage to the Chalk Stream / aquifer, creation of flood risk • Adverse effects on the Roman Road Site of Special Scientific Interest, stopping irreparable damage. • Archaeological sites there require significant protection, • Impact on character and views, overwhelm nearby villages. • Loss of agricultural land • Other sites would be better.	203416 (D Barkataki) 207553 (C Tjen)
North East Cambridge No reliance should be placed on the council's ability to relocate the Cambridge Waste Water Treatment Plant (CWWTP) and the residential component of Hartree should not be included in prediction of housing numbers.	201314 (E Green)
Kingsway Solar and Forest City I am very concerned about the proposed Kingsway solar farm destroying the countryside. There is also the proposed Forest City how does this match with Cambridges expansion and policies? It appears here in south east Cambridgeshire we are under siege and no one is showing any concerns	201491 (S Jaques)
I strongly support withdrawal of West Fields as potential development site (a Trojan horse).	203538 (P Blandford)

Summary of issues raised in comments	Comments highlighting this issue
Sites are described as “proposed sites” when several developments are clearly already underway. Deeply concerning.	203722 (G Chamberlain)
Site reference 115524 Site would be a disaster for this community. Site 115524 was given an Overall Score of 'Red'. The exclusion of Site 115524 must be permanently enforced. That will protect our vital, extremely limited and increasingly pressurised local amenity space - noting St Matthew's Piece (Cambridge) as the only public park in North Petersfield.	201488 (E Guild)
Object, I am most worried about the traffic and Road capacity through Boxworth and the surrounding villages. There are no clear plans for additional road capacity. The character of the village setting will be completely spoilt. The access to any of the sites along the A14 should not be from Boxworth Road.	201729 (I Negus)
Walled Garden, Whittlesford Object, site should be put back in the plan.	204319 (C Forbes-Cable)
Sites ECC notes that the Plan seeks to help the Genome Campus “employment park evolve into a place, supporting delivery of local services and facilities and helping it to find its place in the network of towns and villages” (page 21). Furthermore at Granta Park the Local Plan is seeking to support its continued success. For both locations, given their proximity to Essex it is essential that the Local Planning Authorities works collaboratively with ECC and other partners, to ensure consideration is given to the cross boundary impacts within Essex in particular connectivity to similar businesses within Essex – Chesterford Research Park within Uttlesford and industries within Harlow; as well as connections to London Stansted Airport. Attention is also drawn to ECC’s role as a neighbouring infrastructure and service provider with statutory roles and responsibilities.	210460 (Essex County Council)

Comments on Infrastructure

Summary of issues raised in comments	Comments highlighting this issue
References to strategic infrastructure should include, "fire and rescue, police, ambulance".	207472 (Cambridgeshire Constabulary) 207505 (Cambridgeshire Fire and Rescue Service)
Highlights importance of adequate healthcare infrastructure for sustainable development and recommends ongoing engagement with the NHS, specifically the ICB, during the preparation of the Infrastructure Delivery Plan (IDP). Healthcare costs should be included in the Local Plan Viability Assessment for relevant development typologies to ensure developers are aware in advance of potential contributions towards healthcare infrastructure.	205178 (NHS Cambridgeshire and Peterborough Integrated Care Board)
ECC notes and welcomes that this section of the Greater Cambridge Local Plan states “development will only be allowed if it is accompanied by the right infrastructure that will deliver the range of supporting services, facilities and infrastructure that workers, visitors and residents need that deliver the goal of making it a world class campus (page 19 of summary for development strategy).	210459 (Essex County Council)
Section 106 must cover adult skills for career switchers	202356 (A Carpen)
Requests a transparent assessment of the costs associated with proposed changes and clarity on who will bear these costs.	201933 (C Pillinger)
Harston PC highlight the need for enhanced local services, such as healthcare and community spaces, to support future growth in the village. Sustainable Energy: The Parish Council supports the inclusion of local sustainable energy solutions but not at the expense of the surrounding farm land/amenity areas or the other policies in the Neighbourhood Plan.	201612 (Harston PC)

Summary of issues raised in comments	Comments highlighting this issue
Facilities provided in new developments have arrived too little too late. e.g. pupils in Darwin Green are having to go outside Cambridge and Northstowe is woeful. There is no sign that lessons have been learnt. There need to be integrated care centres that do more than just gp services. Too much development, e.g. Cambridge North area is bland, soulless, corporate and mediocre. There is no sign of this being addressed.	201722 (A Milbourn)
Build communities. Do not discriminate against one group because it isn't all of the groups. E.g., why can't my church hire the community centre regularly? Why isn't there space for a church building on site? Allow community building.	207152 (R Forder)
Food Growing • Young, passionate growers are dissuaded by the denial of access to good land; huge initial capital outlays; prohibitive planning procedures; logistical problems of parking and distribution opportunities. Missed a section on market gardening of fruit and vegetables for people to actually eat, I only saw one mention of environmentally friendly farming. • Cambridge cannot achieve its net zero ambition without a strategy to transition to a more sustainable food system. Resilience in the food supply chain also needs serious consideration. For these reasons I feel the Local Plan should do more to encourage and support a healthy and sustainable local food system.	205183 (Y Dignon) 205452 (The Cambridge Organic Food Company)

Comments on Cultural Infrastructure

Summary of issues raised in comments	Comments highlighting this issue
Support Cambridge Junction in asking that (supported by Theatres Trust): temporary provision for all cultural functions must be secured before any demolition or displacement reprovision is delivered as an early phase; no gap in provision any future Junction is at least equivalent in standard and capacity, including audience, back-of-house, technical capability, servicing long-term operational/financial viability assessed alongside spatial design delivery governed through a structured process (CJ/Council governance, RIBA stages, shared brief before developer engagement).	202799 (Cambridge Junction) 203841 (N Yeni) 204348 (J Capon) 205262 (N Oakley)
Support the recognition of the cultural and creative industries in driving employment and tourism, highlighting the role of local institutions like University Cambridge Museums, Kettle's Yard, The Junction and Cambridge Arts Theatre. They advocate for the inclusion of arts and culture in communities facilities in new settlements to help to establish and develop communities.	205037 (Arts Council England)
Wysing Arts Centre asks that Cultural Infrastructure is protected and enhanced, as a strategic civic asset; Create Cambridge is embedded in delivery, governance and phasing; artists are involved in masterplanning (RIBA Stage 2-3); Culture is treated as core infrastructure; genuinely affordable cultural production space is required (e.g. peppercorn, with rental charges well-below market rates and established based on evidence, ie Wysing Arts Centre's research on affordable artist studios); rehearsal, making and sole-use studios are prioritised over generic co-working, and that a minimum requirement (e.g., 10% in schemes over 1,000 sqm) is introduced.	204867 (Wysing Arts Centre)

Comments focused on transport

Summary of issues raised in comments	Comments highlighting this issue
Bus comments: • Concern about the lack of reliable public transport in Harston, especially to Cambridge and surrounding areas. We request that the Local Plan includes improvements to bus services. • As the population of the City grows not least with housing the role of the Bus is enhanced – some areas of the city have limited services. Bus infrastructure at Addenbrookes not suitable for disabled people. • Presently from north west Cambridge A14 corridor it takes up to TWO HOURS to get to the Biomedical Campus by bus. No direct links, you have to go into the city and change buses. If the Campus is earmarked as a location for jobs, and there is housing development planned for north west Cambridge, it is imperative that the bus service is vastly improved.	209972 (G Heathcook) 201612 (Harston PC) 201037 (P Spowart)
Light Rail comments: • The new towns need to be linked to Cambridge and each other by a new light-rail network Any light rail network needs to have light rail stops that have medium-high density housing *and* essential services/conveniences in the vicinity • Private vehicles belong the 20th Century and that public transport requires its own Vision to shape development in a strategic way with huge benefits to the quality of life which underpins true prosperity. I don't see such vision in the Plan. The answer is light rail. • There's no transit system in place once in Cambridge, we need metro, trams and other mass transit that is significantly faster and not congestion bound. • Civic welfare as well as economic growth depends on the installation of a mass rapid transit system based on light rail.	202356 (A Carpen) 204647 (P Pope) 201293 (T Roberts) 201267 (A Duff)
Active Travel comments:	202187 (R Forder)

Summary of issues raised in comments	Comments highlighting this issue
• Put it at the centre your treatment of active travel needs goals, metrics, and design intent. Give people better lives. Can they travel shorter distances? Can they travel more healthily, with less environmental impact? Can they leave the ICEV or EV at home? • "minimising...reliance on the private car" should be achieved with a focus on improving accessibility, functionality, availability, and affordability of other sustainable means of transport, rather than disincentivising private car use through financial penalties or absolute access restriction. • There are some good examples of cycle infrastructure, but there is a failure to understand that it has to be good for all journeys, not just parts of some. Despite the rhetoric there is too much car centricity in developments. The scale of development is going to add to the already massive congestion problems. • Transport is a major source of emissions and needs priority when planning and budgeting developments. Electric vehicles are not a helpful solution to congestion, and contribute to sprawling developments that put more pressure on existing road networks. Higher density development must come with much lower levels of car ownership, and parking should be an optional cost. Dense development needs strong walking, cycling and public transport to succeed. Walking and cycling connections should be required in all development designs. • Walkability, including for wheelchair and buggy users, should be a core spatial principle in the Greater Cambridge Local Plan. Supports the Plan's overall direction but walkability is not yet embedded strongly enough across the Vision, spatial strategy, design policies, transport policies, and health objectives	203558 (D Lever) 201722 (A Milbourn) 203304 (J Day) 201474 (M Reader)
Please stop making ordinary people lives difficult, stop creating congestion provide affordable housing. & don't/can't cycle 8+ miles all weathers & don't enjoy 1 1/2 hr bus journeys as opposed to 15 mins by car non peak, 25 mins peak times. leave Coton Orchard alone.	201027 (J Masterson)

Summary of issues raised in comments	Comments highlighting this issue
City centre is too small and too crowded for this over expansion. Green transport is not encouraged by the state of the roads. New developments are not sympathetic in size and scale. The main arteries in and out of Cambridge are clogged already.	202650 (K Leslie)
Current road infrastructure around Cambridge is inadequate for the existing traffic volume, leading to dangerous conditions. Public transport options have diminished, resulting in increased reliance on cars and further strain on the road network. The roads are poorly maintained, with deep potholes creating hazardous driving conditions, exemplified by the route from Elsworth to Dry Drayton. There is a pressing need to prioritise infrastructure improvements for residents before considering population growth in the area.	203919 (T Hegan)
As an east Cambridge resident I would like to emphasise attention to: Critical traffic management issues along Maids Causeway given the development of ARU. Critical need of improved cycle pathways and access.	202135 (H Lowe)
Fen Road Rail Crossing Traffic on Fen Road is heavily impacted by the extremely frequent closure of the level crossing, leading to dangerous speeding by vehicles. There are major safety concerns; someone may easily be killed by speeding traffic. To alleviate these traffic issues close the level crossing and either a) create an entry/exit to the A14 or b) build a road bridge across the railway.	202132 (R Meyer)

Comments on the Consultation

Summary of issues raised in comments	Comments highlighting this issue
Consultation format issues included: • Consultation platform is overly complicated and will put a lot of people off before they can comment suggesting that you do not really want feedback and are hiding behind IT to limit access/response. • The level of technical detail, volume of material, and time required create a significant barrier for ordinary residents. The average person will struggle to engage meaningfully, and many will simply give up. That is not inclusive engagement. • The relevance of field is not clear • The "Instructions" for the consultation on the GCSP website refer only to the use of the "OpusConsult" platform. This requires a registration process before any input. Although GCSP will accept input by post or by email, these options have been effectively concealed by failing to make this clear on the consultation website. Input from the public, particularly older people or other less "internet savvy", has been hindered and discouraged	201024 (P Zirngast) 208881 (D Smith) 201162 (D Quinn) 208634 (G Jones)
Consultation legitimacy points included: • Concern that housing developments will proceed regardless of local opposition, with insufficient attention given to the impact on existing residents and infrastructure. • Last Local Plan draft "consultation"--ZERO changes made despite 25'000+ researched comments received. Yet again, you are simply wasting taxpayers' money with this PRETENCE of democracy: yet another mere box-ticking exercise, with zero intention or legal obligation to implement changes based on public consultation. • Consultations are generally biased, on very limited predetermined options. They are generating apathy and disengagement with public affairs, they're a disgrace and waste of money.	201931 (C Pillinger) 203642 (A Copping) 202542 (C Turner) 203764 (A Wilson) 201030 (A Lindsey)

Summary of issues raised in comments	Comments highlighting this issue
• The plan is presented with deliberately obstructive questions and detours. For example, how is a citizen to know if the plan is legally correct? But the council blocks comments unless the citizen agrees with the council that it is • Process unduly prioritised those of set demographics. As a younger person in full time work I was obliged to miss work in order to attend local meetings.	

Other General Comments

Summary of issues raised in comments	Comments highlighting this issue
ECC acknowledges the national and international significance of the high tech industries, research and development and life sciences within the area. The economies of scale for such industries is also noted in their presence within West Essex, and in particular Uttlesford District and Harlow Town. In developing and shaping the existing and future economic clusters, ECC would welcome further engagement to ensure there is full consideration to the inter-relationship and importance of the industries and employment growth within western Essex. Furthermore in the identification of development needs, it is important to appreciate the role that London Stansted airport plays and will continue to play in supporting the growth and development within these key industries.	210458 (Essex County Council)
New research on neurodiversity & building facades *must* be incorporated e.g. requirement that Health Impact Assessments cover this Require post-occupancy evaluations on all large sites Poor contemporary design should not be used as a reason to repeat poor designs	202356 (A Carpen)

Summary of issues raised in comments	Comments highlighting this issue
Biodiversity and green spaces should be retitled Biodiversity, Geodiversity and Green spaces and reference should be included to geodiversity conservation and sites of geological importance.	203458 (Cambridgeshire Geological Society)
Conversion of “barns”, constructed on Green Belt, then converted to industrial buildings, should be expressly excluded.	205484 (P Meyer)
As an east Cambridge resident I would like to emphasise attention to: additional HMOs, hotels, expansion of retail eg Beehive, Newmarket Road/Elizabeth Way roundabout changes. Placing of additional HMOs to take account of other possible locations e.g. south /north Cambridge and HMO types to be reviewed.	202135 (H Lowe)
More council housing is needed, as is encouragement for downsizing. Water abstraction must be reduced. Tourism needs managing, as does the power of university colleges, to maintain the quality of Cambridge life.	203538 (P Blandford)
We are a very nature-deprived county and enhancing green spaces and biodiversity is very important, but wildlife benefits most in an area not shared with hordes of people so it is important to provide areas for outdoor recreation separately from areas supporting nature as well as places which aim to do both.	203861 (J Prince)
There are overlapping themes, such as Town Centres, Placemaking, combatting the Climate Crisis and economic applications that feature Traditional Architecture as a primary vehicle towards achieving the greatest possible positive outcomes for all of these themes.	201010 (Community Campaigner D Barton)

Consultation Statement

Appendix 5: Response to Representations - About the Plan



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

About the Plan

About the Plan Introduction

Abbreviations

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

Summary of Main Issues:

Some representors raised concern about the format of the draft plan material.

A number of neighbouring councils, statutory bodies, and infrastructure provides commented on the importance of continued liaison with them.

A number of Parish Councils raised specific comments about their village to this section of the plan. Stapleford and Great Shelford request that their neighbourhood plan is taken into account, and a number of specific comments around the policies map. Elsworth

Parish Council raise concerns about the impact of proposals that have not been fully addressed. Girton Parish comments included the need to protect the gap between Girton and Cambridge. Horseheath parish support the emphasis on biodiversity and climate change, but raise a general question about the detail of plan implementation. Histon and Impington, and Whittlesford, both raise issues around the delivery of necessary infrastructure. Boxworth Parish Meeting highlighted the need to consider impacts on exiting communities. Great Wilbraham Parish Council said they were supportive of many aspects of the local plan.

Comments challenged the level of development proposed, and that it did not take account of environmental impacts. Others considered that development targets should be more ambitious, and the approach did not and are align with the Local Growth Plan and National ambitions for the area.

Some comments on the development strategy offered general support, but others questioned whether it would deliver the homes needed, was to focused on large sites and new settlements, or did not include enough small sites or sites in villages.
Two representors suggested alternative plan periods, extending the plan period. One comment said the plan did not adequately consider the draft NPPF, which is expected to be adopted in mid-2026, necessitating alignment to avoid future revisions.
General comments raised a wide variety of issues. This includes support for policy approaches but also concern about their effective implementation. The interdependence with infrastructure delivery and wider strategies was also highlighted. Issues included measures to support affordable housing, green infrastructure, rights of way, food growing, protection of heritage, supporting Cambridge’s economic clusters, and sustainable transport. Hobsons Conduit Trust highlighted the importance of protecting the water environment. The importance of places to be creative and social setting were highlighted by a pupil from Comberton.

Cambridge United Football Club see either redevelopment of the current site or potential relocation as critical to the Club's long term viability and sustainability at a time when its current capacity is constrained, the City will grow exponentially and the financial pressures for all football clubs at every level are growing.

Comments on specific sites included concerns regarding Land adjacent to A11 and A1307 (Grange Farm), and the Cambridge Biomedical Campus. East West Rail highlighted the relationship of site proposals with their scheme.

Response to Representations:

Comments on the consultation platform are noted. We endeavour to improve our consultations and learn lessons from each stage, so will take on board comments. We aim to make the consultation accessible, and offer help to anyone to make sure they can have their say. The plan is substantial document with a large amount of supporting evidence, so we did include a nontechnical summary of the plans proposals at the beginning of the document. Technical comments on format will be considered in preparation of the proposed submission version. The consultation includes a wide range of events. We can't go everywhere, but very much sought to deliver good coverage across Graeter Cambridge. We also continuously engage with our parishes and residents associations though regular planning forums.

Officers have continued liaison with neighbouring councils, statutory bodies, and infrastructure provides throughout the plan making process. We continued this process since the draft local plan stage. And have published a record of our engagement.

The great Shelford Neighbourhood plan was adopted in October 20205, making it a part of the development plan. Detailed comments on the defined development extend and other issues have been considered separately. Comments raise concerns

regarding on delivery and infrastructure, the Councils have sought to address these by further developing the evidence base since the draft plan stage. This includes further exploration of measures to address transport challenges by the Combined Authority.

The level of homes and jobs being planned for has been carefully considered, and is justified by the evidence being published alongside the Local Plan. National planning policy requires local plans to respond to the needs of the area. We have considered the needs of the economy and likely growth in jobs, and the number of homes needed to support it. This also accords with the standard method of calculating the needs for homes set by government. We have tested a range of strategic development approaches, considering their impact on economic, social, and environmental issues, and have developed an appropriate spatial strategy to accommodate development needs whilst and protecting the environment. The plan also sets out ambitious polices to guide the form of development responding to climate change.

The strategy for villages has allocated sites where it is sustainable to do so as part of the wider development strategy, but also included policies which would support appropriate windfall development and rural exception sites. Neighbourhood planning also remains a toll available to parishes if they wish to address local issue directly.

The plan period running to 2045 remains the Councils preferred approach. It provides an appropriate length of time after adoption. The plan also identifies a longer term vision, in particular for strategic sites. At time of writing the outcome of the government consultation regarding changes to the National Planning Policy is not yet known. It would not be appropriate amend policy to reflect draft policy approaches.

The wide variety of other issues raised are noted. Rights of Way and connectivity are important, and are addressed in Policy I/ST: Sustainable Transport and Connectivity. The interdependence with the delivery of infrastructure has been recognised in the plan

and the evidence base. It would not be appropriate to add rights of way to the policies map. The county council maintains the definitive map. The councils continue to liaise with infrastructure bodies to ensure the growth needs of the area are addressed. The vision and objectives for the plan recognises the importance of the Cambridgeshire economy, but also that this must be balanced with consideration of social and environmental issues.

On specific sites, the issues raised on Land adjacent to A11 and A1307 at Grange Farm and Cambridge Biomedical Campus have been carefully considered and addressed in the evidence related to site policies. They are considered to remain appropriate elements of the development strategy. Comments supporting the omission of specific sites are noted. Proposals for new or alternative allocations have been assessed through the Housing and Economic land availability assessment and Sustainability Appraisal process.

Table of representations:

Comments on the Consultation

Summary of issues raised in comments	Comments highlighting this issue
Comments on the format of the local plan included: • Online version of this draft plan is different from the PDF one. • Online document presents layered information in silos, making it difficult to compare policies. • Complex to make representations. • A single whole PDF of documents would be useful. • Page numbers need to be corrected.	201222 (S Williams) 202349 (A Hall) 203274 (J Palmer) 203507 (J Neal)

Summary of issues raised in comments	Comments highlighting this issue
• It would be easier for the reader if the policies were numbered as well as/instead of having lettered codes. • Website is hard to navigate and the language is not easy for casual users, which may limit residents' understanding of the process. • Maps should be redrawn to clearly differentiate heritage assets from green-separation areas, removing the confusing pink shading.	208328 (Gladman Developments) 208329 (Gladman Developments) 208460 (Longstanton Parish Council) 210643 (Transport 2000 and W Suffolk)
Lacks a plain English summary, designed to help and support people with poor reading and comprehension skills, or indeed those whose cultural and language backgrounds may be diverse. There is a daunting amount of documentation for residents to familiarise themselves with and limited time. Detailed and complex document.	201471 (P Newton) 201901 (C Deer) 202334 (P Deer) 202324 (A Hamill) 203274 (J Palmer) 203507 (J Neal)
More regular consultation with residents is needed for the new railway bridge and station access. We would like clarification on how the Local Plan will align with other consultations and plans.	205785 (Rustat Neighbourhood Association)
I attended the Greater Cambridge Local Plan - Residents' Associations presentation via Teams on 13 January. The Greater Cambridge Local Plan is a very detailed and complex document, which makes it difficult for residents who are not expert in the whole range of areas covered to make informed	202342 (A Hamill)

Summary of issues raised in comments	Comments highlighting this issue
comment on all those areas. That said, each resident who provides comments has a valid point of view and their opinion must be taken into account.	

Comments from Duty to Cooperate Bodies, and general cooperation issues

Summary of issues raised in comments	Comments highlighting this issue
As the immediate neighbouring authority to the south, UDC shares a significant functional geography, through the M11 Innovation corridor and a landscape feature to the Northern edge of the district. The two areas are intrinsically linked by critical infrastructure corridors—including the M11 and the West Anglia Mainline and by the shared chalk aquifer that feeds chalk streams in the sub-region. Uttlesford District Council remains committed to working collaboratively to support the Greater Cambridge emerging Local Plan to address these cross-boundary challenges. The alignment of our policies on water efficiency are critical for enabling the sustainable growth the region.	204968, 204981 (Uttlesford District Council)
The delivery of new healthcare infrastructure is resource intensive, and the NHS faces funding constraints that are exacerbated by population growth from new housing developments. New developments should contribute proportionately to the healthcare needs arising from increased population due to housing growth. Access to essential healthcare services is vital for promoting good health outcomes and supporting the social and economic wellbeing of an area.	205042 (NHS Cambridgeshire & Peterborough Integrated Care Board)

Summary of issues raised in comments	Comments highlighting this issue
Residential developments significantly impact the demand for additional primary healthcare provision for future residents. Healthcare infrastructure should be a priority for infrastructure delivery, given its strategic importance in supporting housing growth and sustainable development. The healthcare estate must be continually reviewed, optimised for land use, and modernised in line with integrated NHS strategies. Planning policies should facilitate the delivery of essential healthcare infrastructure and be developed in consultation with the NHS to aid in estate transformation.	
The ECC response supports the preparation of the Plan and provides broad support. ECC is committed to working with the respective Local Plan Authorities in seeking to develop the Greater Cambridge Local Plan and understand how our representations can be addressed through modifications. Given their proximity to Essex it is essential that the Local Planning Authorities works collaboratively with ECC and other partners, to ensure consideration is given to the cross boundary impacts within Essex, in particular highways and transportation, Early Years and Child Care, Education and Adult Community Learning.	207668 (Essex County Council)
Thank you for the opportunity to comment on your Regulation 18 Draft Local Plan. We have reviewed the Local Plan in conjunction with the associated supporting documents. We have provided comments and recommendations below which align with the various constraints within our remit.	207670 (Environment Agency)
Thank you for consulting the East of England Ambulance Service NHS Trust (EEAST) regarding Draft Greater Cambridge Local Plan. Detailed comments on individual policies provided.	207671 (East of England Ambulance Service NHS Trust)

Summary of issues raised in comments	Comments highlighting this issue
Both Bedford and Greater Cambridge are located within the Ox Cam corridor and this shared geography means numerous strategic matters have a cross-boundary dimension. These include housing, socioeconomic, infrastructure and water scarcity. It is noted that there are established governance arrangements for the combined CPCA and within this area a local government reorganisation process is ongoing. It is expected that Greater Cambridge will look to the Cambridgeshire and Peterborough geography for its strategic plan making context. There will however remain an important need to ensure that the Local Plan also responds to the drivers of growth originating in the sub region to the west particularly in relation to the following national projects: Universal Studios, the proposed Milton Keynes renewed new town, Tempsford new town and East West Rail.	208223 (Bedford Borough Council)
CBC are unclear at this stage if the statement of common ground statement that there are no areas of disagreement can be supported due to our concerns over the transport implications arising from the cumulative impacts of the allocations and proposed allocations at Cambourne.	208507 (Central Bedfordshire Council)
Historic England very much welcomes the emerging plan and the considerable work undertaken to date. We can see the incorporation of many of the comments we have made in previous consultations which is appreciated. We particularly welcome the substantial effort that has been made in preparing a comprehensive evidence base including both strategic and site-specific heritage impact assessments, topic papers, skyline and tall buildings strategy, townscape characterisation study, landscape sensitivity assessment including renewable energy assessment.	208918, 208919 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
We recognise the area faces intense pressure for growth, driven by both the economic success and the attractiveness of the area, in large part a consequence of its rich architectural and cultural heritage. We are keen to support sustainable growth in the right locations, but this growth must be carefully managed to ensure that the very things that contribute to the success of the City and surrounding area are not harmed in the process. Historic England is keen to ensure that the emerging plan gives full consideration to the historic environment, both in the choice of site allocations and policy criteria for sites, as well as through a robust and clear suite of historic environment and other policies that seek to both protect but also enhance the historic environment.	
It is important that in setting the portrait of Cambridge there is acknowledgement of the cross boundary and strategic matters that must also be clearly articulated. In particular for the economy, the for the emerging Local Plan to be effective, it must appreciate the opportunity provided by international and domestic connectivity by London Stansted airport, as well as the biotech and advanced manufacturing business clusters evident within Essex (e.g. at Chesterford Research Park and Harlow). Given the "international significance" of the employment clusters, it is essential that there is appreciation of the proximity to London Stansted airport, and also seeking to ensure that surface accessibility to improve connectivity with Greater Cambridge is fully explored when developing the emerging Local Plan.	210466 (Essex County Council)
ECC recommends that the regional planning context be amended to ensure there is clarity concerning ECC's role and relevant statutory plans/strategies. Furthermore it is important that reference is explicitly	210467 (Essex County Council)

Summary of issues raised in comments	Comments highlighting this issue
made to the following plans and strategies – Essex Local Transport Plan 4. It is also important to note that ECC, will be part of a new single strategic authority for Greater Essex. It will take the form of a mayoral combined county authority. It is expected that a new mayor for Greater Essex will be directly elected by the public in 2028.	
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).	210506 (Cambridgeshire County Council)
Cambridgeshire County Council is referenced in several places, please ensure that the Council is referred to as Highway Authority where appropriate.	210524, (Cambridgeshire County Council)
While there are many areas of agreement, as far as we are aware, the Statement of Common Ground was not checked with Transport Strategy or wider CCC colleagues prior to publication. The Council would therefore welcome discussions regarding future iterations of the document Cambridgeshire County Council, was, along with a number of other organisations signatories to the North East Cambridge Area Action Plan Proposed Submission Dity to Cooperate Statement of Common Ground (November 2021). As the safeguarding of waste and minerals remains a strategic matter that	210520, 210545 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
affects more than one authority, a reaffirming or update to that statement of common ground to support this draft plan is requested.	
Public health are pleased to see that the vision for Greater Cambridge is based on the seven strategic priorities. Public health welcome the 'Draft vision' for inclusive communities that aim to provide a high quality of life with housing and social infrastructure that meets people's needs through all stages of life; food security; and that the physical and mental health and happiness of people will be prioritised; and that open spaces will be easily accessible and that large scale natural spaces will be able to be reached by active travel modes	210547 (Cambridgeshire County Council)
The influence of Cambridge on western Suffolk is acknowledged in the Suffolk Local Growth Plan and by the fact that it is part of the Cambridge-Norwich Tech Corridor, and the Cambridge Housing Market Area. The County Council would welcome strong recognition of the role of South Cambridgeshire in the wider sub-regional economy as part of this strategy, as alluded to in paragraph 1.17.	210630 (Transport 2000 and W Suffolk)
As you will be aware the new plan-making system provided by the Levelling Up and Regeneration Act 2023, and the November 2025 Commence and Update Local Plan (CULP) guidance, does not include the Duty to Co-operate. It has been advised that LPAs should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas and Inspectors should continue to examine plans in line with the policies in the NPPF on 'maintaining effective co-operation'.	207669 (Transport 2000 Cambs and West Suffolk)

Summary of issues raised in comments	Comments highlighting this issue
National Highways welcomes the opportunity to comment on the Greater Cambridge Draft Local Plan Regulation 18 Preferred Options consultation. The emerging Local Plan aims to set out the required growth and development for the period of 2024 to 2045. National Highways is a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents.	210847 (National Highways)
Strongly recommends that the engagement referred to on page 5 of the Spatial Strategy is recorded via a Statement of Common Ground ('SoCG') to evidence effective joint working on cross boundary strategic matters (as per the NPPF at paragraph 36(c). The SoCG does not require agreement between the parties, but does require evidence of constructive, active, and ongoing engagement.	208669 (Guilden Morden Developments Ltd)
The Council has included in its evidence a Duty to Cooperate Statement of Compliance and Statement of Common Ground. In principle, it is supported that these interim documents have been prepared to support the current consultation. Whilst it is recognised that there is engagement between Cambridge City Council and South Cambridgeshire District Council as this reflects the geographical and functional relationship of the area, there are wide ranging cross boundary strategic issues which the Councils will need to demonstrate a written record of the progress to the point of submission with relevant key stakeholders, particularly in relation key infrastructure bodies and whether any requests to accommodate unmet housing needs of neighbouring authorities have been received.	208895 (Nightingale Land and Hill Residential Ltd)

General Comments from Parish Councils

Summary of issues raised in comments	Comments highlighting this issue
The Stapleford & Gt Shelford Neighbourhood Plan (adopted Oct 2025) has not been incorporated into the draft greater Cambridge Local Plan and that this will need doing before the next version of the Local Plan is produced. The draft Policies Map will also need updating to reflect this For example, there is a new Important Countryside Frontage between 41 Gog Magog Way and houses at Chalk Hill, Stapleford, which is not shown and the defined development extent of Stapleford is inaccurate, as is the mapped extent of the Gog Magog Hills in documents supporting the draft Plan. Open spaces, Local Green Spaces and Protected Village Amenity Areas from this Neighbourhood Plan need to be included in the Policies Map.	201526 (Stapleford Parish Council) 208087 (Great Shelford Parish Council) 202661 (S Berridge) 202182 (A Sykes)
The proposals in the Local Plan have some potential benefits but there are also a lot of concerns which the Plan does little to allay. Plan says little or is silent on a number of critical issues, such as travel, flooding, etc, and there has been little apparent consideration of the impact of significant new housing / logistical developments beyond the immediate Cambourne area. Dissatisfaction about commenting on the Plan when there is so much yet to be done. It is noted the plan provides a framework but it is for developers to come forward with proposals and deliver them. Speed of build out has implications for delivery of community services and facilities. Concerns about the involvement of unelected bodies with which parishes have no contact and no influence, and the possibility of the appointment of a Development Corporation.	202110, 202114 (Elsworth Parish Council)

Summary of issues raised in comments	Comments highlighting this issue
Policies Map for Girton is a great step forwards from the version in the Local Plan 2018.	202170 (Girton Neighbourhood Plan Team)
GPC seeks discussions on topics such as Girton Gap protection, alignment with national policy, development extents, active travel, grey belt methodology, and community enterprise space. GPC is committed to evidence-based planning that protects Girton's identity and ensures the Local Plan accommodates the realities of a Green Belt settlement.	202278 (Girton Parish Council)
Horseheath PC agree with the aim of having a vibrant economy that also significantly reduces impacts on the environment and climate. We would like to see a defined aim to increase biodiversity as we understand this is intimately linked with mitigating climate change and environmental degradation. We support a higher level of biodiversity gain to be required for new development than the current national requirement. Support an emphasis on active travel together with enhanced cultural opportunities.	203262, 203265 (Horseheath Parish Council)
Whittlesford Parish Council supports the overall ambition to plan for growth but considers that the scale and phasing of development proposed in Rural Southern Cluster area is not currently aligned with deliverable infrastructure, particularly transport, water supply and community facilities.	203549 (Whittlesford Parish Council)
In general we support the direction of travel, but it is very difficult to fully endorse this document when in so many areas there are few details about the process of implementation and particularly the measures that will be put in place to detect and deal with non-compliance.	210708 (Horseheath Parish Council)
A critique of the plan would be that major housing development sizes are north/ northwest of the city outside the green belt and a large amount of employment sites are south. The current public transport	204741 (Histon and Impington Parish Council)

Summary of issues raised in comments	Comments highlighting this issue
model is hub and spoke with a congested spoke/city centre. These are challenging problems but bearing in mind the relative flexibility of the jobs market vs the inflexibility of public transport options it arguably designs in continued reliance on cars for the majority of south cambs residents. Aspirations for public transport ring roads or some alternative solution feel necessary.	
Boxworth Parish Meeting supports the need for Greater Cambridge to continue to develop and there is a requirement for additional housing and employment in the area. It is vital that these developments are managed in such a way that they not only provide for the future needs of a growing population but do so in a way that does not adversely affect existing communities. We welcome the opportunity to comment on the Draft Local Plan and hope that our constructive engagement can add value.	202748 (Boxworth Parish Meeting)
We are supportive of many aspirations in the Local Plan and congratulate the planners on completing this major work.	206565 (Great Wilbraham PC)

Comments on Levels of Development

Summary of issues raised in comments	Comments highlighting this issue
Plan is based on outdated perceptions of the need for, "growth" not taking into consideration climate change or AI and assuming that the previous attractions of Cambridge as a place to live and work will hold good in a changing world..	202944 (C Hills)

Summary of issues raised in comments	Comments highlighting this issue
Cambridge Friends of the Earth, yet again, cannot and will not provide a veneer of democratic accountability by participating in yet another Consultation to, effectively, enable further environmental and social destruction of our region to placate the voracious appetttes of developers and landowners and the policies of an environmentally and socially ignorant administration, who can see no further than the next election.	210709 (Cambridge Friends of the Earth)
Given the blythe assumption of the 'need' for ever increasing 'economic growth' in the region, Cambridge Friends of the Earth refuses to respond in full to this 'consultation'. We feel that doing so would, potentially, provide credibility to the edicts driving the creation of this Local Plan. Given the continual push for growth in the region, far in excess of its ecological, environmental and social limits, do we have to assume that the Local Plan is being promoted by madmen, economists or, quite possibly, mad economists?	203251 (Cambridge Friends of the Earth)
The plan makes an assumption that there is such a thing as 'sustainable development'. The climate crisis and the need for immediate and steep reductions in emissions means that most development is not sustainable and that the expression 'sustainable development' has become a contradiction in terms. Rethink the focus on development and substitute a focus on steep emissions reduction and protection of the natural environment.	204860 (R Randall)
Does not plan for enough housing. In particular, government targets should be treated as a minimum, not a maximum.	204502 (Redrow South Midlands)

Summary of issues raised in comments	Comments highlighting this issue
Future proofing Cambridge to be successful by 2050 requires the food production system to be supported and invested in as a high priority. To achieve the wellbeing of our community will require investment and support to those producing our food. Any proposed development will reduce our ability to produce our own food in this country.	205175 (Y Dignon) 2098715 (J&C Collins)
Food Security does not appear to be considered as a Strategic Priority. Any proposed development will reduce our ability to produce our own food in this country. Whilst none of know what the future may hold, the farming of any arable land in this country should, in our opinion, be preserved for future generations. Whilst it could be argued that the arable land that is proposed to be developed upon is a relatively small proportion of the country's overall arable land, more and more land is being developed upon nationally.	208715 (J & C Collins)
The vision for Greater Cambridge is supported. However, to achieving this vision it is necessary for the Plan to be based on ambitious targets for growth. It requires amendments to ensure that the level of growth and housing allocations reflect the Vision and are aligned with the Local Growth Plan and National ambitions for the area.	208395 (Ceres Property on behalf of land owner at Friesland Farm, Swavesey)
The plans are a response to Government pressure and arbitrary targets: why should 73,000 jobs and people end up here? The present large settlements are too near Cambridge and are not self-sufficient: Waterbeach, Cambourne, Northstowe. That means traffic into Cambridge. Other planned developments threaten to link nearby villages into one large conurbation. The inevitable rise of traffic and pressure on water supply and sewage disposal cannot be satisfactorily accommodated by the scale of development	D Jones (208480)

Summary of issues raised in comments	Comments highlighting this issue
that is proposed. Some vested interests will profit from the economic development, but many ordinary people will see no benefit from the 'prosperity' that is promised.	
The preferred housing target, the development strategy and the selected allocations for the draft GCLP are unlikely to fully deliver the Vision for Greater Cambridge. The housing requirement is not aligned with jobs growth, which would lead to more people commuting into Cambridge to work mostly by car.	211605, 211606 (Bloor Homes)

Comments raising general issues related to the Development Strategy

Summary of issues raised in comments	Comments highlighting this issue
Supports the Vision for Greater Cambridge, emphasising the need for sustainable and prosperous growth in the area. Development Strategy is overly reliant on new settlements and major development sites dependent on significant infrastructure projects. Overly optimistic about delivery timescales for draft allocations, risking failure to meet housing needs within the plan period. Need a more balanced approach to growth distribution, recognising the potential of villages.	203025 (Cemex UK Properties Ltd)
I support the plans for protecting the environment while trying to accommodate growth. However I live in a village in South Cambridgeshire and do not support the idea that villages should not take their share of extra houses. Our village (Haslingfield) needs extra affordable houses so that it continues to be a place that normal families can live. It also needs footpaths and cycle paths connecting it to all the	203130 (R Hatfield)

Summary of issues raised in comments	Comments highlighting this issue
villages around, where vital services (doctors, dentist, hairdresser, shops, small industries) are based, so that people can access these without cars. Stopping it from growing is not a sustainable strategy.	
The introduction recognises South Cambridgeshire villages but largely frames growth around Cambridge and major transport corridors. Focuses strongly on Cambridge's growth and innovation economy, with less emphasis on the distinct needs of rural communities. The strategy prioritises locations with high public transport accessibility, which risks limiting opportunities for rural communities unless investment in rural services, digital connectivity and community infrastructure keeps pace. There is little evidence on rural housing need, employment patterns or service access challenges. Parish councils and rural community organisations are not clearly referenced in shaping infrastructure or growth decisions. Stronger rural proofing would include clearer rural evidence, safeguards for village services, support for rural-enterprise and firm commitments to transport and digital inclusion in smaller settlements. Stronger rural proofing would include clearer rural evidence, recognition of village infrastructure constraints and a stronger commitment to inclusive engagement and place based solutions for smaller settlements.	203137, 203139 (Cambridge ACRE)
I share the aspirations of the Local Plan expressed in the Introduction: reduced climate and environmental impacts, an increase in the quality of everyday life for local people, minimising carbon emissions and car-dependence, supporting the infrastructure we need, increasing nature, wildlife and green spaces, and safeguarding our distinct local heritage. I also support the ambition to make	203275 (J Palmer)

Summary of issues raised in comments	Comments highlighting this issue
Cambridge “a place where walking, cycling and public transport is the natural choice for travel”. Further, I support the stated intentions of only very limited infill development in rural villages with little or no public transport, where car travel is the only realistic option for most people.	
The Plan’s development strategy, which underpins the Plan as a whole and its requirement to meet identified local housing and employment needs in full, is flawed.	203313 (Wilson Bowden Developments)
The plan fails to allocate sufficient small sites (1-2.5 hectares) for housing, focusing too much on large urban developments, which does not meet the needs of the wider area.	203401 (ESCO Prospect)
Broadly support the ambition to plan positively for growth across Greater Cambridge; however, I have serious concerns regarding the soundness of elements of the draft Plan, particularly in relation to transport infrastructure, cumulative impacts on the villages I represent, omissions in the spatial strategy, and deficiencies in the supporting viability evidence. (submitted in my capacity as District Councillor for Whittlesford, Thriplow & Heathfield, and Newton)	204086 (Cllr R Williams)
Does not support equality of access and opportunities or ensure everyone can benefit from development of new homes and jobs. The current strategy seeks to concentrate development in large strategic sites, which does not account for rural housing and employment needs. The lack of allocations in villages means that any new development will inevitably be smaller sale and ad-hoc, will not provide affordable housing, and will not allow for transport and community facility upgrades that would make rural communities more sustainable.	204502 (Redrow South Midlands)

Summary of issues raised in comments	Comments highlighting this issue
Plan relies on strategic sites without placing reasonable level of growth towards sustainable settlements such as Great Shelford and Stapleford.	208914 (Nightingale Land and Hill Residential Ltd)
We support many of the Draft Local Plan's strategic objectives, including meeting housing need, addressing climate change and enhancing the environment. However, our representation focuses specifically on residential development delivered by SME developers on windfall sites, small brownfield sites and sensitive urban redevelopment within existing sustainable locations, which can often be delivered more quickly and sustainably than larger strategic sites.	209704 (NP Architects)
The plan is completely unsustainable with regards sustainable transport. Focus the proposed developments sites on being as close to Cambridge city centre, in locations that do not rely on car travel. Increase the density of the proposed sites in order to allow as many people as possible to access amenities within a short walk. Design around people without cars, for example teenagers, the disabled and the elderly.	203597 (H Thomas) 203744 (W Clements)
The plan is completely unsustainable with regards sustainable transport, which will lead to both lives blighted by massive congestion on the car journeys people are forced to make, and lives removed from the amenities and relationships people actually want. People are moving here in large numbers because of the city of Cambridge, why are we forcing them to lives a half hour drive from where they want to be? Focus the proposed developments sites on being as close to Cambridge city centre, in locations that do not rely on car travel. Increase the density of the proposed sites in order to allow as	203579 (H Thomas)

Summary of issues raised in comments	Comments highlighting this issue
many people as possible to access amenities within a short walk. Design around people without cars, for example teenagers, the disabled and the elderly.	
Advisory Board of Albion City Development Corporation Ltd strongly support the Draft Greater Cambridge Local Plan. The Forest City project is a proposed self-sufficient urban settlement of 45,000 acres, located east of Cambridge and broadly aligned between Newmarket in the north and Haverhill in the south. the Greater Cambridge ecosystem; one of the world's leading centres for science, technology and innovation, with strengths in life sciences, data and digital technologies, advanced manufacturing and research-intensive industries, is a national strategic asset. Strongly supports planning that recognises and enables the continued growth of this ecosystem.	208128 (Albion City Development Corporation Ltd)
Development strategy is too focussed on the delivery of large strategic sites including an expanded Cambourne, existing new settlements at Northstowe, Waterbeach and Bourn Airfield, and a proposed new settlement at Grange Farm. The delivery timetable for infrastructure to support an expanded Cambourne and at Grange Farm is uncertain. For all of the large strategic site allocations the predicted housing delivery rates are unrealistically high, and the delivery of policy compliant levels of affordable housing is often not achieved. The development strategy avoids directing development to the larger villages, including Papworth Everard regardless of their sustainability credentials, existing services and facilities, accessibility by sustainable modes of transport, or affordable housing needs.	211605, 211606 (Bloor Homes)

Summary of issues raised in comments	Comments highlighting this issue
Approach does not support the residents or services and facilities in those villages, and would not meet the great places, homes, connectivity and infrastructure strategic priorities. Will not deliver green infrastructure.	

Comments on the Plan Period

Summary of issues raised in comments	Comments highlighting this issue
The minimum end date of the plan should be 15 years from adoption, as per paragraph 22 of the Framework. The draft plan seeks to cover the period 2024-2045, i.e. 21 years. Gladman supports this approach as it gives additional years should there be any delays in the plan-making process or during examination. However, in order to be consistent with national policy, Gladman would recommend that the plan period to starts in a more recent year – 2025, ending in 2045. The council may then want to amend the ending year to 2046 to maintain the 21-year plan period.	208330 (Gladman Developments)
The plan period should be extended to 2050. A longer plan period is considered to clearly be the most reasonable strategy, when considered against the alternatives.	208383 (NAIB Trust)
To align with the Cambridgeshire Local Plan and emerging Spatial Development Strategy, and accounting for the number of large strategic allocations in the plan, it is considered that the plan period should be extended to 2050. A longer plan period is considered to clearly be the most reasonable strategy, when considered against the alternatives	211595 (Places for People)

Comments on the relationship with National Planning Policy

Summary of issues raised in comments	Comments highlighting this issue
The plan does not adequately consider the draft NPPF, which is expected to be adopted in mid-2026, necessitating alignment to avoid future revisions. The draft NPPF aims to reduce development management policies that exceed national standards, which creates unnecessary burdens. Recommend council review local plan once new NPPF adopted deleting or amending any local plan policies that are inconsistent with the new NPPF to avoid lengthy discussions regarding their weight during application processes.	203401 (ESCO Prospect) 205096 (Home Builders Federation)
To ensure longevity of the emerging Plan, it is recommended that the Council is consistent, where possible, with the NPPF when published in its final form.	206943 (Henry Boot Developments)
We support the overall vision of creating well-designed, sustainable and resilient communities, and welcome the ambition shown in the draft policies. However, a number of the detailed requirements go beyond national standards or lack sufficient flexibility and therefore risk undermining deliverability or delaying the housing trajectory.	208958 (Persimmon Homes East Midlands)

Comments raising General Issues

Summary of issues raised in comments	Comments highlighting this issue
CPRE Cambridgeshire and Peterborough supports the ambition of the Greater Cambridge Local Plan to deliver sustainable growth. However, sustainability must include environmental protection, inclusive access, resilient infrastructure, digital connectivity, and safeguarding of water resources.	208957 (CPRE Cambs and Peterborough)
Support the principles of sustainable growth underpinning the Draft Local Plan.	211112 (Cam Valley Community Rail Partnership)
PfP supports the vision for Greater Cambridge to be a place where a big decrease in our climate and environmental impacts comes with the continued flourishing of the internationally significant innovation economy, and a big increase in the quality of everyday life for all our communities.	211596 (Places for People)
The Owners and Board see either redevelopment of the current site or potential relocation as critical to the Club's long term viability and sustainability at a time when its current capacity is constrained, the City will grow exponentially and the financial pressures for all football clubs at every level are growing given the flow of investment into all the English leagues. We hope the GCLP will prioritise the Club's needs, recognising its unique role in Cambridge	209103 (Cambridge United Football Club)
Newnham Labour ran an informal engagement event to allow the Newnham community to discuss the draft Local Plan with Cllr Katie Thornburrow. 45 people attended and their views are summarised in the report submitted below. Key points arising were 1) support for more Affordable Housing. 2) Support for the REJECTION of development on West Fields, Site ID 115681 3) Support for policies on Climate Change, Green and Open Space, and River Corridors. Widespread uncertainty about the aims of the	201344, 210676 (Newnham Labour)

Summary of issues raised in comments	Comments highlighting this issue
Cambridge Growth Company, and whether it would comply with the democratically developed policies and plans in the Local Plan. Many were also concerned about power of the University Colleges.	
Fails to adequate address the interlinked nature of so many of the issues. The holistic vision is important. It also fails to clarify the relative costs and the difficulty of enforcing the provisions. There is a risk of imbalance in the responses and expenditure. Very little mention of how provisions affecting developers and other third parties are to be enforced.	205462 (D Stoughton)
CLAF supports the overall vision of the Draft Greater Cambridge Local Plan but urges stronger, more explicit policy commitments to protect, enhance and integrate public rights of way and access networks across Greater Cambridge. Clearer policy language and delivery mechanisms will help ensure that access infrastructure contributes fully to the Plan's objectives for sustainable development, healthy communities and green infrastructure.	210965 (Cambridgeshire Local Access Forum)
CSF CIC would welcome working with Greater Cambridge Shared Planning Service, public health and developers to help shape implementable guidance (for example, a short "Healthy and Sustainable Food in New Development" note or SPD module), building on the draft policy foundations already in the Plan.	210972 (Cambridgeshire Sustainable Food) 205609 (Y Dignon)
Use Traditional Architecture Design Codes for new construction and protect all historical buildings including officially listed and non-designated heritage assets from demolition with a ban on demolition of buildings constructed prior to 1950.	130661 (D Barton)
Comments offering general support: • All looks well thought-out, balancing residents needs plus wildlife and the planet.	203443 (G Pountain) 204365 (J Nelson)

Summary of issues raised in comments	Comments highlighting this issue
• Support, if it can be delivered without compromising in the face of finance/pressure from developers etc.	
The Local Plan is interdependent with wider strategies, infrastructure delivery, and enabling services such as water, energy, and social infrastructure. As these strategies and interventions progress, it is important they are informed by consistent evidence and aligned assumptions on spatial strategy, infrastructure provision and phasing, with greater clarity on the assumptions being made where delivery relies on decisions or investment beyond the planning system. Clear recognition of these interdependencies and stronger systems alignment will be critical to ensuring coherent land-use and investment decisions to strengthen the robustness of the Plan in unlocking future growth potential of the Cambridge city region.	203518 (Cambridge Ahead)
The Local Plan broadly is a comprehensive document inclusive of relative analysis detailing the Planning Authority's intentions over the over the next 5 years for Jobs, Housing, Business Environments etc. Perhaps I have missed this, I've seen no 'Impact Assessment' on the impact of extortionate business rates and other Government non-incentivising taxes, the authors of the plan should be complemented.	201571 (Turks Head Farm)
Highlights the rich heritage of small villages in South Cambs and expresses concern over the current housing developments, noting that many houses are being bought for rental purposes, which does not benefit local infrastructure. Concern about the affordability of housing for young couples and low-wage earners, as house prices are rising beyond their reach.	202358 (E Dean)

Summary of issues raised in comments	Comments highlighting this issue
While the vision and strategy are worthy of support, details matter. The Plan assumes the infrastructure problems (primarily water and transport) will magically be solved, but does nothing to provide those solutions. What is the alternative Plan if the local infrastructure needs the Plan relies on are not delivered?	202550 (P Tribble)
Cambridge Junction's future redevelopment and reprovision, and the detailed implications of the Draft Local Plan, have only become clear at Regulation 18 stage.	202802 (Cambridge Junction)
We are supportive of the processes detailed in this section.	202818 (Cambridge City Council Liberal Democrat Group)
We welcome the Plan and recognise the extensive work and stakeholder engagement underpinning its development. We support the Plan's ambition to balance climate and environmental objectives with the continued flourishing of Cambridge's globally significant innovation economy and improved quality of life for local communities. The Local Plan is a critical lever for sustaining international competitiveness, enabling company formation, retention and scale, and attracting global investment. We particularly welcome the emphasis on building on existing clusters and campuses and the recognition of the innovation infrastructure that underpins growth. We encourage the Plan to further strengthen this system-wide approach by explicitly supporting the intensification and expansion of established innovation clusters to maximise agglomeration benefits.	204900 (Innovate Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
General comment to be consulted as the plan moves forward.	206953 (Cambridge Realty Ltd)
Railpen support the Councils' recognition throughout the draft Plan's preamble and supporting text that the region makes a substantial contribution to national economic health. However, we suggest that the growth of the Cambridgeshire economy should be specifically mentioned within the Council's 'Vision for Greater Cambridge'. We would encourage the Council to be bold, and to recognise that the region's continued growth – fuelled by both housing and jobs – is critical to delivering the environment in which future generations can flourish.	207454 (Pioneer Group Ltd Railpen)
Railfuture East Anglia welcome the plan's ambition to tackle climate change, health and create high-quality places with a strong focus on sustainability, wellbeing, good design, walking, cycling and public transport. Railfuture is a partner within the Cambridgeshire Sustainable Travel Alliance of CamCycle, Cambridge Bus Users and Cambridge Living Streets. We fully support their responses to this consultation.	208028 (Railfuture East Anglia)
The emphasis on high-quality placemaking, green infrastructure and biodiversity net gain is essential to maintaining quality of life, while the strong focus on climate change mitigation and adaptation appropriately aligns local growth with national net-zero objectives. We also welcome the integrated approach to transport, utilities and digital connectivity, which will be critical in supporting innovation-led growth at scale.	208132 (Albion City Development Corporation Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Welcome the ambition of the Greater Cambridge Plan and understand the need to plan positively for the city's future. However, I am deeply concerned that, without stronger protections, rural communities like mine are being placed at risk to accommodate growth that primarily benefits the city rather than the wider area. Cambridge's future should not be built by sacrificing the countryside that gives it its character and identity. Planning for long-term success means working in partnership with rural communities, not placing a disproportionate burden on them. I hope this Plan will stand up for places like Weston Colville, so that young people like me can look forward to a future where growth is fair, sustainable and shared.	208483 (E Hepworth)
Support the strategic direction of the Draft Greater Cambridge Local Plan. However, to deliver a genuinely inclusive, safe and sustainable transport and access network, the Plan must explicitly and consistently include equestrian users across its sustainable transport, active travel, public realm, green infrastructure and Rights of Way policies. Without clear policy direction, equestrian access will continue to be excluded at the delivery stage, undermining the Plan's objectives for health, wellbeing, equality, safety and rural economic resilience.	208662 (British Horse Society)
The Cambridge Rights of Way Improvement Plan (ROWIP) does not appear to be explicitly referenced in the Draft GCLP. The ROWIP is a statutory document that set out priorities for the management, improvement and accessibility of the public rights of way network and is directly relevant to policies on green infrastructure, sustainable transport, active travel and open space provision. The Local Plan	208660 (British Horse Society)

Summary of issues raised in comments	Comments highlighting this issue
should formally reference the ROWIP within its evidence base and policy framework to ensure alignment, consistency and effective delivery of rights of way improvements through new development.	
Putting people, places and choice first. We support the ambition of the Local Plan to address climate change, improve health and deliver high-quality places. However, this must be achieved without prioritising one transport mode over others, without unnecessary destruction of green spaces and orchards, and without policies that reduce choice, resilience, or fairness for residents. the Local Plan should: Explicitly commit to transport neutrality, not transport hierarchy. Protect orchards, green spaces and historic landscapes as strategic assets. Treat cars as part of the transition, not the enemy. Support cycling and walking without coercion or exclusion. Ensure policies work for all ages, abilities and life circumstances. Avoid road closures and restrictions that worsen congestion and emissions. Require evidence of deliverability, not aspiration. Balance climate goals with social and economic reality	208834, 208880 (D Smith)
We suggest replacing the term “people with disabilities” with “people with care and support needs” throughout the document. This terminology is more inclusive, as it encompasses a broader range of needs, including those relating to mental health, physical health, and learning disabilities. A range of other detailed wording points are also provided.	210541, 210543 (Cambridgeshire County Council)
Polices Map shows protected open spaces and nature reserves. Public rights of way are an amenity as well as providing connectivity to key sites. As such could they be included on the policy mapping.	210626 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
There are overlapping themes, such as Town Centres, Placemaking, combatting the Climate Crisis and economic applications that feature Traditional Architecture as a primary vehicle towards achieving the greatest possible positive outcomes for all of these themes.	201010 (Community Campaigner D Barton)
For four centuries the Trust and its precursors (known as the Feoffees) have been responsible for the protection and maintenance of Hobson's Brook and Conduit, with rights and obligations deriving initially from the 1610 Tripartite Indenture. The Local Plan needs to acknowledge and to state much more explicitly the extreme importance of the maintenance of water quality and the natural environment and habitats along the city's green corridors, including that from Nine Wells to the City centre formed around Hobson's Brook and Conduit.	211724 (Hobsons Conduit Trust)
I support the Local Plan as a whole. I respectfully ask that the missing information be made available for comment and that my comments are taken into account in order to make the Local Plan more robust and appropriate at a local level. These predominately concern issues about character, landscape, flooding, heights and the viability of infrastructure.	211933 (C Newell)
Note from Comberton Village college student Kids like more social settings and prefer fun activities to do with the Local Plan, with opportunities to stand and sit, less talking and more reading and doing things (drawing, making things, being creative) with multiple activities inside and outside. Interacting with different forms (joint classes) and exploring new subjects - music sounds relaxing. Allow kids to share ideas (talking or writing) and let the kids choose some ideas.	211975 (K Thornburrow)

Comments raising points on specific sites

Summary of issues raised in comments	Comments highlighting this issue
Without EWR Co's proposed amendments to policies and the policies map, development of land within the safeguarded area may conflict with, or prejudice the delivery of, EWR and be subject to an objection from EWR Co at the planning application stage or compulsory acquisition authorised as part of the EWR Development Consent Order (if granted), potentially making it undeliverable or undevelopable. EWR Co's proposed amendments would provide the necessary policy tests to ensure that all parties continue to work together to develop proposals which avoid this outcome, whilst also aligning with the safeguarding guidance.	211907 (East West Rail)
Land adjacent to A11 and A1307 (Grange Farm) • The A505 is a busy road with accident hotspots, particularly at the A1301/A505 junction, and warns that the area cannot handle more traffic without significant infrastructure improvements. The A1307 is a high traffic route, warning that increased traffic from the development will negatively affect surrounding villages. • Local services such as GPs, schools, and shops are already at capacity and cannot accommodate an influx of new residents. Opposes the proposed development on Roman Rd, citing its status as an area of local beauty. • Strong concerns about the proposed development, it should not proceed due to the availability of suitable brownfield sites, such as Cowley Road. • The scale and density of the proposed housing in a rural location are troubling, with concerns about disruption to the rural appeal and negative impacts on wellbeing due to construction noise.	202358 (E Dean) 204517, 207552, 207533, 207554 (C Tjen)

Summary of issues raised in comments	Comments highlighting this issue
• Development will harm the local environment, with doubts about the adequacy of mitigation measures for rare sites. The plan for a sewage works upwind of the respondent's property raises concerns about outdoor enjoyment and property value. • Concerns are raised about a permanent site for travellers.	
Cambridge Biomedical Campus Proposed vehicle access from Granham's Road into the Cambridge Biomedical Campus contradicts the goals of Policy BG/GI by threatening the Gog Magog Hills and chalkland fringe, which should be protected. The respondent for the 'Better Ways for Busways' alternative, suggesting a busway spur off the A1307 Hinton Way roundabout as a less invasive solution that would improve emergency access and connectivity.	204551 (E Wilson)
Land North West of Balsham Road, Linton (Site reference 115927) Promoting the site for allocation, it would support local business growth and provide facilities such as a nursery and café for residents.	204823 (Vistry Group)
St Matthews Centre, Sturton Street, Cambridge Site Reference 115524 Given an Overall HELAA Score of 'Red'. The exclusion of Site 115524 must be permanently enforced.	201277 (M McColville)

Consultation Statement

Appendix 6: Response to Representations - Development Strategy



Greater Cambridge Local Plan

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

GREATER CAMBRIDGE
SHARED PLANNING

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Development Strategy

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

Vision and Strategic Priorities

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

A number of comments supported the vision and strategic priorities.

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

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

Response to main issues raised in representations

Support for the vision and strategic priorities is noted.

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

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

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Comments on Vision include: • Vision for Greater Cambridge will result in its continued urbanisation. • Vision for Greater Cambridge would only be fully delivered with a higher housing requirement, an amended development strategy, and additional development on the edge of Cambridge and at the more sustainable villages (Willingham, Fulbourn, Sawston, Great Abington, Great Shelford, Fen Ditton, Swavesey) • Housing target and development strategy in the draft GCLP do not align with the Vision for Greater Cambridge, particularly regarding quality of life and carbon emissions. • Supports decrease in our climate and environmental impacts with a continued flourishing internationally significant innovation economy, and a big increase in the quality of everyday life for all our communities. • Need for Vision and the emerging Local Plan to be strengthened to refer to the importance of development delivery within Ox-Cam Arc and meeting Government's agenda to accelerate employment and housing growth within the arc. • Vision must recognise the internationally valued heritage and landscapes of Greater Cambridge. The vision should also recognise that there are potential conflicts	201902 (C Deer), 201940 (KG Moss Will Trust & Moss Family), 201964 (Shelford Investments), 202073 (J Francis), 202118 (Elsworth PC), 202336 (P Deer), 202433 (The CLC Trust), 202554 (Ely Diocesan Board of Finance), 202729 (Cambridge Past, Present and Future, 202897 (Cambridge Past, Present and Future), 205036 (North Barton Road Landowners Group), 203302 (J Manning), 203889 (Hill Residential (Fulbourn Site)), 203916 (Hill Residential (Sawston Site)), 204126 (Hill Residential (Hardwick Site)), 204340 (Hill Residential (Great Abington Site)), 204518 (Axis Land Partnership and Executors of Norman Winfrid Moore), 204525 (Axis Land Partnership and Executors of Norman

between economic growth and the climate, physical and environmental capacity of the area. The vision should be to explicitly manage and mitigate these conflicting aspirations. • why doesn't the Vision rely on the mix of development strategies outlined in the Spatial Strategy as a whole. There is no specific reference to the type of development or its location. Recommends the Plan Vision be updated to clarify the range of development locations to be utilised to meet demand for housing and other types of development.	Winfrid Moore), 208673 (Guilden Morden Developments Ltd)
The respondent supports the vision for Greater Cambridge, emphasising the need for a Local Plan that sets ambitious growth targets and aligns with national policy as per Paragraph 36 of the NPPF 2024.	204468 (Ceres Property)
Supports the vision and the seven strategic priorities that flow from it. Clarity would be improved if the order is changed, and the inter-relationships are explained.	203411 (Juniper)
The ordering of the development priorities contradicts the fundamental aim and purpose of the Green Belt legislation and the national planning policy framework that enshrines it. This inconsistency was noted during the planning appeal that led to the recently completed new retirement village on the Gog Magog hillside outside Stapleford. More detail is supplied in the attached document which addresses the relationship between the S/DS and S/GB policies and proposes refinements in the section starting on page 3.	203009 (M Foote)
Recommends modification of the Wellbeing and social inclusion priority to read, "Help improve equality of access and opportunities for people in Greater Cambridge to lead	201528 (Stapleford PC), 208088 (Great Shelford PC)

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

Natural England welcomes the strategic priorities of the Local Plan and are pleased to note that the Vision for Greater Cambridge, includes the aspiration for a big decrease in climate and environmental impacts, and increase in the network of nature, wildlife and multi-functional green spaces.	207600 (Natural England)
Anglian Water is supportive of the seven strategic priorities set out in the Vision, particularly those that align with our long-term strategic ambitions. We support direct reference to higher achievable standards for water use to reduce environmental impacts. Anglian Water is directly engaged with the Cambridge Water Scarcity Group, as we jointly bring forward strategic supply options with Cambridge Water - including the Grafham to Cambridge strategic pipeline (Phase 1 of the 70km Grafham to Rede pipeline) and the Fens Reservoir.	209156 (Anglian Water Services Ltd)
Responder supports – • I. Cross Boundary Matters – matters where more discussion and consideration must be given, such as ensuring connectivity is considered to key employment and international connectivity to London Stansted Airport and Chesterford Research Park • II. Growth and Infrastructure Delivery – the Plan ensures development will be accompanied by the right infrastructure. • III. Strategic Priorities – inclusion of climate change as a strategic priority, welcomes that the Plan seeks to address water supply matters.	210457 (Essex County Council)

• IV. Economic Growth – welcomes that the fast-growing economy is driven by successful partnerships between academics, business, investors and local government, and the commitment to sustainable and inclusive growth.	
Responder supportive of Local Plan, key themes and strategic priorities, and strategy directing growth to the Cambridge Urban Area, the edge of Cambridge, and new settlements, recognising that that a range of sites will be required. However, ensure that an appropriate proportion of medium scale sites are allocated, such as site at Fen Ditton, to enable a broad mix of tenures and dwelling types, including affordable housing, providing flexibility ensuring housing requirements are met within the plan period.	210219 (Vistry Group)
Requests to avoid the Plan being of “very limited weight” upon adoption, Greater Cambridge should strive for a Local Plan that is in full alignment with the emerging national policies for decision taking and positively prepared in this regard.	208255 (Ashwell & Morden Landowner Consortium)
Concern growth is in the wrong direction of travel for our fen and Riverlands, soon to be subjected to sea level rises, not factored in? Would not leave 'Paradise' for the urban sprawl of Marleigh by Marshalls, densely-packed new-build, identikit passive units, the current City Council orchestrated - with questionable pride? The Cambridge Brand will have tarnished further by 2045. Build communities where there's a real need, not here in such a trumped-up and contrived fashion.	208872 (R Lambert)

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

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

established, sustainable settlements served by existing high-quality public transport infrastructure, and which reduces the reliance on the private car. Stapleford and Great Shelford highlighted as sustainable villages.	

Policy S/JH: New Jobs and Homes

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

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

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

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

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

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

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

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

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

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

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

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

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

Response to main issues raised in representations:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Table of representations:

Summary of issues raised in comments	
Support for the identified housing need, noting that it aligns with the National Planning Policy Framework's goal to boost housing supply based on local needs.	203045 (Cemex UK Properties Ltd), 204105 (G W Balaam & Sons), 211261 (Terra Strategic)
Support for requirement of providing a minimum of 48,195 homes and need for affordable housing.	211456 (Hayfield Homes Construction Ltd)
Support for the approach to employment: • Support for draft Policy S/JH, which aims to provide 73,300 new jobs and a diverse range of local employment opportunities. • We support the Plan's commitment to sustaining and expanding globally significant research, science and technology sectors, alongside its clear recognition that housing delivery must keep pace with job growth if Greater Cambridge is to remain inclusive and competitive. The scale of employment and housing growth identified in the Plan reflects Greater Cambridge's pivotal role in the UK economy. Planning positively for this growth is essential if the full benefits of its world-leading science and innovation base are to be realised.	204649 (Jaynic), 208131 (Albion City Development)
Objections to identified housing and employment need or comments that they should be revised upwards, including for the following reasons:	202364 (CLC Trust), 203307 (J Manning), 205140 Home Builders Federation, 201945 (KG Moss Will

Summary of issues raised in comments	Comments highlighting this issue
• The Central growth scenario of 73,200 jobs is seen as conservative and not reflective of the full growth capacity of the Cambridge economy – the higher growth scenario as acknowledged in the Employment and Housing Needs Update should be used in policy revisions. • Oxford Economics evidence points to substantially higher levels of job creation • The 2025 Employment and Housing Needs Update should be recalculated to include commuting patterns adjustment as per the 2023 Greater Cambridge Employment and Housing Evidence Update Employment Land, Economic Development and Relationship with Housing report • Restricting employment growth to historical trends fails to embrace the advancement technology brings. To do so in one of the most innovative clusters in world fails to meet Government's key priority of growing the economy. • The plan's employment target of 73,330 jobs to 2045 under-estimates historic growth and therefore the required industrial floor-space of 317,000 sqm is too low	Trust & Moss Family), 201967 (Shelford Investments), 202028 (Wimpole Associates), 202077 (J Francis), 202098 (Cambridgeshire County Council (Strategic Assets)), 202309 (CALA Group Ltd), 202364 (The CLC Trust), 202534 (Granta Land Ltd - Land West of Station Road, Meldreth), 202557 (Ely Diocesan Board of Finance), 202623 (British Land), 202648 (Granta Land Ltd - Land at Sheene Farm, Meldreth), 202663 (Granta Land Ltd - Land East of Station Road, Meldreth), 202747 (Martin Grant Land Limited), 203063 (Trinity College), 203075 (Granta Land Ltd - Land North of Mingle Lane and East of Hinton Way, Stapleford), 203147 (Christ's College), 203307 (J Manning), 203380 (Jesus College), 203404 (Jesus College), 203463 (Hopkins Homes), 203891 (Hill Residential (Fulbourn Site)), 203904 (Babraham Research Campus Ltd), 203912 (Abbey Properties Cambridgeshire Limited), 203921 (Emmanuel

Summary of issues raised in comments	Comments highlighting this issue
• Concern that assumptions re larger household size and increased commuting, compared to previous assessment of need, are not sustainable; larger household sizes embed affordability issues not being able to move out of parents' home; increased commuting lacks sustainability. • There is an increasing disparity between the jobs target and the housing target. Greater Cambridge needs to plan for a corresponding increase in housing delivery, because anything else jeopardises the continued economic success of Cambridge and the delivery of the required housing in the right locations. • Using previous commuting assumptions will result in increased numbers of workers commuting into the area. • The approach to commuting assumptions is not justified. • The provision of affordable housing is considered to justify an increased housing figure, especially given recent delivery records • Affordable housing target is too low and does not reflect demand. On some strategic sites provision is reduced in favour of providing infrastructure.	College (Wilberforce Road), 203925 (Hill Residential (Sawston Site)), 204027 (E W Pepper Ltd), 204108 (Railpen), 204118 (Emmanuel College (Long Road)), 204120 (Richborough), 204136 (Hill Residential (Hardwick Site)), 204153 (Tritax Big Box Developments), 204204 (R2 Developments Ltd), 204234 (Bellway Strategic Land), 204323 (Barratt Redrow), 204353 (Hill Residential (Great Abington Site)), 204361], 204361 (Wain Estates), 204397, 204414 (Bellway Strategic Land), 204451 (Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204499 (Places for People), 204508 (Redrow South Midlands), 204536 (Axis Land Partnerships and Executors of Norman Winfrid Moore), 204599 (SmithsonHill), 204634 (Urban & Civic and Hill Residential), 204797 (Quy Tech Ltd on behalf of landowners), 204831 (Pigeon), 204833, 210221 (Vistry Group), 204896 (St John's College Cambridge), 205000 (Endurance Estates), 205080 (Axis Land

Summary of issues raised in comments	Comments highlighting this issue
• The housing target is not consistent with national policy because upward adjustments for growth and affordable housing have not been considered. • Housing target should be adjusted upwards to take proposed infrastructure developments (e.g. EW rail, new busways and stations), economic growth ambitions and affordable housing needs into consideration; inadequate housing provision could be a barrier to growth. • Incorporate the additional growth ambition of the Cambridge Growth Company and Combined Authority • The proposed figures for job and housing needs should be regarded as minimums rather than maximums • Increase the housing delivery to a minimum of 61,000 new homes which is more akin with the likely housing needs given the planned employment growth. • Objects to plan expanding villages beyond the outer Green Belt, advocating for the inclusion of Gt Shelford sites to meet housing needs sustainably. • Critical of the lack of updated HELAA assessments for site 115766, which has constrained opportunities.	Partnerships Ltd), , 05140 (Home Builders Federation), 205240 (Cambridge Realty Limited), 205000 (Endurance Estates), 205080 (Axis Land Partnerships Ltd), 205084 (North Barton Road Landowners Group), 205140 (Home Builders Federation), 206216 (Granta Land Ltd - Land at Valley Farm, Meldreth), 207436, 207437, 207438 (Pioneer Group Ltd), 208326 (PX Land Ltd), 208397 (Ceres Property on behalf of land owner at Freisland Farm, Swavesey), 208700 (Guilden Morden Developments Ltd), 208770 (Croudace Homes), 201851 (Chivers Farms Limited), 208899, 208900 (Nightingale Land and Hill Residential Ltd), 209326 (B Homent, J Tee & R Smith), 208700 (Guilden Morden Developments Ltd), 209172 (Turnstone Real Estate Ltd), 204893 (Great Shelford, Ten Acres LLP), 204904 (St John's College Cambridge), 210312, 210313 (Russell Smith Farms), 211046 (Wates Developments (and Landowners)), 209032 (Marshall Group

Summary of issues raised in comments	Comments highlighting this issue
• Concern regarding compliance with NPPF para 23, additional sites are needed to meet housing requirements by 2045 and to include a reliable buffer of at least 10% and revisit of the 'Exceptional Circumstances' case to ensure sustainable sites are not overlooked. • welcomes the commitment to updated Green Belt Study requesting publication before Regulation 19 consultation. • Concern Plan does not currently provide sufficient land to meet the housing requirement, allocate College land.	Properties), 209033 (Marshall Group Properties), 211668 (SmithsonHill), 211679 (Newlands (Cambridge) Limited)
Whilst the Local Plan identifies some level of need within the villages of the District, the current development strategy makes no attempt to meet this need. From a review of the Evidence Base, it appears no assessment of the level of affordable housing need has been made for the Villages of the District. Therefore, the Councils have failed to assess the level of both market and affordable housing need.	209709, 209710, 209714, 209715, 206787 (Endurance Estates)
Cambridge City and South Cambridgeshire administrative areas should be substantially higher number of homes delivery than the minimum of 71,586 dwellings between now and 2050 given its position role as the International Life-Science and employment driver for the County and the Government's Case for Cambridge.	208384 (NIAB Trust)

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

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

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

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

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

Summary of issues raised in comments	Comments highlighting this issue
It is not clear what use classes are proposed to be delivered at any sites referenced at para 2.72 or will deliver any of B2/B8 need that has been identified. Clarity is required through the policy allocations as to the anticipated uses each employment allocation will be seeking to deliver if the approach is to be effective in ensuring the employment needs are met.	
• Concern Plan relies on larger schemes for development, and as such recommend: 15% should be the minimum buffer if North East Cambridge is not included, and the current growth assumptions are taken forward. Requiring an uplift of at least 4,096 homes not currently allocated; • 20% should be the minimum buffer if North East Cambridge is included, requiring an uplift of at least 2,445 currently unallocated homes.	211672 (SmithsonHill)
Comments it is important that GCSP consider whether economic factors suggest that population (and therefore housing) growth is even higher than the standard method indicates is needed, particularly in the context of NPPF paras 85-86. Noting ONS's population and household projections which post-date the	211657 (SmithsonHill)

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

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

Summary of issues raised in comments	Comments highlighting this issue
• Responder comments that there is no evidence that aligning the number of homes to jobs in the way assumed by the evidence will have the impact on affordability necessary for those in the 25-44 age group currently unable to afford homes to access them. There is no evidence around the supply-price-affordability relationship to support the idea that the statistical relationship of homes will enable the needs of that particular group to be met by simply limiting the increase in supply to the specific number of additional households in that group. • Additionally, the premise of the standard method is to provide a level of housing over and above the assumed projection of households (i.e. demographic change) to improve - or at least moderate - the worsening affordability of housing. All else being equal – including housing supply and population change - affordability worsens when incomes increase. This means that in a growing economy, even if the number of homes matched the population growth linked to the number of jobs, affordability would worsen unless the supply of homes is increased further to a sufficient extent that it impacts on prices. Matching the number of homes to the number of additional households driven by economic	211659, 211660, 211661 (SmithsonHill)

Summary of issues raised in comments	Comments highlighting this issue
growth misses. GCSP's approach provides no material uplift to housing supply that might be expected to improve affordability; and is likely to create a deterioration in affordability for younger and lower income households, rather than an improvement, failing to meet need and in businesses struggling to recruit due to problems of affordability for workers. • adjustment HRRs using assumptions from 2014-based projections and to go 'halfway' to the 2008-based projections are not meeting need a That starting point from which projections look forward bakes in significant problems of affordability and a mismatch between homes and housing need in Greater Cambridge; even in 2012, Cambridge had an affordability ratio of 9,5 compared to 7.6 in East of England and 6.6 in England as a whole (Source: ONS) b There is no benchmarking of the 'as is' position in Greater Cambridge in terms of its relative position on affordability, concealed households, household formation and what this means about the level of housing required to meet needs and address the historic problems that exist.	

Summary of issues raised in comments	Comments highlighting this issue
c The adjustment to HRRs only goes ‘halfway’ to the 2008 figure. It does not explain why it does not go ‘all the way’.	
Comments that the policy should treat the economic need figures as minimum requirements: • Allow for appropriate flexibility and a level of choice for different sectors. • The job figure will likely need to evolve to align with the Government's broader growth agenda whilst ensuring the vision can be achieved sustainably. • Reflecting the need for additional jobs as indicated by the Greater Cambridge Employment and Housing Needs Update, which projects a need for between 67,600 and 90,900 additional jobs. • Historical growth trends show that the Greater Cambridge economy expanded by nearly 4,000 jobs annually during its strongest growth phase, suggesting a potential for sustained job creation. • Technological advancements in life sciences are transforming the sector, necessitating a flexible approach to employment growth that accommodates innovation rather than restricting it to historical trends.	204945 (Lolworth Developments Limited), 204462 (The Royal London Mutual Insurance Society Ltd), 204451 (Brookgate Land Ltd and Network Rail Infrastructure), 210220 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
• concerned by the apparent dismissal of the higher growth scenario despite the study itself clearly accepting that this 'could be achieved or exceeded'.	
The Draft Local Plan's underlying evidence base underestimates the need for storage and distribution floorspace in Greater Cambridge, which is not aligned with the area's ambitious growth aspirations.	205277 (Newlands (Cambridge) Limited)
Comments regarding the approach taken to jobs and homes forecasts including the following: • Employment and housing growth assumptions lack robust, up-to-date evidence, especially the forecast of 73,300 additional jobs. • Plan is working on outdated statistics of business needs, particularly labs • The plan cites the Iceni report but it doesn't mention 73,300 jobs • Support for the use of local data to best inform the modelling of jobs and housing growth • The Local Plan's approach to housing need is broadly welcomed, particularly its use of local data, headroom for growth, and commitment to a diverse mix of housing types and tenures, including affordable housing	201178 (Save Honey Hill Group), 201326 (D Lott), 201499 (C Meads), 202428 (University of Cambridge), 203520 (Cambridge Ahead)

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

Summary of issues raised in comments	Comments highlighting this issue
suggested that the policy wording allows flexibility for housing and employment growth beyond the Local Plan High Growth trajectory.	
• Statement of Common Ground does not make it clear how many houses will be built in neighbouring areas • unmet need for neighbouring authorities has not been taken into account to date.	204268 (Croudace Homes), 205140 (Home Builders Federation)
Support for aligning housing figures with the government's standard method to avoid overburdening local infrastructure and resources, and potentially needing to seek assistance from neighbouring authorities to meet a portion of the enhanced housing figure.	201656 (Huntingdonshire DC)
West Suffolk council can confirm it is not seeking to accommodate any housing need identified in Greater Cambridge.	204914 (West Suffolk Council)
Recommends that to ensure that the emerging Local Plan is positively prepared and can be found sound, the Councils must work with Huntingdonshire and North Hertfordshire to ensure there is not an unmet housing need and to ensure that strategic cross-boundary matters are considered as part of the Local Plan.	209758 (Thakeham Homes Ltd)
Concern regarding the extent of the “need” for development in Greater Cambridge and if “need” is to assist the central government in meeting their targets so that they can demonstrate that they have met at least one of their	208713 (J and C Collins)

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

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

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

Summary of issues raised in comments	Comments highlighting this issue
Concern specialist housing for older people will not all be delivered in the plan period, due to phasing and locations are located as part of wider/ larger proposals, delivery lacks certainty.	211261 (Terra Strategic)
1500 new nursing and residential care spaces is not enough for this ageing population and nothing for the needs of the pre-nursing stage elderly who live alone.	204522 (C Forbes-Cable)
Concerned that the figure for student accommodation need is misleading. More recent evidence is provided, which seeks to better reflect the plan period.	203985 (Anglia Ruskin University)
Concern regarding data inconsistencies between the housing requirement in S/JH of 2,295 dwellings per year and the housing need in Appendix D of approx. 1,600 homes. There is a discrepancy of 695 houses in these two data sets. If extrapolated across the plan period this would imply a potential discrepancy of 13,900 homes.	208714 (J and C Collins)
Comments regarding the housing requirements for neighbourhood plans element of the policy, including: • the Plan to use “indicative housing figure” for neighbourhood plans (not “requirement”) • correct the Eddington census anomaly that inflated Girton’s baseline	202217 (Girton PC)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Policy S/DS: Development strategy

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

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

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

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

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

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

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

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

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

Response to main issues raised in representations:

Support for the development strategy is noted.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Overarching

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for Development Strategy includes: • Broad support for the 7 strategic priorities. • excellent proposals and detailed intentions that are well communicated • Support for strategy, specifically the retention of the NEC allocation and policy support for employment-led development, site intensification, in a sustainable location. • We welcome this vision document with its focus on new sustainable sites on active travel routes. • For stated order of preference for future housing land-use and retaining and enhancing the Cambridge Green Belt • limited infill in rural villages where public transport is poor and car travel is the only realistic option • support for the growth ambition and strategic direction, and inclusion of additional headroom in both jobs and housing projections. • Support Cambourne North being identified as an integral part of the strategy to meet housing, employment and community needs and deliver sustainable development.	203570 (The Crown Estate), 201528 (Stapleford PC), 205079 (Y Dignon) 202820 (Cllr K Porrer), 203900 (Cambridge Growth Company), 211535 (Martin Grant Land Limited), 211103 (Hallam Land Management), 211081 (The National Trust), 211067 (Savills), 211063 (St John's College Cambridge), 211041, 211054 (Wates Developments (and Landowners)), 210222 (Vistry Group), 208937 (Cambridge Growth Company), 208380 (NIAB Trust)

• A strategy that includes a particular focus, and reliance, on strategic sites in Greater Cambridge is logical and supported in principle. • Supports the plan-led system in principle, and broadly supports the development strategy and approach to site allocations. • It is noted that the 'Overview' section of the supporting text, at para. 2.55 refers to a blended strategy to meet a variety of needs which responds to opportunities provided by different sources of supply. This general approach is supported. • It is supported that (at para. 2.55d) sites should be developed that can be well-integrated with existing communities to reinforce the distinctive character of the city, towns and villages, having regard to development at densities and in forms which make best use of land whilst creating well-designed, characterful places. • Part 1 is supported, it is considered appropriate that development should be focused within Cambridge City and on the outer edge of Cambridge, accounting for the global importance of Cambridge as the focus for growth.	
Support for the development strategy concentrating jobs and homes, within urban centres, new settlements, or in proximity to existing or proposed infrastructure: • Prioritising new homes in sustainable locations • Reduce the need to travel and enhance co-location benefits • Promoting public and active modes is the natural choice • Locations with the least climate impact • Integrating green infrastructure	201012 (M Colville), 201657 (Huntingdonshire DC), 201023 (K Mahoney), 201376 (Gamlingay PC), 208491 (Central Bedfordshire Council) 202612 (Ickleton PC), 204701 (Optimis Consulting Ltd), 202822 (Cambridge City

• Agree to developing sites at appropriate densities to optimise land use and create well designed places • Support for continued development of the Cambridge Biomedical Campus, intensification at Eddington, the Innovation District at Cambridge West, and the evolution of Cambourne with a new East West Rail station. • Support long term vision which will continue new homes, jobs and infrastructure beyond the plan period to help maintain a land supply and reduce need for development in less sustainable locations • Expresses clear support for the hierarchy of development set out in the policy. • Ickleton PC generally supports the Development Strategy for Greater Cambridge.	Council Liberal Democrat Group), 202609 (Ickleton PC), 204720 (Croudace Homes), 204139 (Richborough)
Support for spatial approach directing most new development to the northern part of the district, using brownfield sites and the A14 corridor, aligning with the jobs-led housing need and sustainable growth objectives	203256 (North Herts Council)
Supports plans to increase numbers of accessible/adaptable homes (e.g. via application of M4(2) building standards).	202079 (Great Shelford Village Charity)
Support for order of preference and approach to future land use for housing and the retention and enhancement of the Cambridge green belt.	203263 (Horseheath PC)
Allocated sites within the GCLP reflect a balanced approach to growth, ensuring that development: Is appropriately scaled to the size and function of settlements, Is supported by	205849 (Lolworth Parish Meeting)

infrastructure planning and mitigation, Responds to identified local and strategic needs, Protects the intrinsic character of rural communities. Lolworth recognises that planned development, when delivered in accordance with the Local Plan, can support sustainable growth while safeguarding the qualities that make villages such as Lolworth distinctive and viable.	
Concern that the development strategy is locating housing away from employment sites with negative consequences: • Housing growth becoming dispersed while employment remains concentrated around Cambridge, increases congestion, increasing pressure on transport corridors and making sustainable travel harder. Highlights the importance of providing safe, attractive routes for walking and cycling. • Location of housing delivery away from employment sites. Residential development to be in Cambridge close to existing infrastructure and sustainable transport options. • Highlights the need for employment and housing to be planned together to avoid increasing car trips, congestion and carbon emissions, and enable equitable access for households without cars. Supports mixed-use development and co-location of homes and jobs to enable walking and cycling and reduce the need for costly public transport extensions. Also raises concern that	201738 (T Burford), 201686 (B Le Gallez), 202506 (H Brown), 203145 (Cambridgeshire ACRE), 203335 (Great Wilbraham PC), 204500 (D Potts), 204701 (Optimis Consulting Ltd), 203663 (V Ashton), 203200 (A Hoare), 204632 (Max Fordham), 205280 (A Williams), 203311 (L Dassy), 204187 (Mr and J Johnson), 205122 (J Grantham), 202451 (A Brown), 203662 (T Preud'homme), 205028 (N Spenley), 204763 (R De Beaux), 204716 (Mothers CAN Cambridge), 204559 (R Hoadley), 204658 (R Humphrey), 205438 (A Kirchgaessner), 204506 (Redrow South Midlands), 209067, 211764 (Camcycle)

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

proofing would include clearer safeguards for rural services, investment in village transport links and a stronger role for parish councils in shaping growth. Suggests importance of enabling plan-led and organic growth in villages to support rural community vitality and local housing needs, notes affordable and specialist housing. Recommendations for emphasis on proportionate growth in rural settlements. Calls for more explicit direction on job and housing needs in rural areas. • Recommends development of approximately 65 dwellings in a sustainable rural settlement is seen as a modest and valuable contribution to housing needs. • Sustainable development not achievable unless no more growth and concerns over the environment. Suggests businesses, housing, roads, people, should be directed elsewhere.	
Much of the Plan's transport discussion, and wider transport debate, is framed around commuting into Cambridge. This commuter-led framing creates two problems. First, transport systems designed primarily around peak commuting struggle to deliver viable and attractive services. Second, it overlooks the fact that the majority of trips are not made for work, but for everyday activities such as shopping, education, healthcare and social life. Access to local amenities plays a far greater role in shaping travel behaviour than access to distant employment alone, yet this is not sufficiently reflected in the spatial strategy.	209068 (Camcycle)

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

● Remove the Grange Farm allocation from the Plan ● Avoid substituting constrained urban or edge of Cambridge sites with remote or poorly connected locations ● Prioritise development in locations where sustainable travel can be the default from day one, without reliance on speculative or uncommitted transport mitigation.	
Objections that the strategy places an overreliance on a few large strategic sites for growth: • Objects to the strategy as fundamentally flawed in meeting identified housing and employment needs. • Raises concern that the strategy is overly dependent on major new settlements and infrastructure that is not yet confirmed, including the proposed rail link. States that locations do not have sufficient infrastructure to support additional growth. Concern re feasibility of significant infrastructure need and impact on delivery. • A number of these strategic sites have significant constraints which will likely result in significant delays to delivery. • NPPF Paragraph 23 emphasises the need for a clear strategy for land delivery to meet assessed needs. • A 20% buffer is recommended instead of the proposed 6.5% to ensure robust planning and adequate housing supply	201929, 201938,, 201946, 201936 (M Asplin), 202035 (Wimpole Associates Ltd), 202328 (Granta Land Ltd), 202365 (The CLC Trust), 201854 (Chivers Farms Limited), 207537 (Horningsea PC), 207535 (Home Builders Federation), 203138 (ESCO Prospect), 203309 (J Manning), 206213 (Granta Land Ltd - Land at Valley Farm, Meldreth), 206071 (Wimpole Associates Ltd), 203892 (Hill Residential (Fulbourn Site)), 203965 (Hill Residential (Sawston Site)), 204043 (E W Pepper Ltd), 203317 (W Bowden), 204087 (M Richmond), 202450 (I Morris), 202160 (H Fordham), 202627 (British Land), 203069 (Pegasus Group), 206079 (Wimpole

• Historically lead to delays in delivery rates, raises concern that relying on the same approach will not deliver the required scale or pace of development, and risk that housing need is not met. This will impact 5 year housing land supply. • Housing trajectory is based on over-simplistic delivery rates, and is not credible. Questions the realism of delivery assumptions, noting that current build-out at major sites such as Northstowe and Waterbeach is significantly below what would be required to achieve the target of 37,865 homes by 2045. Historical data shows a consistent delay in housing delivery from strategic sites, averaging 4.1 years longer than anticipated. • Concerns with over reliance on delivery at new settlements and delivery from windfall sites, with a significant decrease in housing provision within the Cambridge Urban Area and a reduction in the rural area. • Comments on over-reliance now placed on new settlements in meeting housing needs. 93% is made up of 5 sites. 44% of the proposed distribution in housing growth is now anticipated to come forward at the new settlements, compared to 23% in the adopted Local Plan and 18% in the previous Structure Plan. • Objects to the growth of Cambridge and expresses a preference for no expansion of the city. States that while sustainability, biodiversity and climate goals are supported, it is not realistic to accommodate the proposed level of growth while simultaneously reducing traffic and enhancing biodiversity.	Associates Ltd), 204971 (Martin Grant Land Limited), 202081 (J Francis), 202763 (Martin Grant Land Limited), 202766 (P Norman), 203157 (Christ's College, Cambridge), 202906 (The Trustees of the C Y Nutt Deceased Will Trust), 202887 (Northwest Biotherapeutics Capital Limited), 203342 (The Varrier Jones Foundation), 204720, 208771 (Croudace Homes), 204376 (Hill Residential (Great Abington Site)), 204439 (Wain Estates), 204434 (Bellway Strategic Land), 204640 (Urban and Civic and Hill Residential), 202536 (Granta Land Ltd), 204241 (Bellway Strategic Land), 204139 (Richborough), 204420 (Bellway Strategic Land), 203924 (Emmanual College), 204122 (Emmanual College), 204164 (Tritax Big Box Developments), 204275 Croudace Homes), 203390 (Jesus College), 203406 (Jesus College), 201940,

• Objects that the proposed level of housing growth is unsustainable in a predominantly rural county, stating that development would erode countryside gaps and overwhelm existing settlements such as Cambourne, and the need to address connectivity. Raises concern that recent new settlements lack community cohesion and adequate infrastructure. • Objects to scale of development, creates long term disruption, harms liveability, and is driven by development pressure rather than local need. • Recommendation for a diversified strategy with proportionate growth in expanded existing settlements and development along transport corridors to accord with NPPF which encourages development to be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. • strategy should plan for a higher level of employment and housing growth with a greater supply buffer given uncertainty over delivery of key sites. • Suggested that additional smaller sites on the edge of Cambridge in sustainable locations should be considered. • Suggested that additional allocations at strategic growth scale are added to Improve the pipeline supply in sustainable less constrained locations such as to the east of the subregion and at Six Mile Bottom. • Fails to allocate appropriate levels of development within settlements. Only 205 out of 13,463 homes identified for 2024-2045 will be in rural areas, suggesting	201947 (KG Moss Will Trust & Moss Family), 201964 (Shelford Investments), 202073, (J Francis), 202433 (The CLC Trust), 202554 (Ely Diocesan Board of Finance), 203576 (Horningsea PC), 204073 (South Cambridgeshire District Council), 206076 (Wimpole Associates Ltd), 203511 (ESCO Prospect), 202156 (R Lambert), 202913 (K Trudgeon), 204106 (Richborough), 206104 (Wimpole Associates Ltd), 209328 (St John's College Cambridge), 204511 (Redrow South Midlands), 208398 (Ceres Property on behalf of landowner at Freisland Farm, Swavesey), 204043 (E W Pepper Ltd), 205011, 208363, 208364, 208365, 211536 (Endurance Estates), 204850, 204868 (Great Shelford (Ten Acres) LLT), 204506 (Redrow South Midlands), 211107, 211108 (R Raywood, A Bradney and D Unwin), 204529 (Rosconn Group), 204956, 205002,

more flexibility in allocations to mitigate delays with strategic sites. Additional small sites should be allocated (various sites are promoted), including in the more sustainable villages to ensure delivery early in plan period. • Plan leaves ongoing pressure on surrounding villages through Green Belt evidence and promoted sites, despite the absence of formal allocations. • Crucial to identify small sites, including in grey belt, to increase supply of identified sites for housing, to support small/medium housebuilders, enhance housing diversity and foster local growth. • Ensure delivery of more homes earlier in the plan period. • Allocate more medium scale sites capable of delivering 150-250 dwellings. • Concern development strategy misses the sustainability benefits of homes in rural areas for community resilience and is flawed. Further small sites be allocated to ensure delivery rates in sustainable locations early in the plan period • New settlements are expected to deliver less than 40% affordable housing. • Justification for release of land from Green Belt to direct housing to sustainable locations, as significant need for housing and affordable housing. • Infill pressures already exceed the eight-dwellings-per-site limit, creating traffic and community concerns • Figure 12 shows distribution of growth with rural areas and windfalls 16%, compared to 23% in adopted plan and 30% in 1999-2016 plan. • Plan does not confirm with NPPF requirements:	211059 (Wates Developments), 205311 (Axis Land Partnerships ltd), 206352 (Grants Land Ltd – Meldreth)), 207996 (Cambridgeshire County Council), 201968 (Shelford Investments), 202099 (Cambridgeshire County Council (Strategic Assets)), 202558 (Ely Diocesan Board of Finance), 211610, 211611 (Bloor Homes Eastern), 211584 (Terra Strategic), 211583 (Mr & Mrs Smith), 211477 (G Robinson and Partners), 211472 (Beechwood Estates Ltd), 211410, 211411 (CALA Group Ltd), 210222, 210223 Vistry Group, 208903 (Nightingale Land and Hill Residential Ltd), 208381, 208382 (NIAB Trust)

○ Paragraph 73 - failing to deliver at least 10% of homes on sites no larger than one hectare, rather than relying on windfall developments. Current approach allocates 3.5% of the housing to small sites, which is below the NPPF's 10% target. ○ Paragraph 83 - strategy does not align with requirement to enhance rural community vitality, in reliance on windfall developments not planned allocations. ○ Current Green Belt release criteria conflict with NPPF 2024 paragraph 146 ○ Contradicts Dec 2024 NPPF and Feb 2025 PPG update which require a sequential approach prioritising grey belt for release, by failing to map this land the Councils bypass a national mandate to support village vitality (NPPF 83) and small-site delivery (NPPF 73). ○ Plan is premature on the basis it fails to have regard to emerging revised NPPF, in particular 20% of allocations should be on sites of between 1 and 2.5 hectares. ○ Objects as approach is problematic, regarding delivery timeframes, and inconsistent with key principles of the NPPF. Paragraph 72 of The Framework acknowledges the importance of strategic housing land supply comprising a sufficient mix of sites, regarding availability, suitability and economic viability.	

○ Paragraph 72a states that ‘land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved’. According to this data, 94% of all new dwellings proposed between 2024 and 2045 are allocated across only 6 sites, 3 of which are new settlements. The ‘Rest of the Rural Area’ comprises rural centres and group villages, a total of 48 settlements, and has only 3 sites allocated for a total of 205 new homes. The proportion of development attributed to major, strategic sites not only carries a huge risk to deliverability but is also inconsistent with The Framework. • Housing delivery assumptions for all of the strategic sites are reassessed, taking into account realistic annual housing delivery rates and the delivery of critical infrastructure required for those sites. • To Release Land from the Green Belt to meet development needs. • Make additional allocations are made in the more sustainable villages, including Fulbourn, Great Shelford, Sheene Farm, Meldreth • Revise sequential hierarchy of types of location to account for sustainability benefits of sites adjacent to villages. • Revise housing trajectory with realistic figures for delivery on major sites.	

The Draft Plan does not provide enough housing land to meet the 48,195 home target and the 73,300 job target: • A housing land supply buffer of at least 10% (ideally 15-20 %) is required. • It is evident that the housing land identified in the Draft Local Plan is insufficient to meet the real-world need in and around Cambridge for two further key reasons: the continuing reliance on in-commuting; and the reliance on strategic sites.	207904 (Barratt Redrow), 204355 (Barratt Redrow), 204139 (Richborough), 204929 (Places for People), 203890 (Hill Residential (Fulbourn Site))
It is considered that the strategic priorities for the draft GCLP would only be fully delivered with a higher housing requirement, an amended development strategy, and additional development at the more sustainable villages including Fulbourn, Great Abington.	203890 (Hill Residential (Fulbourn Site)), 204340 (Hill Residential (Great Abington Site))
Concern the strategy will not deliver the needs of a growing population: • Green belt releases south-east of Cambridge are piecemeal and fail to represent a holistic approach to sustainable development. • Grange Farm is ill thought out, will become a car commuter settlement given its proximity to A11/M11 and ease of access towards London. It is unlikely the majority of new residents work in southern research cluster. Too small to deliver most services residents will need resulting in out-commuting. • Should deliver a comprehensive plan for south east of Cambridge, edge of Cherry Hinton, Queen Ediths, Biomedical Campus, with targeted review of inner green belt, including accessible natural greenspace.	202493, 202510, 202513, 202524 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)

• Small targeted extension of Peterhouse Business Park would deliver new accessible rich countryside to support growing city.	
Suggests removing or discounting speculative development dependent on unresolved infrastructure funding, provide distinction between allocated and non-allocated supply, and adopt a more cautious, deliverability-led approach that protects Green Belt land, water resources, village character and transport networks	207537 (Horningsea PC)
A strategy should be underpinned by simple enduring design principles. It doesn't have to be complicated, stick to the 'Keep It Simple" mantra.	201920 (A Davidson)
Suggestion there needs to be greater focus on mixed-use zoning with specifics on how to achieve hyperlocal and interconnected employment and community amenities. Cambridge already has many scattered zones with residential areas desperately needing local leisure and shopping areas	205292 (P Colledge)
Comment that the plans do not provide adequate development opportunities in villages around Cambridge, particularly where transport hubs exist that could support housing for employment areas.	205244 (L Gardner)
Objects that the Newlands proposal would dominate the rural landscape, is inappropriate in scale/height, and would add around 4,500 daily vehicle movements at an already congested junction. States the development would serve national/regional distribution needs rather than local needs.	202838 (W Nichols)
Comments proposed allocations, both existing and proposed, are in locations where the required public transport does not currently exist and the delivery of which is outside the control of the Greater Cambridge authorities.	209966 (Granta Land Ltd)

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

Land north and west of Wilbraham Road, Fulbourn is proposed as a strategic site to enhance housing supply and mitigate risks associated with delayed developments. Changes to plan: Part 1 of the policy should be revised to refer to 'Well Connected Minor Rural Centres' and include the allocation of land to the north and west of Wilbraham Road, Fulbourn as a sustainable mixed use allocation to delivery over 2,500 dwellings.	
The plan should align with the Cambridgeshire and Peterborough Spatial Development Strategy: • Combined Authority will produce a Spatial Development Strategy by 2028. Local Plan will be required to align with SDS and if not amended now will be immediately out of date. With Local Government Reorganisation this could be the last Local Plan to guide growth in Greater Cambridge area. Plan should deliver a development strategy which reflects and supports the approach being taken at both the national the regional level and ensures that the area can maximise the benefits and opportunities available at the local level. Plan period should be extended to at least 2050. • Plan period needs to be extended to 2050 to align with the Cambridgeshire and Peterborough Spatial Development Strategy and accounting for the number of strategic allocations within the plan, that will result in substantial growth after the plan period.	208396 (Ceres Property on behalf of land owner at Freisland Farm, Swavesey), 204106 (Richborough), 208377 (NIAB Trust)

• In accordance with the requirements of paragraphs 25 and 26 of the NPPF, it is critical that the emerging DLP is aligned to the Local Growth Plan and the emerging Spatial Development Plan for Cambridgeshire. • As a starting point, this should ensure that housing and employment growth is substantially increased to align with the objectives for Cambridgeshire & Peterborough.	
Comments in relation to the impact on the rural area and rural communities: • Concern that whilst increased housing and jobs are welcome regard must be given to existing landscape and infrastructure. There is a danger villages will be swamped. • Concern rural communities are not clearly visible within high level framing. Priorities around reducing car use and focusing development in well-connected locations could disadvantage villages unless matched with investment in rural transport, digital connectivity and local services. There is limited recognition of rural health inequalities, ageing populations and the role of parish councils and community organisations. Stronger rural proofing would ensure the strategic priorities explicitly address rural access, inclusion and infrastructure needs alongside urban growth. • Concern increasingly agricultural land is being taken, how that affects food production.	202282 (L Turton), 203140 (Cambridgeshire ACRE), 203336 (Great Wilbraham PC), 203617 (H Thomas), 201734 (R Stobbart), 205609 (Y Dignon)

• Concern plan sets out prioritisation for urban centres and the communities and rural communities, such as Great Wilbraham, are disenfranchised. If development in smaller villages is limited the Plan should include strategies for proactively working with villages to develop more sustainability and viability for residents, potentially services such as buses, schools or shops requiring extra support and are not, in themselves cost effective. • Concern Plan encouraging sparse rural development and so unsustainable development which increases transport related emissions, climate change, harming biodiversity, producing places far from amenities, not socially included and don't foster social inclusion. • Recommends focus on building dense human-scale developments near to the amenities people want such as in the city of Cambridge. • Concerns that development which encourages car use will harm carbon emissions, landscape and rural liveability. • Support for response submitted by Cambridge Sustainable Food	
Comments in relation to the environment, green spaces and biodiversity: • Comment that this section lacks adequate allocation for green spaces and wildlife and broadly runs contrary to that goal, leading to destruction rather than enhancement of green space within the city; this must be reconsidered with a much greater emphasis on large, healthy, biodiverse surroundings. • Suggests greater emphasis on access to nature and green spaces.	207151 (P Colledge), 202650 (S Berridge), 202156 (R Lambert), 203263 (Horseheath PC)

• Concern that development is not grounded in the environmental limits of the area, particularly the reliance on depleted chalk aquifers and associated risks to landscape, health, and environmental quality. • All development must be sustainable; we strongly support this basic tenet of the plan.	
We endorse the proposal as it strengthens Cambridge's role in the Oxford-Cambridge growth corridor, delivers mid-tech and advanced-manufacturing capacity and aligns with the employment and economic objectives set out in the Development Strategy.	203243 (Cambridgeshire Chambers of Commerce)
Comment that the Plan requires further work on critical issues such as travel and flooding, which have not been adequately addressed	207525 (P Deer)
Support for use of development of brown field sites and repurposing of empty buildings, less development of green belt and green spaces.	201156 (G Briscoe), 201682 (S Smith)
Comments that the strategy omits provision for attitudinal change towards affordable, sustainable, healthy, local food.	205079 (Y Dignon)
Comment highlights the long-term strategic potential of the Ashwell and Morden area, outside the Green Belt, well-connected by rail and suitable for sustainable growth and suggest it be explored for future housing provision	203257 (North Herts Council)
The general strategic approach of the Plan to develop new settlements and significant extensions to the largest settlements is consistent with NPPF and specifically NPPF 77, provided the development is supported by the necessary infrastructure and facilities	210982 (C Newell)

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

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

evidence shows deliver more slowly in this geography. It also notable that the GCLP carries forward allocations in the urban area which have not delivered since the adoption of the previous local plans. There are well documented difficulties around the viable delivery of brownfield sites in the current economic climate so assumptions about their delivery should be realistic in this context.	
Greater Cambridge is vital to the economic aspirations of the UK, both now and in the future. However, to ensure that continues, the GCLP needs to respond positively to the concerns raised by a range of stakeholders which would threaten the delivery of sustainable growth in the area, which include: 1) the delivery of a quantum of housing that will enable the job growth expected across the wider Greater Cambridge region, including a wide range of sizes and tenures, to ensure that businesses can draw upon the necessary labour pool; and 2) the location of houses in areas which are accessible to and well supported by public transport links and can take advantage of the significant investment that is going into improving local infrastructure such as the delivery of Cambridge South station, East West rail and new guided busways.	209691 (CEG Land Promotions Ltd)
• Concern Policy S/2 (Spatial Strategy) should demonstrate a clear “brownfield first” approach, consistent with NPPF paragraphs 11 and 119, prioritising the reuse of previously developed land, empty homes, and under-used buildings. • Growth should not be directed to locations where inclusive access cannot be delivered.	208948 (CPRE Cambridgeshire and Peterborough)

• Development in areas lacking accessible pavements, crossings, or step-free routes risks excluding disabled people and conflicts with the Public Sector Equality Duty (Section 149, Equality Act 2010).	
Edge of Cambridge should be lower in the order of preference than Cambourne and new settlements.	201012 (M Colville)
S/PRIA/EG and EW Bridge and Underpass(es) cultural hub Project: • I support development within the designated PRIA of a Cultural Hub offering accessible programme. • The area surrounding the bridge and underpasses is lacking a sense of place. • Introduce community, sports and cultural programme and upgrades to the public realm to promote safety and identity. • Strengthen active transport N/S and E/W connections around the infrastructure for better connectivity, prioritising residents and visitors.	205237 (University of Cambridge)

Jobs and homes

Table of representations:

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

where these can be supported in transport, landscape, and in green and other infrastructure terms.	
Supports target of 48,195 houses, with headroom of 30-69% above the incremental target of 10,330 homes, likely probability of meeting or exceeding the target.	201012 (M Colville)
Comments planned developments resulting in additional 17,950 homes after 2045, will help meet future expansion requirements and provides additional headroom.	201012 (M Colville)
Comments housing requirement is not aligned with jobs growth, increasing car commuting into Cambridge, and not meeting climate change strategic priority.	201941 (KG Moss Will Trust & Moss Family), 201966 (Shelford Investments), 202075 (J Francis), 202433 (The CLC Trust), 202555 (Ely Diocesan Board of Finance)
Concern over amount and location of jobs and homes: • Concerns over increased number of jobs and homes in Cambridge. Jobs needed elsewhere. • Concern over number of housing numbers. You say you want an additional 48,195 homes, Northstowe and Waterbeach provide 37,865 homes, and additional sites 13,460 homes. These add to 51,325 homes not 48,195. Cambourne North will provide 13,000 new homes, Cambourne 2350 and Grange Farm 6000. This is way more than 13,460. • Concern Plan does not provide analysis of employment growth to match its housing evidence, are homes and jobs are being planned together. Growth in	201223 (S Williams), 201500 (C Meads), 201699 (R MacDonald), 201992 (D Langley), 202861 (J Williams), 203197 (G Orwell), 204043 (E W Pepper Ltd), 204160 (Mr and Mrs J Johnson), 204908 (K Brightwell), 201499 (C Meads),

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

• Travel to work when settlement is dispersed but employment is all within the city is an issue. • Dispersed growth increases pressure on transport corridors and reduces sustainability • Detail of where employment is planned across the geography requested • The report by Iceni (Greater Cambridge Employment and Housing Evidence Update) considers the central employment scenario was the best option, suggesting 66,600 new jobs. Yet your plan is for 73,300 new jobs. This is incorrect. You cite the Iceni report but it doesn't mention 73,300 jobs. Its higher growth scenario suggested 76,700 jobs, but says it's unlikely. Their range was from ~30k-78k and you do not explain why you've mis-cited the report and taken a very high estimate incorrectly. The number of houses needed is based on the number of jobs, so you have over-estimated the number of houses needed.	
Housing and employment supply figures are overstated and insufficiently robust.	203576 (Horningsea PC)
Concern on reliance on windfall sites for housing delivery, declining numbers suggest need for certainty in small and medium-sized site allocations.	201854 (Chivers Farms Limited)
Consider the undesirability of maintaining high windfall assumptions and instead allocate a greater number of sites. Promoting greater levels of delivery on allocations and lower levels on windfall sites would give Councils a greater level of control over development coming forward and would encourage plan-led development in line with the NPPF's ambitions. Windfalls are inherently uncertain, it is hard to plan the	211674 (SmithsonHill), 211045, 211046, 211058 (Wates Developments (and Landowners))

necessary infrastructure around such a significant scale of windfall development, especially if it comes forward in a piecemeal nature. High reliance on windfall sites is much more likely to lead to unsustainable village development than a strategy where the Council has control over ensuring village development is located where there is good access to a high quality public transport network and provides the required infrastructure.	
Objection that Policy S/DS identified housing and job needs are too conservative: • The allocation of 10,330 homes from 2024 to 2045 is insufficient for sustainable growth in Cambridge. • Do not align with the government's growth agenda for Greater Cambridge. • To match Oxford-Cambridge corridor. • Supporting text at Para 2.64 does not consider that development needs alone provide the exceptional circumstances to justify removing land from the Green Belt, however the ambitious growth context for Cambridge means that the Council needs to consider the potential release of Green Belt land. • Supporting text in paragraph 2.64 does not consider the potential for Green Belt land release, despite the possibility of new evidence changing this context. • Do not reflect the higher growth scenarios identified in the latest employment and housing needs update. • Requests site allocated to meet the increased demand.	203157 (Christ's College, Cambridge), 203390 (Jesus College), 203406 (Jesus College), 202035 (Wimpole Associates Ltd), 204043 (E W Pepper Ltd), 206075, 206103, 206095, 206092, 206070, 206100 (Wimpole Associates Ltd), 210311 (Russell Smith Farms)

• Plan assumes a 'central' rather than a 'high' scenario aligning more with a growth trend over the last 20 years than the higher growth of the last 10 years despite national aspirations for sustained economic growth in the area. • Needs identified through the draft Local Plan do not reflect Cambridge's potential and are not sufficiently ambitious.	
Comments strategic priorities of the Plan delivered only with higher housing requirement, an amended development strategy, and additional development on the edge of Cambridge.	205046 (North Barton Road Landowners Group)
Concern that the Plan does not address local housing needs adequately, particularly in terms of affordable housing, potentially exacerbating affordability issues in communities like Histon and Impington	207589 (Chivers Farms Limited)
Comment that Plan does not provide a clear spatial analysis of employment growth to match its housing evidence, making it difficult to assess whether homes and jobs are being planned together. Without either a better balance between housing and employment or a step change in direct, high-quality active travel and public transport connectivity, the spatial strategy risks locking in long-distance travel and car dependency for decades.	205229 (J Thomas)
Concerns as no recognition of self-and-custom-build housing as a strategic requirement, (statutory duty under the Self-Build and Custom Housebuilding Act 2015 and supporting national policy). As placed in policy (H/CB) and not spatial strategy, plan	201936 (M Asplin), 202086 (M Asplin)

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

Employment provision

Table of representations:

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

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

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

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

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

opportunities exist in the right location to rehouse these employment uses to ensure that they continue to meet the needs of the local resident population, but that they do so in an efficient and sustainable manner that does not result in increased vehicular trips by the private car.	
The proposed Tritax development does not form part of the GCLP's spatial strategy and has not been identified as a suitable or necessary allocation through the plan-making process. Allowing a speculative, large-scale logistics development outside of the adopted or emerging plan framework would fundamentally undermine the integrity of the Local Plan system. The GCLP directs major employment and logistics development to locations that are: - Strategically planned - Well connected by appropriate transport infrastructure - Capable of accommodating such uses without unacceptable harm. The Tritax proposal does not meet these criteria in the context of Lolworth.	205850 (Lolworth Parish Meeting)
BRC object to the policy and request that point ii is reworded as below: Babraham Research Campus – a new employment-led mixed use allocation to support further growth of this existing world leading bioscience research and innovation campus and improve the health and wellbeing of future employees, residents and the local community through targeted environmental enhancements: including approximately	203462 (Babraham Research Campus)

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

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

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

Strategic and smaller scale development

Table of representations:

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

The plan should include a greater mix of smaller and medium sized sites: • Agrees identifying numerous small sites for development is impractical due to inadequate infrastructure in rural areas and potential negative impacts on green belt. • Concern plan does not allocate small and medium-sized sites needed for housing delivery and supporting small builders, despite their importance highlighted in the NPPF. The focus on large developments limits choice for prospective homeowners, and local residents to remain in communities. • To provide a realistic five year housing land supply, as these sites come forwards quicker • To enable a wide range of house builders to enter the market and provide a wider range of product and increase in local employment • Suggests a balanced approach including more allocations in rural villages to support local housing needs and prevent population imbalance. • Allows the SME sector to grown, delivering homes to increase the range of new homes available, and aligns with paragraph 73 of the NPPF.	201547 (Stapleford PC), 201854 (Chivers Farms Limited), 206215 (Granta Land Ltd - Land at Valley Farm, Meldreth), 204043 (E W Pepper Ltd), 211457 (Hayfield Homes Construction Ltd), 211518 (Endurance Estates), 211105 (Hallam Land Management), 211473 (Beechwood Estates Ltd), 211478 (G Robinson and Partners), 211532 (Hopkins Homes), 211231, 211579 (Living Space Housing), 201854 (Chivers Farms Limited), 211262 (Terra Strategic), 204102, 204144, 204145 (GW Balaam & Son)
The Development Strategy fails to accurately provide for rural and village growth to ensure sustainability and vitality of settlements, particularly sustainable large villages: • Minor Rural Centres are referred to as part of the development strategy but there are limited allocations – add growth at the more sustainable villages with a very good range of services and facilities, accessible by a range of modes of	211612 (Bloor Homes Eastern), 211604 (LGH Hotels Management Limited), 211584 (Terra Strategic), 211534 (Hopkins Homes), 211516 (Endurance Estates), 211415 (CALA Group Ltd), 211068 (Savills)

transport, and where there is an identified need for affordable housing for those with a local connection to the village. • Additional population helps in sustaining and improving the viability of existing services. • Growth within villages, including villages within the Green Belt, is essential to ensure they continue to be vibrant, inclusive communities with new opportunities for residents to stay in those communities. • Growth in villages should be better prioritised to ensure that those who wish to live in the rural areas are able to do so and that there is a variety of choice for the rural community. It is important that villages have adequate incremental growth to sustain the services they currently offer as well as offering appropriate additionality of services to avoid them becoming “sleeper villages". Plan makes allocations for just 265 homes on four sites adjacent to existing villages (Duxford, Highfields, and Melbourn). This is the outcome of a fundamental flaw in the framing of the hierarchy of locations within this policy, which reflects an approach to sustainability that gives predominant weight to environmental factors, notably transport emissions, to the detriment of the social sustainability of existing settlements.	
Supports rural area at the bottom of the preference list.	201012 (M Colville)
The proposed development strategy sets out where new homes and jobs identified in Draft Policy S/JH are to be provided to meet the visions and strategic priorities of the Plan. The strategy is reliant on previous allocations from the adopted Plans. New	211218 (Terra Strategic)

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

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

Concern North East Cambridge is retained, as should no alternative funding become available ahead of the Regulation 19 stage later in 2026, it would be unsound to continue to include the site for allocation in the Plan.	203069 (Pegasus Group)
Support for Strategy for Cambridge Business Park at the heart of NEC and TCE is advancing proposals to comprehensively re-develop the site to deliver significant employment-led development and intensification of the site and is clearly aligned with the Development Strategy. Policy criteria 2(a)(i) sufficiently supports development in NEC in the event the CWWTP is not relocated away from the site, which is uncertain during the plan period.	203570 (The Crown Estate)
Concern Cambridge East allocation is it realistic given Marshalls has cancelled its planned move from Cambridge Airport, delivery trajectory is considered to be uncertain.	203069 (Pegasus Group)
Concern over omission of land at South West Cambridge, include to enhance strategic transport connections and support sustainable mixed use development	202440 (University of Cambridge),
Comments on the Cambourne Expansion: • Support the aspirations to substantially expand Cambourne. Concerns regarding accessibility along the A428 from southern Huntingdonshire, particularly St Neots, into Cambridge and its surroundings. • Concern of impact on the small villages north of Cambourne or the farming land which provides food for the existing population. • Concern that Cambourne and Northstowe have been unsuccessful at fostering sustainable communities with real centres and amenities.	201657 (Huntingdonshire DC), 201682 (S Smith), 205673 (M Meyer-Kelly), 202122 (Elsworth PC)

• Cambourne North is a new settlement, separated from the existing town by a trunk road and railway, and not an organic outgrowth of existing Cambourne. • There is also perhaps a sense of rectifying things that were not got right originally (e.g. the lack of a town centre). • Whether integration will be “supporting services and facilities” in anything but the long term seems unlikely.	
Comments on Grange Farm include: • Concern Grange Farm will provide homes with good transport links to London, encouraging commuters to take a large proportion of the accommodation, negating the intended good environmental outcomes. • Concerns in scale of delivery where the planned sustainable development of the south-east edge of Cambridge could replace some of what is proposed at Grange Farm, Abington to achieve a smaller and more appropriately sized development. • Concern site location and setting is within the least spoilt and most attractive landscape surrounding Cambridge and issues with development density and lack of identity. Recommends site be rejected from Development Strategy as alternate sites in far less sensitive landscape that are better suited to a 6000 house development. • Objects as development in/around Rural Centres is more sustainable than at Grange Farm (existing infrastructure, amenities, etc).	201894 (R Pargeter), 202526 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 203405 (B Reeve), 204160 (Mr and Mrs J Johnson), 203069 (Pegasus Group)

• objection to the proposed allocation under Policy S/DS at point “2.c. new settlements”, “ii. Land adjacent to the A11 and A1307 at Grange Farm • predicated on the Cambridge South East Transport (CSET) busway coming forward to make sustainable • questioned whether Grange Farm will be capable of delivering any new homes within the plan period • comments more appropriate to adopt an alternative Development Strategy which offers a more balanced approach to the distribution of growth, which recognises the role of existing sustainable settlements. • Comments significant doubt over the ability of the proposed allocations to deliver new homes within a timely manner and challenges the justification for the inclusion of Grange Farm within the Plan. Not planning positively to meet its identified needs as required by national planning policy (para 36).	
Concern the policy limits the size of development at ‘minor rural centres’ and lower tiers. The policy should not restrict the scale of growth for rural settlements, as this may affect the settlement's ability to maintain its existing facilities and support necessary growth. The Council should therefore consider the delivery of services and facilities alongside the planned strategic growth of settlements.	208340 (Thakeham Homes Ltd)
The strategy lacks justification and consistency with national planning policy, failing to consider suitable alternatives or deliver sustainable development. Support for the expansion of Cambourne, but the development framework should	203963 (Abbey Properties Cambridgeshire Limited)

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

delivered alongside high levels of private parking, which consumes land, dominates streets and undermines walking and cycling. This also pushes up housing costs, forcing households without cars to subsidise parking through higher prices. The Plan should explicitly link higher density development to lower car ownership, avoid assuming one car per home, and require parking to be optional, generally separated from housing, and transparently priced. Without this, density will continue to be experienced as a problem rather than an opportunity	
The plan predominantly focuses on Cambridge, neglecting over 100 areas in South Cambridge, lacking a clear explanation of how growth in new towns and Cambridge will benefit South Cambs communities. There is no clarity on funding opportunities for infrastructure improvements, including the construction of new schools, doctors' facilities, and road repairs in the SC villages, despite recent big developments in Cottenham for instance	202784 (I Koutoudis)
Comments regarding The Wilbraham's: • Concern lack of development opportunities around the Wilbraham's. Residents would support land release from greenbelt, if enables refresh the population and try to protect the school from closure. Not opposed to high quality development and community led development schemes such as Community Land Trusts could be used. See having a funding stream and professional support for these types of projects as ways of providing new housing.	208725, 208726, 208727 (Cllr Matthew Morgan)

• Concern The Wilbraham's have been ignored in the Local Plan. Support for CIL to spread land value uplift more widely from the large developments favoured by the draft plan. Notes a cycle route to Fulbourn might be a very useful 106, or CIL project for the future for the Wilbraham's. Concern for small villages ability to refresh themselves and draw in new people or allow older residents to downsize and are not adequately reflected in the current local plan.	
Concern proposed green infrastructure opportunity areas unrelated to strategic development allocations that could support their delivery are unlikely to be delivered.	201941 (KG Moss Will Trust & Moss Family), 201966 (Shelford Investments), 202075 (J Francis)
The Housing Delivery Study Addendum (2025) cites particularly high annual build out rates, noting these have previously been achieved due to the continued economic growth within Greater Cambridge. However, it fails to advance any evidence that policy changes will have a material impact on the delivery of windfall sites and therefore it is unclear how this aligns with the requirements of the NPPF. The Councils should consider the potential of omission sites which could facilitate a more joined-up approach to development for the 7,225 homes currently anticipated on windfall sites.	209697 (CEG Land Promotions Ltd)
Land South of New Road, Guilden Morden (site reference 40563), Responder suggests the site should be deemed suitable, available and achievable for the preferred development type.	208672, 208668 (Guilden Morden Developments Ltd)

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

Green Belt, Grey Belt

Table of representations:

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

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

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

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

Policy fails to recognise role of that Grey Belt land could play in assisting to meet employment needs. The Development Strategy Topic Paper (December 2025), in particular Appendix 4, explains why GCSP does not consider exceptional circumstances exist in this instance. However, the evidence base and Sustainability Appraisal consider a series of alternative development strategy approaches to meet identified needs, including use of Green Belt land on the edge of Cambridge. The Topic Paper concludes that Green Belt sites on the edge of the urban area could perform well, but explains that the main disadvantage of such an approach would likely be the significant harm to the Green Belt. However, this conclusion pre-supposes that such sites are Green Belt, rather than Grey Belt land.	211589 (Turnstone Real Estate Limited)
However, there is a danger that in some places the green belt is drawn too tightly around the edges of some villages and thus prevents small-scale appropriate developments that would enhance the environment and provide long-term rural resilience. A sensible, measured engagement should take place over the role of the green belt in relation to smaller village developments.	203071 (Little Wilbraham and Six Mile Bottom PC)
Comments on Green Belt release include: • Plan correctly states that development needs do not justify further Green Belt release, even with the existing headroom and post-2045 developments.	201012 (M Colville), 201184 (M Foote), 204642 (C Forbes-Cable),

• Two identified sites with exceptional circumstances for Green Belt release are unique and should not lower the bar for future releases. • Supports limited Green Belt release land on the edge of Cambridge to meet the general development needs identified in this plan and it is not necessary for you to identify grey belt land. • Supports conclusion it is not necessary to release Green Belt land on the edge of Cambridge to meet the general development needs identified in this plan and it is not necessary for you to identify grey belt land. • Support the idea of the green belt and your points regarding what the green belt is. However, there are sites that are allocated as green belt that are not in fact but already in the village envelope. These areas of green belt do not tick the boxes of your description of green belt, so I suggest they are released. We have one such site in the middle of a village. It was to be released in earlier stages of this plan but has been removed in this stage. The Walled Garden, Whittlesford CB22 CB280901. Please release it from greenbelt.	
Responder objects to approach to Green Belt release. CEG highlight that they support the expansion of the Biomedical Campus, but Cambridge has both a booming life sciences sector and tech sector and restricting the release of Green Belt to just enabling the expansion of one existing life sciences operator feels restrictive, and a limiting option in facilitating and realising the undoubted economic growth.	209693 (CEG Land Promotions Ltd)

Green Belt comments at Mingle Lane site: • Comments insufficient exceptional circumstances to justify releasing land behind Mingle Lane from the greenbelt. • Support for not including Mingle Lane (S/RHC/HW) in Plan. Housing need can be met by other new substantial developments proposed such as that at Cambourne together with new rural Southern Cluster sites such as those at Spicers, Hinxton and Babraham. • GCLP suggests at para 2.64 that the identified development needs alone are not considered to provide the 'exceptional circumstances' required in national planning policy to justify removing land from the Green Belt, this is based on the presumption that the proposed allocations will deliver as anticipated. • Strong support for retention of land between Mingle Lane, Stapleford and Hinton Way Great Shelford (S/RSC/HW) within the Green Belt, as it is important for the visual and social benefit to the community of both villages. There is no justification to release this land for development. • Concern that land at Hinton Way (Policy S/RSC/HW) is potentially being removed from Green Belt as this would cause irreversible damage and leave the neighbourhood open for developments which could ruin the quality of life.	201547 (Stapleford PC), 201579 (J Sennitt), 203069 (Pegasus Group), 207497 (A Scott)
NLHRL contend that the site S/RSC/HW is Grey Belt and given the Government's emphasis of directing homes where they are well related to rail services it should be reallocated for development. The Site Allocations Topic Paper states the Housing Land	208904 (Nightingale Land and Hill Residential Ltd)

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

The proposed development meets the criteria for existing infrastructure and transport networks without encroaching on rural green areas. It is a small-scale development that addresses current housing can be quickly built to meet current needs, while preserving the heritage environment with sensitive planning. The development would enhance access to green space for local residents.	
Comments on Parcel H05 include: • weak physical distinction from Horningsea, showing site is functionally part of the settlement rather than the open countryside. • backland garden enclosed by residential dwellings, with limited countryside views and dominant urbanising influences, making it unsuitable for Green Belt protection. • a limited or no contribution to Green Belt Purposes 1-3, release would have a minor impact on the adjacent Green Belt. • current Green Belt boundary is arbitrary, bisecting a single planning unit and lacking permanent, recognisable features as required by NPPF 149(e)-(f). • Aligning Green Belt boundary with Defined Development Extent would resolve the policy tension noted in paragraph 2.136 of Policy S/DE.	206080, 206081, 206082, 206083, 206084, 206085, 206086, 206087 (M Asplin)

• Sustainable location with active-travel links, a suitable small-site that could help meet the Council's 6.5 % shortfall in small sites. • Removing the parcel from the Green Belt would support the vitality of Horningsea village, aligning with NPPF paragraph 83 which the current Development Strategy fails to address.	
The Consultation Draft NPPF (2025) sets a clear intended direction of travel within Policy GB3(1a) which notes Green Belt boundaries should be altered through the preparation of Local Plans where this would enable the development of land around stations. Whilst until the Draft NPPF (2025) is adopted it will carry limited weight and the Greater Cambridge Local Plan is to be examined against the NPPF (2024), GCSP should consider the intended direction of travel for future policy and consider land (including Green Belt land) for allocation that is well connected to train stations.	211531 (Corpus Christi College, Cambridge)

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

Table of representations:

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

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

Infrastructure

Table of representations:

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

infrastructure that workers, visitors and residents need is crucial to protect the three strands of sustainability	
Concern over the lack of infrastructure to support the proposed development: • Especially schools, medical facilities and qualified medics, community facilities, transport, and increase in people, vehicles, pollution. • Lacks clarity on the infrastructure required to support development on the edge of Cambridge (CSET and Busway identified as critical infrastructure in the Infrastructure Delivery Plan but not explicitly referenced within Grange Farm and the Cambridge Biomedical Campus expansion policies.	201172 (J Lambert), 207533 (S Berridge), 203894 (KWA Architects)
Notes the key importance of infrastructure coming forward in time to support new communities and being rigorously enforced.	202820 (Cllr K Porrer)
Concerns plan appears overly optimistic about infrastructure project timelines and lacks a clear funding strategy for necessary water infrastructure.	202214 (A Sykes)
Concern infrastructure required to support population growth may not be deliverable through the development process alone and will need significant additional investment from external sources. Such as healthcare infrastructure, noting that a replacement for Addenbrookes Hospital could require £2.2 billion. There is a concern that without adequate capacity, economic growth could lead to social and environmental decline, resulting in unsustainable development.	202897 (Cambridge Past, Present and Future)
Section 4.3 of the Infrastructure Delivery Plan (‘IDP’) sets out the priority projects. The Cambourne to Cambridge ('CtoC') bus link is identified in Table 4-1 as a strategic	203440 (Juniper Propco)

transport measure. It is unclear in its wording whether it is anticipated it will be delivered by 2035. Clarification should be provided regarding the anticipated timescales within which CtoC will be delivered. This may become clearer prior to the Regulation 19 version of the plan being produced	
Recommends Grampian conditions should be considered to ensure healthcare infrastructure is built in a timely manner.	202214 (A Sykes)
Concern Plan overlooks the post-16 education system that sustains that workforce. Families drawn by opportunity also prioritise high-quality 16–19 provision, and Cambridgeshire's specialist tertiary model—including institutions such as Hills Road Sixth Form College—needs to be brought into scope. Post-16 places require long lead-in times, suitable sites and coordination with the Department for Education therefore capacity cannot be flexed quickly. Without explicit recognition in policy, site safeguarding and proactive planning with providers, the proposed housing and jobs growth will become unbalanced, constrain parental choice and weaken the skills pipeline. To be deliverable, the Plan must treat post-16 education as critical infrastructure.	202854 (Hills Road Sixth Form College)
Comments regarding the Infrastructure Delivery Plan include: • Comments transport inadequate in South Cambridgeshire, noting Great Shelford, requires improvement alongside new projects, as highlighted in the draft Infrastructure Delivery Plan.	202214 (A Sykes), 202433 (The CLC Trust)

• Concerns that the draft Infrastructure Delivery Plan fails to mention need for a new acute hospital to meet the healthcare demands of the growing population. • Concerns over uncertainty in the infrastructure delivery timetable for expanded developments like Cambourne and Grange Farm	
Some flexibility will be needed to meet unexpected events, outcomes or dependencies on infrastructure projects which may or may not be delivered. Most notably, in August 2025 the Government announced that it will not be funding the relocation of the Cambridge Waste Water Treatment Plant (CWWTP) creating uncertainty as to whether Councils' vision for North East Cambridge can be taken forward. We appreciate the purpose of plan making is to have a "plan-led" system, building in as much certainty as possible as to where development and infrastructure should take place over the plan period. However, as the GCLP has already witnessed unforeseen events along the way can impact on the development strategy, and some key sites are dependent on major infrastructure being funded and implemented.	211423 (Gonville & Caius College)
The Plan's housing supply position indicates that, excluding the North East Cambridge allocation (which is surrounded by uncertainty given its reliance on the relocation of the Cambridge Waste Water Treatment Plant (CWWTP) and funding to do so which was withdrawn by Government in August 2025), the Councils are planning for only a modest level of flexibility above the identified housing requirement.	210224 (Vistry Group)

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

Water supply, drainage, waste water and flood risk

Table of representations:

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

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

the type of development indicated for this site, as a result of the Government's withdrawal of funding for the Cambridge Waste Water Treatment Plant Relocation (CWWTPR) in August 2025, following Development Consent Order approval for the scheme in April 2025. Anglian Water considers that this flexibility for development of the site is important, because of the investment now required to address capacity at the existing Cambridge WRC. i./iii/v For new settlements, there is a considerable expansion at Cambourne North to link with a new proposed East West Rail station and the carried forward allocations at Bourn Airfield and Northstowe. The growth at Cambourne, has and continues to be considerable. Both Cambourne and Northstowe are within the Uttons Drove WRC catchment, which is being considered as part of our longer-term planning for the 2025–2030 asset management period (AMP8) and beyond. In line with PR24 adaptive planning principles and our ongoing discussions with Ofwat, we are reviewing growth forecasts across our operating areas and developing options on how to approach investment that can respond to uncertainty in the scale and timing of development. Any future investment at Uttons Drove would contribute to additional capacity and resilience within the catchment; however, it is unlikely that this alone would accommodate the full scale of growth currently proposed. Supporting later phases of development at these locations will therefore require a longer-term strategy, progressed through future	

planning and price review cycles as growth assumptions are refined and investment needs are confirmed.	
Comments that growth cannot happen until there is a water supply solution: • Assertion that there will be enough water for the expanded population is a joke. • New reservoirs are being built but there is uncertainty how these will be filled. • Concern the scale of growth is placing further unsustainable demands on water resources to detriment of already depleted chalk aquifer and degraded chalk streams, until Fens reservoir (late 2030s) and pipeline (2032) are in place.	201223 (S Williams), 202438 (A Fisher), 202484 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)
Environment Agency notes: • in the policy's Supporting Information on "Ensuring a deliverable plan" mentions "is not anticipated to be completed in the housing trajectory accompanying the Local Plan until 2032" - We would recommend the statement "is not anticipated to" to be improved by including further information from developers of the strategic sites on their planned phasing. • Environment Agency recommends in table 2 highlights Allocations for the periods 'Homes 2024-2025' and 'Homes Post 2045'. We recommend this table be revisited and an additional column be added which details new local plan allocations for 'Homes 2024/25-2031/32' and 'Homes 2032/33-2045' (or any further breakdown, that reflects when water supply is planned to be available from other strategic schemes like the Fens Reservoir).	211127, 211128, 211129, 211130 (Environment Agency)

• Environment Agency are encouraged by the statement “Delivery and phasing plans will need to demonstrate engagement with the water industry, and respond the availability of water supply improvements.” and would recommend including this wording to this policy or to policy CC/WE. • Environment Agency recommends in paragraph 2.86 appears to be missing the word ‘waste’ before ‘water treatment works’, in the first sentence. We recommend being clear throughout the Plan when referring to Waste Water Treatment Works, to avoid confusion with Water Supply Treatment Works, which are commonly referred to as just water treatment works.	
We note the proposed new pipelines to alleviate the shortage of drinking water and the proposal to reduce extraction from the aquifer and particularly chalk streams, both of which we strongly endorse. However, it is our understanding that there is a delay in the availability of water from Lincolnshire using the new pipeline until after 2030. How will this gap be manged and what is the impact of this on the plan period?	203264 (Horseheath PC)
Questions where sewage works are to support this plan?	202282 (L Turton)
Concern over both lack of water and flooding which made worse by development over fields and flood plains.	202282 (L Turton)
Concern any increase in flooding due to A428 is being widened is taken into account.	201682 (S Smith)
Comments on environmental resources (green spaces and water) are at their limit. No credible solutions provided where the resources will come from, and what will be done to restrict demand and usage.	205438 (A Kirchgaessner)

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

Transport

Table of representations:

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

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

• Helpfully shows that development in Cambridge and on the edge of Cambridge generates far fewer additional car trips per home or job than remote new settlements, and has dramatically lower car mode share. • largely relies on 'predict and provide' modelling, testing conservative assumptions and then seeking mitigation, rather than exploring what could be achieved through stronger policy requirements and place-based design. • makes comparisons between sites such as Grange Farm, Waterbeach and Northstowe that do not reflect the different delivery mechanisms and constraints that will shape real-world travel behaviour	
EWR Co strongly support the Council's growth strategy (Policy S/DS) which is 'heavily informed' by the location of existing and proposed public transport schemes, including EWR. The EWR project will play a major role in helping the Councils achieve their ambitions for Greater Cambridge by 2045.	209085 (East West Rail Company)
Comments not sensible on the plan ahead of the Combined Authority's Travel Strategy	201902 (C Deer), 202118 (Elsworth PC)
Concern Plan cannot be properly considered without the Greater Cambridge Transport Strategy, given implications of substantially higher levels of commercial and private transport journeys and condition of local roads, and the Infrastructure Delivery Plan.	201913 (R Baker)
Recommendation for appropriate transport and travel modelling to mitigate potential negative impacts on travel towards Cambridge from Huntingdonshire.	201657 (Huntingdonshire DC)

Mitigation proposals should encompass various travel modes and maximise opportunities for Huntingdonshire residents and businesses to access public and active transport.	201657 (Huntingdonshire DC)
Ultra-fast and efficient public transport links from 'spokes' into the Cambridge (the hub) would minimise congestion and journey times.	201920 (A Davidson)
Recommends a future light rail network linking up larger villages and new towns with Cambridge and each other. Locating facilities close to stations.	202362 (A Carpen)
Concern at over-expansion of local economy and move toward sustainable transport.	201223 (S Williams)
Argues that public transport and active travel must be the starting point for all development, with properly designed, networked routes to avoid car dependency and ensure use.	201734 (R Stobbart)
Comments as new housing is out of Cambridge, but people work mostly in Cambridge, transport will be more stressed, and sustainable travel modes have not been consistently included. • The Plan should map where homes are built and where employment is located, to see the needs for transport. • Included more detail on supporting public and active transport between settlements and the city, between settlements and Policy for local amenity within settlements to assist with day-to-day travel within the communities • Add policy to support active travel within new communities and retrofitting to existing settlements.	201812 (J Baumberg), 201826 (T McKoewn)

The plan should have binding targets for the proportion of journeys walked/cycled and by public transport and for reduction in car ownership (and car dependency). Major developments should have targets for mode share and permeability.	202283 (A Lawrence)
Higher-density development should be linked to lower car ownership and strong alternatives to driving to support sustainable travel. Current dense developments often include high levels of private parking, which affects land use and increases housing costs for non-car owning households. The Local Plan should require parking to be optional, separated from housing, and transparently priced to ensure density is viewed positively.	204632 (M Fordham)
Reduce reliance on the private car: • Reduce the dependence on cars for village residents • Public transport to villages needs to be significantly improved	201894 (R Pargeter), 201023 (K Mahoney)
Recommends increased importance on sustainable transport. Privately-owned electric vehicles do not solve other problems; are expensive way to reduce carbon; are not a sustainable solution.	202283 (A Lawrence)
Comments strategy underplays the role that the existing public transport network can and should play in delivering sustainable development.	203069 (Pegasus Group)

States that the planned Cambourne rail station will adversely impact Boxworth, with inadequate road infrastructure likely to turn the village into a major access route, causing significant detriment.	202838 (W Nichols)
Comments in relation to the CSETS transport corridor scheme: • Supports improvements to transport corridors, pivotal to transport strategy, but concerns over the proposed CSET route, failing to use existing transport corridors and for cutting through Green Belt land. • Comment that the Better Ways for Busways has proposed an alternative to the CSET scheme utilising the existing transport corridor, with less environmental impacts, more accessible, and more cost efficient. • Proposed CSET busway is not compliant with upgrading EXISTING transport corridors. Abandon this hugely destructive and unnecessary scheme, instead improve the frequency and affordability of buses running on the existing roads. • Objection to CSET route and questions if multi-modal access road is needed if the Better Ways for Busways' alternative for a busway spur off the A1307 Hinton Way roundabout was adopted. • Figure 13: is potentially misleading. CSET proposals are still at Inquiry, it is not a committed scheme but a proposed scheme.	203087 (N Campbell), 210184 (Historic England), 204099 (A Baker), 207656 (K Foreman), 202617 (P Waters), 201547 (Stapleford PC), 203174 (D Morgan), 207533 (S Berridge), 204944 (C Arthurs), 204942 (O Arthurs), 204758 (M Fyfe), 204448 (N Pond), 203180 (D Morgan), 209022 (Hobson's Conduit Trust)
Questions proposed multi-modal access road from Granham's Road to the Cambridge Biomedical Campus (CBC), suggesting alternative busway spur from the A1307 Hinton Way roundabout be considered.	204107 (A Baker)

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

• Highlights problem areas: (A1301), level crossings, and poor road surfaces to enhance transport safety and accessibility for cycling. Concern over capacity of rural and major roads with increased usage.	
Concern for A14 congestion at peak times at M11 pinch point, and limited input from highways agencies on traffic impact of developments?	201322 (R Morley)
Concern no indication of the East/West railway is included as line of it is incorrect and therefore the local plan.	201682 (S Smith)
Concerns the environmental impact of the East West Rail's southern approach, regarding local wildlife and the Mullard Radio Astronomy Observatory.	202214 (A Sykes)
Concern that in villages car transport will have to remain a mainstay of local transport, and with move to electric vehicles, the plan needs to ensure that the electricity supply infrastructure is sufficient to meet this need.	201894 (R Pargeter)
Comments regarding CSET include: • Objection to CSET route as not within a public transport corridor. • Better Ways for Busways proposed an alternative route along A1307, which does not cross greenbelt land. • Offers additional evidence supporting the benefits of the proposed on-road route. Alternative route would be less environmentally destructive, improve accessibility for a range of users, and cost-efficient. Plan should be scrapped and a new plan created which looks at taking the busway alongside the road.	202620 (I Smith), 202684 (J Hunting), 203051 (C Schofield), 203126 (J Jasiewicz), 204085 (J Robinson), 208405 (M Cooper)

Strategic cross boundary matters

Table of representations:

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

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

Document presentation / content

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

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

Objection sites

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

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

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

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

Comments on the Housing and Economic Land Availability Assessment

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

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

Policy S/SH: Settlement Hierarchy

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

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

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

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

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

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

Response to main issues:

Comments supporting the policy approach are noted.

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

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

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

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

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

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Comments supporting the policy includes: • broad support for policy	202613 (Ickleton PC), 201377 (Gamlingay PC), 202734 (Cambridge Past, Present and Future),

• provides a clear structure for directing development • helps prevent speculative development in the least sustainable places. • for group villages to have no more than 8 houses per scheme • appropriate Cambridge identified at top of the hierarchy • support for the Towns to have own position in the hierarchy • support for Cambourne defined as a town, along with Waterbeach New Town and Northstowe • inclusion of Great Abington and Little Abington in Group Villages • appropriate for Swavesey to be defined as a Minor Rural Centre • support for designation of Ickleton as an Infill Village. • growth to be directed to Great Shelford and Stapleford recognising position in hierarchy and the number of services and facilities within the settlement. • support for Willingham defined as a Minor rural centre • proportionate distribution of growth is important to ensure that settlements – both large and small – remain sustainable and that growth takes place in locations which can support it • support for Meldreth defined as a Group Village • support the proposed overall policy for minimal development in small villages in rural South Cambridgeshire in preference for larger new centres that are already being established	204142 (Richborough), 204167 (Tritax), 205121 (North Barton Road Landowners Group), 204577 (C Forbes-Cable), 201767 (C Blakeley), 203315 (J Manning), 210666 (Gladman Developments), 209134 (Meldreth PC), 208905 (Nightingale Land and Hill Residential Ltd), 203267 (Horseheath PC)

• Anglian Water is generally supportive of the approach set out in the policy, and the provisions setting out the parameters for growth in each settlement category. It is noted that for Cambridge, Towns and Rural Centres the policy is clear that development should come forward (without any limit imposed) "provided that adequate services, facilities, and infrastructure are available or can be made available as a result of the development". However, this same requirement is not included for growth at smaller settlements including Minor Rural Centres, Group Villages, and Infill Villages. • Anglian Water requests that this qualifying statement to demonstrate that adequate infrastructure is available, should be applied to all the settlement categories within the settlement hierarchy, so development proposals clearly address infrastructure capacity - this includes wastewater treatment capacity in the network and the receiving WRC (as evidenced by the Stage 2 Detailed Water Cycle Study). For small settlements (e.g. Tadlow) where we have WRCs with a descriptive permit i.e. Descriptive Works - our position statement indicates that proposals that seek to connect to our network will be objected to unless the developer can demonstrate there is sufficient capacity at the works, OR an onsite solution such as a package treatment plant is approved.	209162 (Anglian Water Services Ltd)

Alternatively, similar wording to Policy S/DE clause 1.c could be used for the smaller settlement categories to ensure "There is the necessary infrastructure capacity to support the development".	
Environment Agency requests changes to policy wording at the end of points 1 and 3: 'Residential development and redevelopment…. provided that adequate services, facilities and infrastructure are available or can be made available as a result of the development *and areas of flood risk are avoided.'*	211131 (Environment Agency)
Comments objecting to the policy include: • suggests policy classification lacks currency and, when combined with other draft plan policies, risks excluding sustainable small sites under one hectare, contrary to NPPF paragraphs 73 and 83 • argues policy sections (9) and (10) impose limitations on growth, policy is unjustified and ineffective, failing to deliver necessary growth and contradicting paragraph 36 of the NPPF. • inconsistent with key principles of the NPPF. Paragraph 72 acknowledges the importance of strategic housing land supply comprising a sufficient mix of sites. • NPPF (2026) directs development to sustainable locations, the current hierarchy fails to support.	201856 (Chivers Farms Ltd), 204454 (Cottenham PC), 204557 (Axis Land Partnerships and Executors of Norman Winfrid Moore), 204618 (Papworth Everard PC), 202331 (Granta Land Ltd - Land at Valley Farm, Meldreth), 201948 (KG Moss Trust & Moss Family), 202366 (The CLC Trust), 201969 (Shelford Investments), 202538 (Granta Land Ltd - Land West of Station Road, Meldreth), 202651 (Granta Land Ltd - Land at Sheene Farm, Meldreth), 202667 (Granta Land Ltd - Land East of Station Road, Meldreth), 204056 (E W Pepper), 208680 (Guilden Morden Developments Ltd), 208773 (Croudace Homes),

• recommends change to policy reflecting the role of railway stations to reflect Government policy. Upgrade settlements with direct connections to high-quality public transport. • reassess hierarchy, include a new category for 'Well Connected Minor Rural Centres' including Fulbourn, Milton, Melbourn, and Waterbeach prioritising growth over less sustainable options • states potential to undermine the growth of rural communities • recommendations to assess settlements individually on sustainability, connectivity, and functional integration and then review hierarchy • indicative maximum scheme sizes are arbitrary and should be removed. Should be assessed on site context rather than fixed thresholds. • suggests removal of development without limitation on sites within the three Rural centres • requests limits on individual schemes in line with those specified in adopted Neighbourhood plan • states policy neglects sustainable opportunities at the Edge of Cambridge • states policy applies only to land within defined development extents creating ambiguity regarding the assessment of sites with strong ties to Cambridge	208785 (Granta Land Ltd – Land East of Station Road, Meldreth) 208809 (Granta Land Ltd – Land West of Station Road, Meldreth), 201955 (M Asplin), 201958 (M Asplin), 201963 (M Asplin), 202103 (Cambridgeshire County Council), 202559 (Ely Diocesan Board of Finance), 203049 (Cemex UK Properties), 203163 (Christ's College), 203315 (J Manning), 203393 (Jesus College), 204103 (G W Balaam & Son), 204125 (Emmanuel College), 204143 (G W Balaam & Son), 204173 (J Johnson), 204445 (Bellway Strategic Land), 204459 (Wain Estates), 204514 (Redrow Homes South Midlands), 204949 (Places for People), 205132 (Axis Land Partnerships Ltd), 203408 (Jesus College), 204244 (Bellway Strategic Land), 204398 (Hill Residential (Great Abington Site), 204566 (Rosconn Group), 204858 (Pigeon), 203982 (Abbey Properties Cambridgeshire Ltd), 201006 (M Colville), 202366 (The CLC Trust), 205024, 209746, 209747, 211523, 211522,

• revise the settlement hierarchy methodology to ensure consistent and transparent comparison between Group Villages. • considers the hierarchy inconsistent with the distribution of growth set out within the Development Strategy • Group villages not in the green belt should be elevated in the hierarchy • Permitting windfall development inside development extents disregards the sustainability of Rural Centres and prevents their growth. • discrepancy between draft Policy S/SH and the housing requirements outlined in Figure D1 of Appendix D • Local residents should have input • development adjacent to settlement boundaries should be allocated for • quantum of development which a settlement can support should consider the wider proximity to services not just services in Central Cambridge and Market Towns • Instead of the arbitrary 8km cycle distance, points should be awarded to settlements which benefit from the Greenways; their purpose is to allow non-motorised commuting to services and employment including in Central Cambridge • fails to recognise that there are services and job opportunities outside of Central Cambridge and the Market Towns	211521, 211520 (Endurance Estates), 211198, 211208 (R Raywood, A Bradney and D Unwin), 211586 (Terra Strategic), 211458 (Hayfield Homes Construction Ltd), 211048, 211060 (Wates Developments Ltd), 207022 (Mac Mic Land)

• suggests Waterbeach new town and Waterbeach to be considered as one complete settlement and (both) be at Town tier. • Papworth Everard should be a Group village as is no longer on a par with other Minor rural centres. • Horningsea should be reclassified as a Group village to reflect scale, characteristics and sustainability. • queries identification of Linton as a Minor rural centre • lacks evidence to support Over as a Group Village and not elevate to a Minor Rural Centre	
Objects to the settlement hierarchy on the basis that it restricts growth in villages such as Great Wilbraham, undermining their ability to remain viable and meet local needs. States this approach risks turning smaller villages into dormitory settlements, increases dependence on private cars and reduces freedom for non-drivers including children and older residents.	203338 (Great Wilbraham PC)
Suggests policy could set out how new and emerging settlements will be addressed during a future review	203414 (Lichfields)
Comments regarding lack of review of the capacity of settlements to accommodate additional development or development threshold limits remain relevant if no sites are available	203895 (Hill Residential (Fulbourn Site)), 203935 (Hill Residential (Sawston Site)), 202083 (J Francis), 211622 (Bloor Homes Eastern), 211613 (Bloor Homes Eastern), 204161 (Hill Residential (Hardwick Site))

States in naming the largest villages ‘Rural centres’ it’s unhelpful, they are not rural and this locks people out of planning discussions as is counterintuitive. Whereas Minor rural centres are rural in character.	203888 (Histon and Impington PC)
Concern infill villages not located on major transport corridors will remain without reliable and frequent public transport opportunities, affecting numerous villages.	203888 (Histon and Impington PC)
Suggests consideration of sustainability measures and infrastructure investments associated with the wider growth location should be more fully acknowledged in the settlement hierarchy assessment. (Linton site)	204837 (Vistry Group)
Redrow requests an assessment of the sustainability credentials of each settlement in the District, undertake a review of the capacity of the most sustainable villages in South Cambridgeshire—including Group Villages located close to Cambridge with strong transport links (Hauxton) - to determine whether additional development can be accommodated within existing development framework boundaries, allocate additional land at the edges of these settlements to ensure that growth is appropriately directed, sustainably delivered, and consistent with the Plan’s stated objectives.	204514 (Redrow South Midlands)
The respondent supports the proposed Policy wording • Bar Hill is designated as a 'rural minor settlement' with a role in providing services for a small rural area, having more facilities than most other settlements in Greater Cambridge. • Bar Hill's as a MRC, strategic location on the A14 is beneficial for the logistics sector, suitable location for industrial and logistics growth in	204167 (Tritax Big Box Developments)

Greater Cambridge, being outside the Green Belt and close to the city, unlike Histon and Impington and access to a local workforce and necessary infrastructure for industrial and logistics uses. • The respondent references key paragraphs from the NPPF 2024 and NPPF 2026 that align with the operational needs of the freight and logistics sector.	
Comments on the policy approach include • Suggests current approach does not align with the NPPF's direction to boost new housing supply, as noted in paragraph 61 and amending part 5 of Policy to allow residential development within defined extents and on adjacent land, provided adequate services and infrastructure are available • restrictive approach in smaller villages risks limiting opportunities to sustain rural communities. • policy focuses on limiting growth rather than enabling rural sustainability • scheme sizes make affordable housing delivery harder, support of local services or responding flexibly to local need. • Little reference to rural transport gaps, digital connectivity or the cumulative impact of small developments.	203149 (Cambridgeshire ACRE), 203149 (Cambridgeshire ACRE), 204708 (Croudace Homes), 204976 (Martin Grant Land), 211614 (Bloor Homes Eastern)

• Stronger rural proofing would allow more flexibility where schemes support affordable homes, local services and community led development.	
“Rural Centres” is a misleading term. These are among the least rural villages: they do not feel remote, lack strong rural characteristics, are close to Cambridge, benefit from good transport links, and are not shaped by a rural economy. The label is therefore unhelpful and should not be applied to the largest hub villages. “Minor rural centres” are more genuinely rural, although many function economically as suburban settlements, with high levels of commuting and, in some cases, their own science parks. Describing these places as rural introduces bias into policy discussions and planning decisions, obscuring their hybrid or suburban character. “Smaller villages”, by contrast, are distinctly rural, facing traditional rural challenges and displaying classic rural characteristics, yet they are not classified as rural under the current terminology.	211000 (Cambridgeshire County Council)
Settlement Hierarchy Study Update represents a proportionate review of the earlier assessment rather than a comprehensive reassessment of settlement roles and relationships between settlements. As such, it provides limited analysis of how committed and proposed growth, improved connectivity and changing functional relationships may influence the suitability of settlements.	210227 (Vistry Group)

It is considered that the approach taken through the update remains overly focused on existing services and facilities and does not sufficiently account for committed growth, proposed allocations, or the dynamic role that some settlements play within the wider spatial strategy. In particular, the assessment gives limited weight to the strong functional relationship between certain Group Villages and Cambridge itself. (Land at Fen Ditton)	
Concerns that new evidence and site-specific information only became available at Regulation 18, affecting the ability to comment earlier on settlement hierarchy implications.	204808 (G Shaw)
Comments on classification of Melbourn and Meldreth include: • suggests Melbourn and Meldreth to be considered as one settlement. • railway station serves both villages • villages of Melbourn and Meldreth should be designated as a Rural Centre • reiterates Melbourn and Meldreth function as a combined settlement with shared services, facilities and schools. Notes recent active travel upgrades strengthen links. • argues a combined or re-scored settlement should be designated as a Rural centre	206217 (Granta Land Ltd - Land at Valley Farm, Meldreth), 202331 (Lanpro)

Comments on classification of Melbourn: • Melbourn could be re-designated as a Rural Centre • Settlement Hierarchy Paper (2021) allocates 14 points, with high scores for shops and services and secondary school • Melbourn is the largest village in the south-west of the district • Greenway Scheme will provide better accessibility to Cambridge by sustainable modes • higher score than Rural Centres in terms of secondary school provision than Great Shelford and Stapleford, designated as a Rural Centre	211417 (CALA Group Ltd), 211061 (Wates Developments)
Comments for classification Great Shelford and Stapleford include: • Argues the classification as a single Rural centre undermines the distinct identities of the two villages and contravenes clause 1a of Policy S&GS 12 Neighbourhood Plan • Concerns raised regarding implications of permitting unrestricted residential development in a combined rural centre • They have a very different range of amenities and services; highlights a lack of amenities in Stapleford • Suggests that minor rural centre is a more appropriate classification for Great Shelford	201549 (Stapleford PC), 202674 (S Berridge), 2010894 (Great Shelford PC)
Comments regarding re-classification of Cottenham: • size suggests Rural Centre not Minor Rural Centre	207654 (Cottenham PC), 204454 (Cottenham PC), 211219 (Terra Strategic), 211232, 211580

• need for delivery of services and infrastructure due to Significant increase in housing. • concern of impact for long-term sustainability of the village • proposed change in settlement status is contrary to the level of services and facilities within Cottenham. • At appendix 11 Cottenham scored 15 points, higher than Gamlingay (scored 7) and Willingham (scored 9). Both of these settlements are also identified as minor rural centres. Settlements with varied scores and are identified as the same category village should not be the case.	(Living Space Housing), 211246 (Manor Oak Homes)
Comments regarding housing limits in Cottenham: Responder objects to indicative maximum scheme size of 30 dwellings, noting identified housing requirements for neighbourhood areas of 130 dwellings identified to be delivered at Cottenham between 2024-2045. How will this number of dwellings be delivered. The defined development extent for Cottenham as being drawn tightly around existing development at the settlement, with no development opportunities within the defined developed extent that would be sufficient to deliver the 130 dwelling neighbourhood area requirement identified by the Draft Plan.	211277 (Woolsington One Ltd)
Comments on classification of Willingham as a Minor Rural Centre. • There is no justification for the arbitrary figure of a maximum of 30 dwellings in MRC.	211263 (Terra Strategic)

• This limits the level of growth that the Minor Rural Centre and less efficient use of land contrary to national planning policy which requires proposals to make the most efficient use of land.	
It is strongly considered that the failure of the evidence base to consider all modes of transport and bus services within Fowlmere and its connectivity to the surrounding settlements represents a flaw in the overall settlement assessment. This has subsequently resulted in sites that are being promoted within Fowlmere not being properly considered for development and not being subject to an independent site assessment.	211048 (Wates Development Ltd)
Suggests review Fulbourn, a Minor rural centre, and include as a Rural centre due to its facilities and transport links.	204962 (Miller Homes)
Notes the inconsistency of retaining Group village development restrictions for Elsworth while a major development of over 13,000 homes is proposed within close by.	202123 (Elsworth PC), 202346 (P Deer), 201906 (C Deer)
Suggests designation of Bourn Airfield as a Rural Centre	203414 (Juniper Propco (Bourn) Limited)
Suggests Bassingbourn and Kneesworth should not be 2 settlement types as they are one settlement.	201373 (Gentian Development Ltd)
It is important that the hierarchy is applied flexibly and in a manner that supports the effective delivery of the development strategy. Opportunities such as Fen Ditton, which are capable of accommodating additional growth in a sustainable manner, can play an important role in contributing to housing delivery, particularly where they are of a scale that complements existing	210228 (Vistry Group)

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

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

A detailed assessment of smaller sites, including North of Willingham Road, Over, should be conducted to ensure at least 20% of allocations in the Local Plan are on sites of the appropriate size. Due to the significant size constraints placed on settlements it is not possible to deliver these as windfall sites.	
Land at Prospects Royston, previously Three Prospects Farm, land east of Royston, (HELAA ID 40511). Policy S/SH should be revised to identify land beyond the A505 at Royston as being in the second tier of the hierarchy, below the Cambridge urban area itself but above Cambourne and the other new settlements and on a par with sites on the edge of Cambridge as a location for strategic and sustainable housing and employment growth.	203331 (Wilson Bowden Developments Ltd)
Land at Girton Road, Girton (site ID 115170) • Responder states the higher growth scenario from the Greater Cambridge Employment and Housing Needs Update should be used in future policy revisions. • Allocation of small and medium sized sites is essential to meet housing requirements, as over-reliance on windfall sites is not a sound planning approach.	204361 (Wain Estates)

• site ID 115170, is one such site which is well-situated and well-connected to support sustainable transport, aligning with the Local Plan's ambitions for knowledge-intensive sectors.	
Land North of Pampisford Road is situated on the edge of Great Abington (Site Id: 115179) • Respondent requests removal of arbitrary limitations for the scale of development that might take place in Group Villages. • Or limits increased, as 8 is not justified and limitations applied to other settlements in the hierarchy removed also with all sites evaluated on their own merit against sustainability and the capacity of existing facilities and services to accommodate growth. • Limits on development are inconsistent with Government policy on promoting a step change in growth. • Where there is no neighbourhood area, the plan examines growth in those villages and directly allocates sites for development. Great Abington is a Group Village but not a Neighbourhood Area, and yet it sits adjacent to Granta Park, a major employment area, a sustainable location, can support economic growth at this employment site. The site is an ideal candidate for allocation through a change in policy.	204566 (Rosconn Group)
Land south of Hauxton Road in Little Shelford	211254 (R Harvey)

• The responder has promoted a site in Little Shelford. Little Shelford is defined as an Infill Village in the settlement hierarchy and has a reasonable level of services and facilities. Given the sustainability credentials of Little Shelford, it is felt that it would be more appropriate for it to be defined as a Group Village. • Concern there is no review of the capacity of settlements to determine available land within the development framework boundary, or the development threshold limits remain relevant. • Concern no major residential development opportunities within the development framework boundary of Little Shelford. Small scale would not deliver affordable housing or provide any meaningful support to existing services and facilities. Little Shelford affordable housing needs are not being met. • Amendments should be made to the development strategy to direct development to the more sustainable infill villages including Little Shelford to support existing services and facilities, deliver additional facilities, and meets identified affordable needs of villages.	
Land at west of North End, Bassingbourn (HELAA ID: 200809). • Important that small and medium size sites such as the site proposed, to meet the housing requirement of the area, compared to major sites and new settlements.	

A one size fits all approach to site allocation is inappropriate and does not allow individual characteristics and benefits of a site. The Framework is clear that sufficient allocations should be included in Local Plans, and the Plan fails to facilitate sufficient allocations in a range of sustainable settlement.	211201, 211200, 211210 (Rainier Developments & Strategic Land)
Concern the level of windfall allowance within the overall housing delivery figure for the Plan. Represents a significant proportion of the total housing to be delivered and is not guaranteed. Given the housing need figure for Greater Cambridge and reliance on large sites and new settlements to deliver the majority of the residual housing need, the Plan should allocate additional smaller sites to ensure the housing need is met and particularly within the short term.	211272 (Mr & Mrs Smith)
Support Cambridge Junction and Create Cambridge in asking that: • cultural infrastructure's ongoing revenue and organisational capacity needs are recognised, not just physical buildings • culture is embedded in cross-cutting outcomes (innovation, health, education, community resilience) • partnership frameworks between councils, cultural organisations and communities are referenced as delivery mechanisms aligning community infrastructure with lived cultural use.	204830 (G Shaw)

Concern ‘Rest of the Rural Area’ comprises rural centres and group villages, a total of 48 settlements, have only 3 sites allocated for a total of 205 new homes. • The proportion of development attributed to major strategic sites is a risk to deliverability and inconsistent with the Framework. • Regarding draft allocations, a ‘blanket approach’ has been taken, with maximum dwelling numbers given to all settlements below Rural centres.	211209 (Rainier Developments & Strategic Land)

Policy S/DE: Defined development Extent

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

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

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

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

Response to main issues:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for Policy includes: • High bar for development outside of villages/rural centres • protection of open countryside • Protection from encroachment • prevents unsuitable development inside and outside of development extents. • Without policy small rural communities could quickly lose their character. • no new housing developments outside defined development areas, except for Parish-led Neighbourhood Plan allocations. • Intent to ensure development located in the most sustainable places • essential for controlling development around villages • principle of defining settlement boundaries around villages	201013 (M Colville), 201769 (C Blakeley), 201896 (R Pargeter), 202615 (Ickleton PC), 204974 (D Davies)

• potential rural exception sites would dry up as parcels of land at village edges would offer the prospect of making large profits if developed and proposals based on maximising developer profits would predominate. • should be no exceptions for green belt land	
Cambridge Science Park, Cambridge Support for inclusion of site within the Defined development extent.	203070 (Trinity College, Cambridge),
Protect rural views.	209678 (H Hale)
Welcome the reference to heritage in criterion 1b.	210086 (Historic England)
Hay Street, Steeple Morden Objection to boundary in Steeple Morden. Should follow a consistent settlement edge aligned with adjacent built form and include the application site.	202095 (R Wright)
Horseheath Road and Bartlow Road Linton Object, amend to NOT include the Horseheath Road and Bartlow Road developments as resulted from the lack of a Local Plan being in place in 2015-2018	201670 (Linton PC)
South of Thompsons Meadow, Guilden Morden Object as DDE should be extended to reflect development south eastern part of the settlement (planning permissions S/3077/16/OL and 20/03151/REM)	201811 (Peter David Homes Ltd)
Caxton Gibbet food retail site, Cambourne Objection to boundary extent at Cambourne, extend to include land up to the A428, encompassing the Caxton Gibbet food retail site and the EV car charging area.	204011 (Abbey Properties Cambridgeshire Ltd)

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

Land at Gog Magag Way and Haverhill Road Stapleford Built up area of the village was extended to the east of Stapleford in the early 2000s by residential development at Chalk Hill and again in the 2020s by development of the Strawberry Fields residential care village.	201550 (Stapleford PC), 210895 (Great Shelford PC)
Between Brook Street and Brockley Road, Elsworth Questions Defined Development Extent in Elsworth not embracing parcel of my land where historically there was residential housing. This would entail a movement of the DDE nominally to the west.	201431 (R Woolf)
The Walled Garden, Whittlesford Should not be in the green belt as it is village central and surrounded by houses) has been taken out of this latest plan having been in earlier stages.	204628 (C. Forbes Cable), 205412 (L Gardner)
Site Allocation S/RRA/CR, Land to the west of Cambridge Road, Melbourn Object as Site Allocation S/RRA/CR is shown outside the settlement boundary, inconsistent with other areas such as Waterbeach New Town. It should be within the defined development extent.	204641 (Vistry)
Objections to policy include: • reformed NPPF (2026) emphasis for development in sustainable, well connected locations, which the current policy contradicts by restricting growth to defined boundaries. • minimal allocations, tightly drawn development boundaries and prescriptive limits on scheme size will constrain organic growth	202927 (The Trustees of the C Y Nutt Deceased Will Trust), 204129 (Emmanuel College (Long Road)), 204520 (Redrow South Midlands), 211524 (Endurance Estates)

• largely unchanged since the 2004 Local Plan, with minor adjustments • stagnation and potential loss of local services • regarding all countryside sites equally is unjustified • flexible, criteria-based approach is sought to support appropriate rural growth and a balanced distribution of housing across Greater Cambridge • boundary-based approach inflexible • fails to acknowledge sustainable sites that are functionally part of the urban area. • policy lacks a mechanism for positively assessing sites based on accessibility and their potential to support sustainable development • lack of review to consider whether boundaries remain appropriate or capable of accommodating future development needs of individual settlements. • Where constrained by the Green Belt current approach prevents any meaningful outward expansion, even in sustainable locations. • should be subject to a full review to accurately reflect the development potential and sustainability of individual settlements and where no capacity within existing boundaries, the Local Plan should allocate appropriate village edge sites in the most sustainable locations • fails to allow for well-connected windfall growth in villages on the basis set out above in relation to policy S/SH	
Anglian Water supports the policy requirement 1.c to ensure that there is the necessary infrastructure to support the development within defined settlement extents. However, it	209163 (Anglian Water Services Ltd)

is considered that this should be equally applicable to developments outside defined settlement extents but may still be adjacent to the settlement and/or our WRC catchments - e.g. Rural exception sites. The policy does not specifically reference the delivery of utility services /infrastructure in the countryside, which would include critical water and wastewater infrastructure to serve existing and future communities.	
Responder requests changes to policy wording at the end of points 1 and 3: 'Residential development and redevelopment…..provided that adequate services, facilities and infrastructure are available or can be made available as a result of the development *and areas of flood risk are avoided.'*	Anglian Water Services
Objects to policy and appendix are unsound as they (para 2.138) limit boundary changes largely to completed development. • This creates a circular methodology that constrains the identification of sustainable small sites, contrary to the NPPF requirement to proactively identify land to boost supply (paragraph 73) and support thriving villages (paragraph 83). • The blanket treatment of residential gardens is overly rigid, and the approach is premature in the absence of updated Green Belt and "grey belt" evidence, reducing flexibility and clarity at plan-making stage.	202005 (M Asplin), 204272 (R2 Developments Ltd)
Objection to Policy includes: • focusing development solely within DDEs is inconsistent with draft Policy S5 of the NPPF, which advocates for a more flexible approach to development locations	204272 (Pegasus Group), 204292 (R2 Developments Ltd), 211479 (G Robinson and Partners),

• hinder sustainable growth by restricting new homes in locations just outside these extents, despite their proximity to public transport. • approach does not align with the government's direction to boost housing supply as outlined in paragraph 61 of the NPPF • approach contradicts the NPPF's pragmatic direction towards allowing suitable development near existing settlements and transport infrastructure. • Locations near Foxton Railway Station cited	
Comments on the policy raise concerns that: • Boundary largely unchanged since 2004 boundary • inconsistent with proposed NPPF changes that advocate for a more flexible approach, allowing development on well-related sites. • suggests part 1 of policy to allow development on unallocated land well-related to defined development extents, aligning with the NPPF's pragmatic approach. • boundaries limit the opportunities for any development in villages • housing and affordable housing needs of these villages would not be met. • no support for existing services and facilities, or the delivery of additional facilities	202570 (Ely Diocesan Board of Finance), 203318 (J Manning), 204171 (Hill Residential (Hardwick Site)), 204411 (Hill Residential (Great Abington Site)), 204711 (Beechwood Estates Ltd), 204728 (Croudace Homes), 204985 (Martin Grant Land), 211247 (Manor Oak Homes), 211255 (R Harvey), 211615 (Bloor Homes)
Comments existing boundaries have largely not changed significantly since 2004. The current extent restricts development, not supporting existing services or allow for the delivery of additional facilities (noted Whittlesford, Swavesey, Fulbourn).	202368 (The CLC Trust), 204567 (Axis Land Partnerships and Executors of Norman Winfrid Moore), 203897 (Hill Residential (Fulbourn Site))

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

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

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

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

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

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

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

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

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

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

Policy S/GB: The Cambridge Green Belt

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

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

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

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

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

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

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

Response to main issues raised in representations:

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

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

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

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

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

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

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

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

Table of representations:

General

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

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

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

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

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

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

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

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

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

Areas of Green Belt

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

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

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

Sites

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Policies Map

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

Green Belt Assessment

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

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

It is understood that a revised Green Belt Assessment will be published after the Regulation 18 Consultation closes, however this should have informed the Draft Local Plan and been published as part of the Regulation 18 Consultation. Also, the omission of any reference to 'Grey Belt' within the Draft Policy S/GB is challenged. The NPPF (2024) introduced a clear duty for Grey Belt land to be identified when undertaking Green Belt Assessments for the purposes of determining applications; reinforced within the Planning Practice Guidance (PPG) (Para 001 ref.001 64-001-20250225). Identifying Grey Belt land within the revised Green Belt Assessment and Draft Local Plan is hence both a policy requirement and crucial to ensuring the Local Plan promotes sustainable patterns of growth (as required by the NPPF). The Council needs to properly consider the inclusion of well-performing sites in the Grey Belt. For example, Land to the South of Station Road, Harston (ref: 115742) was assessed within the Council's Green Belt Assessment (2021) which supported First Proposals (2021) Draft Local Plan (Parcel HS9). Changes to plan: To ensure that the Plan is sound will require: - The publication of a revised Green Belt Assessment to support the Local Plan - A consideration of higher growth targets and subsequent review of the Green Belt / Grey Belt where necessary. - The identification and inclusion of the Cambridge Grey Belt within the Local Plan to guide development to sustainable Grey Belt sites.	203419, 203397 (Jesus College)
LSH agrees with this Policies alignment with National Policy within the NPPF relating to Green Belt release on sites that accord with the Golden Rules. As previously stated above, the Greater Cambridge Green Belt Assessment Final Report August 2021	211233 (Living Space Housing)

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

Policy S/MO: Monitoring

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There was broad support for the need to monitor annually.

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

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

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

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

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

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

Response to the main issues raised in representations

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

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

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

  Windfall housing is monitored through the annual update to the housing trajectory which informs the number of completions of homes which is monitored in the monitoring framework.

Table of representations:

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

	202467 (K Jones), 202691 (T Altmann), 202721 (W Townsend), 202764 (Cambridge Junction / Create Cambridge), 202790 (S Lee), 202889 (Cambridge Junction), 202892 (Cambridge Junction), 202942 (R Terry), 202966 (T Flinders), 203367 (N Ellis), 203447 (S Ashworth), 203479 (L Heap), 203548 (D Lever), 203637 (University of Cambridge), 203856 (N Yeni), 203877 (University of Cambridge), 204416 (New International Encounter), 204719 (A Giarlis), 204856 (L Matthews), 205007 (Wysing Arts Centre), 205068 (University of

	Cambridge), 205128 (H Paterson), 205217 (J Walsh), 205329 (A C de Azevedo Lamha), 205366 (L Howse), 205372 (N Oakley), 205419 (Cambridge Junction / Create Cambridge), 205427 (A Seiglow), 203121 (The Arts Theatre Cambridge), 204188 (Cambridge Junction/Create Cambridge), 204188 (Cambridge Junction / Create Cambridge), 202330 (Cambridge Junction / Create Cambridge) 202892 (Cambridge Junction)
Timely provision of infrastructure, usually available before dwellings are occupied, is critical to successful placemaking and should be a priority. Monitoring must be backed up with resourced enforcement if infrastructure is not brought forward as agreed.	202826 (Cambridge City Council Liberal Democrat Group)

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

S/MO insufficiently specific regarding triggers and consequences for policies not being achieved. The respondent criticises the current wording as subjective, and it implies a judgement from the Council on the timeliness of policy implementation.	
How can we avoid developers rowing back on environmental standards? The council has strict monitoring and policy control standards and environmental standards are central to that.	210303 (Rustat Neighbourhood Association)
• The respondent objects to the policy wording, stating it requires modifications to ensure effectiveness and adaptability to changing circumstances. • The respondent cites NPPF 2024 Paragraph 86 (e) and NPPF 2026 Policy E1, emphasising the need for flexibility in planning policies or commitment to action when development delivery falls behind anticipated trajectories or relies on limited large sites. • Policy lacks clarity on how monitoring outcomes will inform decision-making • The absence of a clear mechanism for responding to delivery issues may hinder development, risking the Local Plan's objectives and economic growth. • The respondent argues that Policy does not adequately link monitoring outcomes to corrective actions, undermining effectiveness. • requests Policy be modified to clarify the use of monitoring outcomes in decision-making and to acknowledge the need for flexibility in response to delivery risks.	204183 (Tritax Big Box Development)
• Requests the Monitoring Framework includes specific indicators related to rights of way condition, connectivity and user satisfaction. • Delivery mechanisms are clearly identified for the implementation of access improvements, including collaboration with parish councils, landowners and user groups.	208170 (Cambridgeshire Local Access Forum)

Food access and affordability ● % of households within a 10-minute walk of a “healthy food retailer” (define locally: e.g., supermarket, greengrocer, community food hub, market at least weekly). ● Number of neighbourhood centres with a weekly fresh-food offer (street market, community market or equivalent). ● Change in density of hot food takeaways within 400m of schools (or other agreed buffer), and net change in A5 uses in priority areas. ● % of major developments delivering “affordable food space” (e.g., low-rent unit(s) or peppercorn concession for social enterprise/community food).	208196 (Cambridge Sustainable Food)
Community food infrastructure and resilience ● Number and floorspace (sqm) of community food assets delivered (community kitchens, food hubs, social supermarkets/co-ops, shared storage/cold chain). ● Number of community kitchens with certified/compliant fit-out suitable for training/enterprise (food hygiene compliant, accessible).	210966 (Cambridge Sustainable Food)
Local production and land ● Area of BMV agricultural land (Grades 1, 2, 3a) safeguarded vs lost (net). ● Hectares of peri-urban land under active food production (commercial or community-supported) within Greater Cambridge (net change). ● Area of edible/fruit tree planting delivered (e.g., number of fruit/nut trees).	210967 (Cambridge Sustainable Food)
Skills, health and inclusion ● Number of school/community settings with food growing + cooking facilities delivered through	210968 (Cambridge Sustainable Food)

development contributions. ● Accessibility KPI for growing spaces: % of new food-growing sites meeting inclusive design standards (accessible paths, raised beds provision, adapted plots).	
Circular economy: waste prevention and redistribution ● % of new non-residential food premises with compliant food-waste separation and storage (designed-in, not retrofitted). ● Tonnes of edible surplus redistributed locally per year (through accredited/community partners), and/or number of redistribution partnerships enabled by plan-led space. ● % of major developments providing on-site or neighbourhood-scale composting provision (where appropriate), with a management plan	210969 (Cambridge Sustainable Food)
Local economy and enterprise ● Number of food enterprises supported in neighbourhood centres (start-ups, co-ops, social enterprises) and survival rate at 24 months where the Plan provides affordable workspace. ● Proportion of public-sector/community anchor procurement spent locally or a proxy such as number of anchor institutions participating in local/sustainable food procurement initiatives.	210970 (Cambridge Sustainable Food)
“Systems” Indicator - to prove the Plan is delivering a joined-up food offer. ● % of strategic sites / major allocations delivering a Food Systems Delivery Plan (a short, standardised plan covering access, community assets, growing space, waste, and local enterprise), secured through condition/S106.	210971 (Cambridge Sustainable Food), 210977 (Y Dignon)
Food access and affordability ● % of households within a 10-minute walk of a “healthy food retailer” (define locally: e.g., supermarket,	206966 (Y Dignon)

greengrocer, community food hub, market at least weekly). ● Number of neighbourhood centres with a weekly fresh-food offer (street market, community market or equivalent). ● Change in density of hot food takeaways within 400m of schools (or other agreed buffer), and net change in A5 uses in priority areas. ● % of major developments delivering “affordable food space” (e.g., low-rent unit(s) or peppercorn concession for social enterprise/community food).	
Community food infrastructure and resilience ● Number and floorspace (sqm) of community food assets delivered (community kitchens, food hubs, social supermarkets/co-ops, shared storage/cold chain). ● Number of community kitchens with certified/compliant fit-out suitable for training/enterprise (food hygiene compliant, accessible).	206967 (Y Dignon)
Local production and land ● Area of BMV agricultural land (Grades 1, 2, 3a) safeguarded vs lost (net). ● Hectares of peri-urban land under active food production (commercial or community-supported) within Greater Cambridge (net change). ● Area of edible/fruit tree planting delivered (e.g., number of fruit/nut trees).	210973 (Y Dignon)
Skills, health and inclusion ● Number of school/community settings with food growing + cooking facilities delivered through development contributions.	210974 (Y Dignon)

● Accessibility KPI for growing spaces: % of new food-growing sites meeting inclusive design standards (accessible paths, raised beds provision, adapted plots).	
Circular economy: waste prevention and redistribution ● % of new non-residential food premises with compliant food-waste separation and storage (designed-in, not retrofitted). ● Tonnes of edible surplus redistributed locally per year (through accredited/community partners), and/or number of redistribution partnerships enabled by plan-led space. ● % of major developments providing on-site or neighbourhood-scale composting provision (where appropriate), with a management plan	210975 (Y Dignon)
Local economy and enterprise ● Number of food enterprises supported in neighbourhood centres (start-ups, co-ops, social enterprises) and survival rate at 24 months where the Plan provides affordable workspace. ● Proportion of public-sector/community anchor procurement spent locally or a proxy such as number of anchor institutions participating in local/sustainable food procurement initiatives.	210976 (Y Dignon)
Appendix F – Monitoring Framework The actions set out in Appendix E are not quick delivery options, unlike allocating more sites which fall under the SUE threshold.	208367 (Endurance Estates)
While the monitoring monitors specialist housing uses, the monitoring also fails to monitor the delivery of affordable housing which should be rectified. Again, there should be levers in the local plan which can be pulled to create a timely difference in housing delivery. Sites which are in the Green Belt which come forward as Grey Belt sites have to have a higher percentage of affordable housing and therefore	208368 (Endurance Estates)

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

Consultation Statement

Appendix 7: Response to Representations - Site Allocations



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 Representations: Site Allocations

Cambridge Urban Area

Cambridge Urban Area Introduction

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There were comments offering broad support for allocation of sites in the Cambridge Urban Area, abut also concern about the impact of growth, such as on traffic. Historic England made extensive comments on the plan, highlighting areas that they supported, but also areas for improvement. A number of comments provided support for Cambridge Science Park North, a development proposal submitted through the local plan process for an expansion of the Science Park north of the A14. Other comments highlighted wards and streets where there was potential for improvement or policy. This includes areas around Chesterton, and around the Elizabeth Way roundabout. There was reference to facilities and the need for improvements such as for arts, sports, youth, leisure. Health facilities were also highlighted. Proposals to deliver an eastern entrance at Cambridge Central Station were welcomed, and the opportunity to densify development in that area were highlighted. Anglian Water sough recognition of their assets in the areas proposed for development.

Response to the main issues raised in representations

Comments are noted. Through plan preparation the plan has sought to identify sites which are suitable for development, but also migration measures required in order to ensure that developments will be sustainable. Heritage issues have been addressed though policy, and a series of evidence studies considering heritage impact appraisal, and consideration of tall buildings for example. Relevant policies have been reviewed in light of comments received. The Science Park North proposal has been considered, there is not considered to be exceptional circumstances to release the land from the green belt, including taking account of the economic land supply available. A range of services facilities and needs were highlighted in comments. The Proposed Submission local plan will be supported by an updated Infrastructure Delivery plan and informed by specific studies looking at Cultural and community infrastructure needs. The area policies proposed around the eastern entrance of the station have been considered in light of proposals.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
I strongly believe that this plan should conform with the 2024 legislation regarding Grey Belt. I believe the Council should NOW either designate Grey Belt sites or invite proposals for sites which may be regarded as such. I am told that the plan is too far in its creation to take this on board. But if neither of the above is done then planning of this kind will be confused, resisted or stymied until 2045/47.	201025 (J Green)

St Matthews Centre, Sturton Street, Cambridge (HELAA Reference 59405) Would be a disaster for this community. Site 115524 was given an Overall Score of 'Red'. The exclusion of Site 115524 must be permanently enforced. It would destroy the only public park in North Petersfield and protected open-space, as demonstrated by five recent planning refusals	201269 (J Sanderson), 201427 (J Bradley) 205180 (C Dunbar) 205704 (J Neal) 201863 (J Brightman)
Cambridge Science Park North We support the creation of approximately 3,500 skilled jobs and at least 460 training and apprenticeship opportunities at Cambridge Science Park North, which will strengthen the city's innovation ecosystem and provide high-value careers for local people. We welcome the development's well-balanced environment that integrates work, learning, leisure and wellbeing, demonstrating a commitment to inclusive growth that benefits residents, employees and future generations. The construction and delivery of the development present opportunity to employ local people, support apprenticeships, and strengthen links between education providers, employers, and the local supply chain. This aligns closely with our aim at Constructed Pathways in supporting individuals into skilled employment and ensuring that major developments deliver lasting benefits for local communities and people.	201594, 201595, 201596 (Constructed Pathways)
Cambridge Science Park North We strongly support the Cambridge Science Park North development because it will create a wide range of employment, training, and education opportunities in the growing mid-tech and advanced manufacturing sectors. Cambridge Science Park North represents an ambitious and forward-thinking project that will strengthen education and skills development through meaningful	201597, 201598 (Cambridge Regional College)

partnerships with local schools and colleges. The inclusion of a dedicated STEM educational hub within the plans is especially exciting. This facility will provide learning and event space to inspire the next generation of innovators, offering practical experience and engagement with emerging technologies. Such opportunities are vital to ensuring that young people across the city and region are equipped for the jobs of the future.	
Cambridge Science Park North As an organisation that works closely with employers, education providers, and local partners, we see first-hand the importance of creating the right conditions for businesses to grow and for people to access meaningful, skilled employment. The proposals for Cambridge Science Park North respond directly by supporting mid-tech and advanced manufacturing activity, strengthening supply chains, and helping to retain talent, investment, and economic value within Greater Cambridge. Overall, we believe that the proposals for Cambridge Science Park North strike the right balance between innovation, sustainability, and inclusivity.	210710 (Cambridgeshire Chambers of Commerce)
Cambridge Science Park North Cambridge Science Park North represents an ambitious and forward-thinking project that will strengthen education and skills development through meaningful partnerships with local schools and colleges. The inclusion of a dedicated STEM educational hub within the plans is especially exciting. This facility will provide learning and event space to inspire the next generation of innovators, offering practical experience and engagement with emerging technologies. Such opportunities are vital to ensuring that young people across the city and region are equipped for the jobs of the future.	201598 (Cambridge Regional College)

Cambridge Science Park North Support for Cambridge Science Park North allocation.	201880, 205960, 205961, 205962, 205963, 205964 (Histon and Impington Community Land Trust), 210085 (Constructed Pathways), 210411 (Cambridge Regional College), 210710 (Cambridgeshire Chambers of Commerce)
I would like to begin by welcoming the ambition, evidence base and overall direction of the Draft Greater Cambridge Local Plan. The emphasis on sustainable growth, net zero commitments, and the integration of transport, housing and place-making is positive and necessary for a city under sustained pressure. This feedback is intended to be constructive and to highlight a strategically important inner-city area that currently feels under-recognised, despite its central location and imminent change. West Chesterton Ward is an overlooked neighbourhood but is highly strategic. Elizabeth Way is recognised but needs stronger ambition to improve this area. Chesterton Road has significant potential for increased footfall and activity.	201702 (A Rahman)
The strategic area between Elizabeth Way, Sandy Lane, Humberstone Road, Montague Road, St Andrew's Road and Chesterton Road has been omitted. New homes are planned in Sandy Lane	208021 (S Stickley)

CB4 1HZ, but do not appear on the local plan and this will impact the strategy for active travel and green space in the area.	
There should be a reference to the planning of a new roundabout at the junction of East Road/Newmarket Road and Elizabeth Way bridge to address congestion and potential conflicts between pedestrians, cyclists, and vehicles. If a new roundabout is implemented without current underpass access, it should utilise Walnut Tree Ave for cycle and pedestrian access, linking to riverside cycleways. Clarification is needed on how the new roundabout will connect to Newmarket Road and the new cycle/pedestrian link between East Road and Sun Street, which is part of Anglia Ruskin plans. There are currently no cycleway road markings near 73 Newmarket Road/Tyre Repair workshop at the roundabout, nor clear signage directing towards Walnut Tree Ave.	201843 (T Jewell)
Concerns raised around traffic pressure and over-reliance on reducing car usage with no clear alternatives.	202355 (E Tse)
Support for policies in the Cambridge Urban Area.	202827 (Cambridge City Council Liberal Democrat Group)
Support sites in Cambridge but more are needed.	203580 (H Thomas)
Arts, sports, youth, leisure and other community facilities need to be given more prominence in your plan including how these will be connected by walking/cycling routes and/or public transport.	203603 (S Berridge)
New buildings should be aesthetically pleasing in keeping with the city's architectural heritage and must adhere to existing height restrictions. There should be affordable housing in the city centre	203603 (S Berridge)

especially with particular consideration given to key workers and lower paid earners such as cleaners.	
Beautiful open spaces should be maintained and new green areas for recreation and wildlife created throughout. Everyone should be able to access nature easily.	203603 (S Berridge)
Support for the plan – but supports higher densities around stations.	204070 (J Shoemaker)
Planning policies must facilitate the delivery of essential healthcare infrastructure and involve consultation with the NHS to support estate transformation. Site allocations should consider future healthcare requirements while avoiding overly prescriptive approaches to ensure appropriate healthcare mitigation decisions.	205056 (NHS Cambridgeshire and Peterborough Integrated Care Board)
Site allocations lacking an explicit requirement for on-site health facilities should include wording that references the need for financial contributions for health and infrastructure mitigation, aligning with the IDP approach.	205066 (NHS Cambridgeshire and Peterborough Integrated Care Board)
Proposal that Petersfield is a Nature Recovery from the Ground Up ward.	205308 (J Neal)
Support for proposals to deliver an eastern entrance at Cambridge Central Station to unlock higher-density development to the east and south-east and support for further densification of research and employment development around Cambridge North, the Science Park, and the Business Park.	208034 (Railfuture East Anglia)
Concerns raised about cleanliness of the city, toilets not being open, and critical of expensive redevelopment of Guildhall, Market Square and Corn Exchange.	208761 (E Diaz)
We welcome the inclusion of proposals to deliver an eastern entrance at Cambridge Central Station to unlock higher-density development to the east and south-east. We support further densification of	208034 (Railfuture East Anglia)

research and employment development around Cambridge North, the Science Park, and the Business Park.	
We welcome the preparation of HIAs for many of the site allocations in the Plan. There are a few sites where there is no HIA. We appreciate that some of these are policy areas. In those cases, we would suggest that the policy should still include reference to nearby heritage assets and potential mitigation measures and enhancements that will be sought in the policy areas. There do not appear to be HIAs for two University Sites in Cambridge – Mill Lane and the Museums sites. We appreciate there may be a reason for this but would nonetheless recommend that an HIA should be prepared for each of these sites.	208921 (Historic England)
We welcome that many of the policies refer to heritage as well as potential mitigation and enhancement measures identified through the HIAs. However, as currently drafted, some of the policies are quite vague and generic, some of the policies do not currently include all of the recommendations including diagrams from the heritage impact assessments, some of the policies are imprecise about what further evidence may be needed, when and why. Therefore, the policy wording could usefully be further tightened and strengthened to ensure that robust policies are in place that will promote opportunities where these heritage assets can be used to support sustainable growth (including heritage-led regeneration) and secure the benefits of positive placemaking within the historic city and wider sub region;	208922,208924, 210186 (Historic England)
We welcome the preparation of HIAs for many of the site allocations in the Plan. There are a few sites where there is no HIA. We appreciate that some of these are policy areas. In those cases, we would suggest that the policy should still include reference to nearby heritage assets and potential	208921 (Historic England)

mitigation measures and enhancements that will be sought in the policy areas. There do not appear to be HIAs for two University Sites in Cambridge – Mill Lane and the Museums sites. We appreciate there may be a reason for this but would nonetheless recommend that an HIA should be prepared for each of these sites.	
We welcome that many of the policies refer to heritage as well as potential mitigation and enhancement measures identified through the HIAs. However, as currently drafted, some of the policies are quite vague and generic, some of the policies do not currently include all of the recommendations including diagrams from the heritage impact assessments, some of the policies are imprecise about what further evidence may be needed, when and why.	208922 (Historic England)
In terms of heritage policy wording for sites, we recommend: i.use the phrase 'Conserve or where appropriate enhance…' ii.mention specific heritage assets. iii.specify appropriate mitigation and enhancements as identified through the HIA. iv.refer to the HIA (with hyperlink). v.use Concept diagrams to illustrate key site considerations/ recommendations For larger sites, or where there are very complex heritage issues, we would expect to see a policy requirement for masterplanning informed by both the Council's HIA and also a further, more detailed, heritage impact assessment as well as Historic Landscape Characterisation and Landscape Character Assessment. We welcome the inclusion of a criterion relating to archaeology where needed.	208924 (Historic England)
Matters including asset encroachment (Policy WS/HS) and utilities infrastructure (see our comments relating to Policy GP/QD) should be a consideration for any site allocation where we	209164 (Anglian Water Services Ltd)

have existing assets, or where the site is in close proximity to our operational sites and should therefore avoid the need to introduce separate clauses within any of the affected site allocation policies. Anglian Water can provide a list of assets within the proposed site boundaries, if this would be helpful to the Councils. The following sites have sewer pumping stations located within or adjacent to the site and as 'above ground' assets this will be land within Anglian Water's ownership, and may have implications for site layout and design:• S/C/CLT: Clifton Road Area; • S/CE: Cambridge East; • S/CBC: Cambridge Biomedical Campus; • S/CB: Cambourne Town Centre; • S/ED: Eddington; • S/NEC: North East Cambridge	
HE welcomes the ambition in paragraph 3.1.2 to 'enable Cambridge to accommodate growth of the highest quality whilst protecting and enhancing the historic environment and the key public spaces which are an important part of what makes the city so special to local people'.	210186 (Historic England)

Policy S/AMC/NEC: North East Cambridge

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There was general acknowledgement that the policy context for the NEC area would need to change as a result of the removal of Housing Investment Funding for the relocation of the Cambridge Waste Water Treatment Plant (CWWTP), including its impact on the ability of the NEC area to support the quantum of homes previously allocated.

There was strong support for the recognition of the NEC as an important area for business innovation and employment, with a number of NEC landowners and developers noting that this position should be retained in any revised policy as it was not dependent on relocation of the CWWTP. Several landowners and developers raised issue with the proposed quantum of commercial floorspace for NEC, perceiving this as a potential “cap” on development, and the requirement for outline permissions if bringing forward an application for only part of a strategic site.

There was support for the requirement to improve public transport routes and active travel to and around site, prioritising walking and cycling. However, resident and community groups raised concerns with the practicality of using a trip budget to manage vehicle numbers, the ability to manage congestion and on-site parking, and rail capacity.

The comments of residents, community groups, and Historic England also highlight potential impacts of NEC growth on neighbouring areas. This included impacts on Fen Ditton and Milton Country Park; on the general cityscape, sensitive landscapes and heritage assets/features; on local social infrastructure and services; and on residential areas as a result of

parking displacement.

The same groups also highlighted what they considered were omissions from the policy, including provision for a cultural venue and an alternative to the Fen Road level crossing.

A number of landowners and statutory undertakers raised concerns that the policy did not go far enough to protect safeguarded uses.

Response to the main issues raised in representations:

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

The revised policy continues to promote NEC as an innovation district through an "Area of Major Change" designation, responding positively to the general support for intensification and diversification of development in the area whilst reflecting the level of uncertainty around its precise development capacity and what constraints may apply. It acknowledges that the CWWTP is likely to remain on site during the plan period but highlights significant development opportunities within the wider NEC area for additional high-quality commercial floorspace and ancillary uses and, where conditions allow, housing, making efficient use of brownfield land within the City. The revised policy recognises the importance of NEC in contributing to Greater Cambridge's future economic growth through provision to intensify commercial floorspace within the existing science and business parks for research, innovation and knowledge-based industries.

The indicative commercial floorspace capacity has been removed, with the onus placed on applicants to demonstrate compliance with the trip budget and that their proposal will not have adverse impacts on the road network, taking into account cumulative

impacts arising from existing or planned development. A specific policy requirement has been added to ensure the effectiveness of transport mitigation measures will be monitored and can be enforced.

- A further requirement has been added to ensure that all development within NEC coordinates measures to prevent parking displacement.
- The representations regarding potential impacts on the wider area would appear to reflect the more significant housing quanta of 8,500 homes proposed for NEC in the Regulation 18 consultation. More modest housing provision (c.650 units) is now expected within the plan period and will likely take the form Build-to-Rent that generates a lesser need for supporting social infrastructure.
- The infrastructure needs of NEC, reflecting the revised development mix and quanta, will now be accounted for within the updated Infrastructure Delivery Plan for the Greater Cambridge Local Plan, and the policy retains explicit requirements to ensure that these needs are met on-site through development proposals or enhancing off-site capacity and accessibility.
- While there is no policy requirement for provision of a city scale cultural venue within NEC, there is still a policy expectation for community, cultural, retail and social spaces aligned with the vision for the innovation district and to ensure that the broader design ambitions for the area are realised, reflecting the desire to active ground floors and avoid the closed, campus-style layouts that have tended to dominate the area in the past.
- More explicit references to safeguarded uses have been added to the policy, reflecting that a range of uses highlighted already benefit from safeguarding in the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021. The need to apply the agents of change principle to ensure the operation of these uses are not prejudiced is also retained. In response to other comments made around safeguarding land, the policy should be read alongside all policies of the Local Plan as a whole, noting in particular that Policy I/SG sets out various infrastructure projects (including East West Rail) which are subject to safeguarding to prevent conflicts between development proposals and existing or planned infrastructure.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
General support for the vision for NEC as proposed in the policy	210230 (Vistry Group), 211500 (Trinity College Cambridge, DP9)
Concerns raised re feasibility of residential allocation and associated measures following the withdrawal of funding for the relocation of the CWWTP.	201179 (Save Honey Hill Group M Starkie), 202573, (Save Honey Hill Group M Starkie), 202582 (Save Honey Hill Group M Starkie), 202597 (Save Honey Hill Group), 202967 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust, M Baker), 201481 (L Woolfenden), 201485 (Fen Ditton Village Society),

	201847 (H Warnock), 202130 (M Asplin), 203581 (Horningsea PC, E A Williams), 205491 (J Pratt), 202739 (Cambridge Past, Present and Future, S Nicholas), 203584 (The Crown Estate, WSP), 204278 & 211502 (Trinity College Cambridge, DP9), 205471 (L Cotton), 208762 (Heatons, on behalf of Tarmac Trading Ltd), 209165 (Anglian Water), 209970 (Granta Land Ltd), 210231 (Vistry Group), 211591 (Places for People)
Please see our comments in relation to Policy S/JH and Policy S/DS. We note that paragraph 3.1.3 sets out the Councils' intention to continue engagement with relevant partners to confirm a refined position for the site. Anglian Water recognises that our current position and strategy to invest in the existing Cambridge WRC, because of the withdrawal of funding for the CWWTPR, and in the absence of	209165 (Anglian Water Services)

alternative funding being secured, will have a significant bearing on the site allocation and future updates to the spatial framework. We will continue to liaise with the Councils as we progress our plans to increase dry weather flow capacity of the WRC and enable growth across the Cambridge WRC catchment to come forward	
Support for continuing to explore funding for the CWWTP relocation and retaining the residential allocation for NEC; include explicit support for co-living and build to rent; safeguard relocation site as least to end of DCO period.	203523 (Cambridge Ahead, E Pritchard), 204863 & 204873 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure), 210069 (Mrs Veronica Cox)
Concerns around the effective discounting of land within the CWWTP Consultation Area for residential purposes	203324 (Save Honey Hill Group, M Starkie), 204761 (Fen House Property Ltd, I Litterick)
Concerns around lack of feasibility evidence for dismissal of on-site consolidation option for CWWTP and lack of consideration of this option as an appropriate strategy; this is contradictory when the strategy justifies protection of the green belt on the grounds that these needs can be met elsewhere, yet delivery of this site is reliant on green belt development.	202589 (Save Honey Hill Group, M Starkie), 202591 (Save Honey Hill Group, M Starkie), 202593 (Save Honey Hill Group, M Starkie), 202594 (Save Honey Hill Group, M

	Starkie), 202598 (Save Honey Hill Group, M Starkie)
Investment in CWWTP will be required as it remains on site and other measures, e.g. Waterbeach pipeline.	209165 (Anglian Water)
Support for recognition of the NEC as an important area of business innovation and employment, not dependent on relocation of the CWWTP	204278 (Trinity College Cambridge, DP9); 204863 & 204873 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure), 205491 (J Pratt)
Concerns around business space quanta and potential cap on development	203391 (St John's College Cambridge, Savills), 203584 (The Crown Estate, WSP), 204278 & 211501 (Trinity College Cambridge, DP9), 204863 & 204873 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure), 210077 (The Crown Estate)

Support for flexible approach to development of Milton Road Garages site and that policy should take recent planning decisions into account	204718 & 210714 (Brockton Everlast Inc, Savills)
Concern that the policy does not do enough to safeguard all the existing mineral infrastructure within NEC in line with NPPF: Paragraph 223 (part e) of the NPPF (2024) and the Minerals and Waste Local Plan	208762 (Heatons, on behalf of Tarmac Trading Ltd); 210544 & 210599 (Cambridgeshire County Council)
Policy should refer to the requirement for the site specific FRA to include hydraulic modelling of the watercourses within the site to inform site layout and design levels, development should prioritise areas less vulnerable to flooding.	211184 (Environment Agency)
Specific reference to Agent of Change principle should be included re new development near any existing critical infrastructure	208762 (Heatons, on behalf of Tarmac Trading Ltd)
Concerns re intensive development of NEC area impacting local landscape and sense of place.	201179 (Save Honey Hill Group)
Land required for the relocation of the CWWTP is not identified on the policies map.	201179 (Save Honey Hill Group M Starkie), 202597 (Save Honey Hill Group M Starkie), 202109 (M Asplin), 203581 (Horningsea PC)
Comment re plans for a cultural venue as part of redevelopment; support for Create Cambridge's involvement.	202141(Cambridge Junction, M Ridler), 202308

	(Cambridge Junction, L Mills), 204170 (Cambridge Junction / Create Cambridge, M Burman), 202323 (Cambridge Junction / Create Cambridge, S Yusuf), 205403 (Cambridge Junction / Create Cambridge, E Hine), 202754, 202872 (Cambridge Junction, R Tinkler), 202874, (Cambridge Junction, B Groisman), 202424 (Kettle's Yard, S Biller); 204686 (NEUBAU Architecture, B Lenz); 204399 (New International Encounter, L Elmer); 203027 (The Arts Theatre Cambridge, V

	Beechey); 203631 (University of Cambridge, Z Svendsen), 203871 (University of Cambridge, J Fritsch), 205048 (University of Cambridge, L Sheerman); 205004 (Wysing Arts Centre, R Cooper); 202057 (H Chamberlain), 202199 (H Tam), 202387 (J Webber), 202412 (T Shaw), 202461 (K Jones), 202686 (T Altmann), 202716 (W Townsend), 202783 (S Lee), 202932 (R Tarry), 202973 (T Flinders), 203341 (N Ellis), 203437 (S Ashworth), 203485 (L Heap), 203536 (D Lever), 203851 (N Yeni), 204700 (A Giarlis), 205081 (H Paterson), 205137 (J

	Walsh), 205299 (AC de Azevedo Lamha), 205318 (N Oakley), 205331 (L Howse), 205393 (A Seiglow)
Support for improved and more cohesive active travel network to and around site, including upgraded river crossing; walking and cycling as routes to public transport	201809 (J Baumberg), 202003 (D Langley), 202304 (R MacDonald), 202646 (A Lawrence), 203707 (T Preud'homme), 204596 (D Potts), 205405 (A Williams), 205422 (S Nuttall), 205475 (P Colledge), 205481 (R De Beaux); 204278 (Trinity College Cambridge, DP9), 207601 (Natural England, C Duerden)
With or without the Hartree proposal, the Cambridge North development area represents a step change in intensity and movement demand. However, the current planning framework lacks a coherent transport-led spatial strategy. Movement through the Cambridge North station area is already compromised, with a loss of segregation and lack of coherent surfacing that risks bringing pedestrians	211769 (Camcycle)

and cyclists into unnecessary conflict. Beyond that there are bottlenecks such as the shared-use path at Moss Bank, which is three metres wide and already functioning as a critical failure point. This constraint is not adequately acknowledged in the Plan or in the previously issued North Cambridge Area Action Plan, despite the scale of growth proposed. More fundamentally, the river crossings are insufficient. Without a new or significantly improved bridge, high levels of cycling to and from Cambridge North will not be achieved. The Local Plan should treat a new or substantially upgraded river crossings as essential infrastructure.	
Need for alternative to the Fen Road level crossing, including safeguarding land for future infrastructure	202830 (Cambridge City Council Liberal Democrat Group, K Porrer), 203726 (W Clements), 204625 (R Robertson), 202646 (A Lawrence), 202739 (Cambridge Past, Present and Future, S Nicholas)
Concerns regarding traffic issues: volume & HGV traffic, parking provision, impact on surrounding areas and the practical applicability of the trip budget.	201225 (S Williams), 204625 (R Robertson), 202338 (H Brown), 202646 (A Lawrence), 203584 (The Crown Estate, WSP),

	204278 (Trinity College Cambridge, DP9), 204863 & 204873 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure), 203833 (A Chan)
Concerns re feasibility of car free zones, minimum cycle parking standards, EVCP requirement	204863 & 204873 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure)
Support for trip budget approach, noting the position is being reviewed and updated.	210579 (Cambridgeshire County Council)
Remove requirement for outline planning applications	204863 & 204873 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure)
Support for requirement for outline planning applications, but object to reference to outline covering the whole site misleading given the impracticalities of preparing this across multiple landowners and sites.	210083 (The Crown Estate), 211511 & 211512 (Trinity College Cambridge, DP9)

Concerns around rail capacity, especially given lack of proposed connection to East West Rail.	202739 (Cambridge Past, Present and Future, S Nicholas)
EWR Co has identified the requirement for land within the North East Cambridge site to construct and operate the new railway. This includes new railway infrastructure, a construction compound and a Maintenance Delivery Unit (MDU). Land required for EWR within the North East Cambridge site is included in the EWR safeguarded area. To avoid a conflict between the proposed North East Cambridge allocation and the EWR Safeguarding Directions, EWR Co requests that draft Policy S/NEC is amended.	211906 (East West Rail)
Proposal for enhanced bus service serving NEC area	203777 A Chan
Support for illustrative spatial framework, clarify that it is not prescriptive	204278, 211496, 211497, 211498, 211499 (Trinity College Cambridge, DP9), 204863 & 204873 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure)
Concern that design requirements should include landscape buffer to transition between NEC and river/fenland; site should reflect countryside rather than urban location.	202739 (Cambridge Past, Present and Future, S Nicholas); 210088 (Historic England)

Concern that roof terraces and cafes cannot always be opened up to the public – should not be a blanket requirement.	211505 (Trinity College Cambridge, DP9)
Concerns around surrounding open spaces - Fen Ditton, Milton CP at capacity; green spaces should be for year round use and not roof terraces/courtyards; concern re requirement for roof terraces to be public	202739 (Cambridge Past, Present and Future, S Nicholas), 204278 (Trinity College Cambridge, DP9)
Support for providing green and blue infrastructure and sustainable connections along the river Cam and into the Wicken Vision Area.	211076 (The National Trust MEE Planning Team)
Concern that development within NEC could impact neighbouring Conservation Areas: HIA should be included in evidence base and policy, along with reference to the nearby CAs and river.	210088 (Historic England)
Paragraph 3.1.2 - HE welcomes the ambition to 'enable Cambridge to accommodate growth of the highest quality whilst protecting and enhancing the historic environment and the key public spaces which are an important part of what makes the city so special to local people'.	211978 (Historic England)
Figure 17 - There are 4 heritage assets shown on this figure. These are not designated heritage assets. Are they non designated heritage assets? Review and amend accordingly.	211979 (Historic England)
Support for removal of some hedgerows/vegetation to facilitate crossing points over the First Public Drain	210081 (The Crown Estate)
Objection to 20% BNG on site requirement	204278 & 211507 (Trinity College Cambridge, DP9)
Concern around high demand for secondary schools; suggestion to safeguard land as contingency	201701 (J Skinner), 201356 (R McDonald), 202338 (H

	Brown), 205481 (R De Beaux), 210587 (Cambridgeshire County Council)
Support for investment in leisure facilities, for example a swimming pool, rowing channels, a new country park within walking distance	203590 (A Carpen), 202338 (H Brown), 201777 (Eastern Region Rowing Council, R Moseley), 205481 (R De Beaux), 207601 (Natural England (C Duerden)
Identifies inconsistencies in active travel and car parking provisions, as well as concerns regarding biodiversity gains and access to nature spaces, potential nuisance impacts and lack of secondary schooling and nursery provision, despite there being an acknowledged shortage of places in North Cambridge.	210840 (Hannah Brown)
Wording regarding healthcare facilities; contributions specified for emergency services.	205059 (NHS Cambridgeshire and Peterborough Integrated Care Board), 207507 (J Lawson on behalf of Cambridgeshire Fire and Rescue Service), 205072

	(NHS Property Services Ltd on behalf of NHS Cambridgeshire and Peterborough Integrated Care Board
Clarity required around potential to infill sites to rear of Lovell Road	201319 (N Upstone)
Water supply - no plan for filling proposed new reservoir	201847 (H Warnock)
We broadly welcome the allocation of this strategic brownfield site. It offers an exciting opportunity for regeneration in a highly accessible, sustainable location. It will be important that the policy ensures the protection and enhancement of the historic environment including the conservation areas, river corridor and wider city scape. We appreciate there are still some uncertainties about the site and the funding for the relocation of the Cambridge Waste Water Treatment Plant. However, we acknowledge the approach being taken to retaining the draft allocation whilst not relying on the housing numbers to meet the need. Whilst there are no designated heritage assets within the site, there are several Conservation Areas nearby including Riverside and Stourbridge Common, Fen Ditton, Baits Bite Lock and Horningsea as well as their associated listed buildings. The River Cam, the meadows and its setting are an important part of the wider setting of the City. Development within this area therefore has the potential to harm the significance of these assets through development within their settings. We recognise that a the HIA for North-East Cambridge has been prepared. However, this does not	210088 (Historic England)

appear to have been included as part of the evidence base for this Plan. It is important to include this as part of the evidence base. Furthermore, it is important to incorporate the recommendations of the HIA into the Policy. This includes recommendations such as increased landscaping along the eastern boundary. The HIA should also be referenced in the policy. We welcome criterion 7c. There is currently no reference to nearby conservation areas and the River. This should be included in the policy. There should also be a new criterion requiring careful consideration of impacts on the Conservation Areas and River as well as views into the City and an appropriate urban edge. We continue to have concerns about potential increases in heights in North-East Cambridge in both the existing Science Park and also the land to the east of Milton Road. We remain concerned about impacts on views from Ditton Meadows and the Conservation Areas as well as wider views approaching the City from the north-east and east. Heights must be carefully managed through appropriate criteria in the policy.	
Existing buildings near the station are incongruous with the surrounding countryside views and do not act currently as community spaces despite reliance in the policy on the space, highlighting a need for better integration. Additionally, the urban/rural fringe is not clearly defined, which could lead to planning inconsistencies.	210838 & 210839 (Hannah Brown)
Figure 17: There are 4 heritage assets shown on this figure. These are not designated heritage assets. Are they non-designated heritage assets? Review and amend accordingly; Paragraphs 3.1.6 and 3.1.24 seem to be the same. Delete duplicate paragraph	210187, 210188 (Historic England)

The University supports the general direction of the policy to densify the site and make the best use of the available land. There are a number of detailed comments in relation to the policy wording which are attached in a table with comments set against the relevant policy/paragraph numbers. There is inconsistency across the plan of naming the site. Eddington should be used for all references to the site.	202528 (University of Cambridge – M Parsons)
Reflect hybrid planning permission 22/02771/OUT. Retaining CWWTP should not prejudice other parcels. Should make explicit reference to build to rent and co-living tenures being acceptable. Removal of specified quantum of employment floorspace. Remove restriction to Class E(g) and defer to definition in policy J/NE. Remove requirement for car-free zones near to hubs or centres as this is incompatible with the allocation. Remove requirement to exceed minimum cycle parking standards. Replace existing trip budgets with information included within the North East Cambridge Transport Position Statement 2025 Add 650 parking spaces at Chesterton Sidings. Allow for the reprovision of 425 Network Rail Spaces Remove EVCP requirement as this doubles up on building regulations. Allow for development to progress without being halted by parking displacement. Remove requirement for outline planning applications. Condition design codes and Stewardship strategies. Spatial framework- should be clear this is not a prescriptive tool, remove heritage asset at Chesterton Sidings, remove local centres as this is not referred to in other retail policies.	Bidwells (204863)
National Highways will object to any structures placed within the highway boundary and recommend this is reflected within the policy moving forward. In principle, National Highways are supportive of upgrades or new crossings for the A14, such as Jane Coston Bridge and underpasses, to assist with	209005 (National Highways)

the wider connectivity requirements, subject to the correct structural and safety assessments completed and appropriate agreements ensuring ongoing maintenance and required funding are met. For the overall trip budget to be met, it is crucial individual sites do not exceed their trip budget, and breaches are controlled appropriately to reduce trips back in accordance with the agreed budgets. National Highways would need to understand the impact of this development and the cumulative impact on the A14 junction 33 should the trip budget not be met and ensure appropriate mitigation measures are secured as part of the plan making process.	
The current car dependency of Science Park is problematic due to long commuting distances and inadequate public transport coverage, particularly for those commuting from eastern settlements and outskirts of Cambridge.	203777 (A Chan)
A network of highway-running buses is needed, well connected with the local bus network, to create viable public transport alternatives to driving.	211023 (A Chan)
Proposal for two bus interchange on the A14, one at the busway crossing and another at the Milton crossing, utilising existing routes for better transfer options and potentially fostering express or orbital bus services.	211024 (A Chan)
Suggestion of bus gates in Milton to restrict through traffic while allowing bus access onto the new bus-only Milton crossing, aimed at reducing A10 congestion and improving local traffic flow. Suggestion of moving the Milton park and ride further out after implementing the above.	211025 (A Chan)
Concern at requirement for development to be within 5 minutes walk of high quality public transport and active travel routes, which may not always be achievable. Notes that people are generally willing to walk further than this.	211508 (Trinity College Cambridge, DP9)

Amend Policy S/NEC and the Policies Map to explicitly identify and justify the 34ha Green Belt land take required for the CWWTP relocation.	202577 (Save Honey Hill Group)
Amend Policy S/DS to resolve the internal contradiction with Policy S/NEC by clarifying whether development needs can, in fact, justify Green Belt harm in this instance. Relying on a project that requires VSC for Green Belt harm while the Local Plan claims such circumstances do not exist for general development is internally inconsistent and unsound under NPPF 36(d).	202582 (Save Honey Hill Group)
Policy S/NEC: North East Cambridge (8,350 dwellings/ 22,545 population) (p.103): Under the subheading 'Uses' Section 4 – add a new criterion g. as follows; "g. Contributions to fire & rescue, police and ambulance facilities provision/ funding"	207474 (James Lawson Planning on behalf of Cambridgeshire Constabulary)
Suggestion that policy amended to reflect that the proposed new district centre is contingent on relocation of the CWWTP.	210078 (The Crown Estate), 211503 (Trinity College Cambridge, DP9)
Suggestion that the policy should be less prescriptive around location of medium to higher density development and tall buildings.	210079 (The Crown Estate)
Concern that the trip budget specified is out of date, dating from preparation of the AAP in 2021 and do not reflect the latest plans for the area.	210080 & 210082 (The Crown Estate), 211506 & 211509 (Trinity College Cambridge, DP9)
Lack of detail on the vernacular and density of buildings, which is important for high-density development at an edge of city site. Lack of clear, quantifiable floor space allocation for community,	210837 (Hannah Brown)

retail, open space and active space (contrary to the defined floor spaces for commercial and industrial use).	
Reference to design character drawing on industrial heritage should be reviewed as this does not apply equally to the area west of Milton Road.	211504 (Trinity College Cambridge, DP9)
Objects to prescriptive limits on car parking spaces and restrictions on through traffic from Milton Road to Kings Hedges Road.	211510 (Trinity College Cambridge, DP9)

Policy S/LAC: Other site allocations in Cambridge

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Concerns were raised about Policy S/LAC, citing excessive reliance on large strategic allocations for meeting identified housing needs. The NHS requested that policies set out explicit requirement on-site health facilities and financial contributions. Concerns from Anglian Water were expressed about specific sites' impacts on sewer pumping stations. Concerns were raised from National Highways about not having a cumulative impact assessment to ensure the impact on the SRN is appropriately managed and mitigated. In particular, the impact on the SRN including junctions on the M11, A11 and A14.

Response to the main issues raised in representations

Since the Draft Plan stage Policy S/LAC has been removed to streamline the plan and ensure that each site stands on its own merits. Comments have been noted and amended on corresponding policies.

The development strategy has been informed by evidence which sets out that the impact of larger sites rather than incremental development has less carbon impacts and reduces impacts on villages across Greater Cambridge. This model also makes the delivery of infrastructure easier to deliver as it is supported by a sufficient critical mass. Therefore, justifying the allocation of larger strategic allocations to meet housing needs.

In response to Anglian Water, for these sites the sentence has been added to say that development should not preclude operation and maintenance of sewer pumping stations located within or adjacent to the site. In response to the NHS, the IDP will set out the contributions for healthcare on specific sites, this is not duplicated for every site, and financial contributions are required on all proposals depending on scale it is therefore not included in policy wording. In response to National Highways, a transport assessment will be undertaken on major planning applications to understand the impact on the local road network, and the wider transport strategy will identify and manage issues across the wider transport network. Additional transport modelling has also been carried out on the local plan to inform mitigation requirements.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Suggest amendment to Part 2a of the policy replacing "make the development acceptable" with "achieve an outstanding standard of development". Supporting information to be similarly amended.	202741 (Cambridge Past, Present and Future)
Matters including asset encroachment (Policy WS/HS) and utilities infrastructure (see our comments relating to Policy GP/QD) should be a consideration for any site allocation where we have existing assets, or where the site is in close proximity to our operational sites and should therefore avoid the need to introduce separate clauses within any of the affected site allocation policies. Anglian Water can provide a list of assets within the proposed site boundaries, if this would be helpful to the Councils. The following sites have sewer pumping stations located within or adjacent to the site and as ‘above ground’ assets this will be land within Anglian Water’s ownership, and may have implications for site layout and	209164 (Anglian Water)

design: • S/C/CLT: Clifton Road Area; • S/CE: Cambridge East; • S/CBC: Cambridge Biomedical Campus; • S/CB: Cambourne Town Centre; • S/ED: Eddington; • S/NEC: North East Cambridge.	
The College objects to Policy S/LAC, citing excessive reliance on large strategic allocations for housing needs, which risks timely delivery due to infrastructure dependencies. A more balanced approach is recommended, with additional housing land allocated across various sites to reduce delivery risks and ensure timely housing provision. The College requests reconsideration of land at Wilberforce Road for allocation. Concerns regarding the site's suitability include landscape impact and loss of protected open space, but the College argues that development can be designed to minimise harm.	203930 (Bidwells on behalf of Emmanuel College (Wilberforce Road))
The respondent notes that the current wording of the policy should be amended to correct the reference to Cambridge Retail Park from an allocation to a designation, as it is included as a designated Public Realm Improvement Area (PRIA).	204121 (Bidwells on behalf of Railpen)
The respondent highlights that the indicative dwelling or floorspace capacity for site allocations may vary and should be determined through a design-led approach.	204121 (Bidwells on behalf of Railpen)
The respondent objects to proposed Policy S/LAC, citing excessive reliance on a few large strategic allocations for housing needs, which poses risks to timely delivery due to complex infrastructure requirements. A recommendation is made for a more balanced approach that includes additional housing land across various sites, sizes, and locations to reduce delivery risks and ensure timely housing provision. Nomination of sites along Lond Road for intensification.	204134 (Bidwells on behalf of Emmanuel College (Long Road))
Site allocations lacking explicit requirements for on-site health facilities should include wording for financial contributions towards health and infrastructure mitigation, aligning with the IDP approach. Early engagement is essential to deliver the infrastructure in the IDP.	205078 (NHS Property Services)

This policy identifies site allocations within the city centre. Whilst National Highways do not offer specific comments on these sites due to the distance from the SRN, National Highways suggest these sites are included in a cumulative impact assessment to ensure the impact on the SRN is appropriately managed and mitigated. In particular, the impact on the SRN including junctions on the M11, A11 and A14.	209007 (National Highways)

Policy S/C/SMS: Garages between 20 St. Matthews Street and Blue Moon Public House, Cambridge (now Garages at St Matthews Street and Norfolk Street)

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Concerns were raised about density and impacts on trees. An objection was raised by Historic England to better reflect the heritage assets within and close to the site boundary. The requirements from the HIA should also be incorporated onto the site including requirement for archaeology assessment.

Response to the main issues raised in representations

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

- The capacity for the site has been considered in the local content of two to three storeys. The surrounding terrace to the south of the site has a dwellings per hectare of 70 and the homes to the north of the site has a dwellings per hectare of 92. This would make 12 dwellings in this location acceptable in the local heights context.
- The protection of trees is set out in Policy B/TC to protect the retention of trees. Any future planning application will need to comply with this policy and provide an arboricultural assessment to assess the impacts on trees.
- The policy has been amended to mitigate impacts against heritage assets. The policy has been amended to include contextually appropriate materials, local context heights and also the addition of an archaeology assessment requirement to address comments made by Historic England.
- The name of the policy has been amended to more accurately reflect the location of the site.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Questions if the site has capacity for 12 homes.	202532 (J Neal)
Point 1A any future development must do much more than simply “retain and incorporate the existing mature tree”: it must ensure the tree’s RPA (Root Protection Area) is entirely undamaged, and that the space under and around that important tree remains fully available for future public enjoyment.	202532 (J Neal)
Whilst there are no designated heritage assets within the site boundary, the site lies adjacent to the boundary of the Mill Road Conservation Area and close to the grade II Listed Church of St Matthew. Development within this area therefore has the potential to harm the significance of these assets through development within their settings. We welcome the preparation of the HIA. While some of the recommendations of the HIA are included in the policy wording, reference should also be made to contextually appropriate materials, local context heights and also the addition of an archaeology criterion.	210089 (Historic England)

Policy S/C/HTR: 137 – 143 Histon Road

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

The Cambridge Investment Partnership (CIP) supports the allocation of this site and the site capacity. Comments were made by CIP to ensure the design is co-ordinated with development on the ATS part of the site. The protection of trees wording should be reviewed to ensure it does not inhibit the development of the site.

An objection was raised by Historic England to better reflect the heritage assets within and close to the site boundary. The requirements from the HIA should also be incorporated onto the site including requirement for archaeology assessment.

Response to the main issues raised in representations

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

- Support noted from CIP.
- The policy has been amended to mitigate impacts against heritage assets. The policy has been amended to include contextually appropriate materials, local context heights and also the addition of an archaeology assessment requirement to address comments made by Historic England.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
CIP controls all of site bar ATS site, application should reflect planning application for 70 units.	204205 (Carter Jonas on behalf of the Cambridge Investment Partnership CIP)
It should be noted that the CIP application is not comprehensive development as ATS site has not come forward but the application has been designed in a way to combine the two sites.	204205 (Carter Jonas on behalf of the Cambridge Investment Partnership CIP)
Whilst there are no designated heritage assets within the site boundary, the Castle and Victoria Conservation Area lies adjacent to the site. Development of the site has the potential to impact upon the Conservation Area and its setting. We welcome the preparation of the HIA. While some of the recommendations of the HIA are included in the policy wording, reference should also be made to contextually appropriate materials, local context heights and also the addition of an archaeology criterion.	210090 (Historic England)

Policy S/C/HGH: Henry Giles House 73-79 Chesterton Road

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There was broad support for the allocation.

Comments were made in relation to strengthening the wording around the retention of trees and the use of similar styles to the surrounding local architecture and improving active travel connections.

The site promoter commented that the capacity of the site should be reviewed.

Historic England commented that the site is an especially sensitive location and development should be contextually appropriate materials, local context heights and the addition of an archaeology criterion.

Response to the main issues raised in representations

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

- Support noted.
- The approach to the design of the site has been set out to reflect the local character and massing. In response to the increase of capacity, there is potential for a higher capacity to be accommodated where further evidence can be developed to ensure impacts on neighbouring buildings / heritage assets are managed. This has included revisions to the policy to set out the need for development to respond to the local context including, contextually appropriate materials, local context heights and also the addition of an archaeology criterion.
- In response to Historic England, the suggested amendments have been made.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
It is proposed that the policy is strengthened in relation to design and character on Chesterton Road to reflect the style of those between Carlyle Road and Alpha Road; removing "where possible" to ensure full retention of the silver birch tree on Carlyle Road; and requiring, rather than encouraging, active travel links from Chesterton Road through to Grasmere Gardens.	203770 (Cambridge Green Party)
Formerly the site of Sir Horace Darwin's Cambridge Scientific Instrument Company, the architectural style should demonstrate clear historical links with early scientific instruments *or* take inspiration from The Tivoli / 1930s Art Deco era.	203772 (A Carpen)

Support for the site allocations. Request for review of capacity to be increased because the site is highly sustainable.	203929 (Twenty5Planning Limited on behalf of the TT Group)
The site lies within the Castle and Victoria Conservation Area, adjacent to the Central Conservation Area and fronting the river, the of the river opposite Jesus Green. Although we have no objection to the principle of redevelopment on this site, this is a sensitive location with the potential to impact on the historic environment. We welcome the preparation of the HIA. While some of the recommendations of the HIA are included in the policy wording, reference should also be made to contextually appropriate materials, local context heights and also the addition of an archaeology criterion.	210091 (Historic England)
TT Group support the continued proposed allocation of this site. The attached representations demonstrate that the quantum of development should be revised and uplifted to optimise the delivery of this highly sustainable site, in accordance with the NPPF and PPG.	203929 Telereal Trillium Investment Properties

Policy S/C/HRC: Horizon Resource Centre, 285 Coldham's Lane

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There was broad support for the site allocation from all representators including Cambridgeshire County Council who own the site and Historic England. The policy was supported as is with no amendments.

Response to the main issues raised in representations

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

- The policy is supported by those who commented on the policy and following a review no changes are required to this policy. A minor editorial change has been made for clarity of expression.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for site allocation.	202115 (Carter Jonas on behalf of Cambridgeshire County Council)
There are no designated heritage assets within the site or nearby. No comments	210092 (Historic England)

Policy S/C/PDC: Cambridge Professional Development Centre, Foster Road

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There was broad support for the allocation of this site Cambridgeshire County Council with no amendments and Historic England, with some minor amends relating to heritage. Historic England confirmed that there are designated heritage assets within the site and have requested an amendment to the HIA.

Comments were made by a local resident to ensure that the walkability, access to local facilities, access to green space and management of surface water flooding were considered in the development. The respondent suggests focusing on larger open spaces further out for development instead of this site, which is bordered by established residents.

Response to the main issues raised in representations

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

- In response to comments raised by a local resident about the density of the site and impact on existing buildings and character. The site allocation has been subject to further testing at the Regulation 18 stage which has informed a reduction of units onsite to reflect neighbouring densities around the site. This review has concluded that 40 dwellings is suitable in this location and achieves an appropriate density for its setting.
- In response to comments raised about concerns about flood risk, any development on the site will be required to comply with Policy CC/FM Managing Flood Risk. Surface water flooding implications will be managed through the development management process. As a site allocation, this allocation has been reviewed in the Local Plan's Strategic Flood Risk Assessment. The site is not within Flood Zone 2 or 3.

- In response to Cambridgeshire County Council comments made about an increase on capacity on this site back to the previously adopted version of this site allocation, a further review of the site has been undertaken and it is the view of the Council's that 40 dwellings is more suitable in this location and is reflective of the local character.
- In response to local resident's comments raised about protected open space, the boundary of the Protected Open Space has been reviewed to include the playing fields adjacent to the site only as it is a more accurate reflection of what constitutes open space. This will also allow for the design of the scheme to utilise the full site allocation.
- In response to Historic England, the HIA has been revised to reflect the removal of this site allocation from the historic core.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for site allocation.	202112 (Carter Jonas on behalf of Cambridgeshire County Council)
Suggestion to increase capacity to 67 dwellings.	202112 (Carter Jonas on behalf of Cambridgeshire County Council)
Concerns raised about allocation of site and impact on walking, access to local facilities and recreation including green spaces.	201022 (D Wilson)
Concerns raised about the density of the site and impact on existing buildings and character.	201022 (D Wilson)
Concerns raised about runoff and potential flooding issues.	201022 (D Wilson)
Respondents suggested that larger open spaces would be more suitable for development.	201022 (D Wilson)

Whilst there are no designated heritage assets within the site, the site lies very close to the Trumpington Conservation Area. Any development of the site has the potential to impact the significance of the conservation Area through development within its setting. We welcome the preparation of the HIA. We question paragraph 1.10 of the HIA – the site is not far removed from Cambridge but lies within the city limits. Maybe more accurate to say removed from the historic core. Criterion 1 reflects the recommendations of the HIA.	210093 (Historic England)

Policy S/C/PPS: Police Station Parkside

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There was broad support for the site allocation.

Comments were made by the Police and Crime Commissioner as the site promoter about modifying wording around

Concerns were raised from Historic England about building heights and strategic viewpoints. The Cambridge Liberal Democrat Group commented on cycle provision and car free development onsite, as well as retention of existing buildings.

Further responses were made from a local resident about strategic viewpoints.

Response to the main issues raised in representations

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

- In response to the Cambridge City Council Liberal Democrat Group, to provide flexibility for the re-design of the site to facilitate its redevelopment the wording has not been revised. The provision of cycling parking will apply to the planning application on this site and these standards are set out separately in development management policy
- In response to a local resident comment, Strategic Viewpoint E Limekiln Road has been included in Point D as well.
- In response to the Police and Crime Commissioner, the retention of trees onsite is a clear ambition for the Councils' therefore it has been left in the policy with no amends. The discussion of the removal of any trees will be assessed through

the development management process using development management Policy BG/TC: Improving tree canopy cover and the tree population. The wording of point d has remained unchanged as the impact on strategic views is important to protect and the degree to which these are unacceptable will be demonstrated by evidence provided at the development management stage and assessed by the Councils'.

- In response to Mothers CAN Cambridge, the suggestion that the site should be car free, the Policy I/EV: Parking and Electric Vehicles sets out standard for car parking for development, it will not be duplicated in the site allocation. Due to the City Centre location, the predominate means of travel for residents of this development is likely to be public and active travel.
- In response to Historic England, the policy has been reviewed to include other Strategic Viewpoints and Strategic Viewpoint E Limekiln Road has been included as well. The policy has been amended to include the HIA recommendation that development is limited to approximately 4 residential storeys.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for the site allocation.	202832 (Cambridge City Council Liberal Democrat Group)
Respondent has set out that the site coming forward should enhance and improve the current building and that this should be reflected in the policy wording.	202832 (Cambridge City Council Liberal Democrat Group)
Development should not impact on views from Lime Kiln in South East Cambridge.	203774 (A Carpen)

Provision of existing cycle parking should be retained and any new cycle requirements be in addition to what is existing.	204175 (Cambridge City Council Liberal Democrat Group)
Support for flexibility of uses defined in the policy.	204175 (Cambridge City Council Liberal Democrat Group)
The criteria set out as 1. a. to d. and 2. are generally supported.	204175 (Cambridge City Council Liberal Democrat Group)
The policy should consider whether there are circumstances where harm to a heritage asset might be outweighed by a public benefit.	204178 (Savills on behalf of Police and Crime Commissioner for Cambridgeshire)
Minor wording suggestions are needed for clarification of ask in the policy.	207777 (Savills on behalf of Police and Crime Commissioner for Cambridgeshire)
Site boundary should be revised to reflect land ownership.	204178 (Savills on behalf of Police and Crime Commissioner for Cambridgeshire)

Supportive of protection of existing trees.	204727 (Mothers CAN Cambridge)
The development should be car free with no parking permits for residents.	204727 (Mothers CAN Cambridge)
There are no designated heritage assets within the site or nearby. We welcome the preparation of the HIA. The HIA recommends that height is limited to 3-4 storeys. This should be specified in criterion g to add greater clarity regarding height.	210094 (Historic England)

Policy S/C/NCA: North Cambridge Academy, 108, Arbury Road

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There was broad support for the site allocation including from Cambridgeshire County Council who supports the policy with no amendments. North Cambridge Academy were also supportive of teh principle of the allocation.

Comments were made in support of the Community User Agreement and for development of sports facilities by local residents.

Concerns were raised about impacts on local views and on parking by local residents. Concerns were also raised about open space designations within the site allocation and need for flexibility in policy wording to achieve the optimal layout by the Meridian Trust.

Further responses from Historic England raised concerns about building heights being reflected in the policy to respond to the SA.

Response to the main issues raised in representations

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

- The site allocation has been reviewed in the context of the representations made. The protected open space is retained onsite as there will be sports pitches proposed onsite. The proportion of affordable housing will be set by development management policy H/AH Affordable Housing and policy H/HM Housing Mix. These policies will ensure that the development provides a mix of housing to meet the identified need.

- A Heritage Impact Assessment (HIA) has been prepared to support this site allocation to identify any potential impacts on the surrounding local character and heritage assets around the site. The mitigation measure proposed is a building height of 3-4 storeys and further Heritage Assessments to be undertaken to support any future planning applications.
- The number of units has been tested as suitable in this location. The HIA has suggested that the development has the potential for 3-4 storeys and therefore 40 dwellings can be delivered on this site.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The number of units proposed is too high and there is not sufficient local infrastructure to support them.	201287 (M Jordan)
The cumulative impact of development in the local area so should be looked at.	201287 (M Jordan)
Support for site allocation.	202211 (Carter Jonas on behalf of Cambridgeshire County Council)
Support, the development of new sport facilities at North Cambridge Academy will be good for the school, the area, and the city. The plan to make the facilities open to the public after school hours is excellent.	202165 (M MacGinley)
Concerns raised about the draft allocation proposals map showing protected open space over significant areas of the site allocation.	202147 (LSA Planning on behalf of Meridian Trust)
Concerns raised about the flexibility of the site allocation.	202147 (LSA Planning on behalf of Meridian Trust)
A proportion of the new housing should be identified as key worker (above and beyond the affordable housing requirements) and linked to North Cambridge Academy staff needs.	202744 (Cambridge Past, Present and Future)

Concerns raised about overlooking and impacts on historic views, specifically of the historic chimneys of the Museum of Technology.	202446 (G Dawes)
Support requirement for a Community Use Agreement for sports facilities.	205426 (A Williams)
There are no designated heritage assets within the site or nearby. We welcome the preparation of the HIA. The HIA recommends that height is limited to 3-4 storeys. This should be specified in criterion g to add greater clarity regarding height.	210095 (Historic England)
The respondent supports the principle of mixed-use development for approximately 150 dwellings and sports facilities but seeks clarity on the draft allocation proposals map. The outlined site boundary appears to coincide with the respondent's original submission, but the designation of Protected Open Space over a significant portion of the site raises concerns about flexibility for development. The design of sports facilities should consider safeguarding measures for pupils and ensure functionality for community use outside school hours. The respondent highlights the need for careful consideration of pedestrian and vehicle access related to the sports facilities and residential development. There is a request for flexibility in the overall site allocation to achieve an optimal layout for the mixed-use development, particularly concerning the northern part currently designated as open space. The respondent requests the removal of the open space designation from the northern part of the site to facilitate flexibility for the development.	202147 (Meridian Trust)
Sport England supports, in principle, the ambition for North Cambridge Academy to develop as a mixed-use sporting hub, providing enhanced sports facilities and adequate replacement playing field is provided alongside residential development. As the allocation involves the loss of playing field land, it	209215 (Sport England)

must clearly demonstrate compliance with paragraph 104 of the NPPF. Sport England supports the policy requirements for: • Expansion of the existing sports hall; • Provision of a new 3G pitch, four tennis courts and a MUGA; and • A Community Use Agreement securing public access outside school hours. For examination soundness, the policy should explicitly require that any loss of playing field is replaced by provision that is equivalent or better in quantity, quality, accessibility and management arrangements. Recommend that replacement facilities are delivered in a timely manner and secured through appropriate planning conditions or obligations.	
This representation has been prepared on behalf of the Meridian Trust and Cambridgeshire County Council, (hereafter referred to as 'The landowners"), in relation to their land interests with regard to the draft allocation S/C/NCA: North Cambridge Academy. The landowners are supportive of the principle of the new draft allocation that includes approximately 150 dwellings, sports and recreation. The overall site boundary that is outlined in black appears to coincide with our original submission that outlined the site in red. It would appear that the entire site within the black line as shown above, is shaded pink and then part of the overall site allocation is overlain with green hatching that designates this area as Protected Open Space. If correct, this latter designation forms the majority of the overall allocation.	202149 (LSA planning-North Cambridge Academy)
The sports facilities need to be designed in a manner that they will function with the existing school in respect of safeguarding and security measures for pupils and work effectively outside of school hours for the community. Care will be needed to ensure appropriate pedestrian and vehicle access can be provided along with other associated works for these facilities and the residential development. The	202505 (LSA planning-North Cambridge Academy)

policy clearly sets out what is expected to be delivered at points 1a and b in terms of sports facilities, but the current land use designations reduce the flexibility of where these facilities and the housing could be located.	

Policy S/C/ER:1-99 Ekin Road and 1-8 Ekin Walk

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made in relation to the need for Council housing including ensuring homes meet high energy efficiency standards.

Concerns from Historic England were raised in relation to reflecting the recommendations from the HIA regarding building height that is limited to 3-4 storeys and adding greater clarity around this expectation in policy.

Further responses were made by Cambridge Investment Partnership as the Site Promoter to support the approximate amount of homes onsite, impact on protected open space, to have flexible building heights to allow for Building Regulation changes, to remove unacceptable impacts on views and to protect and / or enhance the open space.

Response to the main issues raised in representations

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

- The policy has been revised to set out that building heights should be limited to approximately 3-4 storeys to address Historic England comments about needing to specify a building heights to mitigate impact on skyline and representations made by Cambridge Investment Partnership for flexibility on building heights to allow for Building Regulation impacts.
- Cambridge Investment Partnership also asked for wording to protect and / or enhance the Protected Open Space. The wording has not been revised to protect the open space, however the assessment of impact on open space will be assessed through the planning application process using Policy BG/PO: Protecting open spaces.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for site allocation.	204206 (Carter Jonas on behalf of Cambridge Investment Partnership)
A planning application has recently been submitted for the site under 26/00039/FUL. There are some suggested policy amendments needed to reflect some more specific details of this application.	204206 (Carter Jonas on behalf of Cambridge Investment Partnership)
The respondent supports the requirement to protect and enhance the protected Open Space but suggests rewording to 'protected and/or enhanced' due to the land being highway.	204206 (Carter Jonas on behalf of Cambridge Investment Partnership)
The respondent supports the aspiration for appropriate building heights but recommends revising the wording to allow for necessary increases in height to meet modern construction standards. The wording around protection of skylines and conservation areas should be amended for clarity.	204206 (Carter Jonas on behalf of Cambridge Investment Partnership)
The wording around protection of open space should be amended to reflect that some of this land is adopted highway.	204206 (Carter Jonas on behalf of Cambridge Investment Partnership)
Land at Ekin Road, Cambridge, (CIP) submitted on 12 January 2026 - planning application (reference 26/00039/FUL): Most council homes exceed the "Cam Standard" for energy efficiency and climate resilience; the development will have green roofs, play areas, and social spaces. When combined with	201537 (G Kalombo)

nearby East Barnwell developments, there will be 254 new homes in Abbey ward (198 council homes total), a net gain of 97 council homes across both sites.	
There are no designated heritage assets within the site or nearby. We welcome the preparation of the HIA. The HIA recommends that height is limited to 3-4 storeys. This should be specified in criterion g to add greater clarity regarding height.	210096 (Historic England)

Policy S/C/DR: 2-28 Davy Road and Garage Blocks

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There was broad support for the allocation of the site from Historic England.

Comments were made by a local residents on the need for more innovative design in proposals for the site.

Further responses were made by Cambridge Investment Partnership to reflect the capacity of the latest proposals for the site.

Response to the main issues raised in representations

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

- The proposals for the site are designed to complement the existing character and have been designed in accordance with the HIA.
- The site allocation has been revised to reflect the most recent proposals onsite in terms of capacity. This is to reflect representations from Cambridge Investment Partnership.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The design should make provision for detailing and artistic imagination.	203775 (A Carpen)

Support for site allocation.	204209 (Carter Jonas on behalf of Cambridge Investment Partnership)
The site owner would like to increase the site capacity to 68 new homes, an increase of 36.	204209 (Carter Jonas on behalf of Cambridge Investment Partnership)
The respondent supports retaining mature trees but suggests that part (a) be amended to allow for justified tree removals through an Arboricultural Impact Assessment.	204209 (Carter Jonas on behalf of Cambridge Investment Partnership)
There are no designated heritage assets within the site or nearby. We welcome the preparation of the HIA. We welcome criterion c.	210097 (Historic England)

Policy S/C/HPC: 1-78 Hanover Court, 1-49 Princess Court and Garage at Newtown Garages

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There is broad support for the site allocation from Cambridge Investment Partnership. Comments were made by Historic England who welcomed the preparation of the HIA, the criterion that reflected the findings of the HIA and the identification of heritage assets in the policy wording.

Further responses were made by Cambridge Investment Partnership to reflect the capacity of the latest proposals for the site. Cambridge Investment Partnership also supports the part a and part d of the policy. Part b should be modified to allow for tree removal, and part c should be removed.

Response to the main issues raised in representations

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

- Support is noted from Historic England.
- In response to the Cambridge Investment Partnership, the retention of mature trees is retained as wording in the policy as the retention of trees is a key policy for the Local Plan to maintain and enhance urban greening. The removal of any trees will be negotiated through the planning application process, and development will be assessed against Policy BG/TC: Improving tree canopy cover and the tree population.
- In response to the Cambridge Investment Partnership, the capacity of the site allocation has been revised to reflect the latest planning application for 165 homes.

- In response to the Cambridge Investment Partnership, Point 1c has been retained in the policy, relating to the electricity substation, to reduce impacts on residential amenity and outlook.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for site allocation.	204211 (Carter Jonas on behalf of Cambridge Investment Partnership)
Support for flexibility on uses using the wording approximately and for the design considerations set out in policy.	204211 (Carter Jonas on behalf of Cambridge Investment Partnership)
Support for the retention of trees but suggests rewording to allow for justified removals through an Arboricultural Impact Assessment.	204211 (Carter Jonas on behalf of Cambridge Investment Partnership)
Reference to electrical substation should be removed.	204211 (Carter Jonas on behalf of Cambridge Investment Partnership)
Support is expressed for part (d) on archaeological investigation, with a request to amend it to include a desk-based assessment as the first step.	204211 (Carter Jonas on behalf of Cambridge Investment Partnership)

The site is located within the New Town and Glisson Conservation Area and close to a number of listed buildings including the grade I The Church of Our Lady of the Assumption and the English Martyrs and Grade II* Wanstead House and numerous GII listings. Any development of the site has the potential to impact upon the significance of these heritage assets through development within their settings. We welcome the preparation of the HIA. We welcome the criterion which reflect the HIA.	210098 (Historic England)

Policy S/C/GER: Former Garage Block, East Road

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made by Historic England who welcomed the preparation of the HIA, but felt that its recommendations should be brought out more clearly into the policy including the wording around the building heights limit of 3 storeys in point e.

Concerns were raised by a local resident about the development being in keeping with the local character, especially the adjacent residential area and streetscape along East Road.

Further responses were made by Cambridge Investment Partnership to include justification for tree removals through an Aboricultural assessment, and suggested addition to point g to require development proposals fronting East Road to respond to its existing and emerging context.

Response to the main issues raised in representations

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

- To address comments relating to building heights from Historic England, Point e has been amended to include - Development heights must be a maximum of 3 storeys. This is in direct response to Historic England's comments to ensure the policy wording reflects the HIA and adds greater clarity on the acceptable heights in this location.
- In response to comments from local residents and Cambridge Investment Partnership, Point g - Development proposals fronting East Road to respond to its existing and emerging context. has been added in direct response to a local resident's comment and a comment from the Cambridge Investment Partnership to ensure the design of the

development fits in with the adjacent residential area and streetscape along East Road.

- In response to the Cambridge Investment Partnership, the retention of mature trees is retained as wording in the policy as the retention of trees is a key policy for the Local Plan to maintain and enhance urban greening. The removal of any trees will be negotiated through the planning application process and development will be assessed against Policy BG/TC: Improving tree canopy cover and the tree population.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Concerns raised about the design of the building and impact on residential area. The adjacent properties are only two storeys, and therefore there is a risk of overlooking and dominating the setting from any tall buildings.	204221 (R Robertson)
Support for site allocation.	204215 (Carter Jonas on behalf of Cambridge Investment Partnership)
The design of any building proposed for this site must primarily fit in with the adjacent residential area to the south and not the streetscape of East Rd. So much of the adjacent housing is only two storey there is a risk it would be badly overlooked and dominated if a tall building was allowed to be built on the garage site.	204221 (R Robertson)

Support for the retention of trees, but suggests rewording to allow for justified removals through an Arboricultural Impact Assessment.	204215 (Carter Jonas on behalf of Cambridge Investment Partnership)
It is suggested that the policy reflects the requirement for the development proposals fronting East Road to respond to its existing and emerging context.	204215 (Carter Jonas on behalf of Cambridge Investment Partnership)
Whilst there are no designated heritage assets within the site, the site lies close to the Mill Road Conservation Area and St Matthews Church (GII listed). Any development of the site has the potential to impact upon the significance of these heritage assets through development within their settings. We welcome the preparation of the HIA. The HIA recommends that height is limited to 3 storeys. This should be specified in criterion e to add greater clarity regarding height.	210099 (Historic England)

Policy S/C/SH: 1-33 Stanton House, Christchurch Street

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There is broad support from the Cambridge Investment Partnership for the allocation of this site. Parts a and b of the policy are supported. It is suggested that the policy wording be amended to say that there is capacity for approximately 29 homes, resulting in a net loss of 5 units, including suitable replacement sheltered accommodation. This is due to a needed for general needs housing as well as replacement sheltered accommodation.

Comments were made by the Liberal Democrat Group to make it clearer that the impacts on the existing terraced housing and flats on Christchurch and Napier Streets should be considered.

Further responses were made by Historic England relating to the HIA. The HIA recommends that 'Development at a scale similar to the local prevailing building height and existing buildings on site should be appropriate. Site is not considered appropriate for tall landmark buildings' and this should be included in the policy. Historic England welcomed the preparation of the HIA and confirmed that there are no designated heritage assets within the site and the site lies adjacent to the Kite Conservation Area and Christ Church (grade II).

Response to the main issues raised in representations

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

- In response to the Liberal Democrat group, the supporting text has been revised to make it clearer that the impacts on the existing terraced housing and flats on Christchurch and Napier Streets should be considered.
- In response to Cambridge Investment Partnership, the support is noted and the capacity of the site has been reworded to

address the suitable replacement sheltered accommodation issue.

- In response to Historic England, the supported is noted and the recommendation from the HIA has been included in the policy wording.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The impacts on the existing terraced housing and flats on Christchurch and Napier Streets should be considered.	202834 (Cambridge City Council Liberal Democrat Group)
Support for policy.	204216 (Carter Jonas on behalf of Cambridge Investment Partnership)
Support for flexibility in wording but reference should be made to sheltered accommodation.	204216 (Carter Jonas on behalf of Cambridge Investment Partnership)
Whilst there are no designated heritage assets within the site, the site lies adjacent to the Kite Conservation Area and Christ Church (grade II). Any development of the site has the potential to impact upon the significance of these heritage assets through development within their settings. We welcome the preparation of the HIA. Criterion 1a is quite vague in relation to building heights. Given the heritage sensitivity of the site, greater clarity is needed regarding building heights. The HIA recommends that	210100 (Historic England)

‘Development at a scale similar to the local prevailing building height and existing buildings on site should be appropriate. Site is not considered appropriate for tall landmark buildings’. This should be included in the policy	

Policy S/C/SCL: Land South of Coldham's Lane, Cambridge

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There is broad support from local residents to see the long awaited site come forward.

Comments were made on the site allocation in relation to building heights in this predominately residential location and the impact on local character.

Comments were made on the site in relation to the impact on Cherry Hinton brook chalk stream and the concerns raised by the Environment Agency.

Comments were made by residents to improve the cycle routes between David Lloyd and Brookside.

Comments were made by Stantec on behalf of Mission Street and BGO Propco Newton Ltd questioning the archaeological requirement as this was not an issue with the planning application.

Response to the main issues raised in representations

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

- In response to local residents concerns about heights, the planning application for this site has now been approved and it was assessed for its impacts on local character and on balance the decision is that this site is suitable for this density and the proposal has been found acceptable.
- The impact of development of the chalk stream has been mitigated through the development management process with conditions, as recommended by the Environment Agency. This will mitigate the impacts on Cherry Hinton brook and other environmental concerns.
- The cycle route between David Lloyd and Brookside and surrounding cycle network improvements are beyond the

scope of this site allocation and planning application to be able to improve.

- In response to Stantec regarding archaeological impacts, point 1c has not been removed from the policy to ensure that the DBA is considered should another planning application come in.
- In response to Historic England, the latest version of the HIA has set out the revised viewpoints to be Viewpoint F, these are equivalent to the Viewpoint 7 and 10 mentioned in policy which have been rationalised. No changes are required to the policy wording.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The building height is too tall and should be more reflective of local context.	201226 (S Williams)
Concerns raised about impact on the Cherry Hinton Brook.	201245 (S Williams)
Objection to policy due to over congestion on the Tins Pathway.	202697) (M Downs)
Objection to the policy due to access and safety.	203771 (C Bone)
Significantly-improved developer-funded active travel routes should be designed in and built, and amenities should be expanded to enable local residential access. Provision should be made for a new rail/light rail stop on the railway line.	203829 (A Carpen)
The cycle paths around the site should be improved.	202634 (A Lawrence)
Support for the development of the site.	202634 (A Lawrence)
The requirement for a desk based archaeological assessment should be reviewed in the context of the EIA.	204039 (Stantec on behalf of Mission Street and BGO Propco Newton Ltd)

Policy S/AMC/SCL fails to take the following matters into account: The site proposed for the country park is severely constrained Opportunities for public access have not been addressed. The part of the site previously ear-marked for public access is subject to flooding. Local water courses and bodies are vulnerable to pollution from toxic land fill. There is insufficient emphasis on the protection of flora and fauna. Management issues have not been given sufficient attention.	204669 (J McGill)
Concerns raised about biodiversity, safety, access and drainage and contamination.	205152 (H Anderson)
Development within this area therefore has the potential to affect the significance of this asset including through development within its setting. We understand that there is no HIA for this as it is a Policy Area. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy. Criterion c refers to building heights of no taller than 6 storeys. In the absence of a Heritage Impact Assessment this is inappropriate and should be deleted. This needs to be explored through an HIA and masterplanning. Delete reference to 6 storeys.	210120 (Historic England)
here are no designated heritage assets within the site or nearby. We welcome the preparation of the HIA. We welcome reference to St Andrews church. Part of the HIA refers to viewpoint 7 and part refers to viewpoint 10. The policy itself criterion 1b refers to Viewpoint F. Please check and clarify which viewpoint it is.	210101 (Historic England)

Policy S/C/BRN: Land at Barnwell Road and Newmarket Road

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There is broad support for this site allocation from Cambridge Investment Partnership. They suggest that the wording need to allow for justified tree removals with an Arboricultural Impact Assessment and replacement planting.

Comments were made by a local resident that there should be a larger community centre and community halls and that there should be shared provision of facilities.

Comments were made by Historic England to confirm that there are no designated heritage assets within the site or nearby and to welcome the preparation of the HIA. Historic England have asked for clarification of the correct naming of viewpoints.

Response to the main issues raised in representations

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

- A Community Facilities Strategy and Cultural Strategy has been prepared to support the Regulation 19 Local Plan and this has identified where there is a need for these facilities based on existing provision and anticipated growth. These studies have concluded that this is not a priority in this location.
- In response to Cambridge Investment Partnership, their comments are noted and the retention of mature trees is retained as wording in the policy as the retention of trees is a key policy for the Local Plan to maintain and enhance urban greening. The removal of any trees will be negotiated through the planning application process, and development will be assessed against Policy BG/TC: Improving tree canopy cover and the tree population.
- In response to Historic England, their comments are noted and the Viewpoints are correctly labelled as per the latest evidence base. In response to heights, half of this site has permission and the heights will be tested for the remainder of the site for sensitivity through the development management process.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for site allocation.	204220 (Carter Jonas on behalf of Cambridge Investment Partnership)
CIP plans to develop remaining land in future applications, although detailed designs are not yet prepared.	204220 (Carter Jonas on behalf of Cambridge Investment Partnership)
The policy should be more flexible about the wording regarding tree retention and removal.	204220 (Carter Jonas on behalf of Cambridge Investment Partnership)
Provision should be made for a much larger community centre and community halls given the densification of the housing in the area.	203776 (A Carpen)
There are no designated heritage assets within the site or nearby. We welcome the preparation of the HIA. Part of the HIA refers to viewpoint 11. The policy itself refers to Viewpoint M. Please check and clarify which it is. Is it one in the same? What height is considered suitable for this site?	210102/ 210103 (Historic England)
Sport England notes that planning permission (23/04687/FUL) has been granted for the redevelopment of this site. The Local Plan should outline that sport facilities (bowls green and tennis court) as part of the planning permission will be replaced, in accordance with condition 59, as required by planning	209216 (Sport England)

permission 23/04849/FUL. Outlining this demonstrates that the loss of these sports facilities have been assessed against paragraph 104 of the NPPF and that replacement mitigation provision has been secured.	

Policy S/C/TRP: Travis Perkins, Devonshire Road

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made by Historic England to confirm that there are no designated heritage assets within the site and that the site lies adjacent to the Mill Road Conservation Area. Historic England welcomes the preparation of the HIA and policy criterion 1b and 1c.

Response to the main issues raised in representations

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

- In response to Historic England, comments are noted and no policy changes have been made in response as the policy wording reflects the heritage assets in this location.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Whilst there are no designated heritage assets within the site, the site lies adjacent to the Mill Road Conservation Area. Any development of the site has the potential to impact upon the significance of the Conservation Area through development within its setting. We welcome the preparation of the HIA. We welcome criteria 1b and 1c.	210104 (Historic England)

Policy S/C/OPK: Parcel Com4 Orchard Park

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made by Historic England to confirm that there are no designated heritage assets within the site.

Response to the main issues raised in representations

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

- In response to Historic England, comments are noted and no policy changes have been made in response as the policy wording reflects the heritage assets in this location.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
There are no designated heritage assets within the site or nearby.	210105 (Historic England)
Sport England objects to the part loss of playing field at this site. The Orchard Park SPD (2011) identified the playing field to remain as public open space. With this said, the planning permission referenced 22/01632/FUL resulted in the loss of the playing field. Sport England cannot find a record of being consulted on that planning application despite being a statutory consultee for development affecting playing fields. Furthermore, having reviewed the Officer's Report, there is no consideration	209217 (Sports England)

afforded to paragraph 104 of the NPPF. If a future planning application were submitted, the Local Planning Authority should accord with the statutory requirement to consult Sport England.	

Policy S/C/BFS: Brookfields

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There is broad support from Historic England, who commented to confirm that there are no designated heritage assets within the site.

Response to the main issues raised in representations

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

- In response to Historic England, comments are noted and no policy changes have been made in response as the policy wording reflects the heritage assets in this location.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Part of this site lies within the Mill Road Conservation Area. Any development of the site has the potential to impact upon the significance of the Conservation Area. We welcome criterion 1a, 1b and 1c.	210106 (Historic England)

Policy S/C/CJ: Cambridge Junction and Cambridge Leisure, Hills Road

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Respondents asked for Safeguard the Junction to be safeguarded into the future. It is essential that there is no deterioration in the nature and standard of facilities. Temporary provision for all cultural functions must be secured before any demolition or displacement reprovision is delivered as an early phase; no gap in provision. Any future Junction is at least equivalent in standard and capacity, including audience, back-of-house, technical capability, servicing. Need more meeting rooms. Long-term operational/financial viability should be assessed. Avoid creation of conflicts with sounding uses. Must ensure that these or equivalent leisure uses are re-provided at the same level within the development proposals.

One comment stated that the Cambridge junction site is very new and would have a high carbon footprint to replace.

Historic England advise that whilst there are no designated heritage assets within the site, the site lies close to the New Town and Glisson Road Conservation Area. Any development of the site has the potential to impact upon the significance of the Conservation Area through development within its setting.

Landsec said they were is continuing to explore development options for the Cambridge Leisure site, both in respect of its existing property assets and also the possibilities for the site, either as a standalone regeneration project (allowing future integration with

neighbouring sites for regeneration purposes) or as part of a broader regeneration scheme on the eastern side of Cambridge Station. They ask for the policy wording to be made more flexible.

Other comments included consider impact of building height on surrounding areas e.g. Rustat Avenue, and the need local retail provision.

Response to the main issues raised in representations

The policy and supporting text note the cultural importance of The Junction and that, where it is appropriate, temporary venue spaces and meanwhile uses should be provided during the construction phases. This is considered to be a reasonable approach in order to strike a balance between the retaining an important local and sub-regional facility and the practicality and feasibility of it remaining operational throughout the construction process of a comprehensive redevelopment. The policy contains a requirement that any reprovision of this use must support the enhancement of it as a live performance and cultural venue.

The policy identifies the importance of the commercial leisure offer at Cambridge Leisure and seeks to retain this as part of the redevelopment of the site.

The Local Plan contains policies regarding the reuse of existing buildings and materials and so this is not repeated in this site allocation policy.

The policy has been updated to provide further criteria in relation to building heights and the impacts of development on nearby heritage assets. Additionally, the policy and indicative spatial framework identify some support for retail provision in this area, particularly around the proposed railway station entrance.

The comment from one of the existing long leaseholders is noted. The policy seeks to strike a planning balance between providing flexibility and a clear expectation for future development proposals.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The Cambridge junction site is very new -- 20 to 30 years old. You cannot pretend you care about the climate crisis and at the same time wilfully knock down existing buildings just because you fancy it. The carbon footprint of concrete is huge. There will be huge opposition to this particular 'development', based on opinions I have already heard from people I have told about it. Why don't you practice designing/approving buildings that will have a long sustainable life -- you clearly didn’t do this the first time round, on this site?	201227 (S Williams)
Limit height of development next to Rustat Avenue developments. All have south-facing balconies to enjoy sunlight. Incentivise supermarkets (Aldi/Lidl/or something else) to take up retail space in Leisure Centre. Currently only expensive convenience stores, so have to drive to get food. For flats, incentivise developers offering residents their own management companies from the start. Go without Estate Management Companies from developments as much as possible to save flat owners the pain. Work to support public access from one side of train station to the other (EWR). Consider removing listing status Cambridge station. It's old, at capacity and of limited value.	201652 (T Foets)

We have suggested amendments to the policy wording for robustness and to more sufficiently safeguard the Junction in the future. It is essential that there is no deterioration in the nature and standard of facilities provided by the Junction. Policy wording should be amended to better recognise the Junction as "a locally and regionally important venue". We suggest the addition of 'that meet the needs of the venue' after 'a range of flexible spaces' within the second sentence. Design and layout requirements for this allocation must also avoid conflicts between the Junction and neighbouring uses in line with the NPPF's "agent of change" principle.	202013 (The Theatres Trust)
I support Cambridge Junction: • Temporary provision for all cultural functions must be secured before any demolition or displacement reprovision is delivered as an early phase; no gap in provision • any future Junction is at least equivalent in standard and capacity, including audience, back-of-house, technical capability, servicing • long-term operational/financial viability assessed alongside spatial design delivery governed through a structured process (CJ/Council governance, RIBA stages, shared brief before developer engagement) • Agent of Change applied so residential development doesn't restrict Junction operations • I cannot support this allocation unless continuity, equivalence and viable delivery mechanisms are secured.	202131, 202745 (Cambridge Junction), 202190 (H Tam), 202452 (K Jones), 202676 (T Altmann), 202709 (W Townsend), 202774 (S Lee), 205275 (N Oakley), 202857 (Cambridge Junction), 202981 (T Flinders), 202994 (Arts Theatre Cambridge) 204996 (H Paterson), 205263 (AC de Azevedo Lamha), 205339 (A Seiglow), 202286, 202291,

	205347 (Cambridge Junction), 202377 (Kettle's Yard), 202379 (J Webber), 202389 (T Shaw), 202918 (R Tarry), 204438 (A Neenan), 204660 (NEUBAU Architects), 204892 (Wysing Arts Centre), 203862, 203640, 202804 (University of Cambridge), 203843 (N Yeni), 203471 (D Lever), 203468 (L Heap), 203423 (S Asworth), 203316 (N Ellis), 204358 (New International Encounter), 204681 (A Giarlis), 205289 (L Howse), 204805 (L Matthews), 204150 (Cambridge Junction) , 202007 (H Chamberlain), 205012 (University of Cambridge),

	205090 (J Walsh), 204822 (G Shaw)
The Junction is an amazing venue providing a wide and varied menu of arts events. It should be supported to develop and grow, but without losing its unique ethos. The size of the concert space is great	202595 (M Salters), 203596 (P Tribble)
Could bullet 1c be revised to ensure that the same amount of equivalent leisure space be retained as follows: Redevelopment of the existing commercial leisure units (including cinema, bowling alley and food and beverage outlets) must ensure that these or equivalent leisure uses are re-provided at the same level within the development proposals;	202835 (Cambridge City Council Liberal Democrat Group)
Cambridge Junction is part of Arts Council's National Portfolio of organisations receiving regular, core funding from us. The organisation has strong impact both regionally and nationally. We see the redevelopment of this site as a fantastic opportunity to improve facilities and provision which would benefit both audiences and creatives alike. We would advocate strongly that new plans ensure that the organisation is able to thrive both artistically, financially and in terms of expanding reach.	205045 (Arts Council)
Re The Junction, could a revamped/replacement facility take architectural inspiration from the railway history of the railway sheds it was built on. Furthermore, the site needs to have a significantly greater number of meeting rooms and rehearsal spaces. Provision for The Junction could involve working with Hills Road Sixth Form College to help meet some of its needs for independent study spaces, which could help sustain the venue.	203825, 203769 (A Carpen)
Whilst there are no designated heritage assets within the site, the site lies close to the New Town and Glisson Road Conservation Area. Any development of the site has the potential to impact upon the	210107, 210108, 210109 Historic England)

significance of the Conservation Area through development within its setting. We welcome the preparation of the HIA. We welcome criteria m, n and p. The HIA recommends that height is limited to roughly 6 storeys. This should be specified in criterion n to add greater clarity regarding height.	
Landsec is continuing to explore development options for the Cambridge Leisure site, both in respect of its existing property assets and also the possibilities for the site, either as a standalone regeneration project (allowing future integration with neighbouring sites for regeneration purposes) or as part of a broader regeneration scheme on the eastern side of Cambridge Station. The emerging planning policy within the Draft Greater Cambridge Local Plan must flexibly and proactively facilitate these objectives in the interests of good plan-making. Landsec is generally content with the broad intent and direction of travel that the draft policy adopts, but some areas remain where alteration to the policy wording are requested. In particular, it is suggested that there needs to be more flexibility in certain areas of the policy wording to be more adaptable to the rapid nature of change in market and economic conditions, particularly in respect of historical main town centre uses. Detailed wording changes are provide din individual representations.	209176, 209177, 209178, 209179, 209180, 209181, 209182, 209183, 209184, 209185, 209186, 209187, 210304, 210305, 210306, 210307, 210308 (Landsec)

Policy S/C/CLT: Clifton Road Area

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Universities Superannuation Scheme Ltd support the aspiration for regeneration for a mix of uses but suggests modifications to the draft allocation to ensure it reflects a deliverable, commercially robust proposition. The allocation needs be flexible to accommodate market changes over a 10 15 year horizon, as development is unlikely before 2030. The uncertainty surrounding the scope, form and programme for the delivery of an eastern entrance to Cambridge Station and the implications of this for the Site. The site could likely deliver 150 build to rent homes.

Historic England advise there are no designated heritage assets within the site, the site lies adjacent to the New Town and Glisson Road Conservation Area. The site is also close to the GII listed Railway Station. Any development of the site has the potential to impact upon the significance of these heritage assets through development within their settings. The policy should be mor specific regarding building heights.

Cambridge Past Present and Future consider the eastern station entrance essential. Othe comments included the Junction is important for cultural life and should be supported. New buildings should reflect the area's old railway history, taking inspiration from the old railway sheds that were on the site. Another comment questioned the long term future of the area as an industrial site.

Rustat Neighbourhood Association fed back from a meeting where they discussed the site. The aske for more resident input on planned EWR entrance and other issues. Station drop offs could impact on area by pocket park entrance, research is needed. Another representor raised this point, and apart from disturbance to residents in Rustat Avenue whose flats overlook the Pocket Park, there will almost certainly be traffic issues at the Davy Road / Rustat Road junction which need to be anticipated and accommodated.

Response to the main issues raised in representations

The policy provides flexibility to enable a wide of suitable land uses to come forward through the comprehensive redevelopment of the site. Since the consultation on the draft Local Plan, East West Rail have consulted on their project and provided some further details on the likely timescales of the new station entrance being delivered.

The number of homes likely to be delivered on the USS land is noted.

The policy has been updated to better reflect local heritage assets and the likely impacts of tall buildings in this location. The NPPF is clear that Local Plans should not prescribe architectural forms for development, however, the policies in the Local Plan do outline a requirement for context led development.

The possible impacts of station drop off on local communities is noted and reflected in the policy wording.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
I'd like to voice support for the policy of retaining the existing retail outlets when/if the Clifton Road area is redeveloped	201935 (I Rudy)
Whilst there are no designated heritage assets within the site, the site lies adjacent to the New Town and Glisson Road Conservation Area. The site is also close to the GII listed Railway Station. Any development of the site has the potential to impact upon the significance of these heritage assets through development within their settings. We welcome the preparation of the HIA. We welcome criterion g. The HIA recommends that height is limited to 1-2 storeys. This should be specified the policy criteria to add greater clarity regarding height. We welcome the inclusion of a Spatial Framework at Figure 39. We welcome reference to the Holford Plan in the supporting text.	210109 (Historic England)
What are the functions that the city/tradespeople need that the site's firms currently provide? e.g. Builders' merchants and component suppliers? Can clear provision be made? See the recently built homes on the old Water Works? Please put in standards to prevent such lazy, poor quality architecture and building designs being used. Cambridge deserves better. New buildings should reflect the area's old railway history, taking inspiration from the old railway sheds that were on the site. They should be of a type that is considerably more aesthetically pleasing than what Brookgate has built in the Cambridge Station redevelopment - and visibly so.	203778 (A Carpen)
The Junction is essential for cultural life in Cambridge, providing a venue for diverse age groups to engage in arts and social activities. The respondent emphasises the importance of the Junction in	205330 (N Saad)

encouraging youth participation in arts and music, highlighting its role as a positive alternative to social media and street corners. The respondent advocates for continued funding and support for Create Cambridge, recognising its significance in the local cultural landscape.	
Rustat Neighbourhood Association met with c 30 residents on 17 January 2026. Agree need to retain retail and leisure facilities. Densification implies building up. Do not build up where blocks light for existing residents on Rustat Avenue/Road. Housing for residents/families required. Mixed use site has different needs: Many students and visitors as well as residents. How will site cater for all? Water scarcity and holding developers to environmental standards a key concern. Interface with planned EWR entrance on Clifton Road/Gloria Carpenter Park not well developed. Requires more resident input. How will Local Plan interface with other Plans/consultations. The plan for a new railway bridge coming into Clifton Road and accessible via the Gloria Carpenter parklet requires considerably more detailed thinking through to avoid detrimental impacts on existing and envisaged residents in the Rustat Road area. “Drop off” is problematic as people often need to wait in their cars for arrivals. Residents are concerned that people will drop passengers off in Rustat Road by the Pocket park entrance (opposite Davy Rd). There needs to be an impact study of projected outcomes in different scenarios. There are concerns about congestion and bike-safety at the Clifton Rd/Cherry Hinton Rd junction. There are concerns regarding the pollution and noise impacts that would arise from the proposed development of the site. Impact assessments required. Any bike parking at the Eastern entrance must be fully secure to prevent theft. he grade-II listed station building and new footbridge must be designed to protect heritage character.	201484, 205774, 205775, 205776, 205777, 205778, 205779, 205780, 205781, 205783, 205784, 205785, 210303 (Rustat Neighbourhood Association)

More regular consultation with residents is needed.	
I fully support the redevelopment of the Clifton Road area. There is considerable scope to make better use of the site by mixed-use and by intensification along the lines of the policy document. any building at the Cherry Hinton Road end should be no taller than two stories, probably rising to three stories as gardens get larger. Given the overall growth plan for Cambridge and South Cambridge and especially the proposed housing development of the Cambridge airport site to the east, the need for a new station entrance is compelling and will have real benefits for rail passengers. Will come with very substantial traffic and people flows in the area of the proposed new entrance. Needs to be a thorough traffic assessment on this, and the implications need to be incorporated into the site master plan. Apart from disturbance to residents in Rustat Avenue whose flats overlook the Pocket Park, there will almost certainly be traffic issues at the Davy Road / Rustat Road junction which need to be anticipated and accommodated.	201520, 205799, 205800, 205801, 205802, 205803 (R Crabtree)
Support the aspiration for regeneration for a mix of uses. Suggests modifications to the draft allocation to ensure it reflects a deliverable, commercially robust proposition. We recommend the allocation be flexible to accommodate market changes over a 10-15 year horizon, as development is unlikely before 2030. The relationship between existing, to be retained and proposed uses within the Site and wider area. The high likelihood of the Royal Mail depot remaining fully operational in its current location, which reduces the developable area of the Site and maintains physical, amenity and viability challenges for the remainder of the draft allocation. The uncertainty	209233, 209234 209235, 209236, 209237, 209238, 209239, 209240, 209241 (Universities Superannuation Scheme Ltd)

surrounding the scope, form and programme for the delivery of an eastern entrance to Cambridge Station and the implications of this for the Site. The initial Site review indicates the opportunity to deliver approximately 150 Build to Rent (BTR) residential homes. Support the principle of an active travel-based approach to the new station entrance. However, we consider that the broad parameters for a station entrance should be established at the Site Allocation stage so as not to place unnecessary constraints on the development of the wider site supportive of the future phases of the Chisholm Trail, but policy requirement currently unreasonable, needs flexibility. Requirement for reprovision of all existing floorspace unreasonable.	
Just wanted to question the long term existence of Clifton Road industrial estate, Royal Mail still makes sense but everything else a little less. Residential zones have already encroached which sometimes does cause noise pollution friction, and it seems like a good spot for future housing development. Since COVID commercial activity seems to have slowed a little since ARM left and I think ANSYS/Synopsis will follow suit soon. Otherwise, though pls carry on, very happy with more development. If you ever need a counter-protest for Davy Road let me know as I am extremely YIMBY on Coleridge.	202430 (S Potts Tamman)
This policy is tentative about an eastern access to the station (“any possible future new eastern entrance”). An eastern entrance is essential for the continued safe functioning of the station and to open up opportunities to reconfigure the main station forecourt. Figure 39 is inaccurate and too schematic to be helpful in shaping future development. This policy should set out principle and parameters for the components required for an eastern entrance to the station, including detail on pedestrian routes, cycle parking, a taxi rank, bus stops, and traffic management on Clifton Road, Rustat Road, Davy Road and Fanshawe Road.	202778 (Cambridge Past Present and Future)

Policy S/C/SRW: Station Road West

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There is broad support for the site allocation from Brookgate Land Ltd and Network Rail Infrastructure Ltd

Comments were made by local residents in relation to the architectural design and considering the railway history of the site.

Comments were made by local residents and Cambridge Past, Present and Future in relation to improving pedestrian access, decluttering the public realm and reducing car dominance.

Comments were made by Historic England confirming that there are no designated heritage assets within the site and welcoming the preparation of the HIA and requiring the policy to consider wider Strategic Viewpoints.

Response to the main issues raised in representations

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

- The connectivity of the site with the wider area for pedestrians to gain safe access to the station is an important ambition and wording has been included in the policy to reflect this and ensure that pedestrian access and experience is prioritised.
- The HIA has set out the key considerations for design to reflect the local character and designated heritage assets and the wording in the policy has been reviewed to reflect the recommendations of the HIA.
- In response to Historic England, comments are noted and the wording for not impacting negatively on Strategic Viewpoints has been included.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Concerns raised about impact of the Grade II Listed Railway Station.	201228 (S Williams)
A more detailed vision for the station is needed to manage the transport interchange, congestion and heavy flow of people including reducing the dominance of cars outside the station entrance.	202796 (Cambridge Paste, Present and Future)
The design of the station should be more imaginative and reflect character of railway history in the area.	203830 (A Carpen)
Support for the allocation of the final undeveloped parcel as part of wider CB1.	204832, 204839 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
The policy should reflect the relevant planning applications and be more flexible to respond to economic circumstances.	204832, 204839 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
The location is highly sustainable for build to rent and co-living.	204832, 204839 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
The quantum of development should be context led.	204832, 204839 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
Active travel access needs to be improved to the station.	207459 (A Carpen)

Whilst there are no designated heritage assets within the site, the site lies adjacent to the New Town and Glisson Road Conservation Area. The site is also close to the GII listed Railway Station. Any development of the site has the potential to impact upon the significance of these heritage assets through development within their settings. We welcome the preparation of the HIA. We welcome criterion1a, 1b and 1c. The HIA refers to several viewpoints. The policy only refers to Viewpoint E. We recommend including the following wording: '…should not negatively impact Strategic Viewpoints particularly Viewpoint E Limekiln Road.	210110 (Historic England)
Support for the allocation of the final undeveloped parcel as part of wider CB1. Need to consider 21/00264/FUL and 18/1678/FUL for development that has previously been considered acceptable on site. Inappropriate to outline a fixed quantum of floorspace. This should be context-led and be capable of responding to changing economic circumstances. Failure to acknowledge that a hotel was previously considered acceptable. Need to recognise the highly sustainable location for build to rent and co-living. Overall, the Site should be allocated for mixed use development. Conflicting requirements on height and massing. Point (b) prescribed height, whereas point (a) states it should be context-led. Therefore, suggest removing point (b). Subjectivity around 'negatively impact on strategic viewpoint E' should be amended to 'have regard for Strategic Viewpoint E'. Redline boundary should be amended to remove railway tracks.	204832 (Brookgate Land Ltd and Network Rail Infrastructure)

Policy S/C/BJH: Betjeman House, Hills Road

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There is broad support for the site allocation from Pioneer Group Ltd. Pioneer Group Ltd also commented that the allocation should be modified to reflect the site allocation and be renamed Botanic Place.

There was broad support from Historic England who confirmed there were no designated heritage assets and that they welcomed the policy wording criterion under point 1a, b, c and d.

Comments were made by local residents in support of the demolition of Betjeman House.

Response to the main issues raised in representations

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

- In response to Pioneer Group Ltd, the policy has been renamed Betjeman House, Hills Road (Botanic Place)
- In response to Historic England, comments are noted and no changes have been made in relation to this comment.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The policy should reflect the current live planning application.	207455 (Pioneer Group Ltd (Railpen))
Support for the site allocation.	207455 (Pioneer Group Ltd (Railpen))

The site is no longer residential and should be non-residential and reflect the planning permission for 54,000 sqm of floorspace for commercial class E.	207455 (Pioneer Group Ltd (Railpen))
Support for demolition of Betjeman House and replacement with lower density development.	201229 (S Williams)
This site is located in the Glisson Road and New Town Conservation Area, lies adjacent to the grade II* Botanic Gardens, a registered park and garden and close to the grade II listed War Memorial and milestone. Development within this area therefore has the potential to affect the significance of these assets through development within their settings. We welcome the preparation of the HIA. We welcome criterion1a, 1b,1c and 1d. We appreciate the site is under construction but welcome the reference to the scenario should the permission not be completed. We welcome the reference to the retention of the Flying Pig House.	210111 (Historic England)

Policy S/C/OPM: Old Press/ Mill Lane

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made by the University of Cambridge raising concerns about the conflicting policy wording around heritage assets.

Comments were made by Historic England to reflect the assets onsite and to complete an HIA for this site.

Response to the main issues raised in representations

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

- In response to the University of Cambridge, the boundary has been amended to reflect the suggested change.
- In response to Cambridge Past, Present and Future, the support for criterion 1a and 1b is supported. The Pitt Building has been amended to be included in the boundary. The wording around heritage assets has been amended to address these comments.
- In response to Historic England, amendments have been made to the policy to reflect the amendments suggested. HIAs are not prepared for site allocations that existed in the Cambridge Coty Council or South Cambridgeshire District Council Local Plan. This is the same across the Local Plan and therefore the HIA has not been revised. Furthermore, the development on this site is underway and close to completion.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue

The University requests that the site allocation boundary (red line) is amended to remove the University Centre and other smaller properties to avoid confusion due to changes in land ownership.	202445 (University of Cambridge)
If the University Centre is removed from the allocation, the key principles relating to access, public realm and active frontages would continue to be adequately addressed through other policies.	202445 (University of Cambridge)
Concerns raised about treatment of heritage assets and their protection.	202797 (Cambridge, Past, Present and Future)
The University requests that the site allocation boundary (red line) is amended to remove the University Centre and other smaller properties. The inclusion of the University Centre adds unnecessary complexity to the allocation. Its removal would allow the policy to focus on providing greater clarity and deliverability for a site that is now in separate ownership.	202445 (University of Cambridge)
There are a number of designated heritage assets within the site boundary including part of the Central Conservation Area and a number of listed buildings including Cambridge University Centre, The Mill Public House, The Mill The Mill Bridge and Paved Surround, Mill Haven - West House and Mill Haven - East House, Cambridge University Press (Pitt Press), Telephone Kiosks, 1 Mill Lane, House Adjoining Number 74 on The North, 74 Trumpington Street, 8-11 Little St Marys Lane, Number 1 Little St Marys Lane including gas lamp and Emmanuel Church all listed at grade II. The site is adjacent to other listed buildings including Little St Mary's Church (grade II*), Pembroke College and Pembroke College Chapel both listed at grade I, St Botolph's Church also listed at grade I as well as numerous grade II listed	210112 (Historic England)

buildings. This is a highly sensitive location in terms of heritage. Development within this area therefore has the potential to affect the significance of these assets including through development within their settings. There does not appear to be a Heritage Impact Assessment for this site. An HIA should be completed for this site. Paragraph 3.1.103 states that there are no grade I, GII* or GII buildings within the site. However, there are a number of GII listed buildings within the site and there are highly graded assets nearby. Paragraph 3.1.103 therefore needs to be amended to correctly recognise the presence of designated heritage assets. Amend criterion a as the Pitt building is within the site. Also, there are other highly graded nearby assets (Pembroke, Little St Marys and St Botolph's) that need to be listed.	
The College welcomes the allocation for a student accommodation-led scheme. We are uncertain whether the Old Press/Mill Lane site qualifies as a "university or college campus site" under Affordable Housing policy H/AH and believe it should be treated as such.	208236 (Kings College)
It is also not clear why the site area includes Little St Mary's Lane etc when the southern portion of the site has already been developed by Pembroke College and so the impact of any development on this residential street has already occurred. The College suggests the plan is amended to exclude this. It is also not clear why the site plan is different from that for Policy S/PRIA/OPML (or indeed why separate policies are needed).	208237 (Kings College)
As the implication of S/C/OPM is that the room capacity will be determined by the acceptability of detailed proposals, it seems unnecessary to specify 256 rooms. If a number is considered desirable,	208238 (Kings College)

then ‘around 260 rooms’ would make more sense. The phrase ‘for university related sites’ seems unnecessary / unclear and should be deleted.	
Restricting uses to those in only subsections a), b) and c) of Class E is unnecessary. Other Class E uses may be equally suitable.	208239 (Kings College)
As a consequence, we would suggest the following revised wording for bullet point 2: Allocation to provide mixed use student accommodation (approximately 260 student rooms) and faculty buildings, commercial business and service in Class E and other ancillary facilities. Site capacity to be subject to detailed proposals. In point 1) limb b) is unnecessary as a Heritage Impact Assessment is required by Policy GP/HE and the Council’s validation requirements anyway. Our experience from other schemes is that the phrase ‘active frontages’ in limb c) can be taken by members of the public to mean retail units. As active frontages can also sensibly include building entrances / designs which ensure natural surveillance of the street, the expectation should be clarified by providing a definition of ‘active frontages’ (this would also relate to policy J/FD 2 where a similar aspiration appears).	208240 (Kings College)
We would also comment as follows on the supporting information to the policy: The last sentence in paragraph 3 appears incomplete and so the meaning is unclear. Although the aspirations are understood, there is duplication with the PRIA policy. However, to say that redevelopment must ensure that safer streets etc are created is unacceptably onerous when works will be carried out in the public highway etc over which the College has no control. Replacing the word ‘must’ with ‘should take reasonable opportunities’ would suffice. The landscape etc aspirations in paragraphs 5 and 6 are similarly understood but could be in conflict with the desire to retain aspects of	208241 (Kings College)

the site's formerly industrial character which was a feature of discussions during the development of the 2018 Masterplan.	
This policy should reference the requirement for a sequential approach to be taken to the site layout, with more vulnerable development located within areas at lowest risk of flooding where possible. A site-specific Flood Risk Assessment (FRA) will need to demonstrate that safe access and egress is available and there will be no displacement of water or loss of floodplain storage. The site assessment recommends that habitable floor levels are set above the maximum fluvial flood level with a suitable freeboard. There are likely to be opportunities to reduce flood risk as part of this development, such as by integrating water storage areas into the landscaping, use of SuDS and reducing the built footprint in the floodplain.	211177 (Environment Agency)

Policy S/C/NMD: New Museums, Downing Street

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made by the University of Cambridge raising concerns about the existing SPD and how it is outdated and what this means for future development.

Comments were made by Historic England to reflect grading of the heritage assets onsite and to produce an HIA for this site.

Response to the main issues raised in representations

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

- The SPD will remain in place once this Local Plan is adopted until a new Local Plan comes in under the new system and is updated, which will be after 5 years. It will remain a material consideration in decision making. There are elements of this SPD that have been superseded by policies in the Local Plan. The Local Plan policies will take precedence and apply, this includes policies relating to environmental standards. The core principles of the SPD have been reflected in policy.
- In response to Historic England, amendments have been made to the policy to reflect the grading of the heritage assets. HIAs are not prepared for site allocations that existed in the Cambridge Coty Council or South Cambridgeshire District Council Local Plan. This is the same across the Local Plan and therefore the HIA has not been revised. Furthermore, the development on this site is underway and close to completion.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
The current policy approach relies on the NMS Site SPD, which is outdated and does not fully align with current or future site aspirations. Sustainability objectives in the SPD are outdated compared to more ambitious targets in the Local Plan. If the site remains in the Local Plan, a more flexible approach should be adopted, requiring a Development Framework with the first planning application.	202435 (University of Cambridge)
There are a number of designated heritage assets within the site boundary including part of the Central Conservation Area and a number of listed buildings including the Cavendish Laboratory of Experimental Physics, Mond Laboratory, The Arts School, The Laboratory of Physical Chemistry, and the Zoological Laboratory all listed at grade II. The site is also surrounded by numerous listed buildings including Corpus Christ (grade I), Pembroke (grade II* and grade II) and St Benet's Church (grade I) Development within this area therefore has the potential to affect the significance of these assets including through development within their settings. This is a highly sensitive location in terms of heritage. There does not appear to be a Heritage Impact Assessment for this site. An HIA should be completed. The recommendations of the HIA should be included in the policy wording. Include St Benet's Church in criterion 1b.	210113 (Historic England)

Policy S/PA/CC: Cambridge City Centre

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There is broad support for the designation from Historic England, Pioneer Group Ltd,

Comments were made by local residents to manage impacts on and acknowledge the physical constraints of Cambridge's historic core.

Comments were made by Cambridgeshire County Council for a typo and to increase cycle parking provision.

Further responses were made by local residents to designate the Riverside areas.

Comments were by made by the NHS about healthcare provision.

Response to the main issues raised in representations

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

- Support for the designation is noted.
- Eastern gate has not been added to point 4 because it has a more unique vision than a mixed use allocation.
- In response to Cambridgeshire County Council, the typo has been included. The provision of cycle parking is included under promotion of sustainable modes of transport.
- There are no current plans for the Lion Yard Central Car park to be redeveloped.
- The ARU campus does not have a specific designation as there is already development coming forward around this area and it is covered in part by the wider Eastern Gate designation.

- The Riverside does not have a policy designation because it is covered by policy BG/RC River Corridors which sets out policy to protect and enhance the river setting.
- Healthcare provision is dealt with by the IDP, and the requirements for healthcare provision set out in the relevant site allocations.
- The Historic Core of the City of Cambridge has been accounted for in the Skyline and Tall Buildings Strategy and the in HIAs developed for each site allocation to provide mitigation and design measures to manage the impact on the local designated and non-designated heritage assets.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
We support this policy but would like to see policy 1c revised to make specific mention of the historic skyline, our suggestion would be: “preserve or enhance heritage assets and their setting, the historic skyline, open spaces and the River Cam”. It could be argued that the historic skyline is ‘setting’ but this is not clear and therefore is open to interpretation.	202798 (Cambridge Past, Present and Future)
The draft policies map identities the City Centre designation as a ‘Policy Area’. However, it proves extremely difficult to review the boundaries using this tool, particularly given the number of designations in this central location. It is considered that any final policies map should provide clear distinctions and colour coding for the various ‘Policy Areas’ so it is easier to read the map, including an ARU campus designation.	203958 (Anglia Ruskin University)

Riverside should be designated a PRIA because: (i)It is a key link in the City's sustainable transport infrastructure, as the entry point to central Cambridge for three Greenways; (ii)It is a unique stretch of accessible urban riverfront that connects three green spaces and combines distinctive heritage assets with unspoilt river views; (iii)Work is underway with GCP to realise the area's potential as a vibrant destination with city-wide benefit; (iv)It sits alongside Eastern Gate Opportunity Area and close to four Areas of Major Change, surrounded by development proposals with major implications for the area.	204425 (Riverside Area Residents Association)
I believe that Riverside should be added to the list of areas for PRI for redevelopment or improvement. It is a beautiful city-wide asset, providing a riverfront promenade between 2 commons and a nature reserve and a number of important historic sites, some pre-dating the university itself. The improvement of this area should be captured in the Local Plan, so that plans which are taking place anyway by the GCP, and others, can be mindful /in accordance with the policies in the Local Plan. I have included a request for this under GP/QP	205006 (A Sheedy)
Site allocations lacking explicit on-site health facility requirements should reference the need for financial contributions for health and infrastructure mitigation, aligning with the IDP approach. Engagement with Council Officers during early plan preparation is welcomed, along with the opportunity to contribute to the Infrastructure Delivery Plan. An additional assessment by the ICB in Stage 2 of the IDP process will provide targeted evaluations of key site allocations and health infrastructure needs, offering more detail for each site allocation.	205086 (NHS Cambridgeshire and Peterborough Integrated Care Board)
The policy takes no account whatever of existing pressures on, and the physical constraints of, Cambridge's historic core. The policy also takes no account whatever of chaos caused within limited	205295 (J Preston)

public realm whenever major developments are proposed. Existing cycle parking cannot cope with current demand let alone that already in the pipeline, pavements are cluttered with Voi scooters, and the Council's idealist vision of cafes around the Market Square is belied by takeaways and delivery mopeds. The policy is totally premature and unjustified in the absence of thorough analysis of existing issues and of the capacity of the centre to absorb any more growth.	
The Lion Yard Central Car Park should be a key site for repurposing (if not full redevelopment). If 50,000 homes are planned for Greater Cambridge area, where will be the additional amenity space be for residents & visitors in the city centre? A paradigm shift is required to reduce vehicular traffic and associated health issues arising from pollution, plus road safety. A sustained modal shift away from private vehicles can be encouraged by reducing central parking to essential users only. Car Park floors can be repurposed as residences, offices, shops, eateries and even rooftop green spaces, improving the public realm.	205313 (North Newtown Residents Association)
Whilst we consider the policy to unnecessarily duplicate wider policy, the overall approach to encouraging development within the City Centre, and specifically at Fitzroy/Burleigh Street/Grafton Area, is supported.	207439 (Pioneer Group Ltd)
Support for policy.	210114 (Historic England)
We support the policy that is proposed. However, could an additional note be added to Supporting Information that the City Council is embarking on a placemaking project to develop a city centre vision which will be wider than planning policy but may suggest direction to achieving goals reflected in this	204190 (Cambridge City Council Liberal Democrat Group)

policy, and that city centre development coming forward should have regard to this project as it develops.	
I support this policy - I would add one point. In point 4 - add the Eastern Gate Public Realm Improvement Area. The Western end of Newmarket Road before the Elizabeth Way roundabout also presents an opportunity for mixed-use intensification.	202910 (M Cleminson)
Page 162, paragraph 3.1.117 Typo - The city centre has therefore had to evolved to ensure it remains a vibrant place to visit.	210521 (Cambridgeshire County Council)
An important issue for the city centre is the lack of public cycle parking. This policy should include the need to increase the amount of public cycle parking as part of new development wherever possible.	210585 (Cambridgeshire County Council)

Summaries of Representations: Sites Areas of Major Change

Policy S/AMC: Areas of Major Change

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Support from Historic England to the criteria requiring a new, strong landscape framework that is guided by and incorporates existing positive landscape and townscape features and heritage assets. Broad support from Anglian Water, but clarity was sought on what the reference to water management was referring to. Cambridgeshire County council suggested adding reference to Rights of Way Improvement Plan (ROWIP).

Pioneer Group are concerned rather than supporting development the policy places additional controls, conflicting with the aspiration for growth in these areas. Railpen also considered a number of the requirements disproportionate.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan policies.

The policy wording has been revised to be more positively prepared and has been streamlined to avoid duplication with other Local Plan policies. The policy name has also been amended to make it clear that this policy will only apply to Areas of Major Change within Cambridge and therefore not those within South Cambridgeshire. It is also clear that it will only apply to larger schemes, where a comprehensive and coordinated approach is often required to maximise positive planning outcomes. Whilst specific plots or sites within an Area of Major Change are likely to come forward at different points in time, the intention of the policy is to avoid piecemeal development and ensure that overall, these areas are supported by the necessary supporting infrastructure that may be more than what is expected to be delivered by an individual proposal. It also emphasises the need for a joined up approach with relevant public bodies, who may be responsible for the delivery of said infrastructure.

Reference to water management features has been added to the supporting text to provide greater clarity. Reference to the Rights of Way Improvement Plan (ROWIP) has been added to the Supporting Information.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Areas of Major Change should be considered as areas of opportunity in which development is actively supported and encouraged. As demonstrated by the wording "Excluding very minor development, development proposals within AMCs will only be permitted in the following circumstances..." it is considered that the policy seeks to negatively control development contrary to the presumption in favour. This will unnecessarily restrict the opportunity of the very change the AMCs are designed to facilitate. The policy seeks to establish controls which are not necessary and which increase the burden	207440 (Pioneer Group)

of planning policy upon development viability. This fundamentally conflicts with aspiration to see growth in these areas. Wider requirements of the AMC policy are picked up elsewhere within the emerging Plan and should therefore be deleted. See attached proposed revisions to the policy	
Anglian Water supports this strategic allocation policy which requires that the necessary infrastructure to support the development has been secured and a phasing strategy is in place where the phased provision of infrastructure is required - this is consistent with Policy I/ID. We agree with clause 4, that the redevelopment of these areas of major change, should protect existing assets including “water management”. However, the supporting text should qualify what this term encompasses. These sites also offer the opportunity to improve the public realm, achieving betterment through provision of SuDS and water reuse.	210190 (Anglian Water Services Ltd)
We welcome criterion 4b.	210115 (Historic England)
The respondent supports coordinated development but believes the criteria in Part 2 (a)-(c) impose unnecessary requirements that could hinder deliverability and flexibility of development sites. The policy does not consider that sites are at different stages of development, as exemplified by the Beehive Centre, which already has planning permission and extensive coordinating documents. The requirement for a site-wide masterplan and coordination documents is seen as disproportionate, especially for less complex sites where phased development is appropriate.	203196, 203909 (Railpen)
Page 165, paragraph 4a could refer to the Rights of Way Improvement Plan (ROWIP): https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-andpolicies/rights-of-way-improvement-plan. Rights of Way Improvement Plan should be referenced where connectivity/community & social inclusion is discussed. Often there is a reference to ensuring facilities	210512 (Cambridgeshire County Council)

and developments are connected better by active travel (walking, cycling, wheeling etc.) but there is already a network that can be built upon or improved for this.	

Policy S/AMC/AS: Abbey Stadium

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Cambridge United supports the designation of the Cledara Abbey Stadium as an Area of Major Change and is supportive of the Draft Policy's recognition that development on the site would be supported. There main concern was that the policy needs to be flexible in order to make the best use of the site. They recognise that the movement of people on match days can be disruptive and are committed to working with stakeholders through a through a Matchday Management and Travel Plan.

Comments were made by multiple representations to raise issues about congestion and traffic, and by local residents and about the environmental impacts of development. Further responses were made by Sport England about meeting standards for the Football Association. Historic England gave views about how the policy should consider local heritage impacts.

Response to the main issues raised in representations

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

- In response to concerns about congestion, a requirement for a Transport Mitigation Assessment has been added into the policy area.
- The environmental impacts of the development will be managed by the development management policies which set out

requirements for biodiversity under BG/BG and urban greening under BG/UGF, as well as open space provision under BG/EO.

- In response to Historic England, the suggested changes have been made.
- A HIA has not been prepared for this site because it is a policy area, where the policy guides the form of development, but not proposing allocation of specific development.
- In response to Sport England, a sentence has been added to the supporting text to reflect the need for proposals to meet the standards of the Football Foundation and Cambridgeshire Football Association.
- Broad support from Cambridge United Football Club for the policy is noted. The policy supports potential non-match day uses at the stadium and does not preclude redevelopment of the stadium coming forwarded through a phased approach. Part 1 (a) of the policy notes that subsequent planning applications should support the delivery of the vision and it does not require a single application.
- Noting the existing active travel and public transport that serve the site and wider area, the policy requires, at the planning application stage, for a Transport Assessment to be prepared which would consider transport impacts and mitigation measures in more detail, depending on the scale and nature of the proposal. Therefore the policy does not prescribe specific transport interventions but does note that highways, active travel and public transport enhancements are likely to be necessary and will need to be taken into account as part of the preparation of the Transport Assessment.
- All development proposals should be context led and mitigation measures should be identified and implemented where necessary. This is supported by a suite of policies across the Local Plan including within the Great Places chapter. Given the relationship between the greenspaces in the City and the adjacent built form, it will be important that any redevelopment of the stadium is context led and supports the Plans aspirations for high quality design.
- Any development proposals that result in the loss of protected open space or any other designations are covered by other policies in the Local Plan and so are not repeated here.

- There has been no specific proposal identified by the football club for an alternative stadium location, nor confirmation that the club are actively seeking to relocate. The plan therefore does not identify a site allocation for a new stadium elsewhere. A future development proposal to relocate the stadium would need to be considered on its merits against the policies set out in the Plan, including those that relate to sports and culture. If the stadium was to relocate, then it is at this stage that the open space designation would be considered as part of future plan reviews. It would be premature to remove the protected open space designation at this stage.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Football stadium is a source of traffic and anti-social behaviour.	200985 (C Campos)
The sites impact on environmental regeneration, and open space should be considered and there are further opportunities for biodiversity.	202811 (Cambridge Past, Present and Future)
Objection to the absence of specific reference to the Grade I listed Leper Chapel in the policy.	202811 (Cambridge Past, Present and Future)
Impact on traffic on match days should be considered. Traffic solutions away from residential areas should be considered.	202914 (M Cleminson)
Concerns raised about lack of capacity for more access routes to the site.	204639 (S Schwitzer)
The site is located adjacent to the Riverside and Stourbridge Common Conservation Area, as well as a number of grade II listed buildings and close to the Grade I Leper Chapel. Development within this area therefore has the potential to affect the significance of these assets	210116 (Historic England)

including through development within their settings. We understand that there is no HIA for this as it is a Policy Area. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy. Criterion j should refer to a heritage impact assessment (not historic). It should also refer to the grade I listed Leper Chapel.	
Can we please ensure that developments to the Abbey Stadium are mindful of how clogged up parking can get in Riverside on match days. Please can they be sensitive to the pressures placed on neighbouring areas and find solutions to parking issues away from residential areas.	202914 (M Cleminson)
Sport England supports the principle of this policy. To ensure that the redevelopment of the stadium and the improvement of the sporting facilities are fit for purpose, we request that the supporting information includes a requirement for the design of the proposals to meet the standards of the Football Foundation and Cambridgeshire Football Association.	209218 (Sport England)
Pleased that civic leaders have given their public support to Cambridge United's vital role in Cambridge. However, Cambridge United is capacity constrained. At the moment we are able to meet fan demand but on current trends that will likely soon become a bigger challenge. Over the last 10 years there has been a 31% increase in attendance, and the occupancy has been over 90% in the last two seasons. In this context, the Club would like the Draft GCLP to provide planning policy support for the Club to improve the Cledara Abbey Stadium, potentially in phases, to increase the capacity and facilities on matchdays, but also to ensure that the stadium is used on non-matchdays as an	209104 (Cambridge United Football Club)

important facility for the local community. However, if, as seems likely, the Cledara Abbey Stadium cannot be improved in a way that is financially viable, to safeguard the Club's long-term future, the Club will work with the Council and others to identify potential alternative sites to ensure that its current capacity does not constrain both the Club's and the city's wider ambitions.	
The Club supports the designation of the Cledara Abbey Stadium as an Area of Major Change and is supportive of the Draft Policy's recognition that development on the site would be supported. However, to be effective and to facilitate the improvement of the stadium, the policy needs to be flexible. The Club is concerned about the restrictive nature of some elements of the draft Policy. There is a need to add more flexibility to the draft Policy to ensure that the Club can make the very best use of the site in a way that is viable and sustainable. See proposed wording for policy in Appendix A of the accompanying attachment. The key aim of any potential stadium redevelopment would be to increase the capacity and number of fans able to attend games, while also enhancing the matchday experience through an improved hospitality offer, and encourage wider non-matchday use by the local community. These aspirations should be explicitly referenced and supported in the wording of the draft Policy.	209105, 209106 (Cambridge United Football Club)
Comment on criterion a). While a masterplanned vision for future development on the site is appropriate, there needs to be recognition that a degree of flexibility is required, and that this masterplan may not be delivered all at once, owing to viability and time constraints. As such, while reference to a wider masterplanned vision of the site is understood, there should recognition and allowance for flexibility built into the criterion to allow a phased development.	209107 (Cambridge United Football Club)

Comments on criteria b) - e). Cledara Abbey Stadium is already well served by existing transport infrastructure, and the Stadium also has access to Park & Ride services and is well connected to the wider transport system via established pedestrian and cycle routes. It is recognised that the movement of people on matchdays can cause disruptions. The Club would, therefore, be committed to bring forward further measures as part of any planning application to address this issue. However, it should be recognised that there are wider factors that impact the highways network, and any impact associated with the Club is typically restricted to a limited period of time on matchdays (circa. 25 days per annum). Therefore, rather than a blanket policy requiring any redevelopment to solve issues that go beyond the Club, we believe a nuanced approach should be taken. The Club believes that improvements to matchday traffic can be made through soft interventions and would commit to delivering these through a Matchday Management and Travel Plan associated with a redeveloped stadium (and the associated capacity uplift). These interventions would focus on promoting active travel, encouraging behavioural change to reduce private vehicle use at peak times, and improving overall travel planning for supporters. The Club would also commit to working proactively with the local authority to manage and enforce appropriate parking controls in the surrounding area, ensuring that matchday operations minimise impacts on nearby residential streets and deliver a more sustainable and coordinated transport strategy.	209108 (Cambridge United Football Club)
Comment on criterion f). The Club want to protect all trees on the site, but that simply might not be possible were the stadium to be improved. This should be explicitly recognised. The reality is that the	209109 (Cambridge United Football Club)

stadium is adjacent to open space. Tree planting will not 'soften 'the impact. Seeing the stadium from the open space will not be a surprise to anyone as it has been there for nearly 100 years.	
There is also a greater need for flexibility in the policy wording in relation to where development can take place, and the policy boundaries. Draft Policy S/AMC/AS explicitly recognises that the Cledara Abbey Stadium site is constrained to the west and south (through ecological assets, open space and allotments). However, there is little flexibility in the policy wording that allow encroachment into these areas if, on planning balance, the benefit of ensuring delivery outweighs the harm (which would be mitigated or compensated wherever possible). If there is limited encroachment on land that is protected by other Plan policies, the encroachment must be justified in accordance with those policies, and this does not need to be re-stated in the Policy. However, it should be recognised in this allocation that improving the Abbey Stadium and safeguarding the long-term future of the Club and its role in Cambridge will be given significant weight in assessing the impact of development.	209110 (Cambridge United Football Club)
The design led approach should not seek to limit development, but to make the best use of the site and ensure operational requirements of the Club can be fulfilled.	209111 (Cambridge United Football Club)
The Club's stated preference to date is to remain at a redeveloped Cledara Abbey Stadium. However, given the many and obvious constraints, the Owners and Board recognise that this might be neither financially viable nor deliverable. The Club is open-minded about relocation to a site elsewhere. In this situation, the Club would like to work in partnership with the Council and others to help identify an appropriate alternative site that meets both the Club and the city's needs. The Abbey Stadium is the	211868 (Cambridge United Football Club)

only home Cambridge United has ever known and, whilst securing the Club's future and maximising the moment of opportunity the city is now in may require a move, we know this is a very sensitive and emotive issue. Should a defined allocation not be forthcoming, it would be helpful to include a broad statement of support for the Club's relocation (in the correct circumstances) either within draft Policy S/AMC/AS, or within a bespoke policy that explicitly deals with the Club's relocation within the Plan. This would be in line with Paragraph 98 of the NPPF, which requires Councils to plan positively for the provision of cultural facilities.	
Should the Club find an appropriate alternative site, and develop a new football stadium on it, it would be appropriate for the current site to be redeveloped for residential or commercial use. In such a scenario, the need to protect the pitch as open space would fall away. As such, to make best use of the land (which is brownfield) the draft policy should recognise the development potential of the site should the Club find an alternative site. This approach would be consistent with paragraphs 104 b) and 124 of the NPPF. It is recommended that the Policies Map is amended to remove the protected open space designation and ensure the site's future development potential is not compromised if the Club needs to relocate.	211869 (Cambridge United Football Club)
Page 116, paragraph 1e should refer to Newmarket Road Park & Ride rather than Newmarket Park & Ride.	210522 (Cambridgeshire County Council)

Policy S/AMC/BC: Beehive Centre

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made by local residents critiquing the allocation of the land for lab uses as the sector is in decline, and the development does not protect surrounding communities from loss of light. Comments were made by Historic England to make more specific reference to heritage assets. Cam Skate sought reference to community and leisure uses.

Further responses were made by local residents about overheating and urban heat island effects.

Response to the main issues raised in representations

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

- The redevelopment of the Beehive Centre is not an allocation of the Local Plan, they have already gained planning permission. The implications of it will be reflected in this area of major change to ensure mitigations are enabled for the public realm, pedestrian experience and suggested uses.
- Suggested amendments have been made to address comments from Historic England and Cambridge Past, Present and Future with respect to heritage assets.
- Pedestrian and cyclist movements have been reflected in the policy wording to ensure there is connectivity and safety for local residents in this area. Active travel is a priority for this area due its central location.

- Reference to the Transport Strategy has been tidied up in the policy wording in response to Cambridge, Past, Present and Future.
- Point 4b has been amended to address comments made by Cam Skate.
- Suggested changes from Railpen have been made where it is considered these provide greater clarity on the Councils' vision for this area.
- The urban heat island effect is managed by policy C/SD and S/DC which set out requirements to demonstrate how overheating is managed through the Sustainability Statement and how overheating is managed in buildings and the public realm through the cooling hierarchy.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Whilst there are no designated heritage assets within the site, the site lies immediately adjacent to the Mill Road Conservation Area. Any development of this site has the potential to impact upon the heritage assets and their settings. We understand that there is no HIA for this as it is a Policy Area. We welcome criterion 4 but recommend the addition of the word 'height'. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy. We appreciate that the site has been granted planning permission by the SoS. However, the policy needs to be robust, should the permission not be implemented and alternative proposals come forward for the site.	210117 (Historic England)

The respondent expresses concern that the anti-car sentiment in planning policies has not been fully considered, particularly for car owners who commute and have independent children. They argue that restrictions on car use will lead to a less happy community, as cars enable 70% of residents to maintain their quality of life. The respondent believes that issues attributed to cars are symptoms of a larger problem, namely that the area is not a high-density city like London and cannot support a large population.	202705 (D Whant)
They suggest that if growth is necessary, it should occur in surrounding villages and towns, supported by a network of transport hubs. The respondent feels that Cambridge has lost its appeal due to development that has not considered long-term consequences.	202705 (D Whant)
The use of vitality and viability is unclear. The clarity of the policy needs to ensure the site's strategic role and planned evolution of the site.	203421, 203928 (Railpen)
The area is currently not very cyclist or public transport friendly. I would suggest better coordination between the retail park, beehive centre, and Tesco. Move shops to sites along Newmarket Road and parking to the back, so people could seamlessly access the shops from the bus stop instead of having to walk through an exposed parking lot. This is also a less historically sensitive area of Cambridge, so I support densification to provide much needed housing or office space.	203794 (A Chan)
More attention to urban heat islands and how areas of significant development work alongside existing housing must be a key factor here. The Beehive should never have been allowed to cause the impact that it did at outline planning and the Local Plan must protect homes especially those not in conservation area. The east especially shouldn't be taken advantage of - many communities use bikes but lack safe access due to urban sprawl and the retail park.	205340 (B Smith)

This is not a comprehensive statement that does enough to protect Silverwood Close from the loss of light and overwhelm by the planned buildings presented at the outline planning stage. I object most strongly to this, in part it's an enormous waste of land that would suit housing very well since lab-space is on the decline, and there is no protection to neighbouring residential buildings with clarity of height, noise and proximity to boundaries.	205388 (B Smith)
Frustration exists regarding the redevelopment of the Beehive, which lacks a residential component; a policy requiring mixed-use development for larger projects is suggested to address the city's housing needs.	207392 (Cambridge Past, Present and Future)
Whilst there are no designated heritage assets within the site, the site lies immediately adjacent to the Mill Road Conservation Area. Any development of this site has the potential to impact upon the heritage assets and their settings. We understand that there is no HIA for this as it is a Policy Area. We welcome criterion 4 but recommend the addition of the word 'height'. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy. We appreciate that the site has been granted planning permission by the SoS. However, the policy needs to be robust, should the permission not be implemented and alternative proposals come forward for the site.	210117 (Historic England)
No mention of community, sports, leisure, culture or creative hubs within the policy which we see as integral to supporting the vitality of this area given its city centre location.	210563 (Cam Skate)

Policy S/AMC/EB: East Barnwell

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There is broad support for the policy area from the Cambridge Investment Partnership.

Historic England confirmed that there are no designated heritage assets near the site.

Comments were made by Sport England to set out that under the 23/04687/FUL sports provision was re-provided.

Response to the main issues raised in representations

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

- Support noted.
- No comment noted from Historic England.
- In response to Sport England, the suggested amendments have been made.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
There are no designated heritage assets within the area or nearby. No comments.	210118 (Historic England)
Support the principles.	203403 (Cambridge Investment Partnership)

The East Barnwell area includes the site allocation S/C/BRN. For clarity, we advise you refer to the planning permission 23/04687/FUL and explain that the permission included the replacement of the sports provision to be lost as part of the planning permission 23/04849/FUL. This would demonstrate that the loss of these sports facilities has been assessed against paragraph 104 of the NPPF and that replacement mitigation provision has been secured.	209219 (Sport England)

Policy S/AMC/FBG: Fitzroy/ Burleigh Street/ Grafton Area

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There is broad support for the designation from ARU.

Comments were made by the Cambridge Liberal Democrat Group to include more reference to leisure provision.

Comments were made being critical of the negative preparation of the policy area, providing a shopping list of requirements rather than positive proposals.

Further responses were made by local residents about concerns about the urban heat island effect.

Historic England made representations to reflect more of the heritage assets in the policy wording.

Response to the main issues raised in representations

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

- The policy area is drafted in a way to establish which land uses support the vision for the area and what the constraints are and what is needed to support development in this area. It is not worded to prevent development but support sustainable development in this location.
- Leisure provision is covered by policy point 1A.
- The suggested amendments from Historic England have been made.
- The urban heat island effect is managed by policy C/SD and S/DC which set out requirements to demonstrate how

overheating is managed through the Sustainability Statement and how overheating is managed in buildings and the public realm through the cooling hierarchy.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The site contains several designated heritage assets including the Arts Theatre Workshop and Store listed at Grade II* and 17 Fitzroy Street and 38 Newmarket Road both listed at garde II listed. Part of the Kite Conservation Area is included in the Policy Area. There are also numerous listed buildings nearby. Development within this area therefore has the potential to affect the significance of these assets including through development within their settings. We understand that there is no HIA for this as it is a Policy Area. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy. We welcome criterion 1b, 7b and 8. The Policy should make more reference the role of heritage in the re-vitalisation of retail areas. See our Heritage Led Regeneration Toolkit | Historic England for further suggestions	210119 (Historic England)
Leisure use is missing from this policy so please add the following to Grafton Shopping Centre Point 4 “Retention of significant public leisure use".	202842 (Cambridge City Council Liberal Democrat Group)

Can this policy make reference to Fitzroy and Burleigh Streets' purpose as a focal point for local services to the immediately surrounding Kite community as well as an extension to the city centre. Please add that there should be priority given for retention of convenience shopping and larger anchor stores which serve both audiences	202842 (Cambridge City Council Liberal Democrat Group)
ARU supports this policy and development opportunities at the Grafton Centre. ARU particularly supports the specific reference to the site being suitable for uses associated with ARU's East Road campus. It would be an opportune area for further ARU based development, reinforcing the perception of an East Road campus and interconnectivity across the multiple hubs.	203991 (Anglia Ruskin University)
The policy is constructed in a negative manner. Rather than establishing a baseline that development within the AMC is acceptable, it establishes a shopping list of requirements, many of which conflict with the requirements of existing and emerging national policy.	207441 (Pioneer Group Ltd)
The policy fails to recognise the existing permission or flexibility in the use class order.	207441 (Bidwells on behalf of the Pioneer Group)
The site is at risk of heat island affect due to impact of labs proposed around the Grafton Centre. Concerns about the prevalence of science labs in the City Centre and impact on community and safety in the public realm.	208877 (R Lambert)
Can this policy make reference to Fitzroy and Burleigh Streets' purpose as a focal point for local services to the immediately surrounding Kite community as well as an extension to the city centre. Please add that there should be priority given for retention of convenience shopping and larger anchor stores which serve both audiences. Leisure use is missing from this policy so please add the following to Grafton Shopping Centre Point 4 "Retention of significant public leisure use".	202842 (Cambridge City Council Liberal Democrat Group)

Policy S/AMC/SCL: South of Coldham's Lane

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made by local residents on impact on green infrastructure, chalk streams, connectivity, parking and safety.

Comments were made by Historic England requiring an HIA and requesting further detail on the heritage asset within and adjoining the site.

Comments were made by Friends of Cherry Hinton Brook about active travel connections, enhancing biodiversity and water safety around the country park.

Further responses were made by Cambridgeshire County Council regarding the impact on local pits.

Response to the main issues raised in representations

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

- A review of the policy structure and configuration to reflect the distinct four areas of the site allocation that are emerging through wider changes to the context of Cambridge East with the introduction of new Cambridge East Station, and setting out a clearer vision for where the biodiversity needs to be protected and enhanced on local wildlife sites and which parts of the site are suitable for redevelopment.
- In response to Historic England, amendments have been made to the supporting text to highlight the heritage assets adjoining the site
- In response to Cambridgeshire County Council, the policy wording has been revised to highlight the LNRS and show which areas have importance for green infrastructure and wider ecological enhancements and connection to wildlife corridors.

- In response to wider comments about restrictions to parking and selling food. Selling food is covered by licensing and is not the role of the Local Plan site allocation. The issues relating to parking will be picked up by a Transport Assessment supporting any future planning application and a policy I/EV: Parking and electric vehicles.
- In terms of comments relating to density, the building height has in this location has been informed by evidence in the HIA and also by the local character.
- In terms of concerns around impacts on chalk streams, policies in the wider plan include policies to require water supply and water quality consideration at the planning application stage.
- In terms of active travel and connections, wording has been added to the policy to improve connections between Tin's Lane and Coldham's Common and wider active travel connections.
- In response to Misson Street & BGO Newton Ltd, the policy has been restructured to better reflect the latest proposals.
- In response to concerns about site contamination including impacts on soils, wording has been added to the policy to ensure the mitigation of these issues.
- In response to Historic England, the wording has been amended to reflect the nearby heritage assets. A HIA has not been provided for this site as it is a site allocation from the Cambridge City Council Local Plan, and this is consistent across the Local Plan.
- The policy area has been restructured to make clear that there should not be impacts on the City Wildlife Site and protected open space. A separate section has been set out for this area to set out the requirements for ecological enhancement and recreation. Public access and safety has been added into the masterplanning section as well as flood mitigation to address representations from Friends of Cherry Hinton Brook. Active travel connection to Cherry Hinton, Coleridge and Romsey has been added to point 3g to address representations from Friends of Cherry Hinton Brook. In response to concerns raised about water safety, point 3f has been added to address concerns about public safety and water access in the Country Park.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**

Mill Road Conservation Area slightly overlaps this policy area along Burnside. Development within this area therefore has the potential to affect the significance of this asset including through development within its setting. We understand that there is no HIA for this as it is a Policy Area. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy. Criterion c refers to building heights of no taller than 6 storeys. In the absence of a Heritage Impact Assessment this is inappropriate and should be deleted. This needs to be explored through an HIA and masterplanning. Delete reference to 6 storeys.	210120 (Historic England)
I object, I live very close to the start of the Tins pathway. An entry point here would be very difficult because the path is already quite busy. It would be impossible for any more cars to be using Burnside which is single file traffic. The last thing this area needs is a kiosk selling snacks. Changes to plan: Absolutely no parking. and nowhere selling food.	202697 (M Downs)
These ?20 metre high buildings are going to be cheek by jowl with houses on Wolsey Way and our garden on Orchard Estate. We will only a few feet away. They are much too high to be so close to a residential area and will dwarf the rest of the built environment. Local residents are not being kept informed on the results of the drilling tests, to see if it is even safe for foundations to be drilled. You have a rare chalk stream several metres downhill from this site. It is obvious the leachate will end up in the water.	201230 (S Williams)

Significantly improved developer-funded active travel routes should be designed in and built, and amenities should be expanded to enable local residential access. Provision should be made for a new rail/light rail stop on the railway line.	203829 (A Carpen)
We object to the proposed development of the lakes area because we do not feel sufficient thought has been put into the following: - access - the busy corner of where The Tins meets Brookfields and Burnside is already dangerous at peak times with all manners of transport and is an inappropriate site for the main entrance. - safety - since the plans were originally submitted a young person has drowned in the lakes. 24 hour access to the area without monitoring / security does not seem sufficient to prevent further accidents.	203771 (C Bone)
The application of a maximum storey height on buildings is inflexible when assessed in the context of other emerging spatial strategies and projects including East West Rail. The draft policy is also inconsistent with other parts of the draft Plan, including Policy S/C/SCL, and also with planning permission 23/04590/OUT. We propose that S/AMC/SCL paragraph 2c) should be amended.	204031 (Mission Street &BGO Propco Newton Ltd)
Policy S/AMC/SCL fails to take the following matters into account: The site proposed for the country park is severely constrained. Opportunities for public access have not been addressed. The part of the site previously ear-marked for public access is subject to flooding. Local water courses and bodies are vulnerable to pollution from toxic land fill. There is insufficient emphasis on the protection of flora and fauna. Management issues have not been given sufficient attention.	204669 (J McGill)
I do not think that the new plans for S/AMC/SCL South of Coldhams Lane take into account the detailed comments and recommendations made by local groups and individuals regarding the previous 2018 Local Plan. There are still many aspects which are vague and not showing how concerns will be	205152 (H Anderson)

addressed. Maintaining biodiversity, safety (including site supervision), future management, access (including vehicle parking and road safety), pollution and drainage issues are not properly outlined and could therefore open to misinterpretation if these plans go ahead.	
FCHCB have significant concerns about the policy for this AMC, as outlined in our full statement. For the urban country park: 1. Any public access must be strictly supervised, to avoid repetition of the 2024 fatality. 2. Access to the country park should prioritise active travel, given constraints on vehicle access and parking. 3. Proposals for governance and management to date need full revision 4. The risk of pollution of Cherry Hinton brook and the lakes from leakage/run-off from the land-fill site (containing highly toxic materials), must be made clear, along with the need for protection of the wildlife, evidenced by the designation of the area as City Wildlife Sites.	204667 (Friends of Cherry Hinton Brook)
Point 1a. Add: retain as much biodiversity and green space as possible, since this parcel of land is designated as both City Wildlife Site and protected open space.	210441 (Friends of Cherry Hinton Brook)
Point 1c. Reword first sentence of this point as follows; "In the area to the south-west: deliver a new urban country park through enabling periodic, highly supervised public access that will ensure the safety of all visitors whilst maintaining the important biodiversity and ecosystems of this wetland area. "	210442 (Friends of Cherry Hinton Brook)
Point 2a. Add after 'public access' the following phrase "... (covering both safety of the public and protection of wildlife) ....".	210443 (Friends of Cherry Hinton Brook)

Point 2d. Add to last sentence: .... streams, "as well as the variability in rainfall and water table levels which are having a major impact on drainage and periodic flooding of associated residential areas (such as Burnside and Brookfields)". This is important as the current proposal for the main entrance to the country park is in an area prone to flooding and immediately adjacent to the brook.	210444 (Friends of Cherry Hinton Brook)
We propose an additional Point f, since the proposal does not address access from the south of the AMC: "Ensure a safeguarded active travel access route from Cherry Hinton, Coleridge and Romsey wards and the city centre, to help to eliminate traffic congestion and parking in associated residential areas to the south of the Area of Major Change".	210445 (Friends of Cherry Hinton Brook)
In relation to the Supporting Information section: This recognises that “Outline planning permission was granted in January 2025 for offices, research and development, along with delivery of a country park.” but fails to mention the numerous issues that have been raised since then, including (a) that 72 conditions have to be met before the application for the northern parcels of land can go further because the construction is proposed for a location that is a toxic land fill site, and (b) that the area proposed for public access and a country park is highly dangerous (evidenced by the 2024 fatality in the lakes). It is irresponsible of the Local Plan to imply that this area would be suitable for unlimited public access and what most people would consider a normal country park. We request that the Supporting Information section provides more information and appropriately flags up the constraints of this location. We have provided our objection to the 2024 planning application as an uploaded separate document.	210446 (Friends of Cherry Hinton Brook)

Recommend the wording of the policy be expanded to include strengthening of the important wildlife corridor and delivery of Local Nature Recovery Strategy priority habitat and to take note of local wildlife sites.	210610 (Cambridgeshire County Council)

Summaries of Representations: Sites Public Realm Improvement Areas (PRIA) in Cambridge

Policy S/PRIA: Public Realm Improvement Areas (PRIA) in Cambridge

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Two main areas were highlighted by comments seeking further policy development in the plan.

The Elizabeth Way Bridge and Underpass(es) cultural hub project was highlighted as an opportunity for public realm improvement, making the area more accessible for active travel but also opportunities for cultural provision.

The Riverside Residents Association and others highlighted the Riverside Area Vision, proposing that the area needs careful planning and investment to make it safe and attractive for both pedestrians and cyclists, especially given predicted traffic increases from converging Greenways. Development should be supported if it aligns with the Riverside Vision and emerging thinking on the area's future potential as a strategic asset for the City as a whole.

Another comment welcomed the Mill Road policy area.

Anglian Water and Cambridgeshire County Council considered the policy should reference sustainable drainage. Historic England welcomed the aims of the Policy. Cambridge Past Present and Future considered it needed to be supported by a heritage strategy. Cambridgeshire and Peterborough Combined Authority highlighted the need to consider impacts of the policy on the functioning of the transport network. There were also comments highlighting the need to support active travel.

Railpen suggested amendments of the policy, proposing that developers could prepare and submit steering documents to guide the development of an area that could be taken account of in planning applications.

Response to the main issues raised in representations

Comments regarding specific PRIAs have been addressed under these individual policy areas and therefore are not address here.

The supporting text of the policy now makes reference to the historic environment and should be read alongside the relevant policies in the Great Places chapter of the Local Plan.

The policy does not prioritise place making over vehicle movement, especially at junctions, as suggested by the representation. The policy is clear that a context led approach is required for development proposals in these locations, which reflect the needs of the area. This may include transport and movement as well as placemaking matters such as the quality of the public realm and the improvement of existing shop fronts.

SUDs and water management is not specifically referenced in the policy as this is covered by other policies within the Local Plan. However, the broad principle of the representation is noted and broadly supported elsewhere in the plan.

The policy has been amended to reflect that facilities and amenities should extend beyond the provision of shops and services. However, part 3 of the policy continues to require a policy framework to guide overall change in these areas as a ‘steering document’ is not a commonly recognised term.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
S/PRIA/EG and Elizabeth Way Bridge and Underpass(es) cultural hub Project: Support development within the designated PRIA of a Cultural Hub offering accessible programme. The area surrounding the bridge and underpasses is lacking a sense of place. Introduce community, sports and cultural programme and upgrades to the public realm to promote safety and identity. Strengthen active transport N/S and E/W connections around the infrastructure for better connectivity, prioritising residents and visitors. Encourage movement along desire lines to and across the river, for local wards Petersfield, Market, Abbey and Chesterton.	201990 (Skateboard Cambridge CIC) 204004 (L Cooke) 203880 (B Greig) 202564 (J Neal) 204049 (A Giarlis) 203135, 201833 (NEUBAU Architecture Ltd (B Lenz, Architect)

	204242 (Cambridge Junction / Create Cambridge) 205237 (University of Cambridge) 201800 (NEUBAU Architecture Ltd)
I support the development within the PRIA of a cultural hub offering an accessible programme. I oppose demolition of the underpass. RIBA guidance puts avoiding demolition as the number one way to improve sustainability of development. This is due to embodied energy and intensive energy and CO2 output required for demolition works. Therefore, I support the regeneration of the underpass into a cultural hub, using inventive architectural interventions. This would strengthen active travel and improve safety due to increased footfall. I would also improve place making and community.	204329 (K Fisher)
Riverside is a vibrant connected urban riverfront destination with city-wide benefit that celebrates Cambridge's relationship with water. Riverside unites Stourbridge Common and Midsummer Common through an elegant inclusive promenade that enhances community life, local heritage and ecological sustainability, and makes walking and cycling joyful experiences. We recommend that Riverside becomes its own Public Realm Improvement Area, focusing on Environment & biodiversity, Connectivity, Character, Heritage & identity, Safety & accessibility and Vehicular movement & parking.	203766 (Cambridge Green Party)
Riverside is a vibrant connected urban riverfront destination with city-wide benefit that celebrates Cambridge’s relationship with water. Riverside unites Stourbridge Common and Midsummer Common	204631 (M Cleminson)

through an elegant inclusive promenade that enhances community life, local heritage and ecological sustainability, and makes walking and cycling joyful experiences. It should become a PRIA focusing on Environment & biodiversity, Connectivity, Character, heritage & identity, Safety & accessibility and Vehicular movement & parking The existence of a Heritage Trail covering both Riverside and the Eastern Gate should be noted – highlighting the historical and cultural importance of both these areas. Please see attached information.	
The Riverside Area Vision sets out objectives for character, identity and heritage, connectivity, creating places that are safe, accessible and inclusive with three activation spaces and integrate the environment and enhance biodiversity. It needs careful planning and investment to make it safe and attractive for both pedestrians and cyclists, especially given predicted traffic increases from converging Greenways. We propose a community-driven review to shape a future Riverside Area Vision which highlights opportunities to make the area a vibrant attraction for Cambridge residents and visitors. Suggest - Proposals within the Riverside Area will be supported if they align with the Riverside Vision and emerging thinking on the area’s future potential as a strategic asset for the City as a whole.	211845, 211846, 211847, 211848, 211849, 211850, 211851, 211855, 211856, 211858 204440 (Riverside Residents Association)
I propose that Riverside should be designated PRIA for the following reasons: 1. It is a key link in the City's sustainable transport plans, as the entry point to Cambridge for three Greenways. 2. its unique stretch of urban riverfront that connects three green spaces and combines distinctive heritage assets with unspoilt river views. 3. Work is underway with GCP to realise the area's potential as a beautiful destination with city wide benefit.	204980 (A Sheedy)

The changes that are planned need to align with local plan policies and the only way to ensure this is to include it in the Local Plan.	
I welcome the draft policy for Mill Road and strongly support its focus on protecting independent shops and creating a safer, low-traffic, people-centred environment. These measures are essential to maintaining the area's distinctive character and supporting its long-term vitality. However, with the traffic filter now in place for several months and no accompanying public realm improvements yet delivered, I urge the Council to begin implementation promptly. Early action on pavements, crossings and streetscape upgrades would show commitment to the plan's aims and start bringing real benefits to residents and businesses.	200984 (F Sanchez Garcia)
I support The Cambridge Cycling Campaign submission. New developments must include adequate links to the surrounding area and links should be part of the Cambridge wide infrastructure without making longer journeys tortuous and complex. Provision should account for future growth in active traffic, climate change strategies and future developments	205009 (A Brown)
The public realm improvement areas should also offer the opportunity to achieve betterment through provision of SuDS and water reuse. Such measures are not implicit in the policy or subsequent site-specific policies, and we consider this should be positively expressed in this overarching policy.	210191 (Anglian Water Services Ltd)
We object that this policy does not include any reference to heritage (which is why we believe that a Historic Environment Strategy is required as part of the Local Plan).	202814 (Cambridge Past, Present and Future)
We welcome the general aims of this policy. Historic England focuses on using the power of heritage to secure vibrant and sustainable futures for places with historic character so that generations to come can continue to enjoy them. Our High Streets Heritage Action Zones have maintained, restored and brought	210121 (Historic England)

buildings back into use for local communities and businesses. See our Heritage Led Regeneration Toolkit | Historic England for further suggestions and case studies. We recommend that this policy should include provision for the re-instatement of historic shop fronts.	
I support The Cambridge Cycling Campaign submission. New developments must include adequate links to the surrounding area and links should be part of the Cambridge wide infrastructure without making longer journeys tortuous and complex. Provision should account for future growth in active traffic, climate change strategies and future developments	205009 (A Brown)
The Plan identifies specific locations as Public Realm Improvement Areas that would “benefit from a holistic approach to any future development that comes forward, to provide policy guidance for development that also improves public transport access and infrastructure delivery and seeks improvements to the public realm.” Those public realm improvements reference ‘place making’ over vehicle movement, especially at junctions.” That policy approach will need to be revisited in the light of the forthcoming Greater Cambridge Transport Strategy and any potential impacts the policy would have on the functions of the transport network.	205458 (Cambridgeshire and Peterborough Combined Authority)
There is strong support for embedding flood-alleviation principles into micro rain gardens and small parcels of land within new developments, such as spare or under-used corners. Their role in managing surface water and reducing flood risk should be made more explicit. There is also an opportunity to design small green spaces in ways that help residents understand and value their function in preventing flooding. A key question remains whether growth funding for this type of intervention will be distributed across Greater Cambridge as a whole or primarily targeted at areas experiencing new development.	211007 (Cambridgeshire County Council)

Part 1(c) of policy S/PRIA should be amended to clarify the reference to local shops, as it is currently not sufficiently defined and may not apply uniformly to all Public Realm Improvement Areas (PRIAs). Suggest: ‘help sustain or deliver facilities and amenities appropriate to function and character of the area’. The following would provide a more practical and flexible approach to guiding change while avoiding unnecessary additional policy layers: Part 3 should read “where proposals provide opportunities and potential challenges, site promoters should develop a steering document, approved by the planning authority as part of a planning application to promote and guide overall change during the life of the plan for the relevant area” Para 3.1.156 should read “it is recognised that while development can improve an area’s attractiveness it can also challenge the area’s character, in such circumstances site promoters are encouraged to develop a steering document to guide the area’s reconfiguration. Site specific policies requirements are also included, to highlight key local characteristics along with short and long-term opportunities and area aspirations that development should take account of as part of any planning application.”	204029 (Railpen)

Policy S/PRIA/CRP: Cambridge Retail Park

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were raised about protecting the strategic cycle route linking Riverside, the Beehive and Petersfield, and to safeguard land for a future bridge at Coldham's Common. Camcycle raised concerns about the lack of permeability.

Comments were made by local residents about specific improvements include a direct connection to Cambridge Railway Station, Chisholm Trail and bus services. Cam Skate requested to include leisure, and community uses in the policy wording.

Comments were made by local residents to improve design and heights and integrate with light rail network.

Further responses were made by Railpen on the alignment with nearby sites and the provision of infrastructure and a movement strategy.

Comments were made by Historic England about reflecting local heritage assets.

Response to the main issues raised in representations

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

- Suggested amendments have been in response to comments raised by Historic England.
- Wording has been added to the policy to protect the cycle route linking Rivers, the Beehive and Petersfield.
- Some of the Railpen suggestions have been incorporated into the policy wording where this aligns with the Council's approach to the site and the preparation of consistent policies.
- There are not currently plans for a future bridge at Coldham's Common and therefore the safeguarding wording has not been added to the policy wording.

- It is too premature to reflect any plans for a light rail network. The issue is currently being explored by the Cambridgeshire and Peterborough Combined Authority.
- Point 1a has been revised to include reference to leisure and community uses to address representations from Cam Skate.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Whilst there are no designated heritage assets within the site, there are two listed buildings on the other side of Newmarket Road – 247 Newmarket Road and Cambridge Gas Company War Memorial, both listed at grade II. Development within this area therefore has the potential to affect the significance of these assets including through development within their settings. We understand that there is no HIA for this as it is a Policy Area. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy.	210122 (Historic England)
It is essential we protect the strategic cycle route linking Riverside, the Beehive and Petersfield, as well as safeguarding land for a future bridge to Coldham's Common.	201999 (D Langley)
Development must protect the strategic cycle route linking Riverside, the Beehive and Petersfield.	202297 (R MacDonald), 202514 (H Brown), 202629 (A Lawrence), 202888 (J Williams), 203207 (G Orwell), 203322 (A Hoare),

	203344 (S Hughes), 203658 (V Ashton), 205150 (J Grantham), 205220 (K Brightwell), 205324 (R De Beaux), 205374 (S Nuttall), 205380 (A Williams),
The site should also safeguard land for a future cycle/pedestrian bridge to Coldham's Common.	202297 (R MacDonald), 205220 (K Brightwell), 205324 (R De Beaux), 205374 (S Nuttall), 205380 (A Williams),
Active travel needs to be prioritised from the outset, with provision for walking & cycling being mandatory.	203322 (A Hoare), 203684 (T Preud'homme)
Section 1.d and 1.e talk about active travel mostly within or around the site; it should also be a requirement for development to integrate with public transport for travel to and from the site. This is important as at present the area is poorly served by public transport. Specific improvements would be to ensure: Direct connection to Cambridge Railway Station; Direct connection to the Chisholm Trail; A wider range of Bus services, adding services perpendicular to Newmarket Road.	203585 (P Tribble)
Protect the strategic cycle route linking Riverside, the Beehive and Petersfield. Safeguard land for a future bridge to Coldham's Common. Requirement for the provision of trees along Newmarket Road and open space and amenity space. No/minimal parking provision.	202514 (H Brown) 20888 (J Williams) 203344 (S Hughes)

	203207 (G Orwell) 204562 (D Potts) 204590 (R Hoadley) 202629 (A Lawrence)
Expansion must unlock better walking, cycling and public transport for existing residents Limit car access between Cambourne and Cambourne North Set binding mode share targets Require early delivery of the main active travel network and crossings	202901 (J Williams)
Active travel needs to be prioritised from the outset, with provision for walking & cycling being mandatory. It should require provision of a protected, continuous and direct cycle route linking Riverside, the Beehive and Petersfield. It should also require safeguarding of land for a future pedestrian and cycle bridge across the railway to Coldham's Common	203322 (A Hoare)
Feel very positive with East gate ambitions and ideas. Will improve pedestrian and cycle access to Health and other facilities East/ West of roundabout. There is a need to ensure all current planning applications consider the ambition. Suggest cycle lanes and pathways should ensure they connect to current Newmarket road, (west side), ones which could be improved and greater use of Walnut Tree Ave made. If there is key development at Halfords site consideration needs to be given to impact on pedestrians and cyclists.	202289 (G Wrycroft)
Can this be part of a much wider masterplan that requires a significantly improved standard for building design (again incorporating the findings in neuroarchitecture) and also incorporating / making provision for a new rail/light rail stop at Coldham's Lane Bridge. A station at the bridge by the rail junction to the	203742 (A Carpen)

Cambridge-Newmarket Line would enable significant public transport access to the retail park, to the revamped Beehive sci-tech development, and to the Abbey Stadium, as well as for residents of NW Romsey. See https://cambridgetownowl.com/2023/07/15/why-the-beehive-redevelopment-plans-need-a-rail-station/ note it would enable closer rail access to the Grafton.	
Recommends amending part 1(b) of policy S/PRIA/CRP for clearer integration objectives with the Beehive Centre and the surrounding neighbourhoods; For part 2(a and c), Railpen suggests replacing 'policy framework' with 'steering document(s)' for practicality and clearer urban relationship guidance. In part 3(a and c), Railpen highlights the need to acknowledge the railway line in east-west connections and remove ambiguous references to the Greater Cambridge Partnership. Railpen requests clarity on the 'overarching development and environmental strategy framework' in para 3.1.159, proposing a reference to a 'steering document' instead. Provides detailed wording suggestions.	204083 (Railpen)
The land use should retain retail and ensure that cars can still access the site and not focus too much on active travel and public transport.	203801 (A Chan)
The Retail Park is presently of low quality as public realm, is dominated by car parking and is unattractive for pedestrians. I would support sensitive development (including retail, food, etc) to increase the amenity of the site; and efforts to make it safer and more pleasant as a through route for pedestrians.	205067 (N Spenley)
As with Beehive, the site at Coldham’s Lane, Newmarket Road and Henley Road are close to residential properties including Silverwood Close, New Street which are impacted by the Beehive.	205474 (B Smith)

Height Mers here as does overcrowding, which is not made sufficiently clear, nor is the reduction of traffic (pre-planning discussions showed two multi-storey car parks). Care must be given to traffic on Coldhams Lane which has increased since Mill Road bus gate was introduced. In summary the Local Plan must protect homes from the problems of obfuscation and height that have arisen during Beehive planning applications.	
No mention of community, sports, leisure, culture or creative hubs within the policy which we see as integral to supporting the vitality of this area given its city centre location.	210562 (Cam Skate)
Cambridge Retail Park is one of the most car-dominated sites in the city, yet it sits between dense residential areas and along key walking and cycling desire lines. Its redevelopment is a critical opportunity to reduce short car trips and address fragmented networks. The Plan refers to improving permeability through the site but does not explain how this will be achieved in a location defined by railway severance. Policy S/AMC/BC should be amended to include: ● A requirement for a protected, continuous and direct cycle route through the site that avoids conflict with turning vehicles and aligns with strategic desire lines; ● A requirement to safeguard land and secure delivery mechanisms for a future pedestrian and cycle bridge across the railway to Coldham's Common; and ● A requirement that permeability for walking and cycling is mandatory rather than encouraged, with multiple direct connections beyond the site boundary.	209082, 209083, 209084 (Camcycle)

Policy S/PRIA/EG: Eastern Gate

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments received focused on two main areas.

St Matthews Centre, Sturton Street, Cambridge was identified in previous HELAA assessments, causing concern for future impact on the community if it was to be considered. Comments requested not to allocate the site, siting the importance of the local amenity space, and previous planning refusals.

Ther were a large number of comments supporting the Elizabeth Way bridge and Underpass(es) cultural hub project. There were objections to the demolition of the roundabout and underpass, opportunities to create a cultural hub, with better connectivity for active travel, space for cultural activities, and an improved urban environment.

There was a suggestion to widen the boundaries, both north to Riverside and west to include the entire ARU Campus along both sides of East Road, and to include locations like Mercers Row, or to extend to the riverside.

Comments supported the re-establishment of the historical local centre and high street function of Newmarket Road, with a range of attractive shop fronts, cafes and restaurants.

Historic England highlighted the historic environment issues in the eastern gate area that would need to be considered. Other comments said that the neglected heritage of the area must be revived and become available for use by the community and wider public.
Railpen sought a change to the current policy wording of part F, as integrate positively with the adjacent areas is not sufficiently clear or measurable as a policy objective.

Response to the main issues raised in representations

St Matthews Centre, Sturton Street, Cambridge was not allocated in the Draft Local Plan but was identified in previous HELAA assessments. Whilst the HELAA sets out the reasons for assessing the site on the grounds of suitability, availability and achievability, the HELAA Red scores are noted, and the site has not been put forward in the Proposed Submission Local Plan.

Responses highlighted an opportunity to explore the extension of the policy area (PRIA/EG) to incorporate Elizabeth Way up to and beyond the river. The objectives would be consistent with the wider plan objectives and context of policies related to WS/CH: Cultural and creative hubs, Policy J/AW: Affordable workspace and creative industries, Policy BG/EO: Providing and enhancing open spaces, Policy GP/QP: Establishing high quality landscape & public realm, Policy CC/SD: Sustainable development and the climate emergency, Policy WS/CF: Community, sports and leisure facilities, and Policy I/ST: Sustainable transport and connectivity.

Proposals set out by The Underpass Project, including the Founding Principles are recognised as seeking to revitalise and improve the PRIA, and align with the proposed policy. Whilst the Local Planning Authorities are supportive of the objectives outlined for the project, the PRIA is currently the appropriate type of allocation to achieve the aspiration of the policy and enable opportunity to secure funding and other initiatives through community engagement and participation with stakeholders. The boundary of the policy

area has been amended to reflect the boundary identified as opportunity for improvement within The Under Pass Project, and wording has been amended to incorporate further benefits of the area including improving access to culture offers, providing spaces for creative arts, improving the public realm amenities and landscape, biodiversity and improving health and wellbeing.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
St Matthews Centre, Sturton Street, Cambridge (HELAA Reference 59405) Would be a disaster for this community. Site was given an Overall Score of 'Red'. The exclusion of the site must be permanently enforced. That will protect our vital, extremely limited and increasingly pressurised local amenity space - noting St Matthew's Piece as the only public park in North Petersfield. Unambiguous evidence of this need lies in the sequence of five Planning Refusals since 2021 (none appealed), each pertaining to this area: 25/0432/TTPO, 24/0413/TTPO, 23/0119/TTPO, 22/0271/TTPO, and (most significantly) 20/04514/FUL.	201191 (K Herron), 201192 (R Isaacs), 201193 (J Linney), 201194 (S Bjornson), 201195 (A Lindsay), 201196 (B Smith), 201198 (S Schofield), 201199 (L Kirsop), 201200 (N Adamson), 201201 (B Greig), 201202 (C Horne), 201204 (S Cracknell), 201205 (S Moss), 201206 (G Glover),

	201207 (G Archer), 201209 (B Sylvester-Bradley), 201210 (J Selby), 201211 (R Williams), 201212 (J Chapman), 201213 (P Salin), 201215 (U Stubbings), 201216 (E van Zwanenberg), 201217 (G Haraldsdottir), 201218 (D Schwarz), 201219 (H Schwarz), 201220 (S Salin), 201257 (A Erdil), 201259 (I Harvey), 201262 (L Tubb), 201263 (R Mills), 201264 (C Spooner), 201265 (F Lyall Grant), 201329 (L Franks),

	201401 (J Wright), 201423 (C Aman), 201427 (J Bradley), 201454 (T Neal), 201469 (Cllr R Robertson), 201513 (B Greig), 201741 (J Johnson), 201743 (J Johnson), 201816 (K Russull), 201879 (R Rozier) 203768 (Cambridge Green Party (R Comins, Research Officer)) 203600 (N Glegg) 202935 (Cambridge Glenys Self) 203420 (Federation of Cambridge Residents' Associations (W Blythe)) 201359 (JV Neal), 201187 (J Neal), 201188 (L Kelly),

	201189 (J Murphy), 201190 (B Cijffers), 201270 (D Storey), 201271 (C Carpenter), 201273 (J Ladlow), 201285 (C Douglas), 201289 (J Wickerson), 201290 (Cambridge glenys self), 201291 (Cambridge GRT Solidarity Network), 201292 (J Connett), 201320 (J Davey), 201328 (J Franks), 201553 (H Phillips), 201840 (G Kent), 201866 (J Hurst), 201960 (P Watson), 201965 (A Furlong), 205573 (J Ord), 205654 (S Buckingham), 207648 (Duxford PC)
Any planning should preserve the existing green space and prevent the felling or reduction of trees on St. Mathews Piece, with a defined exclusion zone to mitigate potential impacts on nearby buildings. The proposed density of developments appears incompatible with policies regarding green space,	202529 (A Brown)

biodiversity, and tree canopy. Developments in the Eastern Gate zone must not exacerbate traffic issues on New Street, which currently serves as a shortcut between Newmarket Road and East Road.	
Part of this site lies within the Riverside and Stourbridge Common Conservation Area. There are also several grade II listed buildings including the Church of St Andrew the Less, 247 Newmarket Road and Cambridge Gas Company War Memorial. There are numerous listed buildings nearby. Development within this area therefore has the potential to affect the significance of these assets including through development within their settings. We understand that there is no HIA for this as it is a Policy Area. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy. We welcome criterion 2c and paragraph 3.1.162.	210123 (Historic England)
The boundaries of the Eastern Gate area are inappropriate. They fail to recognise the integrity of the Riverside neighbourhood area, which includes all streets from Riverside south, such as Abbey Road, Riverside, Priory, Saxon and Beche Roads, River Lane, and the CHS estate. But even more strange, there is no discussion of the ARU campus. The recent acquisition of the Mackays site on East Road suggests that a Master Plan is needed, either within or separate from the Eastern Gate. Widen the boundaries significantly, both north to Riverside and west to include the entire ARU campus along both sides of East Road.	201794 (Cambridge Group of the Ramblers, J Tuffnell, Secretary)
Support S/PRIA/EG Elizabeth Way bridge and Underpass(es) cultural hub project: I support this project. I object to vehicle-led transport strategies and oppose the demolition of the roundabout. I support safer, better connectivity for pedestrians/cyclists and a multi-disciplinary urban	201991 (Skateboard Cambridge CIC (P Elbro, Director)

design strategy which: Creates a cultural hub in and around the infrastructures for cultural, recreational and commercial use, coordinates Transport and bus lanes with urban realm design, encouraging pedestrians/cyclists desire lines N/S towards the river, and promotes a sense of place with priority use for residents and visitors.	204228 (A Giarlis) 204229 (NEUBAU Architecture Ltd B Lenz, Architect) 204336 (K Fisher) 204009 (L Cooke) 204352 (K Fisher) 204388 (K Fisher) 204245 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204212 (L Cooke), 205243 (University of Cambridge)
S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I support proposals that seek to increase and intensify planting and biodiversity within the S/PRIA/Eastern Gate. This includes areas above and adjacent to the Elizabeth way bridge, landscaped areas within the East Road underpass, and improvements along the Newmarket Road, including new hedges and trees planted to separate pedestrians and cyclists and other active transport users, from cars. This is a very recent project (2025), and I support development within the designated S/PRIA/EG of a Cultural Hub offering	204321 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204431 (K Fisher), 205265 (University of Cambridge)

accessible Community-led Cultural, recreational and commercial uses, to promote a sense of place and identity for the Elizabeth Bridge, Underpass(es) and environs.	
Support regeneration of the bridge and adjacent underpasses within the S/PRIA/EG With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I support proposals that seek to regenerate and open for use, the empty storage facilities underneath the Elizabeth bridge and within the underpasses. This would enhance the area's vitality and use and benefit from the existing pedestrian and cyclist footfall along the river promenade.	204320 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204430 (K Fisher)
The St Andrew the Less Community Project supports plans for improvements to the Eastern Gate and encourages an addition: 1.g. celebrate and enhance the existing heritage, recognising that heritage can increase pride in place and connectedness for communities. The heretofore neglected heritage of the area must be revived and become available for use by the community and wider public. The development of a heritage trail will also contribute to the vibrancy of this area and Riverside.	204739 (NEUBAU Architecture Ltd (B Lenz, Architect) 204549 (The St Andrew the Less Community Project) 204825 (A Sheedy)
I strongly support the re-establishment of the historical local centre and high street function of Newmarket Road, with a range of attractive shop fronts, cafes and restaurants. Making the road a single carriageway and tree line promenade should be considered and linking previous historical north-south crossings.	204882 (A Sheedy)
The Eastern Gate area should be extended to Mercers Row, to include the historical streets of Oyster Row, Garlic Row and should do everything to return these streets to residential streets and eliminate the rat run from commercial vehicles.	207546 (A Sheedy)

Proposed site plan of S/PRIA/EG - extend the red line boundary I support the variation / extension of the red line boundary to include the East Road Roundabout ‘Underpass’ and also the whole of the Elizabeth Way bridge (above and below) incl adjacent public realm, landscaped areas and highways, North and South of the river Cam (Walnut Tree Avenue, Cutter Ferry Path, Cutter Ferry Close a.o.) (as submitted by the Elizabeth Way bridge and Underpass(es) project)	204426 (K Fisher)
Support Safer and more comfortable travel: I support any improvements to create a more comfortable and simplified pedestrian movement along the Newmarket road/East Road/Elizabeth Way and roundabout, prioritising pedestrians and cyclists, providing safer junctions and analysing desire lines for better connectivity between adjacent wards and the river.	204409 (K Fisher) 204303 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead))
I do not support the planned demolition of the underpass, and it was rejected by a majority of respondents (refer to GCP public consultation process) Demolition is not a viable or sustainable solution for the transport problems. I support alternative options brought forward which would regenerate the infrastructure and coordinate it with other as-found 70s leftover spaces, creating a public realm and cultural hub with better access and manoeuvrability for pedestrians and cyclists to move between the adjacent wards and the river.	204273 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204384 (K Fisher)

Oppose plans to demolish the Newmarket Road and East Road and underpass: I object to any plans proposing the demolition of the East Road Roundabout underpass, which would be an unsustainable loss of a public space. The underpass contains a thriving biodiverse landscape and also has great potential for adaptation as a public common, to include active landscaping, street furniture, skating, exhibitions, workshops and other cultural and public engagement.	204311 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204423 (K Fisher)
Oppose plans to demolish the Elizabeth Way Roundabout, which would be an unsustainable loss of a public space. The underpass contains a thriving biodiverse landscape and also has great potential for adaptation as a public common. We support the Underpass and the Elizabeth Way bridge cultural hub project, supporting proposals that seek to regenerate and open for use, the empty storage facilities underneath the Elizabeth bridge and within the underpasses. This would enhance the area's vitality and use and benefit from the existing pedestrian and cyclist footfall along the river promenade.	203767 (Cambridge Green Party (R Comins, Research Officer))
Support proposed extended site plan S/PRIA/EG I support a phased approach to planning, build and operations which seeks to address the imminent transport issues as a first priority. Following this, any plans should accommodate active modes of transport within the proposed multi-disciplinary urban plan, which seeks to re-imagine this area within the S/PRIA/Eastern Gate as a cultural hub. (as submitted by the Elizabeth Way bridge and Underpass(es) project)	204317 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204427 (K Fisher)
Support gateways / entry points to residential neighbourhoods: I support any improvements to create an urban gateway/sense of arrival in the city via the Elizabeth Way and the Newmarket Road. I support a	204308 (Cambridge Junction / Create Cambridge (M

change in perception of the hierarchy between cars and other transport users, contributing to lower speeds and improved safety and visibility for pedestrians and cyclists, elderly residents and children.	Burman, Artistic Director & CEO / Co-lead)) 204410 (K Fisher)
Comment 1c - public realm improvements: I strongly support public realm improvement that will generate a sense of place and safety including lighting, street furniture and new urban programme and uses for this neglected area.	204367 (K Fisher)
Comment 1e - better visual and physical connections: I strongly support better connectivity and signage/ wayfinding for residents and visitors. Active and landscaped transport networks linking adjacent wards with the river will help regenerate neglected pockets within the urban realm, making them accessible for public use.	204373 (K Fisher)
I support the development of a cultural Hub within the designated PRIA, offering a mix of accessible programmes and open access active space in the public realm, particularly on, in and around the Elizebeth Way Bridge. The area has its own identity and is well used, the architecture is of historic significance and many of the spaces are unique. I am in favour on introducing space for community sports and cultural programming alongside the development of some of the existing active transport link and better connections both East/Wast and North/South. I am in favour of keeping the underpass. Issue not raised previously. we are in desperate need of community, youth and arts spaces as well as workshops, storage and experimental space for supporting the city's cultural life. The Elizebeth Way Bridge and Underpass has a range of unique spaces within and around its structure that have the potential to transform access to arts and culture across the North and East of the city. Especially if these are run in conjunctions with existing arts events and organisations.	204294 (T Woodcock)

Vehicular Traffic along Newmarket Road and East Road and underpass: I support the redevelopment of Newmarket Road pedestrian and cycle paths, and the adaptation of Elizabeth Way underpass as a public common. I support the re-design of the car-dominated transport roundabout to include cycle lanes and four required pedestrian & cyclist crossings, which prioritise pedestrians and cyclists and integrate practical and desired lines for better N/S and E/W connectivity.	204300 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204407 (K Fisher)
Better connectivity: I strongly support better integration of pedestrian and other active transport modes with this car-dominated infrastructure, as well as prioritising pedestrian and cyclist desire lines	204255 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204364 (K Fisher)
support: Comment relating to an urban design led approach to S/PRIA/EG with reference to the Elizabeth Way bridge and Underpass(es) cultural hub project, I strongly support an urban, multi-disciplinary design led approach which seeks to resolve transport issues with a comprehensive strategy that integrates transport with urban disciplines. Any design proposals should respect the conservation character of adjacent wards and offer sustainable solutions to re-invent the neglected 70s infrastructure.	204297 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204403 (K Fisher)
On site provision of functional public spaces and nature: with reference to the Elizabeth Way bridge and Underpass(es) cultural hub project, development proposals should use S106 or other public funding opportunities to improve on the type and diversity of public realm spaces allocated for spontaneous and non-programmed outdoors recreation, regenerating leftover or neglected highways and public spaces and other opportunities for hard landscaping, as well as re-introducing nature, suds and raingardens.	204293 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead))

Shared highways surfaces should prioritise use for active modes of travel and encourage active engagement from a diverse local community, by increasing street furniture for seating, creating opportunities for urban sports and active landscapes, to encourage integration of young people and to promote an active, outdoors lifestyle. The needs addressed should reflect the demands of local residents and local businesses, in order to generate a local neighbourhood public realm strategy, reflecting a diverse resident demographic.	205260 (University of Cambridge Z Svendsen, associate professor) 204400 (K Fisher)
Support: public realm improvement area opportunity: with reference to the Elizabeth Way bridge and Underpass(es) cultural hub project, I support the regeneration and transformation of this neglected transport infrastructure, to realise the potential of underused spaces for sustainable redevelopment, and to provide much needed community, cultural and sports uses. This should include a range of ages and users including skate friendly seating, natural shelter, bicycle parking, increased street lighting and active landscapes, access to water as well as safe facilities particularly for women including toilets within F+B offerings.	204290 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204396 (K Fisher)
support: Comment point 3 - urban design led character appraisal: with reference to the Elizabeth Way bridge and Underpass(es) cultural hub project, I support the group's intent to adapt a multi-disciplinary approach to public realm improvements and place making. I strongly encourage the integration of pedestrian and cyclist desire	204287 Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead) 204391 (K Fisher)
support: Comment 2d - pedestrian comfort: From a transport perspective, there is currently no direct or safe way to cross N/S or E/W along the Elizabeth way bridge and roundabout, difficult to gain access to the river other than residential neighbourhoods. I strongly support development that seeks to integrate	204284 Cambridge Junction / Create Cambridge (M

and prioritise desire lines for pedestrians, cyclists and other active modes over vehicular transport, creating a safer transport hierarchy.	Burman, Artistic Director & CEO / Co-lead) 204390 (K Fisher)
support: Comment 2c - re-modelling access to the East Road underpass: The East Road underpass is large at approx. 1,450m2 in area and comprises one-third landscaped areas and mature trees. Designs for the underpass should intensify landscaping and biodiversity, make material improvements of hardscape areas, to allow for active urban sports and flexible-use street furniture, supporting future use as a public square/common.	204279 Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead), 205253 (University of Cambridge)
support: Comment point 1d - new public spaces: with reference to the EW bridge and Underpass(es) project, I support the group's intent to adapt the East Road Underpass pedestrian & cyclist infrastructure as a public common and cultural hub.	204257 Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead) 204370 (K Fisher), 205248 (University of Cambridge)
support: Comment 1f - business and retail parks adjacencies: I strongly support the regeneration of the Elizabeth Way bridge and Underpass(es) as they have potential to provide synergies and also alternatives to commercial programme in the neighbourhood retail parks. There is a strong case for a sustainably integrated, affordable community and cultural hub appropriately placed within the urban context of the riverside promenade and transport infrastructure.	204260 Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead) 204377 (K Fisher)
support: Comment 2a - restore the balance between people and vehicles: I strongly support better links and a transport strategy prioritising pedestrians and cyclists with the East Road/Elizabeth	204265 Cambridge Junction / Create Cambridge (M

Way/Newmarket Road approach routes and the Roundabout including under passages, there are currently no concessions made to prioritise local, active transport and negotiating the current vehicular traffic condition can be considered dangerous.	Burman, Artistic Director & CEO / Co-lead) 204381 (K Fisher)
support: Comment point 1a - - character of the area - East Road/Elizabeth Way roundabout: The East Road Roundabout, situated within the Eastern Gate area, is known to be a major high-traffic access node - it is well positioned to promote a ‘sense of arrival’ in the City (currently a neglected asset). I support efforts to mitigate the negative impact of vehicular transport, to prioritise access and connectivity for pedestrians, cyclists and other forms of active transport, and to activate the pedestrian underpass as a public space giving it a new identity.	204252 Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead) 204359 (K Fisher)
With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, the project sits in catchment area of 5 adjacent wards, connected by a shared infrastructure link, the Elizabeth Way bridge and related underpasses. The area sits within a public realm improvement area with potential to adapt leftover indoors and outdoors spaces for cultural and sports programmes, which would work well in line with the Cambridge tradition of skating and urban skating, providing indoors and outdoors recreation and youth engagement.	205113 (M Cleminson)
Support: principles of sustainable development / retention of concrete infrastructures in a climate emergency: with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project. Object to proposals to demolish the Underpass, proposals were rejected during the 2023 consultation. It would cause unnecessary disturbance and high-carbon emissions to backfill and level the underpass drum 70’s transport infrastructure which contains existing biodiversity and has proven potential as an inviting public square. Support minimal environmental footprint / maximum impact	204269 (A Giarlis), 204393 (NEUBAU Architects),

redevelopment of the as-found underpasses and under crofts, greening of the public realm in and around the transport infrastructure.	
Reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project. I support the designation of this asset as a noteworthy architectural asset, albeit where the asset should be championed through regenerative and community-focused practices. The space is currently undervalued and transition experiments such as the 'Out of the dark' urban light show showcased an alternative, community-led and culturally advancing use for the space. Attention should be paid to how the cultural economy of such an asset can be utilised, with a designation and allocation for cultural use in the Local Plan being the first step.	204495 (T Ziromskas)
This is desperately needed but must develop the spaces in response to the developing needs of the growing community and particularly with the responsive development of cultural facilities for young people, creatives, families and actives travellers. Many of whom are already developing innovative ways of utilising existing spaces. It is important that a top down solution is not imposed by 'consultants'. There are organisations working around the Underpass/Under croft project that are far better suited to develop responsive and user led solutions. I object to vehicle-led transport strategies and oppose the demolition of the roundabout.	204678 (T Woodcock)
When considering the Elizabeth Way roundabout development as part of Eastern Gate please look at cycleway markings needed on Newmarket road/Sun Street (West approach) access points and improved signage for cyclists who want to use Walnut Tree Avenue to get to Riverside cycleway. Also, for cyclists joining this junction from Walnut Tree Ave. This access point should be improved to make it	202002 (T Jewell)

the attractive option for pedestrians and cyclists over what is poor condition paving by Halfords and poor signage. The underpass is currently a safer option to cross over.	
Railpen supports the policy and its reference in Part 1 to the Beehive Centre and Retail Park and how the Eastern Gate area and adjoining or nearby sites can collectively deliver a greater beneficial impact to the local area. Railpen requests an amendment to Part 1 (f) of policy S/PRIA/EG as currently worded below: f. integrate positively with the adjacent Cambridge Retail Park (Policy Ref. S/PRIA/CRP), Beehive Centre (Policy Ref. S/AMC/BC), Fitzroy/Burleigh Street/Grafton Area (Policy Ref. S/AMC/FBG) and surrounding neighbourhoods. References to ‘integration’ is not sufficiently clear or measurable as a policy objective.	204092 (Railpen)
The boundary of the Eastern Gate PRIA does not include Riverside. I suggest this should be designated as a PRIA for the following reasons: (i) It is a key link in the City’s sustainable transport infrastructure, as the entry point to central Cambridge for three Greenways; (ii) It is a stretch of accessible urban riverfront that connects three green spaces with distinctive heritage assets with unspoilt river views; (iii) GCP are working to create a vibrant destination with city-wide benefit; (iv)It is adjacent to Eastern Gate PRIA and Areas of Major Change, with development proposals with major implications	205173 (M Evans)
About points 2a and 2b. You just hate car drivers. Soon all cars will be electric, but you will still hate car drivers. It is your fault if we have congestion in Cambridge, as you want to greatly expand the population and the city can't cope with it. Sustainable development means very limited development, and you just can't get your heads around that. You have been completely captured by Camcycle -- their utopia is a paradise for able-bodied single people who live near to the centre and never have to carry bulky loads or multiple children with them.	201232 (S Williams)

The Draft Local Plan acknowledges issues of vehicular traffic dominance and accessibility around the Elizabeth Way roundabout but fails to address the condition of Elizabeth Way itself, a key corridor linking North and East Cambridge to the city centre. Residents report safety concerns on Elizabeth Way, including near-misses for parents with young children, speeding traffic, and cyclists being forced onto pavements due to disappearing cycle lanes. Speeding and red-light running are prevalent issues, exacerbated by the confusing multi-lane layout, which residents believe encourages aggressive driving. There is strong support among residents for reducing Elizabeth Way to two traffic lanes with narrower carriageways to help calm traffic and improve safety. Cycle provision is inconsistent and unsafe, leading to conflicts between cyclists, pedestrians, and fast-moving traffic, with pedestrians often forced off pavements. Residents view Elizabeth Way as one of the most dangerous roads in the city, a result of outdated design prioritising cars, and express a desire to engage in discussions to enhance safety and liveability.	201910 (A Rahman)
This policy is good as far as it goes, but should bring out the important foci for the area. - as a high street for Riverside - as a cultural hub project for the Elizabeth Way Bridge and Underpass - as a revived space for Heritage, particularly celebrating the 13th century church of St Andrew the Less I attach details on all of this.	203004 (M Cleminson)
Please include content on references to developments/discoveries in the field of neuroarchitecture, require Health Impact Assessments to cover the mental stress generated by certain building designs and styles.	203698 (A Carpen)

Please include something about outstanding/iconic buildings for the corner of East Road / Newmarket Road - a huge opportunity for something that is not a dull box.	
The benefits of redevelopment and opportunities to enhance the Eastern Gate are well established and supported. The policy should be more positively phrased in respect of the benefits of development opportunities. However, there is one point of concern within this policy, specifically 'Studies will also be required to justify proposed land uses floorspaces and their redevelopment on a proposal-by-proposal basis'. This is a somewhat 'anti-development' approach, albeit likely inadvertent. It would be constructive if the policy cross referenced that such justification is not required where there is separate policy support for stated uses (i.e. education development as set out in draft policy J/FD).	203996 (Anglia Ruskin University)
RARA seeks to re-establish the historical local centre and high street function of Newmarket Road for Riverside residents, with attractive shop fronts, cafes and restaurants. Making the road a single carriageway and tree-lined promenade should be considered for this currently run down and pedestrian-unfriendly stretch. Please rephrase point 2b to start: "prioritise a pedestrian-led movement hierarchy which emphasises." as in Policy GP/QP. We support point 2c to re-establish the historic route and visual links between Occupation Road and Abbey Road. Please also add to 2c "and the former pedestrian connectivity between Coldham's Lane and River Lane." (photo attached).	2034447 (Riverside Area Residents Association), 205182 (M Evans)
There is a risk of much of this area becoming a heat island. Priority should be given to increasing tree cover, public open space and wildlife corridors. Land currently built on or tarmaced over (for example	204824 (R Randall)

underused garages or little used buildings) should be designated for parks/open space/nature reserve areas. Permission should be refused for anything which might damage existing trees or open space.	
☑ non-designated heritage asset with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project, I support retention as a noteworthy 70's Heritage asset. In 1950 the architect / town planner Lord William Graham Holford produced a report for Cambridge County planning, proposing a comprehensive road framework the scale of which was unprecedented in the history of Cambridge transport planning, leading to construction of the infrastructure in 1969. This introduced environmental and social challenges to the local residential area. ☑ I support regeneration and re-use of the EW Bridge and underpasses as a pedestrian/cycle friendly, cultural hub.	205057 (M Cleminson)
With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, I support the re-design of neglected pockets of the public realm using a multi-disciplinary approach. The East Road underpass provides a benchmark opportunity for integrating public art and engagement events. It presents a microclimate with existing biodiverse planting and has potential to be more green and provide opportunities for temporary art installations. Development proposals should use S106 or other public funding opportunities to improve on the type and diversity of public realm spaces allocated for spontaneous and non-programmed outdoors recreation, as well as promoting biodiversity.	205188 (E Nowak)
I recommend that the Riverside area is (a) either added to the Eastern Gate Improvement Area, or preferably (b) becomes an Improvement Area of its own. Riverside presents many opportunities: making a pedestrian boulevard along the length of the river, providing an attractive and safe	205526 (D Spiegelhalter)

environment for cycling, enhancing the area underneath Elizabeth Way Bridge and outside the industrial history museum, encouraging biodiversity and wildlife both in and beside the river itself.	
support: Point 2i - support ‘local labour’ promoting and retaining local talent and skills: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I support local labour and the provision of workspaces for local SMEs to promote Cambridge local small to medium size businesses and start-ups through affordable space provisions including Artists workshops, makerspaces, exhibition spaces, shops a.o. as well as offering apprenticeships.	205276 (University of Cambridge)
Support for Policy S/PRIA/EG is expressed, with a request for it to explicitly recognise Elizabeth Way as a key strategic corridor requiring comprehensive planning beyond just the roundabout. The respondent highlights a critical gap in the Plan's analysis, noting that it focuses on the roundabout while neglecting the strategic importance of Elizabeth Way for connectivity. Concerns are raised regarding the historical context and transport issues affecting the entire Elizabeth Way corridor, which limits pedestrian and cyclist safety. The respondent suggests that the policy should extend its scope to address the scale, layout, and design of Elizabeth Way, promoting a comprehensive strategy for safety and community reconnection. A modification to Policy S/PRIA/EG is proposed to ensure it aligns with the Plan's sustainability, accessibility, and community cohesion objectives, providing clearer long-term direction.	205472 (Cambridge City Council (Cllr J Dalzell))
The introduction of new at-grade crossings along Newmarket Road conflicts with the need for bus priority, suggesting a need for either subways and bridges or a re-evaluation of the bus-based strategy.	207390 (Cambridge Past, Present and Future)

S/PRIA/HRRS: Hills Road and Regent Street Corridor

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made by Trinity Hall to include Bateman House as a site allocation. Comments were made by North Newton Residents Association about widening pavements. Further responses were made by a local resident to ask for a masterplan for the area and have consideration for children and the late night economy. Comments were made by Historic England about reflecting local heritage assets and preparing a HIA.

Response to the main issues raised in representations

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

- In response to Historic England, the suggested amends have been made to the policy. As this is a policy area a HIA has not been prepared for this area.
- Point 2 of the policy has been amended to include wider pavements in response to the North Newton Residents Association.
- Due to the scale of this site allocation a masterplan led approach is not appropriate across the whole policy area, this policy area sets out key principles to guide development in this area to improve the public realm for children and for the late time economy by improving the public realm and making it safer.
- Bateman House has not been allocated as a site allocation because it is next to the Botanic Gardens and a Conservation Area which are quite significant constraints for any redevelopment. A pre-application should be able to resolve these issues and suggest a way forward for this site.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
82-90 Hills Road Cambridge Trinity Hall supports policy S/PRIA/HRRS, which aligns with the objectives of Cambridge Local Plan 2018 Policy 25 that identifies 82-88 Hills Road as an allocated site for improvements. An updated version of 2018 local plan allocation M5 should be added to Chapter 3 of the draft Local Plan, crucial for enhancing the Hills Road/Regent Street Corridor.	202787 (Trinity Hall)
The quality of architecture in these area needs to be improved.	203696 (A Carpen)
6c - needs clear statement that wider pavements are required the length of Hills Road, from Station Road to Regent Street, in line with improvements proposed in 6a (Regent Street). Footfall from the railway station to the city centre is high; improvements proposed in the 2018 Local Plan have not been implemented. This key route into the city for residents & visitors requires a) reduction in traffic and the space given to it and b) focus on local businesses & public realm so that Hills Road returns as the 'high street' for Newtown & Glisson Road residents as it was.	205179 (North Newtown Residents Association)
The Policy Area lies within New Town and Glisson Road Conservation Area and the Central Conservation Area. There are numerous listed buildings along Regent Street and Hills Road, including the grade I listed Downing College and Church of Our Lady of the Assumption and the English Martyrs, the grade II* Wanstead House and grade II listed St Pauls Church and there are numerous grade II listings. The Botanic Gardens is a grade II* Registered Park and Garden. Development within this area therefore has the potential to affect the significance of these assets including through development	210124 (Historic England)

within their settings. There is no HIA for this as it is a Policy Area. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy. The Policy should make more reference the role of heritage in the re-vitalisation of retail areas.	

Policy S/PRIA/MC: Mitcham’s Corner

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made by local residents about the removal of the gyratory at Mitcham's Corner and use of this as public space. Further responses were made by Sport England to reflect the integration of active design principles. Comments were made by Historic England about reflecting local heritage assets. Comments were also made by local residents about the bias against cars.

Response to the main issues raised in representations

In response to comments received, Amendments have been made as per Historic England’s suggestions. In terms of the comments from Sports England, the reference has not been included because it is not specific to this public realm improvement area these active design principles. The policy area can set ambitions for the public realm improvement but not specific interventions in the transport network, this is the role of the highways authority.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
4a and 4b -- you just hate car drivers. Cars don't drive on the pavements and pedestrians don't walk on the road, so their needs are perfectly well-balanced already, thank you	201233 (S Williams)

We are keen to see the removal of the gyratory at Mitcham's Corner, for the traffic volumes to be kept to an absolute minimum and for as much promotion of walking and cycling as possible. There is great potential for this to become an excellent public space. The ugly gyratory is well beyond its "sell-by-date". Despite the gyratory's existence, there is already a burgeoning community. Removal of more traffic will further encourage this and could provide Cambridge with another place and neighbourhood that it is proud of	201304 (M Bleazard)
Mitchams corner needs a complete redesign, prioritising people over cars, and with as many homes, shops and restaurants etc as possible.	203583 (H Thomas)
The Policy Area lies within Castle and Victora Road, De Freville and the Central Conservation Area. Development within this area therefore has the potential to affect the significance of these assets including through development within their settings. We understand that there is no HIA for this as it is a Policy Area. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy.	210125 (Historic England)
Sport England encourages the integration of Active Design principles, or alternatively reference to our Active Desing Guidance, to maximise opportunities for physical activity.	209220 (Sport England)

Policy S/PRIA/MR: Mill Road

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There was broad support for the policy from local residents, although concern was raised about bias against cars in the policy wording. Comments were raised about needing more bus routes. A comment suggested plans for pedestrianisation should go further. It was stated that there is no mention of trees, nature or greenery, and that more sustainable drainage and more green public space is needed. Historic England highlighted the importance of considering local heritage assets. Kings College considered the policy repeated other policy requirements.

Response to the main issues raised in representations

Amendments have been included to address representations from Historic England and local residents about heritage assets. It is the role of highways authority and wider transport strategy to manage bus routes. It is an important role of the local plan to support active travel. Point 3c of the policy has been added to reflect greening and sustainable urban drainage. The Transformation Project is noted, however it is not appropriate to include this in the policy wording. The principles of improving the public realm and the high street are reflected in the policy wording.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for the policy.	200981 (M Lucas-Smith), 201279 (F Samuel), 205267 (A Williams), 205466 (P Lythgoe)
Concerns raised about bias against cars in the policy wording.	201234 (S Williams)
Plans for pedestrianisation of Mill Road needs to go further.	201279 (F Samuel), 203808 A Chan)
Safety of pavements is an issue so support the policy.	201715 (K Mak)
A new public use should be found for the Old Library.	202824 (Cambridge Past, Present and Future), 205327 (J Preston)
Need to specifically mention preservation or enhancement of the Conservation Area.	205327 (J Preston)
Parts of the Policy Area lies within the Mill Road, Newtown and Glisson Road and Kite Conservation Areas. It includes part of the Mill Road Cemetery – a grade II Registered Park and Garden as well as the Cambridge City Branch Library and Gas Lamp both listed at grade II. Development within this area therefore has the potential to affect the significance of these assets including through development within their settings. We understand that there is no HIA for this as it is a Policy Area. The Policy currently makes little reference to the historic environment. Amend policy wording to include more	210126 (Historic England)

reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy. The Policy should make more reference the role of heritage in the re-vitalisation of retail areas. See our Heritage Led Regeneration Toolkit	
The policy should give guidance on securing a new public use for the Old Library.	202824 (Cambridge Past, Present and Future)
We would also comment as follows on the supporting information. It is not clear why the site plan differs from that in Policy S/C/OPM. The third paragraph is entirely unnecessary as Design and Access Statements are a requirement of the Councils' planning application validation requirements.	208243 (Kings College)

Policy S/PRIA/OPML: Old Press/Mill Lane

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made about the bias against car ownership.

Comments were made by Historic England, Cambridge Past, Present and Future, and a local resident to highlight the heritage assets in the policy. Historic England set out that a HIA is required. Further responses were made by Cambridge Past, Present and Future to raise concerns about point 1d allowing the demolition of potential heritage assets. Comments were made by Kings College critiquing the duplication of policy between S/C/OPML and raised concerns about the masterplan.

Response to the main issues raised in representations

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

- This site is a Central Cambridge location and therefore in a sustainable location with public transport and active travel connections, and it is therefore the strategy to reduce car parking in this location to reduce congestion.
- In response to Kings College, point 1 of the policy has been revised to align with the site allocation and not the masterplan and design and access statements have been removed from the supporting text. The other policy criterion have been retained to shape any other future development coming forward on this site.
- The policy wording has been amended to reflect the heritage assets on and offsite including the Grade I Listed Leper Church.
- In response to concerns about demolition arising from point 1d, the assessment of the planning balance at the planning application stage will determine whether the value of retaining the building outweighs the delivery of open space.
- A HIA has not been completed for this site because it is a policy area.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Concerns raised about bias against cars in the policy wording.	201225 (S Williams)
Concerns raised about traffic and configuration of the roads around Mitcham's Corner.	201304 (M Bleazard), 203583 (H Thomas)
Concerns raised about Listed buildings and Buildings of local interest not shown.	205361 (J Preston)
There are a number of designated heritage assets within the site boundary including part of the Central Conservation Area and a number of listed buildings including Cambridge University Centre, The Mill Public House, The Mill The Mill Bridge and Paved Surround, Mill Haven - West House and Mill Haven - East House, Cambridge University Press (Pitt Press), Telephone Kiosks, 1 Mill Lane, House Adjoining Number 74 on The North, 74 Trumpington Street, 8-11 Little St Marys Lane, Number 1 Little St Marys Lane including gas lamp and Emmanuel Church all listed at grade II. The site is adjacent to other listed buildings including Little St Mary's Church (grade II*), Pembroke College and Pembroke College Chapel both listed at grade I, St Botolph's Church also listed at grade I as well as numerous grade II listed buildings. This is a highly sensitive location in terms of heritage. Development within this area therefore has the potential to affect the significance of these assets including through development within their settings. There does not appear to be a Heritage Impact Assessment for this site. An HIA should be completed. The recommendations of the HIA should be included in the policy wording. We welcome criterion 1 a and 1 c, but these should be expanded to better reference the historic environment.	210127 (Historic England)

The respondent supports the policy but raises a concern regarding a non-listed building of heritage value on the eastern side of the Mill Pond, which is significant to the area's historical context. The respondent opposes the potential demolition of the building by its owner for the creation of open space, advocating for its repurposing instead. While the respondent supports the wording of policies 1a and 1b, they express concern that policy 1d could be interpreted to justify the demolition of the mill building. The respondent requests that the conflict within the policies regarding the potential demolition of the mill building be resolved.	202840 (Cambridge Past, Present and Future)
The College would suggest that this policy is combined with S/C/OPM as there is both repetition and inconsistency between the two policies. It is not clear why this policy requires accordance with the 2018 Masterplan, when Policy (S/C/OPM), which is more fundamentally concerned with the redevelopment of the area not just the public realm, doesn't. The first sentence of the policy should therefore be deleted. Despite being concerned with public realm, this policy strays into more detailed design aspects which are covered in the redevelopment policy – consequently limbs a) b) and c) should be deleted from this policy.	208242 (Kings College)
We would also comment as follows on the supporting information. It is not clear why the site plan differs from that in Policy S/C/OPM. The third paragraph is entirely unnecessary as Design and Access Statements are a requirement of the Councils' planning application validation requirements.	208243 (Kings College)

Summaries of Representations: Sites Edge of Cambridge

Edge of Cambridge Introduction

Summary of issues arising from Draft Local Plan representations:

Cambridge City Council Liberal Democrat Group offered general support for the allocations approach. One comment supported the plan in that it did not allocate land at the west fields.

Most comments made on this chapter introduction focused on alternative sites being suggested for allocation. Comments supporting their allocation included issues around strategy choices, and the relative sustainability of the edge of Cambridge supporting green belt release.

One comment raises concern about the amount of development proposed. Historic England requested further consideration of building heights, particularly at North East Cambridge. Mixed comments were received about the Cambridge Biomedical Campus. One comment considered growth was not sufficient. Another comment sought greater protection for the surrounding area. One comment challenged the approach to the Cambridge South East transport scheme.

Response to main issues raised in representations:

Comments are noted, including those which supported the draft plan's approach. Comments proposing alternative sites, and providing information on alternative sites, have been assessed through the Housing and Employment Land Availability Assessment. Strategy choices have also been considered through wider evidence, including the Sustainability Appraisal, and document why it is not considered that exceptional circumstances exist to release additional land beyond that proposed for Cambridge Biomedical Campus. Land adjoining the campus outside the proposed development remains within the green belt. The South East Transport shame is the subject of a Transport and Works Act application, where a public inquiry will consider comments received.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
We support these policies to encourage vibrant and active communities with access to green spaces.	202845 (Cambridge City Council Liberal Democrat Group)
While I support the ambition to plan positively for Cambridge's future, I am deeply concerned that, without stronger protections, the city's growth could come at the expense of the very rural landscapes and communities that make this region so special.	209245 (D Hepworth)
Building Heights We have some ongoing concerns regarding the densities and heights on some of the edge of Cambridge sites. Development at very high densities/heights has the potential to impact on the overall	208929 (Historic England)

setting of this historic city. We appreciate that there will inevitably be a trade-off between height versus further urban expansion. We have particular concerns about heights in north-east Cambridge and remain so about impacts on views from Ditton Meadows and the Conservation Areas, as well as wider views approaching the City from the north-east and east.	
Cambridge South East Transport Scheme No need to pursue this route and destroy the landscape at such an astronomic cost when a perfectly good alternative has been proposed by Better Ways for Busways along the A1307 corridor from the A11 to the Cambridge Biomedical Campus. This could be done in sections to avoid disruption, much of the route already has bus lanes in place and the cost is a fraction of that proposed by the route across green belt which would ruin good agricultural land. The Gog Magog Hills have been included as a priority for enhancing green infrastructure and will be negatively impacted by CSET and therefore I strongly oppose this ill thought through strategy.	207646 (J Coppendale)
Green Belt Object, as set out extensively in our response to Policy S/GB, when there is a need to allocate so many more housing sites, the blunt application of Green Belt to any consideration of further allocation on the edge of Cambridge, which is shown to be one of the most sustainable locations for growth in the GCLP evidence base, is at best illogical. These representations are accompanied by the submission of the following land parcels for allocation in the Greater Cambridge Local Plan: 1) Southern extension to Peterhouse College (A southern expansion to previously released Green Belt sites GB3/GB4) (HEELA Site ID 200790); 2) An easterly expansion to	209699, 209700 (CEG Land Promotions)

the previously released Green Belt site GB1 (HEELA Site ID 40058b); and 3) Southern extension to Employment site E/3 (HEELA Site ID 200795).	
Cambridge Biomedical Campus With Life Sciences identified as the greatest area of growth, why is the area around the Cambridge Biomedical Campus restricted to that proposed in Policy S/CBC Cambridge Biomedical Campus (including Addenbrooke's Hospital) Figure 60. Releasing more Green Belt will meet all of the strategic priorities as set down in the Draft Greater Cambridge Local Plan.	200995 (P Wheeler)
Cambridge Biomedical Campus The area covering the campus should be extended to protect the area on the opposite side of the railway which provides a green pathway for flora and fauna extending from Trumpington Meadows via Trumpington Community Orchard Clay Farm Community Garden and Hobson Park and onward to Nine Wells. This area is also important for Wellbeing and social inclusion.	201016 (C Wright)
West Fields, Cambridge Pleased site has not been included in the sites for development because it is vital that the Green Belt around the City is maintained for future generations, despite our great need for more affordable housing.	201466 (S Smalley)
Land South of Shelford Road, Fulbourn (referenced as site 51610 / 115137 in the HELAA) Evidence submitted to address HELAA issues. Fulbourn's sustainable location warrants new site allocations due to its access to services, employment opportunities, and transport links. The site will provide improved green spaces accessible to all, supporting the aim for allocations on the edge of Cambridge.	205005 (Miller Homes)

Land at South West Cambridge (Site Ref. 52643) The promoted development providing a mix of uses including between 2,500 and 2,800 dwellings, supporting facilities, GI network and landscaping.	205161, 206827 (North Barton Road Landowners Group)
Land adjacent to A1303 and M11 at Rectory Farm Would make an ideal edge allocation for residential or commercial development. The Madingley Park and Ride site located between Eddington and West Cambridge is becoming increasingly under pressure. Site could serve as a Travel Hub that either alleviates pressure on Madingley P&R or replace it entirely, thus allowing the existing Madingley P&R site (a highly sustainable, brownfield site) to be freed up and used to accommodate much needed housing or employment growth at Eddington or West Cambridge.	206091, 206098 (Wimpole Associates Ltd)
Land East of Gazelle Way, Cherry Hinton Objects, fails to inset site from the Green Belt and does not propose allocation of the site for development. Allocate it for a residential-led mixed-use urban extension to the City to provide approximately 1,500 new homes, employment space, new Country Park and associated community and other infrastructure.	209756 (Endurance Estates)
Land at Fen Ditton (HELAA Ref. 47647 and HELAA Ref. 200770) As a medium-scale site, it can be brought forward without reliance on the provision of significant strategic infrastructure, unlike many of the larger allocations within the Plan. This is particularly relevant given the Plan’s own acknowledgement, at paragraph 2.79, that delivery of its vision is dependent on infrastructure provision by a range of external partners, including water supply, waste water treatment, and transport bodies, over which the Councils have limited control.	210226 (Vistry Group)

The College has previously submitted a number of sites as part of the Local Plan. • Land South of Adams Road, Land south of Wilbraham Road, no longer need to be allocated as they are developed • Land north of Madingley Road, Cambridge (HELAA: 40393) is within the built-up area of the city and therefore is not reliant on an allocation to establish the principle of its redevelopment. • A number of other sites are promoted at Great Shelford, Girton, and Coton, are all considered suitable for allocation.	211065 (St.Johns College)

Policy S/CE: Cambridge East

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comment that capacity testing shows the Cambridge East site can accommodate more than the stated ~8 000 dwellings, noting in particular public transport connectivity provided by the proposed station near the site.

Comments were made regarding the proposed uses at the site, including support for and comments regarding the proposal for cultural infrastructure at this site, including proposals for a concert hall and other uses such as a lifelong learning centre; recommendations to include emergency services buildings on site within the policy. Requests for greater flexibility were made by the landowner with regard to specialist housing.

Limited comments raised concern regarding design, heritage and townscape impacts, including concerns regarding proposed architectural style, and impacts on local heritage assets including those arising from the potential height and massing of the proposed development. Comments from Historic England asked that that policy be strengthened to provide greater protection for heritage assets. The landowner requested less prescriptive policy wording relating to heritage assets.

A limited number of comments supported the approach to green spaces including for the green corridor. On the other hand, comments suggested that the development at Cambridge Airport will not protect Green Belt purposes in this area. The landowner

requested less prescriptive supporting text wording regarding potential future changes to the green corridor. The National Trust asked for further engagement to explore connections to the Wicken Fen Vision proposal.

A large number of comments raised concerns about transport impacts, including many concerned that the proposed low car approach was not realistic. The landowner supported the proposed monitor and manage approach to transport included in the policy for addressing Comments were raised that the site needed to review its transport strategy to account for the proposed new station at Cambridge East.

Comments raised concern that greater priority needs to be given in relation to infrastructure provision at this site including for medical needs, to meet the needs of the wider area. Comments were raised by neighbouring authorities seeking clarification about potential infrastructure impacts of this site on their area.

One comment raised concern regarding the potential socio-economic divide between areas of poverty in East Barnwell and newer developments.

Concern was raised over the availability and deliverability of the site, noting in particular that development is dependent on airport becoming available despite uncertainty around relocation of airport operations.

Response to the main issues raised in representations

Comments supporting a higher capacity than that set out in the policy have been considered. The capacity identified in the policy is based on consideration of site size and constraints, testing of a range of densities, and assumptions regarding the mix and land take of different uses. Based on available evidence the housing capacity set out at Draft Plan stage is considered to remain robust.

The housing capacity is expressed as “approximately” to allow for more detailed evidence to refine the eventual figure. A specific figure for office and R&D employment uses is not identified in the policy, to provide flexibility regarding the eventual capacity.

The uses set out in the policy are defined responding to the depth of evidence available. A consistent approach has been taken for strategic sites in this plan, both for meeting specialist housing and gypsy and traveller accommodation needs. The strategy approach to meeting such needs is explained in the Strategy Topic paper and is supported by further evidence. The Councils consider that strategic sites play an essential role in the strategy for meeting such needs. Support for cultural provision is noted. At Proposed Submission stage the requirements for cultural uses, as well as leisure uses, are set more precisely than at Draft Plan stage, as supported by Greater Cambridge Cultural Infrastructure Strategy - Stage 2 (2026) and Draft Greater Cambridge Retail and Leisure Study - Interim Study Findings (2026).

The policy wording seeks to balance protection of local townscape and heritage assets with enabling the significant opportunity that the site presents for sustainably located development. The Proposed Submission policy wording has been amended to reflect this balancing further and has also been amended to respond to further exploration of potential listing of heritage assets on the site, resulting in a more flexible policy that focuses on the listed assets. The reference to “contemporary” design has been removed in response to comments.

The Councils consider that the broad approach to green spaces included in the Draft Plan policy remains robust and retains strong protection for the Green Belt corridor whilst retaining flexibility acknowledging the uncertainty associated with a future master plan. Ahead of Proposed Submission the Councils engaged with all relevant local partners including the National Trust to refine the policy wording regarding off site green infrastructure provision.

The Councils recognise that this is a significant scale of development with likely substantial transport impacts, but also that the site will provide benefits to public and active travel connectivity for the whole of eastern Cambridge. The policy includes strong transport requirements to enable a low car living approach, including design requirements, specified transport schemes, and a trip budget approach enforced through monitoring. A new section has been added to the Plan to address the opportunity provided by Cambridge East station.

The Councils recognise the importance of infrastructure delivery supporting development. The Proposed Submission Plan is supported by an Infrastructure Delivery Plan which identifies the infrastructure requirements relevant specifically to Cambridge East, including identifying funding and delivery timings. The key transport infrastructure requirements relevant to the site are identified within the policy itself.

The Councils recognise the potential socio-economic divide between areas of poverty in East Barnwell and newer developments. The allocation seeks to mitigate this by requiring the development to integrate well with surrounding communities, including providing an exemplar approach to movement and transport within and through the site that would benefit existing neighbouring communities. The proposed cultural and leisure uses would also provide benefits to neighbouring communities. Other policies in the Plan require new development to provide benefits to local residents, including Policy WS/IO: Creating inclusive employment and business opportunities.

The position regarding the availability and delivery of the site has changed since the Draft Plan stage. In June 2026 Homes England and The Hill Group announced that they have completed the acquisition of the Cambridge airport site, and that Cambridge Growth Company will work in collaboration with Hill to deliver the site. The announcement includes that Marshall will relocate its operations by mid-2029, and that the partners will have a focus on accelerating housing delivery. This announcement provides

confidence that the site will be available and can be delivered in line with the timings set out in the housing trajectory included in the Proposed Submission Plan.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Vistry and The Quy Estate support the vision and objectives for Cambridge East (EC). Importantly, the delivery of CE would generate wider sustainability and infrastructure benefits that extend beyond the allocation itself. In particular, the proposed public transport, active travel improvements and the concentration of services and facilities would materially enhance the sustainability of surrounding areas, including locations such as Fen Ditton. The proximity of Fen Ditton to CE means that it would be well placed to benefit from, and contribute to, the critical mass of services, employment opportunities and sustainable movement networks introduced through the CE development, further strengthening the case for additional growth in this location.	210232 (Vistry Group)
Capacity Comment that capacity testing shows the Cambridge East site can accommodate more than the stated ~8 000 dwellings, especially with the new railway station and increased commercial floorspace.	(Marshall Group Properties)
CGC is supportive of this policy. CGC would welcome the opportunity to work jointly with GCSP on this allocation and in particular on further work which could support the potential for a higher development capacity than that currently identified in the draft Plan given the potential future transport accessibility and capacity related to the EWR station at Cambridge East. The provision of the station would open the	208939 (Cambridge Growth Company)

opportunity for additional employment and mixed use proposals and also on whether there is the potential for future expansion to the east of the allocation for Cambridge East identified in the draft Plan.	
Marshall strongly supports that the policy requires the delivery of a truly mixed-use development. The specific cultural and community uses identified in the policy should not be listed ahead of a masterplan being developed. The policy should allow for flexibility by removing the specialist housing percentage requirements. For the B2/B8 space requirement, additional wording is added to account for any changes in demand, e.g. “unless up-to-date evidence of need for industrial land suggests otherwise.” Support that the Policy does not specify an exact E(g) floorspace quantum but encourage the supporting documents to be consistent with the Policy to avoid confusion.	211778 (Marshall Group Properties)
Marshall objects strongly to the inclusion within Policy S/CE of the requirement for two sites of 12 pitches for Gypsies and Travellers and to Policy H/GT, which assumes the incorporation of sites for Gypsies and Travellers within strategic sites.	211779 (Marshall Group Properties)
Uses Support Create Cambridge in asking that: • delivery of a cultural anchor (venue, arts centre or artist studios) is required in Phase 1 • cultural provision is not deferred to later phases, where it is at risk of non-delivery • Create Cambridge is engaged as an advisor/consultee on plans and proposals for cultural infrastructure as part of new developments Early cultural infrastructure is essential to avoid dormitory development and support identity, cohesion and liveability	202058 (H Chamberlain), 202143 (Cambridge Junction), 202200 (Ms H Tam), 202311 (Cambridge Junction), 202324 (Cambridge Junction / Create Cambridge), 202413 (T Shaw), 202426 (Kettle's

	Yard), 202687 (T Altmann), 202717 (W Townsend), 202785 (S Lee), 202877 (Cambridge Junction), 203030 (The Arts Theatre Cambridge), 203852 (N Yeni), 203872 (University of Cambridge), 205089 (H Paterson), 205336 (N Oakley), 205341 (L Howse), 205402 (A Seiglow), 202388 (J Webber), 202933 (R Tarry), 202971 (T Flinders), 205157 (J Walsh), 205052 (Uni of Cambridge), 204842 (L Matthews), 205013 (Wysing Arts Centre), 203541 (D Lever), 203632 (University of Cambridge), 203484 (L Heap), 203439 (S Ashworth), 203345 (N Ellis),

	202462 (K Jones), 202879, 204172, 202755, 205407 (Cambridge Junction / Create Cambridge), 204402 (New International Ecounter), 204689 (NEUBAU Architects), 204702 (A Girarlis), 205309 (A Carolina)
Support provision of a concert hall, need for a modern hall that could seat 300-500 people. Currently we are restricted to churches (seat 200) or the university concert hall which is expensive and no parking.	203817 (Cambridge Wind Band), 203948 (S Hughes), 204794 (Cambridge Graduate Orchestra)
Concern there are major gaps: Proposals for Cambridge East/Airport need to incorporate *a second urban centre for Cambridge* that is sub-regional at scale. Provision for a new large lifelong learning college *must* be incorporated ideally as part of the Cambridge East site as an anchor institution - along with a music venue that has a capacity substantially larger than the Cambridge Corn Exchange, and capable of hosting top tier acts at an affordable price. Provision for a new city hall for the new council. A country park that has a 'nature bridge' over link to Coldham's Common. Ornate twin towers theme. Cambridge East Station	202360 (A Carpen), 203750 (A Carpen)

Under the subheading ‘Uses’ Section 4 – add a new criterion e. as follows; “e. Provision of a fire & rescue service drop down point & contributions to fire & rescue, police and ambulance facilities funding”	207475 (Cambridgeshire Constabulary), 207508 (Cambridge Fire and Rescue Service)
Sport England supports the inclusion of sports provision, including criterion 25(h) which requires the delivery of a sports pavilion (Use Class F2). The scale and type of provision should be informed by an up-to-date Playing Pitch Strategy (PPS), Built Facilities Strategy (BFS) and Facilities Planning Model (FPM) for swimming pools.	209221 (Sport England)
We have reviewed the other site allocations in the emerging Plan. Given our current location and history in the Abbey ward, an appropriate location could be within any major new urban extension at Cambridge East. This draft allocation allows for the provision for a wide range and scale of cultural, leisure, shops and community uses to meet the needs of the wider city and sub-region. The allocation notes that this may include civic uses, a conference centre, concert hall, arts centre or leisure facilities. Although this list would cover a new football stadium, it would be helpful to refer explicitly in the Plan to Cambridge East being a potential appropriate location for a new stadium for Cambridge United.	211873 (Cambridge United Football Club)
Townscape Comment that architectural style should not enable styles that have been built in existing large developments in Cambridge	203750 (A Carpen)
Built form paragraph 8, is not sound because it is neither effective nor fully consistent with national policy. By requiring a “contemporary approach” that "embraces modernity", the policy risks being applied as a presumption in favour of a particular architectural idiom rather than focusing on outcomes.	204638 (Cllr T Bygott)

This ambiguity may exclude high-quality development that delivers coherent streets, perimeter blocks and durable public realm through other approaches. Given the scale and permanence of Cambridge East, the policy should be amended to make clear that design quality is judged on urban form, sustainability and place-making outcomes, not architectural style.	
We have some ongoing concerns regarding the densities and heights on some of the edge of Cambridge sites. Development at very high densities/heights has the potential to impact on the overall setting of this historic city. We appreciate that there will inevitably be a trade-off between height versus further urban expansion. We have particular concerns about heights in north-east Cambridge and remain so about impacts on views from Ditton Meadows and the Conservation Areas, as well as wider views approaching the City from the north-east and east.	208929 (Historic England)
Development within this area therefore has the potential to affect the significance of heritage assets on site and nearby, including through development within their settings. We welcome the preparation of the HIA. Section 5.5 helpfully summarises the key heritage sensitivity and Section 6 makes a number of recommendations. Whilst we broadly welcome criterion 5 – 7, these do not sufficiently reflect the recommendations of the HIA. The HIA recommendations include some strategic landscaping and areas of open space at the north-eastern edge of the site as well as a heritage setting for the airport buildings. These must be included within the policy and the Spatial framework (figure 61). We recommend that you Amend policy and figure 61 to incorporate the HIA recommendations in relation to strategic landscaping, open space to	210128 (Historic England)

northeast of site and heritage setting for airport buildings. Criterion 10 should also refer to the strategic views and Skyline and Tall Buildings Strategy. Figure 61 Amend scheduled Ancient Monument to Scheduled Monument (NPPF Preferred terminology) Amend throughout the Plan.	
Marshall does not consider that any other buildings meet listing criteria beyond the listed Control and office building. In relation to the retention of Hangar 1, the draft policy promotes more definitive constraint which Marshall considers to be a level of detail not appropriate for the plan but a matter to be worked through as part of the design development process. Marshall considers that the draft wording should be reviewed to recognise the reality that, whilst the separate character of Teversham must be respected, development at Cambridge East will be visible from the village.	211781 (Marshall Group Properties)
Nature Supports the policy recognition given to biodiversity and green infrastructure issues. The policy represents a good framework to avoid adverse impacts on nearby high-value nature sites and to provide high quality green infrastructure including off-site strategic natural greenspace.	202972 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 202849 (Cambridge Past, Present and Future), 203209 (G Owell)
Concern that the alignment and width of the Green Belt corridor through Cambridge East should be preserved to maintain its function as a vital green link between Coldham's and Stourbridge Commons and Ditton Meadows.	202849 (Cambridge Past, Present and Future)

Many people, me included, regard Cambridge Airport as part of the Green Belt. I know you say it isn't that any longer. Cambridge East is going to be greatly degraded when that becomes developed. I have found very few details of how much green space will be left on the airport.	201224 (S Williams)
I think that the broad design of Marshall's Airport is adequate. I like the idea of green corridors spreading out of the city through Marshalls and I hope in the long term this can be supported with proper environmental infrastructure such as wildlife road crossings, or wildlife underpasses for Newmarket or Airport Road, although I recognise the likely prohibitive costs of these at present. I am strongly supportive of a Cambridge East Station.	208722 (Cambridgeshire County Council (Cllr M Morgan))
I don't think what you are going to allow on Cambridge Airport will contribute to 'protecting and enhancing the green corridors which extend into the city'. At least you are going to leave some green space, though. Initially I thought you were going to pave over the whole lot.	201253 (S Williams)
We note that the policy requires provision of a country park beyond the site to connect through to the Wicken Fen Vision area and encourage your authority to engage as soon as possible with the National Trust about this.	207602 (Natural England)
The National Trust strongly support the requirement to provide strategic scale green infrastructure beyond the site to connect Cambridge City Centre to the Wicken Vision area, reducing recreational pressure on designated sites. The policy requires provision of a country park beyond the site to connect to the Wicken Vision area. It is noted that the location, scale and character of this site is yet to be determined. Work needs to be undertaken to establish this, in order that it can be identified in the proposed Submission Plan. It also needs to be clear how and when the country park will be delivered, in order that it is available for use prior to the occupation of new dwellings at Cambridge East. The	211077 (The National Trust)

National Trust would welcome engagement in discussions about green infrastructure delivery and suggest that consideration is given as to whether our site at Northfield Farm could assist with this provision.	
Green Corridor protection is ambiguous and risks incremental erosion of landscape and heritage assets, particularly around Teversham. Townscape, landscape and heritage wording, particularly in relation to Teversham, needs greater precision	201181 (Save Honey Hill Group), 203619 (Horningsea PC)
The specific reference to compensatory widening is not appropriate or necessary and, as drafted in the supporting text, is misleading to the reader that this can be expected in response to instances where the green corridor is narrowed. Compensatory widening references should be removed to ensure the policy is compliant with national policy. Marshall also wishes to question whether it is appropriate that the Green Corridor is designated as Green Belt.	211782 (Marshall Group Properties)
Movement Comments about transport include: • The indicative “trip budget” and “monitor and manage” approach lacks binding limits, clear triggers, and enforceability • Development should be conditional on finding solutions to active transport constraints (including Fen Ditton Road underpass for Marleigh cycle route, widen Coldham’s Lane railway crossing) • Set ambitious mode share targets and secure walking and cycling links early • Trip budget is too high • The site must not promote car trips to the city centre, which is facilitated by restricting access to Barnwell Rd and Newmarket Rd.	201181 (Save Honey Hill Group), 202001 (D Langley), 201236 (S Williams), 202301 (R MacDonald), 202370 (C B), 202643 (A Lawrence), 203654 (V Ashton), 203695 (T Preud'homme), 203814 (A Chan), 204570 (D Potts),

• You are promoting a low car use approach -- that is not what residents want • People do not want to park their cars at off-site car barns as you suggest • People will NOT avoid using cars and Newmarket Road and Coldhams Lane will be absolute nightmares at rush hour • All homes need easy (walking) access to shops and jobs, and wider recreation • Ensure the layout is friendly to bus route planning, with rights of way access to bus stops, direct bus routing, utilise bus gates • Policy wording must be sufficiently robust to ensure any transport infrastructure which is critical to accommodating sustainable growth in this location is secured and adequately planned for. Concern that there could be potential impacts within East Cambridgeshire. • Need improved links to Addenbrookes and along Barnwell Rd to access secondary schools and station. • I would like to highlight the importance of walking and cycling connectivity across Marshall's to Marleigh and Teversham. I think that it should be thought that any benefits of Marshall's redevelopment can be shared with Teversham. How an adequate viable bus service to Teversham is provided should be considered as part of the transport design for Marleigh.	204593 (R Hoadley), 204659 (East Cambridgeshire DC), 205156 (J Grantham), 205391 (A Williams), 205406 (N Saad), 205436 (S Nuttall), 205343 (R de Beaux) 202849 (Cambridge Past, Present and Future), 208723 (Cambridgeshire County Council (Cllr M Morgan))
CCC Active Travel Strategy 'wheeling' refers to travel using a wheelchair, mobility scooter, pushing a pushchair etc. rather than cycling.	210527 (Cambridgeshire County Council)
The existing transport strategy needs to be reviewed in light of the recent announcement of a station within the site as part of EWR and the proposed provision of an eastern access to Cambridge station, both of which have the possibility to significantly impact the operation of the site in transport terms.	210580 (Cambridgeshire County Council)
Broadly supportive of this policy framework in relation to transport as it reflects its own ambitions and complements the transport strategies that we have developed. The proposed monitor and manage	211784 (Marshall Group Properties)

approach means that infrastructure delivery uncertainty can be managed and should not serve as a hinderance to Cambridge East moving forward. Supports the principle of an evidence driven approach to deriving a trip budget but clear that this does not need to be prescribed by the policy. The Policy should recognise that the extant trip making from the site can be used to support a first phase of development.	
The current capacity of the trip budget has been identified at approximately 1,500 trips in the AM peak and 1,800 trips in the PM peak. This level of trips is understood to have been tested with the regional model and is considered to be able to be accommodated within the local road network, including the local SRN junctions. National Highways would require as part of the local plan process to understand the impact of this development and the cumulative impact on the A14 junction 34 prior to agreeing the trip budget and agreement of appropriate mitigation measures should the trip budget not be met.	209008 (National Highways)
EWR Co is now considering including a new Cambridge East station within its plans for EWR. At this stage, the design of this station is still in its early, feasibility phase. EWR Co is aware of challenges around the site and will continue to explore how this opportunity could be realised to support economic and housing growth in the area. If third-party funding is not secured, the station will be removed from EWR Co's plans. The Councils' full support for a new station at Cambridge East is also welcomed, with EWR Co agreeing that this would provide a 'step change in public transport connectivity' for the Cambridge East development site and eastern Cambridge more widely. EWR Co recommends that land required for Cambridge East station is included in Policy S/CE: Cambridge East, rather than the AMC, as the new station is closely related to the former, with which it will need to be closely integrated with and will help to unlock. EWR Co would welcome consideration by	211885, 211904(East West Rail Company)

the Councils as to how to maximise the density of development of the Cambridge East site and amendments to Policy S/CE to achieve this, given the benefits in terms of sustainable travel that a new EWR Cambridge East station would bring.	
Given that the Station now has the same status as a station at Cambourne upon which a new community is being planned as part of the Local Plan, Marshall considers that the Policy should sensitively reflect the opportunity.	211785 (Marshall Group Properties)
Proposed trip budget risks normalising high levels of car use rather than driving mode shift. The framing of the trip budget also lacks spatial context. Trips into the city are extremely problematic, and must be discouraged. General vehicle access to Barnwell Road should therefore be removed as well as the numerous site accesses onto Newmarket Road. Plan underestimates the level of investment required in the surrounding active travel network. ● Review car trip budgets and introduce binding walking, cycling and public transport mode share targets ● Make delivery of key active travel links a planning condition and phasing trigger, supported by a co-delivery plan between the councils, highways authority and developers, including pooled funding where necessary. ● Explore and understand the need for connectivity across Coldham's Common with financial safeguarding to deliver a bridge from the Cambridge Retail Park to Coldham's Common.	211768 (Camcycle)
Aviation safeguarding, noise, and height constraints are insufficiently defined, creating uncertainty and risk of abortive development	201181 (Save Honey Hill Group), 203619 (Horningsea PC)

It is unclear how access to medical facilities will be provided; Addenbrookes A and E cannot cope, also dentists.	202370 (C B)
There should be greater priority for infrastructure to support the significant growth in east Cambridge. It has long suffered in comparison to most other parts of Greater Cambridge.	203785 (T Panter), 209123, 209124, 209125, 209126, 209127, 209128, 209129, 209130, 209131, 209132, 209133 (R Patel)
The overall level of growth planned for Greater Cambridge and two planned developments (Policy S/GF: Land Adjacent to A11 and A1307 at Grange Farm and Policy S/CE Cambridge East) are expected to impact upon West Suffolk given its proximity and the functioning of the surrounding towns of Newmarket and Haverhill. This will require collaborative working with West Suffolk and a full assessment through the preparation of the local plan evidence base.	204788 (West Suffolk Council)
Concern exist regarding the potential socio-economic divide between areas of poverty in East Barnwell and newer developments. There are reported anti-social behaviour issues in the new Marleigh development. The overstretching of NHS primary care services in the area is a major concern.	205406 (N Saad)
Marshall would welcome the opportunity to explore further what parameter plans would be required and the level of detail that these are expected to contain. The policy should make reference to viability and the unique circumstances that exist on the site.	211783 (Marshall Group Properties)
The concept plan is not representative of a masterplan for the site and so it should not be assumed that features on the concept plan are fixed. The concept plan and policy wording should be clear what is	211780 (Marshall Group Properties)

already consented and what it proposed. The red line should also be adjusted to include the green corridor.	
Concern over the availability and deliverability of the site: • The policy contains multiple interdependent risks relating to airport operations, transport capacity, green corridor protection, water/flooding, and safeguarding and development is pendant on airport becoming available despite uncertainty around relocation of airport operations • Comprehensive development of the airport site is dependent on a change in airport status, meaning the entire site is available for development. Uncertainty regarding relocation of the airport function must be resolved. • Questions whether the assumptions in the GCLP for Cambridge East are realistic given recent announcements that Marshalls has cancelled its planned move from Cambridge Airport to Cranfield. Note Marshall still aims to vacate site by 2030, predicated on identifying and relocating to a new premises. • The site at Cambridge East comprises land at Cambridge Airport that was safeguarded from the previous plan, which was also identified as a growth area as part of the Cambridge Local Plan (2003). Noting the significant amount of time that this allocation has been identified within previous Local Plans, we raise significant concerns over the delivery of this site within the timescales anticipated, particularly noting larger sites by their very nature can take longer to be delivered. • Marshall announced in October 2025 that the business will not be moving to Cranfield but that the company is still committed to moving its aerospace business from its Cambridge Airport base by 2030 (with development anticipated to start in 2032). Notwithstanding this aspiration, there is still no certainty that the airport will move within these predicted timescales, particularly given that an alternative site to relocate to has not yet been secured. As a result, development at Cambridge East could be significantly delayed which could result in limited or no housing delivery for a number of years, particularly within the first 15 years of the plan period.	201181 (Save Honey Hill Group), 203619 (Horningsea PC), 205234 (K Brightwell), 203340 (A Hoare), 202891 (J Williams), 202515 (H Brown), 209969 (Granta Land Ltd), 211042, 211055 (Wates Developments (and Landowners)), 211592 (Places for People)

There is a risk of overstating housing delivery by conflating consented schemes with contingent, policy-dependent capacity. The final Plan should include a clear phase-by-phase deliverability table identifying which homes are deliverable in the near term and which are contingent on airport availability, major infrastructure and other prerequisites	201181 (Save Honey Hill Group), 203619 (Horningsea PC)
Whilst CE is not reliant on the relocation of the CWWTP like NEC is, it is essential that the Local Plan does not rely disproportionately on CE to meet housing delivery requirements within the early and middle stages of the plan period. Medium-scale, well located sites such as Fen Ditton are capable of coming forward without reliance on strategic infrastructure and can therefore play a critical role in supporting the housing trajectory and ensuring delivery against the plan's timescales.	210233 (Vistry Group)
Land at South West Cambridge (Site Ref. 52643) Promotion of additional site on the edge of Cambridge at land at South West Cambridge (Site Ref. 52643)	205161 (Carter Jonas on behalf of North Barton Road Landowners Group)
Land East of Gazelle Way, Cherry Hinton Endurance Estates strongly objects to the proposed policy map for Cambridge on the basis that it fails to inset Land East of Gazelle Way, Cherry Hinton, from the Green Belt and does not propose allocation of the site for development.	209756 (Endurance Estates)
I think some development on Lakes, like in the Netherlands, such as close to the proposed Cambridge East Station, should be considered.	208723 (Cambridgeshire County Council (Cllr M Morgan))

Policy S/CBC: Cambridge Biomedical Campus

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Cambridge Biomedical Campus Ltd, Pemberton Family and Pemberton Family Trusts, Cambridgeshire County Council and Prologis and Cambridge University Hospitals NHS Foundation Trust all referenced the importance of the campus for UK life science sector, and the global significance of the site. They offered general support for the local plan approach, but also areas where they sought change. There was a general support for the need for a site wide masterplan. Flexibility was a theme in the comments, in terms of use classes and phasing, to ensure the area could be adaptable to future needs of the sectors present.

Opportunities within the Strategic Enhancement Area and the Landscape Improvement Area, but a desire for the policy not to be too prescriptive. Housing delivered on the Campus should primarily serve Cambridge University Hospital / NHS campus workers including medical students, but acknowledgement was also sought that market and build to rent maty be needed to make delivery viable, and the policy should also allow dwellings a spart of the expansion land. The goals of the transport requirements were supported, but plan should be flexible on how they are achieved. The ambition for an east-west street was supported, however, it is essential that the policy recognises that its delivery is likely to occur at a later stage in the overall development programme. CUH focused on the importance of their being an infrastructure delivery plan.

The University of Cambridge also highlighted the need for a more coordinated approach to infrastructure for the site.

Cambridge Growth Company supported the policy and the allocation for expansion through release of land from the Green Belt for future phases to support the future development of the Biomedical Campus.

Great Shelford PC, Great Shelford Village Charity, and Stapleford & Gt Shelford Neighbourhood Plan Steering Group expressed concern about the scale of development, and there needed to be consideration of the cumulative impacts on landscape and ecology.

A number of comments reference the need for a site wide masterplan. There was also support for additional health provision, including a new acute hospital.

Some developers promoting other developments highlighted that their sites could complement the CBC proposals.

Comments objected the green belt release in principle, questioning whether the need had been properly demonstrated, or the impacts properly understood, including on the green belt. A number of these comments included conditions that should be required if land is released, such as firm requirement for a new acute hospital, a focus on uses that need to be located there, and enforcement of transport issues.

Impacts on ecology and wildlife were raised, by Bedfordshire Cambridgeshire and Northamptonshire Wildlife Trust, and Cambridge Past Present and Future, and John Meed who has presented extensive information on farm land birds. Hobsons Conduit Trust

refence the importance of nine wells. They highlight the need for extensive mitigation. Historic England require consideration of heritage and landscape when considering building height and form, and the need for development to be linked with mitigation.

A number of comments focused on the impact of CBC on adjoining communities. Many reports were included of issues arising from parking and antisocial behaviour impacting adjoining areas. Proposals must include mitigating for the failures of previous growth.

A lot of comments highlighted transport concerns and suggested interventions. Personal experiences of accessing the site were highlighted. Cambridge South East Transport Scheme received a number of specific objections, siting alternative transport measures which could be applied.

Comments objected to a new vehicle access into CBC from Granham's Road, saying that there were better ways bus access could be achieved. There were concerns that it would simply move or worsen traffic problems

Response to the main issues raised in representations

Support from a range of stakeholders for the policy approach is, noted, but also local concern on a range of environmental issues.

The Cambridge Green Belt Study (2021) identified that the area adjoining Babraham Road and north of Granham's Road would have 'high' harm to Cambridge Green Belt Purposes, and the area beyond would have 'very high harm'. However, there are exceptional circumstances to justify release of land from the Green Belt. This site is only one of a number of life science sites in the Cambridge cluster, it offers the unique benefit of siting commercial research directly with the hospital. The Greater Cambridge Growth Sectors Study identifies that some businesses need to be in close proximity to clinical research. Submissions by the

Campus on ‘the Power of Proximity’ and the ‘CBC Economic Impact Study’ also provide evidence regarding those benefits. The expansion provides the opportunity to provide new facilities to enhance the site, but also support enhancement of the existing campus. The Written Ministerial Statement of 8 May 2024 emphasised the importance of the site.

A wide range of stakeholders emphasised the importance of a site wide masterplan, and infrastructure and amenity planning, to ensure the full benefits of the site are achieved and the impacts are mitigated. The local plan policy includes this requirement. This will also be of key interest to those living near to the campus who sited many concerns about impacts of living near to the site. Mitigation must include improvements to the surrounding area, and the approach to public realm and landscape has now been refined. Given the scale and long term construction of the Campus, placemaking is fundamental to achieving high quality and comments from local and neighbouring communities regarding community safety, and poor design is noted. A Place Book approach has been introduced to mitigate the impact of new development, and require policy to prepare design codes to respond positively to placemaking requirements. Policy reflects that a Masterplan is fundamental to delivering phases 3 and 4 of the Campus.

The Strategic Enhancement Area and Landscape Improvement Area wording has been amended to respond to request for clarity of what these areas may provide, including reference to habitats, farmland birds and other sensitive ecology. The policy has also been amended to clarify the importance of the key strategic views at Nine Wells LNR and the heritage asset at White Hill Farm, and other important green spaces such as the Magog Down and the Pocket Park. The importance of natural and ecological features is noted, and the policy includes reference to the Hobson Conduit Trust legal agreement for the chalk stream.

The spatial framework has been amended to make clearer the green edge and Local Nature Reserve colours. The landscape buffer to the south has been amended to show clearer boundary treatment. Other changes have been made to reflect comments on the key.

Many comments from the Campus owners and stakeholders sought flexibility in the policy, but is also important that the plan sets clear policy in terms of mitigation and infrastructure expectations, in order that a world class campus is achieved, and impacts on the wider area are addressed.

Transport infrastructure is going to be key to addressing future needs of the site. The opening of the Cambridge South Station is a huge step forward, but other infrastructure will be needed to support future growth, including enhanced South East Cambridge Transport. The realigned Granham's Road entrance is also considered necessary to serve the expanded campus. Concerns raised about the modal filter of Dame Mary Archer Way, have been noted and reference is now made to measures that need to be implemented to manage traffic across the Campus.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Cambridge Biomedical Campus Ltd • CBC Ltd works with landowners and local government / organisations to drive and inform how the Campus should evolve so that it both maintains and further builds upon its success. The UK	203327, 211012, 211013, 211014, 211626, 211627, 211628, 211629, 211630,

life science sector has grown significantly in recent years, with Cambridge playing a fundamental role in this. • Overall, CBC Ltd agrees with much that has been included in the draft Local Plan concerning the Campus. CBC Ltd's primary concern for the draft Local Plan is to ensure that the leading international importance of the Campus as a location for life science excellence is protected, enhanced and, importantly, not diluted. For the Campus to retain its leading reputation, it must be vibrant, desirable and offer best in class facilities to attract talent and key life science businesses. • CBC Ltd seeks a masterplan led policy approach that will provide clarity concerning the timing / trigger for its production, as well as a properly defined context and framework. The policy approach proposes clear triggers and parameters which would require a whole Campus masterplan include. The need for an IDP is also linked to the proposed Campus masterplan triggers. • Given the proximity of the Strategic Enhancement Area to the Campus and significant opportunity for place shaping and contribution to the Campus it offers, works on this land should take place before any works on the land within the Landscape Improvement Area take place. • Any housing delivered on the Campus should primarily serve Cambridge University Hospital / NHS campus workers including medical students. • Applications for other uses should need to provide an amenity strategy. • Need to secure developer funding to improve public space. • Other detailed amendments are proposed.	211631, 211632, 211633, 211634, 211635, 211636, 211637, 211638, 211639, 211640, 211641, 211642, 211643, 211644 (Cambridge Biomedical Campus)
Pemberton Family and Pemberton Family Trusts Support the overall approach to the policy but object to two parts (Part 7 and Part 17d) where the Pemberton Family requires a detailed amendment to the policy to ensure the effective use of land and to ensure a sound allocation that involves the release of Green Belt land. • Strong support to the overall policy and the continued recognition by the emerging Local Plan of the important role of CBC and its future growth	205286, 210481,210482, 211294, 211295, 211296, 211297,211298, 211299, 211300, 211301, 211302, 211303, 211304, 211305,

• object to the policy requirements for the LIA. policy should allow for flexibility in design and not limit the use of the entire area for linear or drainage features. • SEA should specific requirements for landscape buffers, green infrastructure protection, flood risk mitigation, and the use of Green Belt land to enhance biodiversity. • Policy, Spatial Framework and the Proposals Map all need to align and be consistent and accurate in how they represent the land and allocation. Important that all Local Plan plans or diagrams that present the site graphically show and designate these two areas (LIA and SEA) separately. • The term “future phase” should be replaced with “expansion” to avoid the potential inference that the development of the expansion land should only occur after the existing Campus has been regenerated. • Including an explicit reference to “life sciences” to ensure the full scope of work undertaken at the Campus is accurately reflected. This proposed amendment aligns with the uses outlined in paragraph 2 of the draft policy. Additionally, the suggested references to “an innovation hub” and “visitor accommodation” are important to highlight, given the significant benefits these elements will bring to the Campus and its wider community. • Describing CBC as ‘globally significant’ is an accurate reflection of its international standing. The unique mix of uses at the Campus make it a world-leading centre of research, development, and medical application. • Support the identification of land to the south of the Campus for green infrastructure enhancements, including open space and biodiversity. It may be difficult to achieve the necessary net gain in biodiversity and all amenity provision within the Campus’ expanded boundary. This may change, however, and if it does become possible, then the clear direction in legislation and policy is for those benefits to be provided onsite so far as possible. • Provision of higher education uses within the Campus is a key component of its offer and success.	211306, 211307, 211308, 211309, 211310, 211313, 211315, 211317, 211319, 211321, 211323 211325, 211327, 211329, 211331, 211333, 211335, 211337, 211338, 211340, 211341, 211343, 211345, 211347, 211349, 211351, 211353, 211355, 211357, 211359, 211361, 211363, 211365, 211367, 211369, 211371, 211373, 211375, 211377, 211379, 211381, 211383, 211385, 211387, 211389, 211391, 211393, 211395, (Pemberton Family and Pemberton Family Trusts)

• Paragraph 8(e), which states a floorspace figure for research and development and healthcare uses only (excluding higher education, leisure, hotels, and other supporting uses), be deleted and additional text be included at paragraph 8(b). • A reference to use classes is not necessary and may unduly limit the scope of potential uses. Flexibility is particularly important given the evolving nature of life sciences research, which is increasingly associated with AI and data-driven methodologies. As a result, there may be a shift from traditional wet lab facilities to dry lab environments. • Requirement for a Framework Amenity Strategy for the Campus is supported. However, we do not agree with describing the Campus as a “24-hour” community. • A well-designed masterplan for the Campus should intentionally promote interaction between people who live, work, and visit there. • The majority of housing delivered on the Campus will be located within the existing boundaries and will be provided by CUH to meet the needs of CUH and wider NHS campus staff. However, there is also an aspiration to enable the delivery of build-to-rent homes for Campus workers within the expansion land. • The policy wording should recognise that the proposals will bring about a substantial amount of change, and that some of these changes may adversely affect views or heritage assets. It is essential that the policy recognises that land optimisation will sometimes require development forms, scales, or configurations that do not enable the enhancement of all existing views into or across the site. • Recognise that in certain circumstances, proposals for demolition may deliver benefits that outweigh the carbon savings associated with retaining the existing building. • Support the ambition for an east-west street; however, it is essential that the policy recognises that its delivery is likely to occur at a later stage in the overall development programme • Policy should be flexible regarding for Transport strategy and trip budget, it should be sufficient for the policy to set out the ambition not exactly how it will be achieved at this stage. • Healthcare uses may not be suitable and viable for all water use, energy etc aspirations.	

• The benefit that a campus-wide masterplan can play in ensuring the best possible outcomes is understood and appreciated. The LCG has prepared a draft Spatial Framework supported by robust assessment and evidence. We support the requirement to be the output of a planning application rather than something that should necessarily precede one. • Acknowledge GCSP's desire to include a spatial framework (figure 63) but we are concerned that may appear more prescriptive/precise than the stage of the process we are at • Future strategies should apply to the area covered by the application. While coordination across the wider campus is encouraged where possible, it is unlikely that existing management strategies can be revised. • The policy is not contingent on identifying a single delivery body, nor should it be interpreted as such. • Proposals may need to come forward on an expedited timeframe. The draft policy should not prejudice this happening but be flexible enough to accommodate them in an appropriate way that does not prejudice the rest of the masterplan being built out in accordance with its terms. • A number of other detailed points are made and changes proposed. .	
Cambridgeshire County Council and Prologis Pleased to submit representations in support of the draft Local Plan, and in particular Policy S/CBC. Detailed wording changes are suggested. • Describing CBC as 'globally significant' is an accurate reflection of its international standing. The unique mix of uses at the Campus make it a world-leading centre of research, development, and medical application. The policy rightly recognises this position and sets an appropriately defined context for expansion of the Campus. • We recommend including an explicit reference to "life sciences" to ensure the full scope of work undertaken at the Campus is accurately reflected.	209136 209137, 209138, 209139, 209140, 209141, 209142, 209143, 209144, 209145, 209146, 209147, 209148, 209149, 209150) 211314, 211316 211318, 211320, 211322, 211324, 211326, 211328, 211320,

• The term “future phase” should be replaced with “expansion” to avoid the potential inference that the development of the expansion land should only occur after the existing Campus has been regenerated. • support the identification of land to the south of the Campus for green infrastructure enhancements, including open space and biodiversity. • The provision of higher education uses within the Campus is a key component of its offer and success. • Provide clarity on what floorspace figures are referring to in terms of uses, and that they are indicative. Also need flexibility between use classes given the evolving nature of life sciences research • Do not agree with describing the Campus as a “24-hour” community. While the hospitals operate around the clock, these activities do not generate a night-time economy • The term “comprehensive” should be deleted from Para 10 as it could be misinterpreted as implying a level of detail that is not intended at this stage. • A well-designed masterplan for the Campus should intentionally promote interaction between people who live, work, and visit there. • The majority of housing delivered on the Campus will be located within the existing boundaries and will be provided by CUH to meet the needs of CUH and wider NHS campus staff. However, there is also an aspiration to enable the delivery of build-to-rent homes for Campus workers within the expansion land.	211332, 222334, 211336, 211339, 211342, 311344, 211346, 211348, 211350, 211352, 211354, 211356, 211358, 211360, 211362, 211364, 211366, 211368, 211370, 211372, 211374, 211376, 211378, 211380, 211382, 211384, 211386, 211388, 211390, 211392, 211394, 211396, 211398, 211400, 211402, 211404 (Cambridgeshire County Council and Prologis)
CUH strongly supports the overall vision for CBC. • We recommend including an explicit reference to “life sciences” to ensure the full scope of work undertaken at the Campus is accurately reflected. CBC as globally significant is an accurate reflection of its international standing. The unique mix of uses at the Campus make it a world-leading centre of research, development, and medical application. A reference to use classes is not necessary and may unduly limit the scope of potential uses.	208764, 209276, 209277, 209278, 209279, 209280, 209281, 209282, 209286, 209289, 209290, 209291, 209292. 211788, 211789,

• The term “future phase” should be replaced with “expansion” to avoid the potential inference that the development of the expansion land should only occur after the existing Campus has been regenerated. • CUH supports the identification of land to the south of the Campus for green infrastructure enhancements, including open space and biodiversity. Our primary objective would be to ensure that the expansion land and associated enhancement land, provides an opportunity for enhanced recreational access for our staff, patients and visitors. • The provision of higher education uses within the Campus is a key component of its offer and success • The scale of development at the Campus should be determined by physical and infrastructure constraints such as building heights, the trip budget, and land availability. These constraints require further assessment, and current work does not support a defined minimum or maximum. • It is essential that the scale of new healthcare buildings be determined by the specific operational requirements of the Trust, the model of care to be delivered, and the clinical and spatial standards that apply at the time of design. • We are making the case for significant renewal of our wider hospital estate, and a case is being put forward to Government for funding to develop the business case for a new Acute Hospital. • We enjoy excellent partnership working across healthcare, academic and commercial research partners on campus, which should be encouraged. • LCG’s evidence base submitted to GCSP identifies an opportunity to deliver approximately 1,000 additional homes on the Campus. The Expansion Landowners are therefore very supportive of this element of the draft policy. However, we propose an amendment to increase the indicative number of units to allow greater flexibility for additional homes to be delivered on the expansion land. • CUH support the objective that the majority of housing delivered on the Campus will be located within the existing boundaries and will be provided by CUH to meet the needs of CUH and wider	211790, 211791, 211792, 211793, 211794, 211795, 211796, 211797. 211798, 211799, 211800, 211801, 211802, 211803, 211804, 211805, 211806, 211807, 211808, 211809, 211810, 211811, 211812, 211813, 211814, 211815, 211816, 211817, 211818, 211819, 211820, 211821, 211822, 211823, 211824, 211825, 211826, 211827, 211828, 211829, 211830, 211831, 211832, 211833, 211834, 211835, 211836, 211837, 211838, 211839, 211840, 211841, 211842, 211843, (Cambridge University Hospitals NHS Foundation Trust)

NHS campus staff. In order for staff housing to be viable, an element of market housing or build to rent may be necessary. • Requirement for a Framework Amenity Strategy for the Campus is supported. However, we do not agree with describing the Campus as a “24-hour” community. • The policy wording should recognise that the proposals will bring about a substantial amount of change, and that some of these changes may adversely affect views or heritage assets. It is essential that the policy recognises that land optimisation will sometimes require development forms, scales, or configurations that do not enable the enhancement of all existing views into or across the site. • Consider giving greater clarity on the respective roles of the SEA and LIA such that the balance between such objectives as biodiversity enhancement, recreational access, access and movement corridors, landscape buffering/screening and impact on views can be assessed in the round. • Policy should be flexible regarding for Transport strategy and trip budget, it should be sufficient for the policy to set out the ambition not exactly how it will be achieved at this stage. Patient parking is a priority for CUH. • The LCG remain committed to the long term ambition to deliver the east-west link, or High Street, as a public transport and active travel corridor. It is essential that the policy recognises that its delivery is likely to occur at a later stage in the overall development. • Healthcare uses may not be suitable and viable for all water use, energy etc aspirations. • We support the need for a campus-wide Framework Masterplan. • CUH encourage a focus on establishing the approach to Infrastructure Delivery to ensure the ambitions for the campus, and the expectations of each landowner / area of the masterplan are clearly defined. • Othe detailed wording changes are suggested.	

The University of Cambridge supports the policy in the Local Plan that promotes the expansion and enhancement of the Biomedical Campus, recognising its national and international significance for education and research in life sciences. The Vision and Objectives of the policy are endorsed, aiming to establish the campus as a leading centre for medical research and health science in Europe. While generally supportive of the allocation and wording, the University has provided detailed comments in an attached document to clarify aspects of the policy in alignment with other landowners. Concerns are raised regarding the 'Lifespan' section of the policy, particularly about the lack of clarity on phasing and delivery of expansion proposals. The Development Strategy indicates that development is contingent on appropriate infrastructure being in place to support the campus's needs, which the University believes requires a more coordinated approach. The University advocates for a detailed masterplan that includes infrastructure and delivery timing to ensure all developments align with the broader vision of the plan. The University expresses willingness to collaborate with partners and the Greater Cambridge Shared Planning Service to address these concerns and contribute to the Infrastructure Delivery Strategy.	204736 (University of Cambridge)
The Biomedical Campus is encroaching on the Green Belt south of Cambridge, and the proposed CSET busway will further impact this area. These must be considered together. Both the Biomedical Campus and the busway will have significant harmful effects on the Green Belt, with concerns about the cumulative impact on the surrounding countryside, regardless of landscaping efforts. While the proposal for a Landscape Improvement Area is welcomed, previous plans under Policy CSF/5 have not been implemented, raising doubts about future improvements. Clear plans and guaranteed funding for landscape improvements must be established before granting planning permission for any	204687 (Great Shelford PC)

development. Proposals for public access should align with the recommendations in the Stapleford and Great Shelford Neighbourhood Plan. There must be a firm and irrevocable commitment against any further development in the Green Belt should the construction of the busway proceed.	
• The respondent expresses broad support for Policy S/CBC clauses 14, 17, and 18, emphasising the need for new developments to integrate sensitively with surrounding areas and retain key views, particularly from strategic viewpoints like Nine Wells Local Nature Reserve and Magog Down. • Concerned about the cumulative impact of building height and density on the Cambridge Biomedical Campus, suggesting that it may create a 'concrete wall' that detracts from the landscape, particularly from high points on the Gog Magog Hills. This 'wall' could be broken up by fingers of vegetation penetrating into and through the southern fringe. • The respondent calls for greater specificity in Policy S/CBC 14a regarding transitions in height, scale, and landscaping, arguing that current guidelines may inadvertently support taller buildings that negatively impact long-distance views. • There is a concern that the lack of height restrictions in Policy S/CBC clause 16c may lead to increasingly taller buildings that overshadow City views, public spaces and the greenbelt, suggesting that medium-mature trees should be included in planting plans to mitigate the raw edge of the development. • Support is expressed for the vegetated landscape buffer proposed in Policy S/CBC clause 17d, with a recommendation to expand the Strategic Enhancement Area southwards to Magog Down to enhance nature and landscape character. • The respondent believes that improved landscaping policies from the 2008 Cambridge Southern Fringe Area Action Plan should be incorporated into the draft Greater Cambridge Local Plan to ensure community and environmental benefits are preserved.	202085 (Great Shelford Village Charity)

• The respondent argues for limited private car access on the new road and supports alternative transport solutions that would improve connectivity within the Cambridge Biomedical Campus, such as an on-road CSET route coupled with upgrades to existing roads.	
The respondent expresses broad support for Policy S/CBC clauses 14, 17, and 18, emphasising the need for new developments to integrate sensitively with surrounding areas and retain key views, particularly from strategic viewpoints like Nine Wells Local Nature Reserve and Magog Down. Concerns are raised about the cumulative impact of building height and density on the Cambridge Biomedical Campus, suggesting that it may create a 'concrete wall' that detracts from the landscape, particularly from high points on the Gog Magog Hills. This 'wall' could be broken up by fingers of vegetation penetrating into and through the southern fringe. The respondent calls for greater specificity in Policy S/CBC 14a regarding transitions in height, scale, and landscaping, arguing that current guidelines may inadvertently support taller buildings that negatively impact long-distance views. There is a concern that the lack of height restrictions in Policy S/CBC clause 16c may lead to increasingly taller buildings that overshadow City views, public spaces and the greenbelt, suggesting that medium-mature trees should be included in planting plans to mitigate the raw edge of the development. Support is expressed for the vegetated landscape buffer proposed in Policy S/CBC clause 17d, with a recommendation to expand the Strategic Enhancement Area southwards to Magog Down to enhance nature and landscape character.	201552 (J Flynn, Chair, Stapleford & Gt Shelford Neighbourhood Plan Steering Group)

Improved landscaping policies from the 2008 Cambridge Southern Fringe Area Action Plan should be incorporated into the draft Greater Cambridge Local Plan to ensure community and environmental benefits are preserved. The respondent argues for limited private car access on the new road and supports alternative transport solutions that would improve connectivity within the Cambridge Biomedical Campus, such as an on-road CSET route coupled with upgrades to existing roads.	
I am unable to find details of the Strategic Enhancement Area S/SEA/CBC which is referred to in 17d of Policy S/CBC.	201829 (F Goodwille)
We are disappointed that Site 40509 remains unallocated, which we consider unreasonable and inconsistent with the Local Plan's aims. HELAA review highlights clear discrepancies in site assessments. Compared to Site OS276, an allocated Green Belt site, Site 40509 performs significantly better, receiving five Green ratings and no Red ratings, whereas OS276 receives two Reds and only two Greens. Excluding Site 40509 on Green Belt grounds while allocating a less sustainable site is unjustified and demonstrates inconsistency in assessment and site selection, undermining the equitable application of the Local Plan's criteria.	204428 (Waterbeach Instruments Ltd)
Strong support is given to this policy. Cambridge Biomedical Campus is a globally significant hub of research and innovation that has led to tangible improvements to human health and wellbeing. Its expansion and regeneration deserves full support. The potential for Cambridge South to complement and support the expansion of CBC has long been evident, with housing delivered on Cambridge South intended to support the evolution of the Campus and to meet the needs of its diverse workforce. Whilst the two sites are now being promoted separately, that intrinsic relationship between the two sites remains obvious.	208216 (Pigeon Land and LIH)

CGC supports this policy and the allocation for expansion through release of land from the Green Belt for future phases to support the future development of the Biomedical Campus. The strategic importance of CBC has been stated in the Written Ministerial Statement 8th May 2024, including support for the accelerated delivery of any associated housing development and the provision of appropriate levels of affordable housing to meet the housing needs of those working at the campus. CGC recommends that further consideration is given to the boundary of this allocation in relation to the proposed access. The access as shown on the Spatial Framework plan figure 63 appears not to be deliverable due to the consented scheme to the north of Babraham Road. Therefore, an alternative redline for the proposal allocation should be considered to allow for alternative access arrangements.	203914, 208940 (Cambridge Growth Company)
This section needs to give priority to measures that will improve the mental as well as physical health of people. See the research in Neuroarchitecture and note how the existing building style ***increases levels of mental stress in the brain*** - achieving the opposite of what hospitals and health facilities are meant to do. The Frank Lee Centre should be made public and *massively expanded* to become a leisure centre. Provision for a new lifelong learning centre is essential.	203762 (A Carpen)
Provision for keyworker housing near the Cambridge Biomedical Campus should be made given the additional hospital construction happening. The distances staff have to travel involves crossing county boundaries for too many. This could be a requirement for developments at any existing or proposed railway stations, and possibly light rail stops should such a system get built.	203828 (A Carpen)
Urgent need for a masterplan prior to further development Need for a direct link in this policy between jobs and housing availability to ensure they come forward together.	202847 (Cambridge City Council Liberal Democrat Group)

EWR Co supports the principle of the development and expansion of the Campus, as it aligns with EWR Co's objective to facilitate economic growth within the Oxford–Cambridge Growth Corridor. EWR will contribute to the Councils' vision for the Campus.	211898 (East West Rail Company)
Support the expansion of the Cambridge Biomedical Campus, recognising its importance to healthcare and science. Concerns are raised about the safety and wellbeing of staff commuting to the site, highlighting current commuting experiences as lengthy and potentially dangerous. Many staff cannot work from home and must travel to campus, necessitating improvements in convenience and safety. Many staff cannot afford to live in Cambridge, limiting their commuting options to car. Improvements in parking and bus services are essential to accommodate the growth of the campus. The frequency of the guided bus service should be increased, particularly during peak times. A shuttle bus from Cambridge Train Station to the hospital is suggested to alleviate capacity issues on the guided bus for those travelling to St Ives.	201173 (A-J Denman)
The biomedical campus is a good location for as much development as possible. I has a new station, a number of bus routes and jobs and amenities. As much development as possible, as dense as possible should take place. If anything, it should go further than what the plan currently proposes.	203616 (H Thomas)
My 14-year ecological study shows that the fields adjoining the Biomedical Campus hold remarkable populations of farmland wildlife. Encroachment of CBC has already had an impact on threatened species and S/CBC will further increase the pressures. While the proposed mitigation is an improvement over the first proposals in 2021 there will be tensions in the way the mitigation fields may be managed. To help conserve threatened farmland species I recommend a combination of enhanced arable land with some grassland and wildflower plots secured under long-term agreements, with	202585 (J Meed) (206306, 206307, 206308 206309, 206310, 206311, 210870, 210871, 210872 210873, 210874, 210875, 210876, 210877, 210878,

species-specific conditions for farmland birds including appropriate management and annual monitoring.	210879, 210880, 210881, 210882, 210883, 210884, 210885)
Object, CPPF acknowledges the importance of the site and supports the release of Green Belt land for clinical and research investment but opposes further boundary expansion in future Local Plan reviews. The Cambridge Biomedical Campus SPD, adopted in April 2025, should be referenced in supporting documents. An updated master plan is necessary to identify redevelopment opportunities and strategic landscaping to mitigate impacts on the landscape. Policy needs to require the masterplan to be updated. Consider restricting development to those uses where it is essential to be onsite. Amend policy to direct housing development to sites not needed for biomedical purposes. Heavily scrutinise and sensitivity-test forecasts for modal shares for transport to/from the CBC. Test all routes onto and through the Campus for adequate capacity for all modes, recognising that there will be large cohorts of people walking and cycling to and from Cambridge South station. Revisit the options for providing bus priority between the Babraham P&R and the Biomedical Campus to also accommodate buses arriving on the A1307 from Haverhill via the Babraham Research Park.	202862 (Cambridge Past Present and Future)
CPPF is concerned that residential development may encroach on land needed for biomedical purposes, advocating for housing only on unsuitable land. High-rise residential developments should be located in areas appropriate for such buildings, and housing should be limited to key worker accommodation. Policy needs to require the masterplan to be updated. Consider restricting development to those uses where it is essential to be onsite.	209295 (Cambridge Past Present and Future)

CPPF suggests a different approach to development and green space on the south-east boundary to enhance outcomes for nature and people, referencing the Wildlife Trust BCN. Mitigation strategies for new habitats should consider the needs of red-listed farmland birds and may require off-site nature-friendly farming.	209296 (Cambridge Past Present and Future)
The Wildlife Trust supports point 14(b) of the policy and the principles in bullet 17(c). The Wildlife Trust fully supports effective buffering of both LNRs at Nine Wells and Beechwoods. The fields immediately to the east of Nine Wells are also essential to buffer this site and protect the chalk springs. The Biomedical Campus is known as a hotspot for farmland birds. The proposed landscape enhancement and accessible greenspace provision will not provide suitable compensation for the loss of farmland bird population. These will need off-site areas of nature friendly arable farming with a secure long-term future and not typical greenspaces. The policy doesn't adequately provide for this. We are extremely concerned overall that the proposed landscape buffer is the wrong solution in the wrong place in terms of delivering nature recovery and ecological enhancement in line with the Cambridge Nature Network and the Greater Cambridge Green Infrastructure Opportunity Mapping. It fails to deliver the strategic natural greenspace that the City requires and demonstrates a lack of long-term vision to deliver the Cambridge Nature Network. A corridor from Beechwoods LNR to Nine Wells LNR around the edge of the Babraham Park & Ride site is not the right solution.	202995 Bedfordshire Cambridgeshire and Northamptonshire Wildlife Trust)
Wildlife Trust believes that now is the time for a comprehensive approach to long-term planning for development on the south-east edge of Cambridge to create a one-off targeted Green Belt release in appropriate locations and to deliver a regionally significant sub regional greenspace of 500 Ha in size", comprising a large accessible area of chalk downland and associated habitats from Cherry Hinton to	202998 Bedfordshire Cambridgeshire and Northamptonshire Wildlife Trust)

Beechwoods and Wandlebury, and on towards Magog Down. Targeted release of green belt land in more than one location will facilitate the land assembly required to deliver the strategic green infrastructure in the best location	
Nine Wells remains the principal source of spring water feeding into our chalk stream system, and so it is axiomatic that the Trust is directly concerned with the health of the springs and the curation of Nine Wells LNR. The Trust have legal agreements with developers at CBC to cover surface water arriving into the Brook. Parameters have been established for flow rates of run off and many interventions have been successfully including at Clay Farm and CBC. We believe that these legal agreements should be recognised in S/CBC. It should be explicit the importance of water quality and natural habitats.	209014 (Hobsons Conduit Trust)

Other comments from stakeholders

There are no designated heritage assets however there is a scheduled monument known site revealed by aerial photography west of White Hill Farm. There is also a grade II listed monument at Nine Wells with inscriptions including Thomas Hobson, of Hobsons Conduit. There are also important views of the edge of the city from the higher land to the south and in particular from heritage assets including the scheduled monuments of Little Trees Hill (on Magog Down) and Wandlebury. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA. We welcome 14c, 16c.and 16d and 28. 14c should also specifically mention the scheduled monument west of White Hill Farm as well as the listed monument at Nine Wells. The policy should include the need for a Conservation Management Plan of the heritage assets in the Landscape Enhancement Area including their ongoing maintenance. Criterion 16 should be amended to reference	210129 (Historic England)

the need to scale down heights towards the edge of the development as recommended in the HIA. However, we have some serious on-going concerns about heights and the softening of the edge of the City as well as landscape enhancements in the wider area. Landscape Enhancement Areas have been part of the previous Local Plan and yet there has been little change to the wider setting of the city in this broad area. It is imperative that future development of the Addenbrookes site is linked to positive offside mitigation to help enhance the setting of the City and indeed views from heritage assets along the southern hills. This aspect of the Plan, and the link between development and mitigation must be strengthened to ensure that it is implement. This issue applies not only in relation to Addenbrookes but to other Landscape Enhancement Areas in the Plan.	
Unless the Strategic Enhancement Areas start to deliver a softening of the landscape e.g. around Addenbrookes, we will have ongoing concerns about heights of development in the proposed CBC extension to the south of Addenbrookes.	208930 (Historic England)
A new purpose-built ambulance hub is required for Cambridge and the surrounding areas, ideally in the area of green belt south of the Cambridge Biomedical campus. The right infrastructure would include 1 ha of land to build the ambulance hub with close access to nearby main roads. The new ambulance hub would be designed to enable expansion to allow for population growth for the next 30 years. A new Ambulance Hub would cost around £20-£22m (including land purchase, EV charging infrastructure requirements).	210320 (East England Ambulance Service NHS Trust)
Site area includes a safeguarded Waste Management Area for the partially implemented EIC as shown on the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) Policies Map. Developers should be made aware that the partial implementation of this EIC involved the construction	210604, 210611 (Cambridgeshire County Council)

of underground tunnels; and this should be considered in any design. It is requested that supporting text to this effect is included in the Plan for this allocation. we welcome that nature is included within the policy for the Cambridge Biomedical Campus (including Addenbrooke's Hospital), particularly the need to 'improving ecological links between Nine Wells LNR and GoG Magog Hills' and the allocation of 'Non-development areas adjacent to Cambridge Biomedical Campus Strategic Enhancement Area' (S/SEA/CBC)	
Anglian Water welcomes the policy requirements set out within the Resources section of these policies, which sets out important measures including innovative approaches to water management on site, including SuDS, water reuse and solutions to address flood risk, and sewage disposal.	210192 (Anglian Water)

Comments Related to Garnham's Road Access

Object to proposed new vehicle access into CBC from Granham's Road • Not be needed if the suggested alternative for a busway spur off the A1307 Hinton Way roundabout was adopted, because this would connect all the CBC with Cambridge South Station (CSET fails to achieve this) and it would significantly reduce traffic volumes near Addenbrooke's / Babraham Road /Hills Road and provide emergency vehicles a direct blue light route into Addenbrooke's. • A link from Granham's road into CBC would exacerbate congestion at junction with the A1301 High Green (at the Coop) and the queuing at the level crossing. • The Better Ways for Busways' alternative for a busway, as cheaper, faster to achieve and far, far less damaging to our environment and respectful of the Wandlebury landscape	202085 (Great Shelford Village Charity) 201552 (J Flynn, Chair, Stapleford & Gt Shelford Neighbourhood Plan Steering Group) 202664 (A Gannon) 202639 (S Newman) 204955 (O Arthurs) 207657 (K Foreman)

• Proposed route doesn't seem to take into account the destinations which travellers wish to access, i.e. Cambridge South Station, all part of CBC, proximity to Babraham P&R Previous plan committed not to build south of Granhams road • To facilitate the alternative CSET route, we support upgrades to Francis Crick Avenue and Dame Mary Archer Way, as per clause 20b • Granham's Road. This is across farmland, from a notoriously poorly maintained and difficult road • Proposed entrance to the expanded Cambridge Biomedical Campus from Granhams Road may worsen traffic and should restrict private vehicle access • It may shift traffic congestion to A1301/Granhams Rd junction and Graham's Rd level crossing rather than alleviate it, and questioning the necessity of the road given that CSET is intended to reduce traffic volumes.	208406 (M Cooper) 209023 (Hobsons Conduit Trust) 202664 (A Gannon) 202626 (I Smith) 203156 (J Jasiewicz) 204979 (C Arthurs) 203081 (T Lane) 205650 (A Sykes) 203189 (V Morgan) 204457 (N Pond) 208557 (J Robinson) 203100 (C Schofield) 204979 (C Arthurs) 203102 (N Campbell) 204107 (A Baker)
PC would like to raise concerns about the extra traffic that will be using Granhams Road as the relief road joins with it because his is a fast signal track road. Would also like to highlight the importance of Nine Wells as an environmental site for rare chalk streams. Figure 64 shows the area being both sides of Granhams Road (this is land being released from Greenbelt) but maybe some of this is to retain a green area.	202535: 205585: 205586 205587, 205588,205589 (Little Shelford Parish Council)

Object, why continue to pursue an access into CBC from Babraham Road at Granhams. This will increase congestion. It is too close to Addenbrookes and will require a roundabout or lights. The access should be near the Babraham Road roundabout where there is more space to allow a better flow of traffic into the CBC. The policy rightly emphasises the importance of the Gog Magog Hills, yet it has deemed approval of an ill-considered busway which will visually dominate the most attractive landscape close to Cambridge and seriously harm the Green Belt throughout its route. It is a tragic situation. The busway route is hugely flawed. Seven thousand residents have objected and how can the County deem approval at the same time as stating that it harms the Green Belt and is inappropriate development. Although the GCP have spent ten years considering CSET, the approved busway route should be abandoned. For years those who use the 1307 know that forming a good access into the CBC near to the Babraham Road roundabout would be the most effective solution allowing both bus and car access.	204119 (B Reeve)
The Transport Strategy needs thorough scrutiny, particularly regarding the realism of mode-shares for train and bus transport. The technical note on Granham's Road realignment lacks clarity on tested options, and some claims about integration benefits require further examination. Consideration should be given to bus services from the A1307, with potential advantages from a continuous inbound bus lane or separate busway.	209297 (Cambridge Past Present and Future)
Granhams Road	208744 (Trumpington residents Association)

Unless the CBC Landowners devise and implement a robust contemporary solution to ensure that the CBC's private roads are only used by authorized users – and no-one else – the proposal to realign Granham's must be a non-starter.	

Comments raising transport issues

Connectivity between the Biomedical Campus and West Cambridge is required. The Plan must identify and secure key off-site active travel improvements. On-site walking and cycling improvements should not be delayed further.	205245 (K Brightwell) 204600 (D Potts) 202516 (H Brown) 205163 (J Grantham) 205410 (A Williams) 207542 (R De Beauz) 202306 (R Macdonald)
Expansion of the Biomedical Campus is understandable given its regional and national importance. However, the Local Plan does not yet set out a sufficiently robust spatial strategy to accompany this growth. While Cambridge South station will significantly improve access, it primarily resolves an existing deficiency rather than enabling the scale of growth now proposed. Transport cannot be treated as a single intervention. Large-scale employment growth without corresponding housing or genuinely mixed-use development risks intensifying peak travel demand and increasing pressure on already constrained corridors. At present, the level of mixed-use development proposed around the campus is token. If the objective is to support healthcare, research and education, the Plan must enable	209066, 211771 (Camcycle)

people to live close to where they work. The policy should: ● Require genuinely mixed-use development at a meaningful scale within and adjacent to the Biomedical Campus, including high-density housing with low car ownership, to reduce the need for long-distance commuting ● Avoid token residential provision and explicitly link employment growth to housing delivery in a walking or cycling distance to the campus If land is released around the Biomedical Campus, the Plan should not embed physical and spatial constraints that prevent homes being built close to the campus. The Plan identifies cycle connections over the railway but does not acknowledge that these are already major failure points as well as a fragmented on-site network. The busway bridge requires significant intervention, either through cantilevered widening or a parallel structure, if it is to support the level of cycling demand associated with further Campus expansion. Connectivity between the Biomedical Campus and West Cambridge is critical if growth in these two areas is to be successful. This is discussed further in the following section. The policy should: ● Ensure that boundary treatments associated with Green Belt release do not create long-term physical or spatial barriers to movement, future connections or neighbouring communities ● Identify the active travel connections over the railway line as critical infrastructure and explicitly acknowledge the need for improvement ● Secure firm commitments to upgrade the key walking and cycling corridors serving the campus,	

including Trumpington Road, Long Road and the busway path with delivery tied to development phasing.	
With such a significant expansion proposed, including green space provision, I question whether it is wise to try and fit everything on this one site. It will be the size of a town, but it lacks the transport infrastructure to cope properly. For staff, visitors and patients (for some of whom this hospital is not local) it would make more sense to consider another location outside Cambridge. There is only such much that can be built here.	201197 (B Nicolson)
Priority access by bus from the Park&Ride/South Cambs along a new road would be very welcome. It would be great if the Plan and accompanying Transport Strategy brought about 20 minute journeys by any mode between Eddington/West Cambridge and the Biomedical Campus.	203213, 205600 (S Hughes)
The Biomedical Campus has a policy of preferring public transport over private car use. But Stagecoach can't match this, leaving people often waiting 30 minutes or more for a bus to the station and centre from 17:00 to 17:30. I leave my desk at 17:01, arrive at the bus terminus at 17:10, and then wait. And wait. Buses to the station and centre should be every 5 minutes. The RTPI needs to be reliable (currently broken again!) If I miss 18:00 connecting bus, I have a 30 minute wait for the next to Bar Hill.	201041 (P Spowart)
I work at Cambridge Research Park, can see it from the edge of the village but inaccessible by bike. How did they get permission for a site with no safe cycle accessibility.	202641 (C Amos)
Growth of the biomedical campus can only be sustainably achieved if: More housing is planned along it, with <1 parking space per housing provision; boundary treatments associated with the green belt does not hamper active travel movement in the future - more emphasis is put on active travel connections over the railway, in particular a widening of the busway bridge or new path parallel to it clear	203732 (T Preud'homme)

commitments made to upgrade the key walking and cycling corridors serving the campus, including Trumpington Road, Long Road and the busway path with delivery tied to development phasing.	
(1) The Babraham Road Park and Ride is placed too close to the city centre. Regardless of whether the new busway gets built, the P&R should be further out with dedicated bus lanes between the P&R and Addenbrookes. That way cars have an incentive to use the P&R (skip the traffic) rather than driving all the way in. (2) I would urge the council to consider adding a bus stop on the busway bridge across South Station, making the transfer between buses and trains seamless	203826 (A Chan)
Support plans to improve bus access to Cambridge Biomedical Campus (CBC) and links between the Babraham Park&Ride and CBC.	203239 Cambridge Area Bus Users)

Comments focused on the Cambridge South East Transport Scheme

I wish to comment against the proposed CSET bus route across green belt bordering the Gog Magog Hills which is due to cost 160 million pounds at current estimates. There is no need to pursue this route and destroy the landscape at such an astronomic cost when a perfectly good alternative has been proposed by Better Ways for Busways along the A1307 corridor from the A11 to the Cambridge Biomedical Campus. This could be done in sections to avoid disruption, much of the route already has bus lanes in place and the cost is a fraction of that proposed by the route across green belt which would ruin good agricultural land. The Gog Magog Hills have been included as a priority for enhancing green infrastructure and will be negatively impacted by CSET and therefore I strongly oppose this ill thought through strategy.	207646 (J Coppendale)

Object, CSET plan encroaches onto Green Belt land and does is not proposed to lie within the public transport corridor. The proposed Busway will urbanise the rural countryside of south east Cambridgeshire. The Gog Magog Hills will be negatively impacted, when this was a priority for enhanced strategic green infrastructure. The Gog Magog Hills have not been afforded the value and protection required when considering the environmental impacts of the proposed route of the CSET Busway. Construction of the proposed Busway is expensive, when a cheaper alternative is available.	205468 (J Macpherson)
Don't like the CSET plan to concrete over the fields to produce a busway to take commuters from Abington to Addenbrookes (bypassing the local villages). I believe buses should run down the existing roads and bus lanes should be added to existing roads. Nine Wells should be protected, along with the DNA path. Buses should run into the town centre not terminating at Addenbrookes. Train station, car parks at Foxton and Whittlesford need to be enhanced to run commuters to Cambridge stations such as Cambridge South. The CSET's destruction of Cambridge greenbelt is simply wrong, expensive and shameful.	207522 (C Ayling)
BC is continuing to expand along the A1307 and the alternative in road bus lane would include a new spur road that emergency vehicles could use to access A&E more quickly, potentially saving lives. CBC already has a new transport access for travellers coming from the South on the West side of the site with Cambridge South Station. So why build CSET that enters in the same location? Accessing the Eastern end of the site via the bus road provides a different alternative for anyone travelling from the Southeast, such as Linton and Haverhill where housing is less expensive and many of CBC's key employees live. Please do not approve the scheme as proposed by GCP.	208139 (M Harper)

Comments opposed to Green Belt Release

GSPC is opposed to any further expansion of CBC. CBC needs to focus on healthcare and R&D first and foremost, not commercial activities. • CBC should have a mix of uses ‘ together clinical care, clinical education and clinical research including medical research institutes which meet local, regional, and national health care needs – together with directly related biomedical and biotechnology research and development activities’. The Policy does not reflect the unique nature of the site. Policy should restrict uses to those that need the relevant proximity. • The need for the new acute hospital is not recognised either in the draft Plan or in this policy. Without the new acute hospital, we would suggest that the Local Plan is not viable. Policy also does not respond to various health care needs identified in the CBC demand report. Sufficient land is available within existing campus to meet healthcare needs. • The case for expansion has not been established because the underlying data used overestimate potential demand, by failing to identify and focus on those businesses which need to be co-located with anchor institutions, such as Addenbrooke’s and the LMB. • The case for the removal of further land from the Green Belt for expansion has not been made. The underlying data and plans for CBC submitted by landowners and Vision 2050 itself have not been subject to public consultation. Estimates of demand on which the draft Local Plan relies are fundamentally flawed. • Green Belt assessment misinterpreted, the site will cause very high harm to the green belt. • Gas main and landscape impact may limit granhams road realignment potential. Could realign and still leave land undeveloped around it or swap for phase 3 land near nine wells. Realignment may also simply shift pressure to A1301. Private car access should be limited. Question whether this multi-modal access road is needed at all if the Better Ways for Busways’ alternative for a	210897, 210898, 210899, 210900, 210901, 210902, 210903, 211934, 211935, 211936, 211937, 211938, 211939, 211940, 211941, 211942, 211943, 211944, 211945, 211946, 211947, 211948, 211949, 211950, 211951, 211952, 211953, 211954, 211955, 211956, 211957, 211958, 211959, 211960, 211961, 211962, 211963, 211964, 211965, 211966, 211967, 211968, 211969, 211970, 211971, 211972, 211973, 211974 (Great Shelford Parish Council)

busway spur off the A1307 Hinton Way roundabout was adopted. Proper enforcement of driving prohibition should be precondition.

- We support the proposals for a single integrated campus-wide masterplan for CBC and for the use of a single delivery body capable of managing the delivery of infrastructure and securing the long-term stewardship of shared facilities and public spaces. Should also be an energy masterplan.
- There has been no programme of landowner engagement with the community.
- We are concerned that the cumulative breadth, density and height of building on CBC will increasingly present a 'concrete wall' on the southern approach into Cambridge. Greater specificity should be given to the phrase "appropriate transitions in height, scale and landscaping". We are concerned that a lack of building height restriction.
- Policy needs to reference protection of nine wells. Affordable housing should be ahead of other development.
- we would like to see the Strategic Enhancement Area expanded: additional benefits to nature and landscape character would accrue if the Strategic Enhancement Area extended further south, along the SW side of Babraham Rd (i.e. that part of Babraham Rd which falls between Hinton Way and Haverhill Rd) all the way to Magog Down. Local Landscape policies have not been sufficiently responded to.

If, despite our opposition, the proposed release is included in the final Local Plan:

- It must be conditional on funds for the building of the new acute hospital being secured and building of the Cancer Research and Children's hospitals;
- It must be conditional on a solution to the continuing failure to enforce the prohibitions in The City of Cambridge Area G (Consolidation) Order 1993 (as amended) as they apply to the roads within CBC. The proposed southern access road from Granhams Road should not be multi-modal. Private cars should not be permitted to use it.

• Recognise CBC's unique and limited purpose - consideration should be given to including occupation use restrictions. Amenities should also be limited to those which need to be there. • Insufficient regard is paid in to the impact of CBC on the shrinking Green Belt that separates Cambridge from its necklace villages and on the neighbouring fragile Nine Wells Local Nature Reserve. Tall buildings are a particular issue, and we oppose a prominent entrance from Granhams Road.	
1. Object, I am opposed to any further expansion of the Cambridge Biomedical Campus ("CBC"). CBC needs to focus on healthcare and R&D first and foremost, not commercial activities. 2. The rebuilding of the acute hospital is crucial not only to the achievement of CBC's unique purpose, but also to the viability of the draft Local Plan. The healthcare needs of the current and growing population cannot be met without it, especially as the average age of that population is increasing. The need for the new acute hospital is not recognised either in the draft Plan or in this policy. 3. The case for expansion has not been established because the underlying data used overestimate potential demand, by failing to identify and focus on those businesses which need to be co-located with anchor institutions, such as Addenbrooke's and the LMB. This is a fundamental flaw. "Cambridge Biomedical Campus Vision 2050: Creating a life sciences quarter for Cambridge" ("Vision 2050") is not fit for purpose. Despite this, it underpins the supporting evidence submitted by landowners, which has been relied on by GCPS. In particular, the current plans propose disproportionately to expand the commercial activities at CBC. 4. As a result, the case for the removal of further land from the Green Belt for expansion has not been made out. This is compounded by a failure to recognise accurately the level of harm this removal will cause.	203820 (A Sykes)

5. The underlying data and plans for CBC submitted by landowners and Vision 2050 itself have not been subject to public consultation, yet the proposals in this policy (such as for 687,000 net additional sq m (GIA) of research and development floorspace (use class E(g)(ii)) specifically related to biomedical and biotechnology uses and clinical healthcare and hospital facilities) are derived from the relevant documents. 6. If, despite our opposition, the proposed release is included in the final Local Plan: (a) it must be conditional on funds for the building of the new acute hospital being secured and consideration should also be given to making it conditional on the building of the Cancer Research and Children's hospitals, each of which also appears important to the continuing success of CBC. (b) it must also be conditional on a solution to the continuing failure to enforce the prohibitions in The City of Cambridge Area G (Consolidation) Order 1993 (as amended) as they apply to the roads within CBC. Further, the proposed southern access road from Granhams Road should not be multi-modal. Private cars should not be permitted to use it. (c) the draft policy must properly recognise CBC's unique and limited purpose and consideration should be given to including occupation use restrictions. Amenities should also be limited to those which need to be there. (d) I support the proposals for a single integrated campus-wide masterplan for CBC and for the use of a single delivery body capable of managing the delivery of infrastructure and securing the long-term stewardship of shared facilities and public spaces.	
Object, the fields south of the CBC are a flood risk. Careful consideration needed: BIG collection ponds need to be in place close to Ninewells if this is to go ahead. Where are the workers for the new research	203790 (S Marelli)

institutes going to live? The housing market in Cambridge is saturated. More buildings will only mean more heat. Protect trees. There is currently no availability of shops at walking distance, a car is needed for everything.	
The loss of this green space for the community is psychological as well as physical - the sense of space when walking in these fields, when viewing the landscape from Addenbrookes bridge, Hobsons park, Nine Wells Nature Reserve and the DNA path. The proposed new buildings will close these spaces in, disconnecting us from the wider landscape of which we are currently part. The proposal is damaging and poorly considered, for both local people and nature.	203643 (H Donoghue)
Object to the loss of Green Belt for the proposed construction of 1,000 new homes at CBC, on the following grounds: i) The Employment & Housing Topic Paper Table 5.7 shows no need for additional office/R & D floorspace, above committed development, including 4 new schemes of 229,000 sq.m. Therefore, the loss of 22 hectares of Green Belt at CBC is not justified for office/R & D floorspace. ii) The need to redevelop Addenbrookes Hospital can be carried out on the existing site. proposed 1,000 homes is not justified under existing Green Belt policy as there is no need for homes for new employees at CBC. Legal Obligation/Planning Condition should restrict development to Specialised Housing for NHS/ Research workers on short contracts. The proposed 1,000 homes is not justified under existing Green Belt policy as there is no need for homes for new employees at CBC. The redevelopment of Addenbrookes will not result is major jobs increases requiring new homes. The Needs/Supply assessment Table 5.7 shows there is a surplus of supply.	204722 (R Turnbull) 210487 (R Turnbull)

If housing is considered necessary for CBC workers, a Legal Obligation/Planning Condition should restrict development to Specialised Housing for NHS/ Research workers on short contracts, for up to a one year tenancy, & the number of units reduced to 250 units of Specialised Housing, See Vale of White Horse Inspector's Report, pages 15-18, paragraph 56 onwards, on Issue 3: Exceptional Circumstances for housing at Harwell Campus not justified in AONB. This was due to loss of employment land & no need to housing next to employment land.	
Our opposition to the CBC's yet further expansion into our Green Belt does not result from purblind attachment to preservation of the Green Belt no matter what. It is the result of a rational and concerned view that neither the CBC in its submissions nor the two councils in this Draft Local Plan establish the "exceptional circumstances" which are the only grounds for further release – for the only incursion into the Cambridge edge of the Green Belt proposed in this Plan.	208743 (Trumpington residents Association)

Comments raising impact on adjoining communities

Red Cross Lane needs mitigation for the unintended consequences of the CBC/CUH growth to take off excessive no's never intended for a residential area. • CBC creates an environment conducive to innovation and knowledge creation, as evidenced by Cambridge's high number of patent applications per capita. The CBC serves as a hub for cutting-edge research and development, showcasing the positive economic impact of research funding in driving progress within the biomedical sector. Yet alongside rapid growth there can be unintended negative consequences, these can be felt by the neighbourhoods that the CBC site sits beside and on the established smaller residential areas. • A Neighbourhood Impact Report would be a valuable addition to the understanding of this effect locally, taking forward the" CBC commitment from its Vison 2050 to be a good neighbour.	207052 (207053, 207054, 207055, 207056, 207057, 207058, 207059. 207060, 207061, 207062, 207063, 207064, 207065, 210851, 210852, 210853, 210854, 210855, 210856210857, 210858,

• The disproportionate number of people travelling through the surrounding residential neighbourhood creates negative impacts. Active, continuing involvement with local governance bodies particularly the Greater Cambridge Partnership and Cambridgeshire County Council is needed to mitigate the impacts. Every effort including financial incentives, should be made to facilitate the maximum use of public transport and active travel. • Cambridge Biomedical Campus Vision 2050 rightly praises some of the public transport infrastructure, but has enough consideration been given to increases movement acres campus? Has the increased use of public transport by the surrounding neighbourhood been factored in? • Misuse of residential streets for Cambridge Biomedical Campus parking can be tackled. Misuse of residential streets by Private Hire Vehicle drivers can be tackled. CBC/CUH could support residents parking and double yellow lines so that the local streets are not used as an overspill car park for the campus. • Staffing targets are not being met, CUH have said 40 staff are lost a month due to not being able to offer accommodation. When new staff are recruited and then cannot find appropriate accommodation. Private accommodation is mistaken as being on the CBC/CUH site causing stresses for the area. Government guidelines recommend no more than 10% HMOs is any street/estate to maintain balanced neighbourhoods where there is a mixed tenure and no one need dominates and removes family housing. • Develop the Queen Edith's Employment and Skills Scheme. • Need toilets, taxi ranks, parking for private hire, patient drop off, blue badge spaces, better active travel routes, support for carers. • Recognise need for antisocial behaviour enforcement. Remove smoking sheeter near Red Cross Lane. Supporting residents prior to problems.	210859, 210860, 210861, 210862, 210863, 210864, 210866, 210867, 210868, (Red Cross Area Residents Association)
Red Cross Lane needs mitigation for the unintended consequences of the CBC/CUH growth to take off excessive no's never intended for a residential area. Red Cross Lane access needs closing as does the smoking shelter for safety of the residential area that CBC sits beside. Clearly demarcating boundaries	203294 203295 203296 203297, 210869 203298 (S Blackburn)

to CBC/hospitals site is required – to reduce crime, Anti-Social Behaviours, parking dangers/stress, illegal speeding motorbikes, crashes of emergency vehicles and other issues overspilling onto residential streets 24/7. Transition" on the basis that for a decade all reports have not had any positive impact on reducing the unintended negative impacts of growth. The policy requires development to 14 (a) "Integrate sensitively with adjoining residential neighbourhoods. Replace with new Route 3 to Nightingale Park via bus station path and Hills Road, avoiding Red Cross Lane. Remove existing Route 3 to avoid residential areas Babraham Park & Ride has established cycle routes away from Red Cross Areas built to high spec through Ninewells directly to CBC and Hospitals. This needs utilising to take away unintended negative consequences of CBC growth and over use of small residential areas bringing in crime, anti-social behaviours, traffic, parking stress, noise & pollution. benefits of campus growth for the local Red Cross Areas must include mitigating for the failures of previous growth that led to anti-social behaviour, littering and pavement parking.	
• Para 4 on page 212 says: The campus will grow to form a vibrant and sustainable neighbourhood, capitalising on its highly accessible location. It will be a high quality place to live... It isn't that now. The Nine Wells estate has almost nothing in the way of communal facilities, and Dame Mary Archer Way is a significant movement barrier between the Ninewells estate and the existing CBC facilities. • Capacity for approximately 1000 additional homes on the campus. The existing Ninewells population, plus 1000 new homes, is a lot of residents, yet their needs don't even get a mention. • There needs to be a transition down from 6 storeys at the west end of the phase 2 land to 4 storeys at the east end, and a transition from commercial to residential buildings. • Regarding Para 14b: This works both ways. The views of Nine Wells Wood and Magog Down from the main hospital ward tower and the children's hospital need to be preserved too	208143 (C Claxton) (208144, 208145, 208146, 208147, 208148, 208149, 208150, 208151)

• Regarding Para 17 on page 215: Figure 63 on page 219 shows something like this, extending northwards from Granhams Road to the eastern end of Nine Wells Wood. It needs to extend further north, to the "elbow" of Dame Mary Archer Way, to establish a green avenue through the ex-Green Belt land, visible from the hospitals, and creating a green boundary between the commercial and residential parts • Para 19 on page 215 says: Provide a network of world class, coherent, well designed and high quality public and communal spaces, taking a holistic campus wide approach, But again the needs of residents are not addressed at all. • Para 20 on page 216: this is entirely from the perspective of employees and visitors, the travel needs of residents are ignored. The residents don't just go to and from the CBC, they have lots of other journeys to make too. • Active travel needs more than the proposed east-west High Street, it also needs a safe and direct active travel route from/to Babraham Road, the 1000 new houses on the phase 4 land, and the existing Nine Wells estate. • Residents of the 1000 new houses on the phase 4 land are also going to need a bus route, unless they are expected to walk to Babraham Road or Dame Mary Archer Way to access public transport.	

Policy S/ED: Eddington, Cambridge

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

The University of Cambridge supported the general direction of the policy but suggested some amendments.

Natural England points out the proximity of the site to Eversden and Wimpole woods, and the need to consider mitigation. Historic England highlights nearby heritage assets, and that a range of views should be referenced. The HIA is clear than the site is not considered appropriate for tall landmark buildings. Therefore criterion 6 b should be deleted. The HIA references the need for reduced scale of development as well as landscape buffers and screening in the south-eastern area of the site. This should be included in the policy. The heights referred to in the policy and supporting text do not reflect the HIA. The Environment Agency request adding a requirement for a Flood Risk Assessment. National Highways provided the comments they made on the planning application for this site. Cambridgeshire Constabulary requested reference to fire & rescue, police and ambulance facilities funding.

Cambridge Past Present and Future ask for recognition of other views, including from Red Meadow Hill, and the additional cost of maintaining green infrastructure.

Other comments raise points including impact on car parking, rights of way, Huntingdon Road acting as a barrier, and the need for more variation in design and height of buildings. Better bus connections were requested. The Spatial framework should show the

Ascension Burial Ground City Nature Reserve, ands should include an East-West green corridor. The plan should make it clear that there should be no vehicular access at all from Storeys Way.

Response to the main issues raised in representations

Broad landowner support for the policy is noted. The policy has been amended to make it clearer the quantum of development for each phase and it is clear that future development should be well integrated with existing development. The policy does not provide a feasibility caveat to the provision of affordable housing as these matters are addressed through the housing policies of the Plan. The Local Plan, as set out in the Development Strategy and Homes Topic Papers, is clear that there is a housing need for specialist accommodation and that the Local Plan approach is, in part, to address these needs through the strategic sites of the plan. The employment wording in the allocation is now more flexible compared with the adopted Local Plan, and enables university related development to come forward at any time subject to policy requires of the plan.

The policy sets out the necessary supporting infrastructure required to deliver the site. Where this can not be secured and delivered onsite, the councils will seek to secure financial contributions for off-site provision.

The policy has been amended to note that future applications will need to consider the Eversden and Wimpole Woods SAC Impact Risk Zone and already notes that development proposals will need to take account of and safeguard nearby wildlife sites. The policy does not require the completion of Phase 1 of the development before Phase 2 can commence. This would need to be carefully considered through any future masterplan and phasing plan for the site, which would form part of the planning application process.

The Spatial Framework has been updated to reflect the previously missing wildlife sites and heritage assets. It would be for the planning application process to respond to the adjacent landscape and townscape features within and adjacent to the site and whilst these are broadly identified in the Context section of the policy, it now also makes reference to the east-west green corridor. The policy also includes additional reference heritage assets that would need to be considered through further heritage assessments as well as reference to strategic viewpoints. This list is not exhaustive and would need to be considered through these additional studies. The NPPF is clear that Local Plans should not prescribe specific building styles. Therefore the policy approach for high quality new buildings, as supplemented by the policies in the Great Places Chapter, as well as evidence such as the Skyline and Tall Buildings Strategy, is considered to be proportionate for plan making and provides a suitable policy framework to inform and assess future planning applications.

The indicative spatial framework has been updated to include Academic Led Development.

Wording has been added to the policy to address possible flooding concerns, which would also be addressed in more detail in the flooding and water management policies in the Local Plan.

The policy does not require existing footpaths to be removed, and these would be protected through other Local Plan policies and Rights of Way legislation. Whilst the ‘Girton Gap’ is still considered to be an important feature to avoid the coalescence of settlements and for them to maintain their own identities.

The policy, alongside the infrastructure related policies in the Local Plan, requires a comprehensive and detailed approach to be undertaken to address transport impacts of the development. This would include car park provision. However, it should be noted that the existing site is well serviced by active and public transport and future development should not undermine the existing

approach to sustainable travel that has already been achieved on the site. Given the M11 is a motorway on the Strategic Road Network, the Motorway Traffic (England and Wales) Regulations 1982(SI 1982 No. 1163) do not allow for buses to stop and pick up passengers on such roads. The policy wording has been amended in relation to private vehicle access as suggested by the representation. Subject to the approval and delivery of the Cambourne to Cambridge high quality public transport corridor, the site would be well connected with the proposed railway station at Cambourne. The site should provide new or connect to the active travel network to ensure people have access to other services, facilities and areas and therefore the policy maintains this requirement.

The policy notes the requirement for long-term management, maintenance and stewardship of infrastructure including landscape and open spaces. The requirement for financial contributions towards emergency services would be addressed through the infrastructure policy of the Local Plan and so is not repeated here.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The University supports the general direction of the policy to densify the site and make the best use of the available land. There are several detailed comments in relation to the policy wording which are attached in a table with comments set against the relevant policy/paragraph numbers. There is inconsistency across the plan of naming the site. Eddington should be used for all references to the site.	202528 (University of Cambridge)
Eversden and Wimpole Woods SAC should be included in the HRA (AA), particularly in relation to 'Physical Damage and Loss of Habitat – Natural England's Impact Risk Zone (IRZ) for this SAC is about	207603 (Natural England)

to be updated to a 6km core sustenance zone (CSZ) and a 10.2km landscape connectivity zone (LCZ) for barbastelle bats.	
No consideration is given to the Ascension Burial Ground as a prestigious cemetery or a City Nature Site. The site plan does not include an East-West green corridor and does not seem have sufficient green area at the east of the site to support existing wildlife in adjacent woodland, hedgerows and mature gardens. Figure 66 does not show the Ascension Burial Ground City Nature Reserve or mature hedgerows along field boundaries' noted in Context section v. It does not show the Grade II* listed property and Grade II listed garden at 48 Storey's Way almost adjacent the site and the further Grade II listed buildings at 29, 30, 54, 56, 63 and 76 Storey's Way.	202395 (K Wiemer)
Whilst the site does not include any designated heritage assets the site lies adjacent to Conduit Head Road and Storey's Way Conservation Areas and their associated listed buildings. Girton College listed at Grade II* and lodge (grade II lie to the north of the site. The American Military Cemetery, a grade I Registered Park and Garden lies at an elevated position of the west of the site, commanding long ranging views across the site. This contains the grade II* listed memorial and is also adjacent to the grade II * Madingley Mill. There are several designated heritage assets in the village of Madingley, including Madingley Conservation Area, Madingley Hall (grade I), and its grade II Registered Park and Garden, the grade II* church of Mary Magdalene as well as numerous grade II listed buildings. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA. 5a What about views from Madingley Cemetery and Madingley Hall/RPG?	210130 (Historic England)

We recommend that you add these views to criterion 5a. We welcome criterion 5b although in criterion iii ‘Farrow’ should read ‘Furrow’. Criterion 6b: The HIA is clear than the site is not considered appropriate for tall landmark buildings. Therefore criterion 6 b should be deleted. The HIA references the need for reduced scale of development as well as landscape buffers and screening in the south-eastern area of the site. This should be included in the policy. We welcome criterion 6c. Paragraph 3.2.27 - The heights in this paragraph are not supported by the evidence in the HIA. The HIA says nothing about 5 storeys at the edge of the site, nor does it allow for testing for taller buildings elsewhere in the site. Indeed, it specifies lower heights in the south-eastern part of the site. Amend paragraph to more accurately reflect the HIA. See our recent response to 25/03746/OUT in which we set out our detailed concerns regarding height.	
North West Cambridge has an allocation within the current local plan but has been recognised that there is the ability to increase the capacity for new homes. National Highways are currently consulted on the planning application for the increased quantum of development on site. National Highways offered no objection subject to the inclusion of suggested conditions, including the requirement for a Travel Plan with a sufficient monitoring regime to ensure the development does not result in additional trips on the SRN, namely M11 junction 10.	209009 (National Highways)
This policy should refer to the requirement for a site-specific FRA to include hydraulic modelling of the ordinary watercourses within the site to define the flood extents at the site. The policy should also clarify that a sequential approach should be taken with more vulnerable development located outside of areas of fluvial and surface water flood risk.	211182 (Environment Agency)
Concern around the increase of population at the site and the reduction in car parking.	201237 (S Williams)

The proposed expansion of Eddington/North West Cambridge. It’s unclear to me from the documents whether the pathway from just north of Howe's farm, across the fields to Madingley American cemetery will be maintained. As a regular user of this path for walking/mental health, I hope that this walking route is to be kept.	201489 (K Bright)
Sustainable infrastructure (carried over from initial development) vital. New connections are made at marginal cost. Homes kept simple. Open gap with Girton village not necessary. Growing affinity. Huntingdon Road a barrier that needs to be diminished. Concerning appearances from the West, Eddington looks understated and variations in both colour and height would bring create more interesting perspectives and lend the distinctiveness that Eddington deserves. Given the distance from Eddington to Cambridge the access to a railway station is still an issue. U bus provides this capability. Rapid transit to both Cambridge and the future Cambourne station need to be options.	202113 (R Stobert)
The policies overlook two key issues. First, they fail to consider the strategic viewpoint from Red Meadow Hill, which offers panoramic views over Cambridge, the University of Cambridge West Cambridge Campus, and the historic city’s setting, ensuring building heights do not disrupt this view. Secondly The growing population from development will place a financial burden on the charity managing the nature reserve, highlighting the need for funding to maintain visitor facilities and manage the area effectively. The respondent requests that the development of West Cambridge includes mechanisms to support the creation of the nature reserve, aligning with the overall vision for the Local Plan.	202982 (Cambridge Past, Present and Future)
Need to be clear on *how* the site's taller buildings will improve the city's skyline given the mediocre and controversial designs that polarise opinions. Will there be an alternative design that makes	203779 (A Carpen)

provision for the 'teeming towers and dreaming spires' the tourist literature contains about Cambridge? The current style is bulky, bland, minimalist and repetitive. Can this local plan make provision for a building style where ornate and architecturally interesting (and aesthetically pleasing/inspiring) spires can be incorporated into a design style given their complete absence in the existing development?	
If we are serious about public transport, we need to think about how to connect West Cambridge and Eddington with the rest of the bus network. Being close to the M11 would strongly incentivise people to drive to South Cambridge or London if this is not well thought out. I suggest adding bus stops on the M11 (request permission for the DoT) either south (for off-road busway connections) or north (for on-road busway connections) of Madingley Road. This allows the operation of express buses to places like South Cambridge or London, preventing cars from overburdening the M11.	203833 (A Chan)
Policy S/NWC: Eddington (5,550 dwellings/14,850 population) (p.225) Under the subheading ‘Uses’ Section 4 – add a new criterion i. as follows; “i. Provision of a fire & rescue service drop down point & contributions to fire & rescue, police and ambulance facilities funding”.	207476 (Cambridgeshire Constabulary), 207509 (Cambridge Fire and Rescue)
The Context does not include the need to respect the Ascension Burial Ground as a City Wildlife Site and a cemetery. The Context does not include the woodland at the southeastern edge where the site borders Archaeology/Astronomy nor the mature gardens that surround the eastern boundary of the site. Public Space includes no provision for amenity to the east of the site.	208625 (Madingley Road Area Residents Association)
The provision for Nature does not include an east-west green corridor for wildlife between the Green Belt on the west of the site and the city wildlife site, the large mature gardens of Castle ward, college playing fields and Archaeology/Astronomy grounds to the east and southeast of the site.	208626 (Madingley Road Area Residents Association)

There are several errors and omissions in Supporting Information Figure 66. Most notable are the absence of the Ascension Burial Ground City Wildlife Site and a Grade II* listed property on the eastern boundary of the site. The location of the primary school is incorrect. The location of mature hedgerows is not shown.	208627 (Madingley Road Area Residents Association)
The plan should make it clear that Phase one of the development should be completed before any Phase two is commenced. The phases defined as in S/NWC: Eddington. The plan should make it clear that there should be no vehicular access at all from Storeys Way, and the adjective 'private' removed from section 14, so to ensure there is no conflict with section 11(c). 'The Ridgeway' runs NW from the cul de sac of Storeys Way towards Eddington eventually reaching Huntingdon Road. The Planning document should reflect this and not be misled by the developer's labelling.	210832, 210833, 210834, 210835 (Storeys Way Residents Association)

Policy S/WC: West Cambridge

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

The University supports the general direction of the policy which aligns with the approved Outline Planning Approval and offers flexibility for change across the plan period. Detailed comments are provided in relation to the policy wording.
Natural England points out the proximity of the site to Eversden and Wimpole woods, and the need to consider mitigation.

Historic England highlights nearby heritage assets. Any development of this site has the potential to affect these heritage assets and their settings. Criterion 9b should be extended to include the setting of the listed buildings. Cambridge Past Present and Future ask for recognition of other views, including from Red Meadow Hill, and the additional cost of maintaining green infrastructure.

Cambridgeshire County council requested that the policy required facilitating the Cambourne to Cambridge Busway.

Other comments asked for better bus connections, and measures to make cyclists feel safe. Better connections to other destinations in Cambridge. Measures are needed to control light pollution. Several comments reference the West Fields should be protected from development.

Response to the main issues raised in representations

Policies in the Local Plan require new development to be well served by active travel and public transport. At West Cambridge, whilst the site is reasonably well served by public transport, it is expected to improve with the proposed Cambourne to Cambridge High Quality Public Transport Corridor, which is now referenced further within the Movement section of the policy. As part of future applications on the site, the proximity to all public transport stops would need to be considered and outlined in a Transport Strategy and the enhancement of existing footways/cycle paths would be identified where required. Wider cross city bus movements and active travel connections are to be considered through the CPCA Greater Cambridge Transport Strategy, as they are the responsible body.

An additional policy criterion has been added to reflect that the site is now located within the Eversden and Wimpole Woods SAC Impact Risk Zone. Additionally, sensitive lighting strategies will be required for new developments across Greater Cambridge and therefore this is addressed through other plan policies.

The policy has been amended to reflect existing heritage assets and strategic viewpoints in this area, including assets within the site.

The policy notes the requirement for long-term management, maintenance and stewardship of infrastructure including landscape and open spaces. The requirement for financial contributions towards emergency services would be addressed through the infrastructure policy of the Local Plan and so is not repeated here.

Objections to other specific site proposals are noted and addressed through the Housing and Employment Land Availability Assessment (HELAA).

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Would suggest placing buildings near bus stops and improving existing pedestrian access to these stops. Worth mentioning that the footpath/cycle path along Madingley Road is in dire condition and needs improvement for safety. As a cyclist I do not feel safe cycling on it. Also attached a draft proposal for an interchange between east-west running buses (4/905/X3/proposed busway) and orbital/north-south running buses that may utilise the M11 for consideration. They would allow buses to serve trips between West Cambridge and the M11 corridor, which is currently ridiculously slow by public transport.	203835 (A Chan)
We strongly object to the development of the land named "Land off the Lawns" with ID 115526. The key reason: this landlocked lawn is a biodiversity hotspot, one of the few remaining ones within Cambridge. Its difficult access is a feature. While the land is much enjoyed by the neighbours, who thankfully don't abuse it, this land is a key resource as habitat for wildlife. Please consult the sample of the large diversity (140 species) in invertebrate wildlife housed within the land in the iNaturalist citizen science project area for the land, as can be seen at the inaturalist.org website.	204114 (Professor A Cardona)
The University supports the general direction of the policy which aligns with the approved Outline Planning Approval and offers flexibility for change across the plan period. There are several detailed comments in relation to the policy wording which are attached in a table with comments set against the	202530 (University of Cambridge)

relevant policy/paragraph numbers. There is inconsistency across the plan of naming the site. Cambridge West should be used for all references to the site rather than 'West Cambridge'.	
Eversden and Wimpole Woods SAC should be included in the HRA (AA), particularly in relation to 'Physical Damage and Loss of Habitat – Natural England's Impact Risk Zone (IRZ) for this SAC is about to be updated to a 6km core sustenance zone (CSZ) and a 10.2km landscape connectivity zone (LCZ) for barbastelle bats.	207607 (Natural England)
Considering the planned growth of the biomedical campus, many trips between West Cambridge and the biomedical campus are likely. It is essential that these are done via active travel and public transport. This will require an emphasis in improving bus priority to make it more reliable in the face of traffic jams. Two other improvements to the cycling and walking provisions are also needed: - recognize Sheep's Green Bridge limitations and plan a replacement or additional river crossings - require additional walking and cycling connections between West Cambridge and the Sidgwick Site to relieve pressure on Burrell's Walk	203741 (T Preud'homme)
Given the large number of buildings planned for the site each potentially contributing additional light pollution to what is a relatively dark area of Cambridge, the lighting requirement should be in the policy. The University has assured me that for recently developed and future buildings, lighting will comply with category E2 (Village or relatively dark outer suburban locations). Despite this, it is unclear whether the most recently opened building (photo attached) complies with that standard. It would help for the requirement to be clear to architects from the earliest design stage to avoid unnecessary lighting from the outset.	203205 (K Weimar)

I am against development of the West Fields site off Barton Road, and I support the city council, which I believe has rejected this site. It is part of the Green Belt, which is an important part of what makes Cambridge attractive and liveable for residents, visitors, and scientific / business companies. The site is also prone to flooding.	201343 (C Humphrey)
Development on West Fields (Site ID 115681) should remain protected from development until at least 2045 to save the green belt and prioritise and maintain open green spaces.	205701 (Newnham Labour)
I support the position taken in the proposed Local Plan to exclude from the favoured development sites the West Fields south of the West Cambridge site. This open area currently breaks up the ring of new development that is gradually encircling the city, allowing city residents to walk or cycle out into the countryside avoiding urban areas. It also allows wildlife a route from the river and parks within the city to open countryside.	201473 (V Yates)
The policies should consider the impact on the strategic viewpoint of Red Meadow Hill, which offers a panoramic view over Cambridge and is significant for the historic city's setting. There is a need to acknowledge the transformation of land on the western edge of Cambridge into a nature reserve, which will enhance access to green space for West Cambridge Campus users. The respondent highlights the financial burden on their charity to maintain paths and manage visitors to the nature reserve, indicating a lack of funding for necessary facilities and management. The respondent requests that the policy includes mechanisms for the development of West Cambridge to support the creation of the nature reserve, aligning with the vision for the Local Plan.	202988 (Cambridge Past Present and Future)

Clear and explicit statements on the long-delayed West Cambridge Swimming Pool that the University of Cambridge still has not built must be incorporated into this section. Don't let the University get this struck out.	203827 (A Carpen)
Outline planning permission was approved under planning reference 16/1134/OUT. Sport England commented on the planning application on November 2nd 2017 raising no objection to the proposal. The provision of on-site sports facilities should be informed by an up to date evidence base, and any subsequent updates. Sport England are aware that the Council are in the process of undertaking a PPS and BFS, and that a FPM for swimming pools has been completed.	209222 (Sport England)
The grade II* listed Schlumberger Gould research Centre is located within the West Cambridge site. There are two Conservation Areas, West Cambridge and Conduit Head Road adjacent to the site (and their associated listed buildings). Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA. We broadly welcome criterion 9 Criterion 9b should be extended to include the setting of the listed buildings. 3.2.48 The Schlumberger Building is grade II*. The text needs to be amended (currently says grade II). Reference should also be made to the listed buildings in the adjoining conservation areas	210131 (Historic England)
Movement – there should be a statement referring to facilitating the Cambourne to Cambridge busway and associated active travel route.21	210586 (Cambridgeshire County Council)
It is entirely possible to deliver a safe, high quality cycling route between West Cambridge and the Biomedical Campus that would support 20-minute journeys. Delivering a 20-minute public transport journey would require significant reductions in general traffic in the city core particularly around Lensfield Road and the approaches to the city centre. Connectivity between West Cambridge and the Sidgwick	211772, 211773 (Camcycle)

Site must also be improved. These interventions involve decisions that could be explicitly acknowledged and supported through the Local Plan. Without this, bus-based solutions will remain constrained by congestion. Identify active travel and public transport connectivity between West Cambridge, the city centre and the Biomedical Campus as a strategic priority.	

Policy S/HHR: Land between Huntingdon Road and Histon Road

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments from the landowner broadly support the continued allocation of Darwin Green and welcomes a single comprehensive policy for the site, given its advanced planning and construction status. However, they propose several detailed wording changes to the policy.

Additionally, other comments request amendments focusing on ensuring appropriate noise mitigation (prioritising earth bunds over reflective barriers), maintaining watercourse base flows, securing good active-travel permeability without vehicular links to Girton, future-proofing the internal road network for buses, and establishing clear governance for the Country Park.

Historic England highlight heritage considerations (including potential assets and the Conservation Area). There are also comments requesting financial contributions to emergency services be explicitly included.

Response to the main issues raised in representations

The policy has been amended to reflect the recent planning consents for the various phases of the development. However, the policy retains the requirement for two primary schools, which is based on the latest understanding of education requirements generated by the development. If this were to change for later phases of the development, this would need to be justified and agreed with the Education Authority.

The policy provides additional criteria relating to noise mitigation measures and the requirement for the delivery and long term stewardship of the Country Park to be secured through a legal (S106) agreement. It also now identifies the adjacent Conservation Area and has also been updated in the Heritage Impact Assessment for the site. At this stage, there are no known other potential heritage assets in this location, but there is a formal process to designate new Statutory and Non-Statutory Heritage Assets where applicable.

The policy does not address the base flow of existing watercourses as this is addressed through Policy CC/IW: Integrated water management, sustainable drainage and water quality and therefore does not seek to repeat other policies set out in the Local Plan.

Financial contributions towards essential infrastructure, including emergency services, is addressed by Policy I/ID: Infrastructure and delivery and is therefore not repeated in this policy.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**
The respondent supports the continued allocation of Darwin Green under Policy S/HHR but requests minor changes to the policy wording. Darwin Green has historically been divided into two allocations, one under the Cambridge City Local Plan (Policy 20) and one under the South Cambridgeshire Local Plan (Policy SS/2), due to its location across two local authority boundaries. Both allocations have outline planning permission, with Phase 1 partly occupied and under construction, while Phases 2 and 3 are at Reserved Matters stage. The respondent supports a comprehensive policy approach for Darwin	203032 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)

Green in the emerging Greater Cambridge Local Plan, acknowledging the advanced construction and technical work already completed. The respondent has provided specific wording changes for Policy S/HHR, indicating proposed deletions and additions, with justifications for these changes outlined.	
It is important that earth bunds should be prioritised and if not, any noise barriers must be absorbent and not reflective. Reflective barriers along Orchard Park have increased noise issues.	203954 (Histon and Impington PC)
The policy should require a suitable compensation flow should be provided so the pre-development base flow of existing watercourses is achieved at all times	201663 (J Pavey)
Given the proximity to Girton and neighbouring areas, permeability will need to be addressed: • for active travel, to ensure good and safe access to new services and facilities and to existing bus services • agrees that the development should not provide direct vehicular access to/from Girton • the internal road network needs to be future proofed for buses	202140 (R Stobart), 203837 (A Chan)
Clear governance arrangements will be required for the Country Park	202140 (R Stobart)
Are Woodhouse and Impington Farms potential heritage assets	202140 (R Stobart)
Contributions to fire & rescue, police and ambulance facilities provision/ funding should be added to the policy wording	207477 (Cambridgeshire Constabulary), 207510 (Cambridge Fire and Rescue Service)
The Conservation Area has not been considered in the Heritage Impact Assessment or the policy wording	210132 (Historic England)

Summaries of Representations: Sites Other Site Allocations on the edge of Cambridge

Policy S/EOC: Other Site Allocations on the edge of Cambridge

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Historic England requested that criteria 1 of the policy be clarified to list the sites.

Other comments on this introduction were related to site allocation proposals. Green belt releases were proposed for a variety of reasons, including additional development needs, that grey belt should have been included, and due to the specific opportunities the proposals provide, including for housing, employment and a travel hub.

Response to the main issues raised in representations

In response to Historic England's comment the policy structure has been clarified.

Proposals for alternative site shave been considered though an update to the Housing and Economic Land Availability Assessment where they fit within the broad emerging strategy of the local plan. New evidence submitted has been considered, and where

considered appropriate scoring has been amended. Comments related to strategy choices have also been considered, particularly under the development strategy policies. It is not proposed to add additional village sites to the proposed submission local plan. An update to the Green Belt Study has been carried out to consider which areas would meet he governments definition of being grey belt. Whilst some site may meet the definition, exceptional circumstances is still required for green belt release, and the Councils do not consider that exists in light of alternatives available.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Criterion 1 is unclear as to which sites it is referring to. We recommend that Criterion 1 should list the four sites.	210133 (Historic England)
Land North of Madingley Road, Cambridge (HELAA Reference 40491 / Site ID 115543) Site is very suitable for an allocation for B2 (General Industrial) and B8 (Storage and Distribution) uses, including but not limited to high technology industries such as digital infrastructure data centres and gigafactories. Draft plan not currently meeting employment needs.	211514 (Trinity College Cambridge)
Land East of Gazelle Way site (HELAA Reference 40250) The Development Strategy should include additional allocations on the Edge of Cambridge to balance housing supply and mitigate risks of delays from New Settlements. Further growth on the edge of Cambridge is seen as sustainable due to existing infrastructure and proximity to jobs and services. The Council has not conducted a comprehensive Green Belt assessment, which is necessary to identify suitable Grey Belt land for development. Endurance Estates objects to the omission of the Land East of	205103 (Endurance Estates)

Gazelle Way site (HELAA Reference 40250), proposing it for a mixed-use development of in the region of 1,500 dwellings and employment space. Site is grey belt.	
Land adjacent to A1303 and M11, Rectory Farm, Cambridge (HELAA Reference 208800) Representation in relation to a site submission to be tested through the HELAA. A range of issues raised on plan strategy including that plan should address higher development needs, grey belt land should be located. Land adjacent to A1303 and M11 is suitable for residential or commercial development due to its sustainable location and access to transport. The site could also serve as a Travel Hub to alleviate pressure on Madingley Park and Ride, potentially freeing it up for housing or employment growth at Eddington or West Cambridge.	211091, 202044 (Wimpole Associates Ltd)

Policy S/EOC/NWO: Land north of Worts' Causeway

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

The policy requires further consideration of landscape and heritage impacts, specifically noting on-site and adjacent heritage assets that could be affected by the proposed development. Additionally, concerns were also raised regarding active travel site access and shared facilities.

One organisation identified that the site should be considered as part of a wider Green Infrastructure opportunity that aligns with the southern part of the city.

Response to the main issues raised in representations

The policy has been amended to account for the on-site and adjacent heritage assets that could be affected by the development. Additionally, the policy also reflects that landscape mitigation measures for the site should be linked to the green infrastructure provision on-site and how it forms part of a wider network. However, the proposal in the representation to re-consider the Development Strategy and Green Infrastructure network across the southern part of the City has not been taken forward in this specific allocation as it for the Development Strategy to consider this matter.

The policy already requires good access by active travel into the site but additional measures as well as new facilities are not currently deliverable having been considered as part of the planning application process for application 20/01972/OUT.

Table of representations

Summary of issues raised in comments	Comments highlighting this issue
We believe there could be a different approach taken to development and green space on the south-east boundary of Cambridge, which could deliver even better outcomes for nature and people. We refer you to the response made by the Wildlife Trust BCN and the potential for an enabling development which could better deliver the ambitions of the Cambridge Nature Network by extending new green space and habitat creation from Nine Wells, north-eastwards to Cherry Hinton Chalk Pits.	202993 (Cambridge Past, Present and Future)
More needs to be included on multiple entrances and exits - especially by footpath/cycle paths. Must avoid building another housing estate with only a single point of access. What contributions will be made to what shared facilities either on site or on neighbouring sites will be made so the area doesn't end up as a dormitory neighbourhood requiring long journeys to get essentials?	203782 (A Carpen)
There are no designated heritage assets within the site. The grade II listed Milestone lies just to the east of the site. The milestone will need to be protected during the construction works. We welcome the preparation of the HIA. We welcome criterion 1a. The policy should also refer to the Building of Local Interest, Netherhall Farm (though we appreciate it is	210134 (Historic England)

mentioned in the supporting text at paragraph 3.2.70). The policy/supporting text should also refer to the need to protect the milestone.	

Policy S/EOC/SWO: Land south of Worts' Causeway

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

The policy requires further consideration of landscape and heritage impacts, specifically noting adjacent heritage assets that could be affected by the proposed development. Additionally, concerns were also raised regarding active travel site access and shared facilities.

One organisation identified that the site should be considered as part of a wider Green Infrastructure opportunity that aligns with the southern part of the city.

There is broad landowner support for the allocation.

Response to the main issues raised in representations

The policy has been amended to account for the on-site and adjacent heritage assets that could be affected by the development. Additionally, the policy also reflects that landscape mitigation measures for the site should be linked to the green infrastructure provision on-site and how it forms part of a wider network. However, the proposal in the representation to re-consider the Development Strategy and Green Infrastructure network across the southern part of the City has not been taken forward in this specific allocation as it for the Development Strategy to consider this matter.

The policy already requires good access by active travel into the site but additional measures as well as new facilities are not currently deliverable having been considered as part of the planning application process for application 19/1168/OUT.

Table of representations

Summary of issues raised in comments	Comments highlighting this issue
We believe there could be a different approach taken to development and green space on the south-east boundary of Cambridge, which could deliver even better outcomes for nature and people. We refer you to the response made by the Wildlife Trust BCN and the potential for an enabling development which could better deliver the ambitions of the Cambridge Nature Network by extending new green space and habitat creation from Nine Wells, north-eastwards to Cherry Hinton Chalk Pits.	202999 (Cambridge Past, Present and Future)
More needs to be included on multiple entrances and exits - especially by footpath/cycle paths. Must avoid building another housing estate with only a single point of access. What contributions will be made to what shared facilities either on site or on neighbouring sites will be made so the area doesn't end up as a dormitory neighbourhood requiring long journeys to get essentials?	203781 (A Carpen)
There are no designated heritage assets within the site but the Grade II listed Milestone is close to the site. These needs to be protected during construction of the development and should be referred to in the policy/supporting text. Welcome the preparation of the HIA and criterion 1a of the policy wording.	210135 (Historic England)
The Cambridge Investment Partnership (CIP) support draft allocation S/EOC/SWO for land at Newbury Farm. As the Council is aware, CIP controls part of the draft allocation (Phase 3 - land on the western side)	204222 (Cambridge Investment Partnership)

and has already secured reserved matters approval, reference 24/01531/REM. The draft allocation accords with the details already approved.	
We strongly support the policy to reduce the urbanising impact on this edge of the Green Belt, to facilitate access to the countryside, and to manage car use.	210904 (Great Shelford Parish Council)

Policy S/EOC/BS: Bell School, Babraham Road

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Whilst the landowner is broadly supportive of the allocation, representations have been made that the policy should be more flexible in its approach to land uses and should provide the opportunity for residential or healthcare related development.

There are no designated heritage assets within or adjacent to the site.

Response to the main issues raised in representations

There are no amendments made to the policy. Whilst comments suggested that the policy should be more flexible in its approach to appropriate land uses, the site is in very close proximity to the existing educational facility and therefore provides an excellent opportunity to place purpose-built student accommodation adjacent to the school. In addition, the existing or future accommodation needs the school are not known. By allocating the site for student accommodation, the policy is taking a longer term approach to meeting existing or future occupier needs throughout the plan period.

The site is within close proximity to Cambridge Biomedical Campus (Policy S/CBC) which is identified in the Local Plan for approximately 1000 campus related homes. Therefore, this policy does not propose to allocate the site for keyworker NHS housing.

Table of representations

Summary of issues raised in comments	Comments highlighting this issue
The Bell Language School has closed. Can this site be turned into keyworker housing for the NHS hospitals?	203765 (A Carpen)
There are no designated heritage assets within the site and none nearby. No comments	210136 (Historic England)
The Bell Educational Trust is broadly supportive of the allocation of the Site at Babraham Road for residential uses. This is a highly sustainable site which is ideally suited for a range of uses that could make a valuable contribution to the NPPF requirement for 10% of the overall housing from sites under 1 hectare.	208389 (The Bell Education Trust)
The proposed allocation is for the remaining part of the Site which benefits from an extant planning permission for student accommodation. The site can only accommodate students associated with the Bell Educational Trust which historically meant the Bell School. Up until last year, this had been the intention of the Trust, but due to Bell going into administration, it is no longer an option.	208390 (The Bell Education Trust)
In line with Paragraph 127 of the NPPF, The Bell Educational Trust asks the Council to consider amending the policy to allow for greater flexibility regarding future occupiers and uses. Moreover, the requirements for student accommodation if any are unknown. The policy as worded would hinder the site being developed for other appropriate uses whether this be for student accommodation, other residential uses or even healthcare uses to contribute to housing need set out in Policy S/JH.	208391 (The Bell Education Trust)
It is therefore suggested that the wording of the policy be amended as follows: - Site area of 0.38 hectares	208392 (The Bell Education Trust)

- Capacity for approximately 100 student bedrooms or other residential uses or healthcare related uses in the alternative 1. Development proposals must demonstrate how they will meet the following requirements: a. With regard to new student bedrooms the need to contribute towards meeting the needs of the adjacent educational site or other existing educational institutions in line with Policy H/SA: Student accommodation whilst being carefully integrated; or b. Residential development and/or healthcare uses which sensitively respond in height, mass, density and landscaping to its immediate residential context.	

Policy S/EOC/FRE: Fulbourn Road East

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments raised concerns about the impacts of development on the adjacent properties and local townscape character. There were also comments regarding the site's accessibility by active and public transport, in particular the provision of a new railway station in Fulbourn.

One organisation identified that the site should be considered as part of a wider Green Infrastructure opportunity that aligns with the southern part of the city whilst another highlighted that the site should provide training opportunities for young people.

The landowner raised concerns about the lack of flexibility in the policy wording and noted that the site benefits from a planning permission. They also requested greater clarify on the proposed landscape buffer whilst Historic England noted that the site could impact nearby heritage assets and their setting and that the policy required clarification.

Response to the main issues raised in representations

The policy has been amended to provide greater flexibility in relation to the quantum of development. This is consistent with the approach taken for all site allocations in the Local Plan. The policy is also clearer that development should be informed by careful consideration of the local context, including townscape and landscape character and has removed the required to not build in the

previously undefined eastern part of the site. The supporting text also notes that the eastern part of the site is more sensitive in relation to the historic environment and so a design led approach is required for future applications.

The existing planning permission for the site is now referenced in the supporting text.

Responding to the comments on transport, the policy now emphasises the need to increase sustainable travel modes which will need to be addressed through a Transport Assessment, Travel Plan and Parking Strategy. There are no current proposals for a Fulbourn railway station from either East West Rail, Network Rail or the Department for Transport. New infrastructure of this scale would require significant investment which is beyond what can reasonably be expected from this one development.

The proposal in the representation to re-consider the Development Strategy and Green Infrastructure network across the southern part of the City has not been taken forward in this specific allocation as it for the Development Strategy to consider this matter.

Other Local Plan policies address issues relating to skills and training and so are not repeated in this policy.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**
Why have you decided the maximum height here should be so much less than that permitted at Mission Street (Land South of Coldham's Lane)? I would be delighted if you would put the same limit (no taller than three commercial storeys) also at Mission Street.	201238 (S Williams)

The respondent strongly supports policies 1a-f. They suggest a different approach to development and green space on the south-east boundary of Cambridge for improved outcomes for nature and people. The respondent references the Wildlife Trust BCN's response regarding enabling development to enhance the Cambridge Nature Network. They propose extending new green space and habitat creation from Nine Wells to Cherry Hinton Chalk Pits.	203003 (Cambridge Past, Present and Future)
There is already considerable traffic on Cherry Hinton Road & Fulbourn Road that extend beyond rush hours. Provision *must* be made towards having a new transport link from a new Fulbourn Railway Station on an upgraded railway line - which developers must contribute towards. Developers should be required to contribute towards public transport provision and *not* towards private commuter buses which provide local residents with no benefit and only costs - potholed roads and pollution.	203758 (A Carpen)
Provision should also be made for supporting new facilities for lifelong learning and for children and especially teenagers.	207471 (A Carpen)
BioMed Realty support the continued allocation of Fulbourn Road East under Policy S/EOC/FRE. However, to ensure the policy remains flexible and effective, several amendments are required. In particular, the policy should allow greater flexibility in the floorspace quantum and building height parameters, avoiding overly prescriptive limits that could constrain delivery. In addition, clarity is needed regarding the approach to any landscape buffer to the east of the site to ensure this is appropriately defined and controlled. Please refer to the covering letter for further detail on the recommended amendments to the policy wording.	201661 (BioMed Realty)

The policy should allow greater flexibility in the floorspace quantum and building height parameters, avoiding overly prescriptive limits that could constrain delivery	201661 (BioMed Realty)
Planning permission for development has been granted and implemented on site (ref. 21/00772/OUT, as amended by 23/03182/S73), demonstrating the deliverability of development within the proposed allocation. This is a fact that must be noted in the supporting text of the policy.	210427 (BioMed Realty)
The policy cites 56,000 sqm of development (the sub-text states 'approximately' 56,000 sqm). While the policy does not impose a fixed cap on development, the reference to a specific floorspace figure is unhelpful in its current form and risks being misinterpreted as a limit on the quantum of development. An amendment is needed to either remove the floorspace reference or replaced with a reference to an approximate figure of development	210428 (BioMed Realty)
Policy in its current form does not define what constitutes the 'eastern part' which introduces ambiguity.	210429 (BioMed Realty)
The inclusion of a fixed height restriction within the policy wording is unnecessary and overly prescriptive	210430 (BioMed Realty)
Section 1.f; this policy should require increasing sustainable travel modes, not merely consider it.	203597 (P Tribble)
Safe, direct cycling and walking and wheeling access is needed between Cherry Hinton and the Beechwoods/Roman Road/Babraham P&R. It would also connect to the Nature reserves and give safe pedestrian access avoiding Lime Kiln Hill which is simply unsafe on foot or cycle.	203836 (Mr Wookey)
Development has the potential to affect the Fulbourn Hospital Conservation Area and its setting. Criterion b is too vague. The policy should set out how much of the site can be developed. Criterion c – does not properly reflect the HIA. The HIA refers to the prevailing building height to the	210137 (Historic England)

north and west. To the north, development is 2 storey residential. Amend the policy to be clearer on heights. We welcome criterion e which reflects the recommendations of the HIAS.	

Summaries of Representations: Sites Existing Settlements

Policy S/NST: Northstowe New Town

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments focused on green separation, heritage, and community infrastructure. Several respondents emphasise that land forming part of the Longstanton and Oakington green separation — including Longstanton Meadows, ridge-and-furrow fields, and areas within the Longstanton Conservation Area — should be removed from the allocation or more clearly protected from development. This also included comments about the clarity of mapping, that recent permissions were granted within areas marked as green separation, and the need for a stronger policy statement preventing any built development in these gaps.

Historic England and other groups highlight the significance of Longstanton Paddocks, medieval remains, pillboxes, and nearby Conservation Areas, requesting explicit reference to these assets, with appropriate mitigation, and potentially a Conservation Management Plan noted in the policy. Other comments highlighted the need to protect ancient woodland and existing countryside, and to ensure heritage considerations shape land-use designations.

There were several comments regarding community facilities, services and social cohesion. Comments call for stronger provision for community spaces, emergency services contributions, improved healthcare delivery, faith and cultural facilities, and a clearer strategy for traveller pitch delivery. Northstowe Town Council also raises issues around employment space, self-build targets, education wording, and the need for a distinctive facilities and employment opportunities to help avoid the town becoming a dormitory settlement. Longstanton PC highlight the infrastructure burden on their village, which cannot support further development.

Homes England have broadly noted that matters that have been addressed through the consented developments should not be required in this policy to avoid conflicts with these consents and/or delays to implementation. They also note that the policy should not seek to introduce new requirements such as the provision of specialist and Gypsy and Traveller accommodation. Homes England also request clarification on ancillary uses within open spaces and note that some mitigation measures may fall beyond the red line boundary of the allocation.

Transport and connectivity concerns were also raised, with comments relating to for better public transport, fairer bus fares, and direct links to Cambridge North and the city centre. Respondents also support additional tree planting, clearer flood-mitigation requirements, and improvements to policy wording on recreation, including water-based activities and appropriate sports provision.

Response to the main issues raised in representations

- The Northstowe New Town policy is now supported by the Northstowe Strategic Enhancement Area (S/SEA/NST) Policy Area. This policy area specifically identifies that this land is designated to ensure that there is sufficient physical and visual separation between Northstowe and neighbouring settlements and maintains a soft, green landscape to enhance the wider rural setting and relevant Conservation Areas. This has also been reflected on the Greater Cambridge Local Plan Policies Map;

- The policy also identifies local heritage assets and that development will need to protect and, where possible, enhance their setting and how this will be managed through the preparation of a Conservation Management Plan. As this site was allocated in the South Cambridgeshire Local Plan (2018), has a site specific Area Action Plan (2007) and has been considered in further detail through subsequent planning applications, a Heritage Impact Assessment has not been undertaken;
- Additional flexibility has been set out in the Policy to support town centre uses coming forward within the new town that serves both local residents but also those in the wider surrounding area. This also includes greater flexibility in relation to specific forms of sports provision as this would need to be considered through a Sports Strategy; Additionally, the policy requires the provision of employment floorspace as part of a mixed and well balanced community;
- The policy outlines that the development of the new town must be well served by new services, facilities and open space and that these should be phased to the delivery of new homes so that residents, workers and visitors have easy access to them to meet their day to day needs. This also includes temporary provision until such time that permanent facilities are delivered. It has also been updated to reflect the latest education requirements;
- The policy identifies requirements relating to flooding and sustainable surface water drainage measures. Subsequent planning applications will therefore be required to address this policy requirement and for it to be secured through a legal (s106) agreement;
- Financial contributions towards essential infrastructure, including emergency services, is addressed by Policy I/ID: Infrastructure and delivery and is therefore not repeated in this policy;
- The Councils have identified a clear housing need for Gypsy and Travellers accommodation and the Council's preferred approach is to address this through a number of ways, including provision at the strategic sites. This is consistent with the previous approach of the South Cambridgeshire Local Plan (2018) and is reflected in the relevant conditions of the planning

permission for the site. Policy H/GT sets out the specific requirements for the implementation of this particular policy requirement. This approach also applies to specialist older persons accommodation.

- The policy requires the new town to deliver a range of homes including self and custom build. This would need to be considered for each phase of the development, in accordance with existing planning conditions attached to the outline permissions.
- Planning applications would have been considered on its own merits and in accordance with the adopted development plan.
- Adequate bus provision will need to be considered through future phases for development, specifically through subsequent versions of the Transport Assessment. This will inform whether additional funding is required to support additional services and/or a subsidy of fares for new residents.
- There are several ways in which new facilities can be secured and delivered. This will vary depending on site specific circumstances and it is not the role of the Local Plan to pre-determine a suitable approach to delivery.
- Whilst the council and the supporting text to the policy notes the existing planning permissions for the site, a number of policy requirements have been retained within the policy as they have yet to be implemented, for example, the Town Centre Strategy. This has been retained in the policy to ensure that any changes to the consented schemes can be considered against these policy requirements if required.
- The provision of ancillary uses to support sports and open space facilities is addressed through Policy WS/CF: Community, sports, and leisure facilities as it is not a specific matter related to this allocation.

Table of representations

Summary of issues raised in comments	Comments highlighting this issue

Area bounded by Rampton Road, Long Lane, Mills Lane and Woodside (Longstanton Meadows) overlaps the Longstanton Conservation Area and forms part of the green separation between Longstanton and Northstowe. It provides substantial amenity value for the inhabitants of Longstanton and future inhabitants of Northstowe. It should be removed from the Northstowe Site allocation to make it clear that land to the west of Long Lane is not available for development.	201164 (A Helliwell), 211746 (Homes England)
The green separation between Northstowe, Oakington and Longstanton is part of the area's green infrastructure. The land between these settlements provides ecological connectivity, landscape character and access to countryside for nearby communities and should be recognised in the Plan.	204421 (Cllr Thomas Bygott)
The other problem with Northstowe and other new towns is lack of community, lack of community spaces, worse engagement, poorer mental health, and more anti-social behaviour. How do you plan to make these new towns have a realistic sense of community. This is not just about schools. Where can people join the bridge club, knitting circle, etc, etc, all these make a community and enhance individual's mental health? When Stevenage was developed, it quickly became the drug centre of England, in the 1970-80s. How can you learn from this example and others?	201503 (C Meads)
Group supports approach to heritage in Policies S/NS and S/NST, acknowledging the importance of heritage assets. Concerns regarding Longstanton Paddocks, where visible remains of the mediaeval village exist, which is subject to a management plan. Paragraph 11 of Policy S/NST restricts land uses between Northstowe and Longstanton to open land, which is deemed inappropriate for Longstanton Paddocks due to potential harm to heritage significance.	202945 (Northstowe and Longstanton Heritage Steering Group)

Recommend specifically mentioning Longstanton Paddocks in paragraph 54 of the Policy to ensure its significance as a key landscape feature is maintained and enhanced.	
Protected ridge and furrow field which forms part of the designated green separation between Longstanton & Northstowe needs to be recognised and made clear that field is protected and only used as green separation.	203780 (B Ball)
What is the one significant new leisure facility that this site could host, that has easy, frequent, and accessible public transport access, that could otherwise not be located in Cambridge City due to land prices and lack of land availability? Please make provision for this - co-ordinated with the other New Towns so that each place has at least one different facility that the others lack, thus encouraging people from within Cambridge to visit, and ensure that the New Towns are not dormitory towns. Ensure children & teenagers are involved at design stage.	203783 (A Carpen)
Under the subheading 'Uses' Section 7– add a new criterion n. as follows; "n. Contributions to fire & rescue, police and ambulance facilities provision/ funding"	207483 (Cambridgeshire Constabulary), 207514 (Cambridge Fire and Rescue Service)
Whilst the open land uses such as playing fields, allotments and cemeteries precludes housing, destroying ancient woodlands and existing countryside simply to provide a different sort of open space would be hugely detrimental. Proposals within the Longstanton Conservation Area should be reconsidered to provide a strong legal protection for existing countryside within it.	201154 (S Roberts)

The respondent supports the policy of providing a green separation on the northern side of Oakington, including tree planting to enhance the pastoral parkland character. The Oakington Inset Map is unclear regarding the green separation, particularly the brown areas and their designation, which the respondent finds confusing. The respondent presumes that the areas marked S/NS indicate site allocations but requests clarification on the map's key. The respondent raises concerns about recent planning permission granted for housing on land designated as S/NS, questioning how this aligns with the Northstowe policy area. The respondent objects to the use of any green separation land for housing, stating it contradicts the stated policy.	203557 (L Lawrence)
We note the inclusion of two Traveller sites in Northstowe of 12 pitches in each. We would like the Local Plan to clarify and confirm that these sites are to be located within the Northstowe Defined Development Extent and not on land bought outside these boundaries by Northstowe's developers, Homes England.	208077 (Oakington & Westwick PC)
We note and support the clear policies to maintain a green separation between Northstowe and Oakington and Westwick. It is important that there is no development from the Oakington and Westwick boundaries nor a further expansion of Northstowe. We note and support the commitment to plant additional trees and the need to maintain the green separation. We strongly object to any development being allowed in the green separation or that the green separation should take the form of playing fields, allotments, cemetery or for any other form of planned use.	208078 (Oakington & Westwick PC)
We suggest that GCSP submit an appeal against development for eight houses on the field between Manor Farm Close and the Northstowe boundary in order to maintain this green separation.	208079 (Oakington & Westwick PC)

We welcome the statement regarding flood mitigation, but there is a complete lack of detail and specifics in terms of location and form of flood mitigation. The Plan must include a statement regarding these issues.	208080 (Oakington & Westwick PC)
We note that the inset map provided is contradictory, suggesting that the area marked is both a green separation and also an area where certain forms of development could be permitted within the green separation. The map therefore needs to be redrawn to make absolutely clear that no development will be allowed between Northstowe and Oakington and Westwick and a policy statement should be included in the document to this effect.	208081 (Oakington & Westwick PC)
The Parish of Longstanton has provided the backbone for a significant amount of new housing in this area, notably the 'Home Farm' development within the village and now the development of Northstowe. The village's infrastructure cannot support further development. Councillors continued to raise concerns that this would not be the limit of land which is reclassified and that this process would be repeated as the need for housing arises.	208465 (Longstanton PC)
Residents have aired concern that some or all of the proposed 24 Traveller Pitches at Northstowe that would be located on any of the previously mentioned Green Separation Areas. While the council respects the need to provide facilities for all parts of the community, the historic significance and existing infrastructure within the village must be considered when locating these new facilities. These areas are not suitable for pitches. Confirmation is provided that the proposed Traveller Sites will be located within the Northstowe Defined Development Extent and not on adjacent land outside of the NDDE.	208466 (Longstanton PC)

Dedicated, direct, frequent, reliable and affordable connections should be provided connecting Northstowe with Cambridge North, and Northstowe with Cambridge City Centre. For the avoidance of doubt the current Guided Bus provision is unacceptable.	208058 (Northstowe TC)
We would like to underline the timescale for delivery of traveller pitches and add the requirement that such pitches may come only when a comprehensive set of facilities, strong community cohesion, and adequate provision of local services (policing, fire, healthcare, leisure, employment, etc.) are fully in place.	208059 (Northstowe TC)
A typo here predicts 1,018,000 homes; this should read 10,180	208060 (Northstowe TC)
The ratio of employment capacity to dwellings falls below other comparable settlements like Graven Hill and NW Cambridge. Without additional employment space Northstowe will be a permanent dormitory town and with more people commuting this may put more strain on the roads and public transport.	208061 (Northstowe TC)
While these uses are described using planning Use Classes, in addition it would be desirable to use plain language to describe what this means in practice. We would like Lab space to be specifically noted here, as it is in short supply locally.	208062 (Northstowe TC)
We note that Northstowe Phase 1 was delivered with zero self/custom build homes. There are three plots coming forward presently in the first parcel of Phase 3B, but we would welcome an additional target being recorded here so progress toward it can be tested against future planning applications.	208063 (Northstowe TC)

We are now far beyond "early occupation", and all involved parties have failed to deliver "Temporary (...) healthcare facilities" and indeed are in default on the Phase 2 S106 planning obligation requiring permanent healthcare facilities.	208064 (Northstowe TC)
It is unfortunate that the existing established S106 obligations provide for land for faith and cultural use but failed to provide for any monetary or in-kind contributions to realising facilities on that land. It is regrettable that providing facilities in a new and master-planned development has fallen solely on the shoulders of religious and community groups. This contrasts with Cambourne, where a S106 agreement provided for monetary contributions toward delivery of a church.	208065 (Northstowe TC)
We welcome and support this clear re-statement that Northstowe will be separated from adjacent settlements. This separation must be retained and neither Northstowe *nor the adjacent settlements* should be developed into the gap.	208066 (Northstowe TC)
Please strike "which will not undermine the vitality and viability of other nearby towns or compete with Cambridge;" It is essential that Northstowe Town centre is allowed to compete with others in the area. It would be highly inappropriate and unacceptable for the LPA to neuter development of the Town Centre because it could compete with other areas. Please also adjust "immediate surrounding area" to "wider surrounding area" for similar reasons.	208067 (Northstowe TC)
We support the principle of outdoor sports provision, but a bowling green is already provided in Northstowe with no further pressing need given the town's demographics. Would suggest padel or bocce is more appropriate for casual sports provision associated with a town park. It would be appropriate here to reference the close proximity of the secured swimming pool provision to the Town Centre.	208068, 208069 (Northstowe TC)

"Continue to offer recreational opportunities" please reword to "must offer water-based recreation opportunities in the future" as this is currently not happening	208070 (Northstowe TC)
We note that while the relevant S106 payments have been made during the development of Northstowe, for example to fund the capital costs of the Guided Busway, the current level of service provided to Northstowe residents in return is deeply unacceptable. In addition, the charging model adopted by the operator and approved by CCC sees bus journeys commencing in Northstowe attract higher fares than the same bus being boarded in adjacent settlements. The AAP demanded 12 months subsidised/free bus travel, so this text is a significant weakening of that. In any case, this was not made available to later residents. We believe that no such subsidy exists currently.	208071, 208072 (Northstowe TC)
Sport England supports criterion (d) requiring indoor and outdoor sports facilities and strongly supports paragraph 34 requiring maintenance plans for such facilities.	209226 (Sport England)
Parts of the Longstanton Conservation Area lie within the site. There are also 8 grade II listed pillboxes within the site. There are a number of other designated heritage assets nearby including Oakington and Westwick Conservation Areas and their associated listed buildings including the grade I All Saints Church, St Andrews Church and St Michaels Church, both listed at grade II* and several grade II listed buildings. Any development of this site has the potential to affect these heritage assets and their settings. There does not appear to be an HIA for this allocation. It is important that the policy identifies on-site, and nearby heritage assets and any mitigation and enhancement measures required to address any impact. Amend policy accordingly. Is there a	210141 (Historic England)

Conservation Management Plan for the site? If so, this should be referenced. If not, we recommend that this should be included as a policy requirement.	
Suggested wording amendment: “A nursery, secondary school, primary school and special school have now been built but further education facilities will be required to meet the needs of the new town, including additional primary schools”.	210590 (Cambridgeshire County Council)
Draft Policy S/NST includes detailed requirements relating to movement, connectivity and transport mitigation. However, for Northstowe these matters have already been comprehensively assessed and secured through the existing outline planning permissions, Environmental Statements, Transport Assessments and associated conditions and legal agreements. Any policy wording that could be interpreted as adding new requirements, constraining approved development parameters, or re-opening matters already resolved through the outline permissions would risk undermining the effectiveness of the policy and slowing delivery. As a result, this would be inconsistent with national policy and guidance on positive plan-making and deliverability.	211735 (Homes England)
The draft Local Plan seeks to include additional specialist accommodation of 1,050 units (Part 7a ii) and 24 permanent Gypsy and Traveller pitches (Part 7a iii). These are additional policy layers that are introduced to the Northstowe site that are not consistent, nor committed to in the outline development descriptions. Homes England has no additional land available at Northstowe and so these references should be removed from the draft policy.	211736 (Homes England)
The draft Local Plan and Policy S/NST should clarify how strategic sports hubs are intended to function within areas that are designated as protected open space. While the protection of open space is supported, sports hubs require ancillary development such as car parks and sports	211737 (Homes England)

pavilion. Policy should explicitly allow sports hubs to deliver necessary supporting infrastructure and ancillary development. Alternatively, sports hubs could be given a distinct policy designation that recognises both open space and community infrastructure, ensuring that built forms are not constrained by restrictive open space policies.	
The Lifespan section of the draft policy is particularly overprescribed as it requires comprehensive masterplanning, adherence to phasing plans and design codes and stewardship strategies. These details are already adhered via reserved matters applications, discharge of conditions application or planning obligations. The wording should be updated to reflect what matters have already approved and agreed for Northstowe.	211738 (Homes England)
The draft policy makes reference to required capacity improvements associated with the A14. Highways improvements delivered as part of the Northstowe development, including works affecting the A14 corridor, are intended to mitigate the impacts of the Northstowe development alone. Other site allocations / planning applications in the vicinity should not rely on this increased capacity and must demonstrate, through their own transport assessment, how any capacity constraints on the A14 would be mitigated as part of their proposals.	211741 (Homes England)
Part 7b of the proposed policy refers to a variety of uses proposed in the Town Centre (Phase 2) and includes incorrect floorspaces. The draft Policy should refer to the figures set out in the approved Town Centre Strategy (for Phase 2 (ref. S/2011/14/COND14). Part 7c states that retail and other town centre and local centre uses to be provided in accordance with an up-to-date Retail Needs Assessment and Town Centre Strategy.	211743, 211743 (Homes England)

There is an approved Town Centre Strategy for Northstowe under the Phase 2 outline (ref. S/2011/14/COND14). A retail needs assessment is not required by any of the outline consents and should not be introduced at this stage.	
The proposed policy requirements for education healthcare, community, cultural and leisure facilities are broadly consistent with the four outline permissions as it the requirement for temporary facilities. The policy refers to youth facilities which can form part of wider community facilities and the open space strategy. This approach is supported, provided it does not create additional triggers or obligations beyond those already secured through existing legal agreements and planning conditions.	211744 (Homes England)
The policy places a stronger emphasis on biodiversity networks and long-term landscape management than the outline summaries alone; however, this is consistent with the Environmental Statements accompanying Phases 3A and 3B and does not represent a departure from the approved development strategy.	211745 (Homes England)
Homes England are also landowners for land that is located outside of red line boundaries for the outline planning permissions. This is an acknowledgement that supporting infrastructure is to be delivered outside of the settlement boundary, such as the Southern Access Road East (if required) and flood mitigation measures.	211747 (Homes England)
I am very concerned about the addition of permanent traveller sites in the Northstowe town. Relocate these sites from Northstowe to the outskirts of villages. I appreciate the need for these sites, but I do not think in the main part of Northstowe is the correct location for them.	201732 (R Beaumont)

This plan is extraordinarily difficult to get to grips with. There has been no public meeting in Longstanton at which we could have found out what is proposed. Local residents have not been notified of this consultation. When I entered that I live in [REDACTED] (the westernmost part of Longstanton) it came up with nothing of significance, but I hear that there are plans for Traveller sites potentially just South of where I live. This process needs to be restarted in a way that actually involves local residents.	202590 (A Riley)
Longstanton & District Heritage Society believes that this local plan should emphasise the vital contribution Northstowe's rich heritage can make to the building of a strong community and providing the "unique identity and sense of place" promised in the town's original planning documents. LDHS asks for four particular aspects to be considered: 1. Clarification and confirmation of the conservation and protection status of the heritage asset known as "Northstowe Longstanton Paddocks". 2. Acknowledgement in the Local Plan of the new Heritage Strategy for Northstowe being commissioned by Cambridgeshire County Council Natural and Historic Environment Team. 3. Greater emphasis of the need to protect, conserve and present Northstowe's rich heritage as part of a connected Fen-Edge landscape and for the facilitation of heritage learning by all members of the Northstowe community alongside members of other local, connected communities. 4. Clear designation of the Green Separation between Northstowe and the villages of Longstanton and Oakington as "Protected Space". Specific areas are proposed for designation.	204189 (R Hetherington)

There appears to be an error in paragraph 3.3.67 which states 10,18000 homes	204383 (Abbey Properties Cambridgeshire Ltd)

Policy S/WNT: Land north of Waterbeach

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

The comments raise concerns about the overall vision for Waterbeach, particularly the continued allocation of greenfield land which is seen as eroding the area's historic low-lying landscape and local identity. While there is support for some elements, such as the Strategic Enhancement Area, respondents argue that the policy lacks sufficient clarity and ambition in delivering meaningful green infrastructure. There are worries that the proposed level of on-site green space will not meet recreational demand, potentially increasing pressure on nearby protected nature sites. Contributors also stress the need for clearer protection of heritage assets, stronger alignment with existing plans, and greater certainty that Waterbeach Village's distinct character will not be undermined.

A significant theme is the adequacy of infrastructure, services, and connectivity. Respondents highlight the need for clearer commitments to emergency services provision and education (including SEN and secondary school capacity), alongside better phasing to ensure infrastructure keeps pace with housing delivery. Transport concerns also highlight the proposed closure of the existing railway station, ongoing pressure on key routes such as the A10/A14, and calls for improved public transport, cycling links, and alternative solutions such as bus corridors and a new station at Milton. More broadly, there are doubts about the deliverability and sustainability of proposals, including unresolved issues around water infrastructure and the provision of Gypsy and Traveller accommodation. Concerns are also raised about inconsistencies with existing planning permissions and the Spatial Framework, as well as the risk that the scale and pace of development could outstrip both infrastructure provision and realistic delivery, ultimately

affecting community cohesion and long-term stewardship. There is also a comment requesting that the Waterbeach New Town SPD is carried forward to support the delivery of the site.

Response to the main issues raised in representations

The policy wording has been amended to provide greater clarity on the role and function of the Strategic Enhancement Area, whilst also requiring its delivery to be coordinated by the two landowners bringing forward the new town. There is also further reference to the role the SEA has in terms of filtering views from Denny Abbey and other heritage assets in that area. The exact location of specific uses within the SEA will need to be considered and determined through the planning application process, as it would not be reasonable to determine this through the Local Plan, especially given there are existing planning consents for the site and live reserved matters applications being considered. The recreational pressures generated by the development have been considered in Local Plan terms through the Sustainability Appraisal and the Habitats Regulations Assessment, with any identified mitigation measures required added to the policy. At the delivery stage, this will then be considered in further detail, ensuring the phasing of mitigation (including the delivery of accessible open space) is aligned to the delivery of new homes. The policy wording now reflects the important multifunctional nature of the SEA and how it will need to address the recreation, wellbeing and other needs of those living, working and visiting the new town.

The Greater Cambridge Local Plan Development Strategy sets out the councils identified strategy for growth and how the councils have arrived at this position, noting a range of evidence studies and how the plan is in general conformity with the national planning policy framework. Additionally, the plan and policies within it, are subject to consideration through the Sustainability Appraisal which consider environmental, social and economic indicators. The principle of residential led development at Waterbeach New Town as already been established through the South Cambridgeshire Local Plan (2018) and subsequent planning permissions. Therefore,

the proposed allocation remains for a residential led mixed-use development and supports the continued delivery of the site, including the necessary mitigation and supporting infrastructure.

The Councils have identified a clear housing need for Gypsy and Travellers accommodation and the Council's preferred approach is to address this through a number of ways, including provision at the strategic sites. This is consistent with the previous approach of the South Cambridgeshire Local Plan (2018) and is reflected in the relevant conditions of the planning permission for the site. Policy H/GT sets out the specific requirements for the implementation of this particular policy requirement.
The Housing policies of the Local Plan identify different housing types and tenures and how these should be delivered throughout Greater Cambridge. This allocation for Waterbeach New Town outlines the broad quantum of development, acceptable land uses and policy requirements, which must be read alongside the other relevant policies of the Local Plan. There are clear national definitions for the different types of affordable/subsidised housing products and the Local Plan, in combination with the Greater Cambridge Housing Strategy, will inform the housing types and tenures that come forward at the new town across each phase.

The policy has been clarified to confirm the education provision required to support the development and the phasing of this will need to be agreed with the education authority. Financial contributions towards essential infrastructure, including emergency services, is addressed by Policy I/ID: Infrastructure and delivery and is therefore not repeated in this policy.

The policy wording has been developed further to ensure there is an appropriate, context led, approach at the interface between the new town and the existing village to maintain its townscape character. The policy also supports higher density development around the relocated railway station, as suggested by the representation.

The transport impacts of the development are noted, and the Movement section of the policy sets out clear requirements for future development to address impacts generated by the new town. This will need to be phased in line with the delivery of the town and will require a multi-modal approach including high quality active travel connections, enhanced public transport provision (including the relocated Waterbeach railway station and public transport corridor) as well as highways improvements. The policy is clear that development should not have an adverse highways impact on existing settlements and that financial contributions will be required for measures identified in the Ely to Cambridge Transport Study as well as a monitor and manage approach for each phase of the development to ensure that the mitigation measures are adequate as the new town builds out. The Interim Greater Cambridge Transport Strategy notes that in the medium term (2030-2035), there will need to be a north corridor package of measures delivered, which includes targeted A10 improvements, with possible larger highway interventions delivered in the long term.

Whilst the principle of relocating the railway station was established through the 2018 South Cambridgeshire Local Plan, the Greater Cambridge Partnership will be responsible for its delivery. The proposal to also retain the existing station in combination with the relocated station will be subject to further consultation undertaken by the Department for Transport. There may be an opportunity during this consultation for respondents to put forward other options including other new stations along this route. At this stage, the Interim Greater Cambridge Transport Strategy does not identify either of these proposals.

The policy as well as other policies in the Local Plan note the timely provision of infrastructure, services and facilities are needed to support developments of this scale. This will need to be kept under review through subsequent phases of the development to ensure the needs of new residents, workers and visitors are meet as the town comes forward. The policy has been amended to provide some flexibility on this basis. The policy also requires temporary and meanwhile uses to be delivered to provide initial facilities where needed, as not all amenities will be commercially viable at an early stage of the town’s development before a critical mass of people has been achieved.

The comment regarding sustainable connections to the Wicken Vision area and Wicken Fen has been added to the policy whilst the request for further engagement is noted.

The provision of water and wastewater infrastructure is a clear requirement for any new development and is addressed through Policy CC/WE: Water efficiency in new developments and is therefore not repeated in this policy. Additionally, any detailed proposals for the delivery of such infrastructure are subject to planning consent.

The policy has been amended to confirm the number of new homes that will be delivered during the plan period. The long-term stewardship, governance and community identity are addressed in the policy as this will be an important part of how the town is delivered and maintains its long-term success.

It is not uncommon for completed homes to be advertised for sale whilst future phases of development are under construction. There is a build out period both for the properties as well as the supporting infrastructure like streets and local open spaces and it is unlikely to be economically viable for the house builder(s) to only commence latter phases of development once all earlier phases are sold. Additionally, this is a planning condition that cannot be reasonably applied to developments through the planning system.

Amendments to the indicative spatial framework have been made to reflect the consented development and factual updates to the policy have also been applied. However, some requirements, such as addressing potential areas of flood risk are still relevant until such time that the consented development in this area, and any necessary mitigation measures, have been implemented.

The supporting text to the policy now highlights that the Waterbeach New Town SPD will be a material consideration in the determination of future planning applications. However, under the changes to national planning policy, existing SPDs cannot be 'rolled over' or readopted by local planning authorities.

The policy wording and the indicative spatial framework provide a clear and consistent approach to ensuring that development is contained within the allocation area, and the role and function of the adjacent SEA. Any development proposals outside of the developable area or elsewhere in the parish, will need to comply with other policies in the Local Plan. Notably, the Defined Development Extents ensure that isolated development in the countryside is not generally supported whilst land to the south of the parish falls within the Cambridge Green Belt, which has national and local protections.

Made Neighbourhood Plans and adopted Local Plans have the same weight in decision making, however, if there is any conflict between the policies in the two plans, the most recently adopted/made plan takes precedence in decision making. Nevertheless, the Councils do not believe that the proposed allocation conflicts with the Waterbeach Neighbourhood Plan, as it is an update to an existing adopted allocation.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**
Vision and Identity • Object to allocation of further greenfield sites in Waterbeach which erodes low-lying historic fields that form part of the local landscape identity.	201331 (J Bell)

Uses • Under the subheading 'Uses' Section 4– add a new criterion m. as follows; "m. Contributions to fire & rescue, police and ambulance facilities provision/ funding" • Be clearer on the permission for a SEN School and that no more than two secondary schools are required. • I am concerned that housing proposed within Waterbeach New Town will not be genuinely affordable for people with existing local connections, including younger residents and families. The Draft Plan does not clearly explain: - How affordability will be secured over time - What proportion will be social or genuinely affordable rent - How local need will be prioritised. This undermines confidence that the development will support a balanced community.	207484 (Cambridgeshire Constabulary), 207515 (Cambridge Fire and Rescue Service), 210529 & 210591 (Cambridgeshire County Council), 208980 (J Williams)
Context • Strategic Enhancement Area welcomed but policy needs to be more explicit in identifying area for provision of strategic natural greenspace to serve the new development. • Current extent of on-site green infrastructure will not be sufficient or attractive enough to support the recreational needs of the new population and will therefore likely result in displacement of recreational pressure to nearby designated nature sites. • Policy should be amended to incorporate delivery of strategic green infrastructure within the strategic enhancement area in accordance with the masterplan SPD document. • The plan does not give sufficient assurance that Waterbeach Village's distinct character will be protected, risking increased traffic and loss of landscape and breaching the Waterbeach Neighbourhood Plan. • It is important that the policy identifies on-site, and nearby heritage assets and any mitigation and enhancement measures required to address any impact. • The new town at Waterbeach should include high-density development focused around its new station.	202983 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 208975, 208981 (J Williams), 210142 (Historic England), 208035 (Railfuture East Anglia)

Travel • Transport impacts on the A10/A14 and surrounding villages remain significant. • Object to closure of existing Waterbeach railway station. • No objection to new station but existing one should be retained. • Forcing residents to travel further to reach rail services contradicts Policy I/ST's aim to prioritise walking, cycling, and public transport. • Retaining both stations would enhance access to rail, reduce car dependency, support social inclusion, and provide network resilience. • Milton should receive a new railway station and a metro-style service, to improve connectivity and support the plan's sustainability objectives. • Support moving railway station to better serve the town, but for many destinations (west Cambridge, science park, retail park, city centre), it is not convenient for residents to do a feeder>train>feeder journey as it is slow, expensive, or infrequent. • Suggests bus lanes along southbound A10 to create a bus corridor to relieve the pressure on road. • Propose blocking through traffic in Milton and building a bus/cycling-only bridge across the A14. • Support the provision of high quality pedestrian and cycle links to nearby existing facilities such as Cambridge Research Park (CRP) • Policy wording used must be sufficiently robust to ensure any transport infrastructure which is critical to accommodating sustainable growth in this location is secured and adequately planned for.	201332, 201333, 201334 (J Bell), 201366 (D Malik), 201402 (R Swift), 201404 (P Johnson), 201405 (I Williams), 203844 (A Chan), 204476 (Royal London Mutual Insurance Society), 204670 (East Cambridgeshire DC)
Infrastructure • Delivery heavily dependent on timely and costly infrastructure, some of which has already been delayed.	201180, 202602, 202603, 203305, 203314 (Save Honey Hill Group), 208977

• Risk that housing delivery will outpace infrastructure provision. Plan should include stronger triggers to ensure infrastructure comes forward at the right time and mitigates potential for substandard living conditions. • Temporary facilities / meanwhile uses may not guarantee the same quality of service as a fully developed town. • Water supply, wastewater treatment and environmental capacity present unresolved risks. • Proposed pipeline solution has not been robustly reassessed against more sustainable alternatives, despite earlier studies identifying a local Waterbeach WRC as the preferred option. • The Plan is unjustified under NPPF 36b because the Waterbeach strategy depends on a pipeline founded on a misleading account of regulatory advice. • Plan unsound as it treats the Waterbeach pipeline as a necessity despite the CWWTPR DCO ExA Report confirming there is no operational need and no presumption of need under Section 105. • 2014 Water Cycle Study previously identified a local Water Recycling Centre would provide "betterment" for the River Cam and the local community. By promoting a pipeline justified solely by "facilitating" a relocation that is now unfunded and uncertain, the Councils are endorsing a strategy that fails to meet the "Exceptional Circumstances" established by the Secretary of State's Decision Letter and contrary to NPPF paragraph 11, as more sustainable alternatives (local treatment) exist. • DCO confirms that Pipeline South will become redundant once a new works is built. Proposing high-cost, high-carbon infrastructure that is designed to be decommissioned shortly after completion is inconsistent with the sustainability objectives of the Minerals and Waste Plan 2021 and the NPPF. • Insert binding policy wording to ensure that wastewater treatment and potable water supply are delivered prior to or alongside housing occupation, with clear triggers and monitoring.	(J Williams), 208035 (Railfuture East Anglia) 203593 (Horningsea PC)

• The access strategy relies heavily on the A10. Traffic impacts on the A10/A14 network require robust and timely mitigation, prevent rat-running through neighbouring villages. • Long-term stewardship arrangements for open space, community assets and unadopted infrastructure are essential but challenging at this scale. • The ongoing proposals for Waterbeach are problematic, being a dominant satellite attached to the side of an existing settlement and relying predominately on the existing village and overburdened road and facilities. The facilities and road improvements should have been in place prior to the impact and occupation of the new housing to avoid harm to the existing. The current Plan for the satellite New Towns is not sufficiently robust in phasing.	
Other • Stated capacity of up to ~11,000 homes may overstate realistic delivery by 2045 • Long-term stewardship, governance and community identity require stronger safeguards. • No further development should be approved until the new-town properties are sold. • New town has been infilled contrary to the original understanding and that no new schools have been provided • The Draft GC Plan does not assess cumulative development pressure across Waterbeach Parish as a whole, focusing almost exclusively on the New Town site. I am concerned that this leaves other sensitive parcels of land vulnerable to Incremental or speculative development, the loss of agricultural land and open countryside and harm to heritage assets and their setting • The Draft GC Plan does not provide sufficient reassurance that the separate identity, character, and quality of life of Waterbeach Village will be protected in the long term. I am concerned that: - Increased traffic, pressure on services, and loss of landscape setting will cumulatively erode village character. The Draft Plan does not clearly explain how it will remain in general conformity with the Waterbeach Neighbourhood Plan, as required by planning law.	201180 (Save Honey Hill Group), 201333 (J Bell), 208975, 208976 (J Williams)

Alignment with existing policy and planning application context: • It is noted that the policy and supporting text seeks to reflect key elements established through the outline planning permissions at Waterbeach New Town. However, there are a number of deviations from that framework which WDC wishes to highlight • Conflicting statements on heritage value, drainage and the use of design codes at phase level are included in the draft. • The requirement for 24 Gypsy and Traveller pitches in Policy S/WNT was not included in the adopted South Cambridgeshire Plan or the Waterbeach SPD and it is unrealistic that these could be delivered under the existing outline planning permissions. • The draft policy's wording that development east of Bannold Drove should be avoided because of flood-risk is inaccurate and fails to recognise relevance of provision within the outline planning permission for Waterbeach and should therefore be deleted. • The Spatial Framework Diagram in the draft plan deviates from the parameter plans in the outline permission and the SPD. • The draft policy makes no mention of any on-going role for the SPD • Omits any reference to the adopted Spatial Development Plan and northern buffer area and fails to capture the transport phasing linked to the A10 corridor. • Land-use allocations are presented as fixed quantities rather than "potential for" values and the policy attempts to protect a private museum, which exceeds the authority's remit.	209202, 209198, 209199, 209200, 209201, 211749, 211750, 211751, 211752 (Urban & Civic), 205116, 206847, 206848, 206849 (Waterbeach Development Company) 210989 (C Newell)
The National Trust considers that Waterbeach could be far better connected to the Wicken Vision Area and Wicken Fen via a foot/cycle bridge over the River Cam which would provide a more direct route via sustainable modes of transport. This development should look beyond its	211080 (National Trust)

boundaries to provide access to the wider landscape, particularly to the east. This should be included in the policy. The National Trust would welcome the opportunity to discuss this further. The National Trust are currently working with partners to deliver a new foot/cycle bridge over Burwell Lode to improve access to the south of Wicken Fen.	
What is the one significant new leisure facility that this site could host, that has easy, frequent, and accessible public transport access, that could otherwise not be located in Cambridge City due to land prices and lack of land availability? Please make provision for this - co-ordinated with the other New Towns so that each place has at least one different facility that the others lack, thus encouraging people from within Cambridge to visit, and ensure that the New Towns are not dormitory towns. Ensure children & teenagers are involved at design stage.	203784 (A Carpen)

Policy S/BA: Bourn Airfield New Village

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

The comments are generally supportive, particularly from key stakeholders such as Juniper and Natural England. The overall ambitions of the draft plan, including the growth strategy and the allocation of Bourn Airfield for a new community, are endorsed. However, there is a strong emphasis on ensuring the policy remains fully aligned with the existing outline planning permission, allowing for flexibility as the scheme evolves over time. Respondents call for clearer wording on how the policy will apply alongside extant permissions, and raise concerns about inconsistencies with the spatial framework, including omissions such as access points and a primary school. There is also objection to elements of the policy seen as premature or unjustified, such as the removal of land from the allocation area within the Strategic Enhancement Area and the inclusion of Gypsy and Traveller pitch requirements.

A range of site-specific and strategic issues are also highlighted. These include suggestions to strengthen transport provisions—particularly around public transport delivery—and to ensure comprehensive integration of all land parcels, including areas currently excluded from the allocation. Environmental and design considerations are raised, with support for enhanced biodiversity measures such as dark corridors, and calls for improved leisure, retail, and community facilities to avoid creating a dormitory settlement. East West Rail highlighted the relationship of the site with their proposals.

Heritage concerns are also noted, particularly the need to identify and protect nearby listed buildings and conservation areas, supported by appropriate assessment and policy references. More broadly, some respondents question whether the proposed land use mix is appropriate, suggesting alternative approaches such as a stronger focus on employment uses, while The National Trust emphasise opportunities for partnership working to improve sustainable connections to surrounding assets such as the Wimpole Estate.

Response to the main issues raised in representations

The policy has been amended to provide some flexibility around the quantum of homes and commercial floorspace. This enables future development proposals to respond to future needs whilst also ensuring that the policy approach is consistent with the other Local Plan allocations. The policy is broadly consistent with the consented application for the new settlement but has been updated to reflect any recent material considerations. For example, the requirement to form green networks linking with Cambourne North and surveys and mitigation, where needed, to address local bat species in the wider area.

The red line boundary of the allocation does not affect the implementation of the existing planning permission. The 2018 South Cambridgeshire Local Plan identified two boundaries for this site, a larger Strategic Site and the smaller Major Development Site in which the development would take place. The proposed allocation in the Greater Cambridge Local Plan applies a similar approach, with a site allocation for the developable area (previously known as the Major Development Site) and areas for mitigation and enhancement within the Strategic Enhancement Area Policy Area. The policy makes specific reference to the SEA for this site and identifies that it forms an important component of the new village. Therefore, which the role and function of the SEA has been clarified in the policy wording, the Councils have retained the proposed approach for the reasons set out above.

A significant proportion of Bourn Quarter has been built out whilst the remaining plots within the site have planning consent. The councils do not believe that the site needs to be kept within the allocation area, however reference is now made to the policy that the development of Bourn Airfield needs to integrate with this locally important employment site.

Amendments to the indicative spatial framework have been made to reflect the consented development and factual updates to the policy have also been applied.

The Councils have identified a clear housing need for Gypsy and Travellers accommodation and the Council's preferred approach is to address this through a number of ways, including provision at the strategic sites. This is consistent with the previous approach of the South Cambridgeshire Local Plan (2018) and is reflected in the relevant conditions of the planning permission for the site. Policy H/GT sets out the specific requirements for the implementation of this particular policy requirement.

The policy broadly sets out the necessary uses which are required to support this new community, including leisure provision, education facilities and community uses. This will need to be refined through any subsequent planning applications for the site and informed by the latest evidence and any other material considerations. These facilities should be informed by the views of local people, as set out in the NPPF and the Council's Statement of Community Involvement, which requires community engagement ahead of the planning application stage. The Councils have a strong track record of encouraging and facilitating youth engagement during the design development stages of planning applications and this is supported by other policies within the Local Plan.

The principle of residential led development at Bourn Airfield as already been established through the South Cambridgeshire Local Plan (2018) and subsequent planning permission. Additionally, the Councils evidence does not identify a current or future need for

further large-scale retail or employment uses in this location. Therefore, the proposed allocation remains for a residential led mixed use development.

Additional wording has been added to the policy to address the comments relating to ecology and the historic environment.

The comment regarding sustainable connections to The Wimpole Estate and the request for further engagement are noted.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**
No comments to make on the policy, which reflects previously agreed policy.	202984 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)
Juniper supports the overall ambitions of the draft plan including its growth strategy and the inclusion of Bourn Airfield as a site allocation. Policy S/BA should support the delivery of a new community at Bourn Airfield. Juniper supports the overall vision, identity and uses as expressed.	203427 (Juniper Propco (Bourn) Limited)
Policy for this site must be entirely consistent with the outline permission and support its implementation so that new homes can be delivered as soon as possible. The policy must provide for some flexibility to enable the delivery of development on the site to evolve to respond to changes in circumstances that may be encountered over the lifetime of the development of the site, should new planning applications be required.	203427 (Juniper Propco (Bourn) Limited)

Greater clarity is required, particularly regarding the relationship between the development being implemented in accordance with an existing planning permission and policy which would apply to any new applications.	203427 (Juniper Propco (Bourn) Limited)
The SEA around the developable area should be removed from the Local Plan as it is premature to de-allocate a part of the site that is integral to the whole scheme. These areas already benefit from a consented parameter plan.	203427 (Juniper Propco (Bourn) Limited)
The Spatial Framework for the allocation is not consistent with the outline permission. It should also provide flexibility for future amendments to the layout of the settlement. If retained, it needs to include the correct eastern vehicle access and missing primary school.	203427 (Juniper Propco (Bourn) Limited)
Amendment is needed to public transport section, either to a segregated bus link or equivalent scheduled rapid mass transit. Amendments also needed to reference related to Cambourne to Cambridge as it is not factually correct.	203427 (Juniper Propco (Bourn) Limited)
Bourn Quarter should be reincorporated into the allocation boundary, along with the land outside the Major Development Site area, to ensure a comprehensive approach across all areas and effective integration and connectivity between different uses. It should not be unpicked at this juncture.	203427 (Juniper Propco (Bourn) Limited)
Object to the Gypsy and Traveller approach in the draft plan, which is unsound and should be remedied by provision in forthcoming strategic sites, such as Cambourne North where it can be secured. The reference to Gypsy and Traveller pitches is unsound and should, therefore, be removed from Policy S/BA.	203427 (Juniper Propco (Bourn) Limited)
What is the one significant new leisure facility that this site could host, that has easy, frequent, and accessible public transport access, that could otherwise not be located in Cambridge City due to land prices and lack of land availability? Please make provision for this - co-ordinated with the other New Towns so that each place has at least one different facility that the others lack, thus encouraging people from within Cambridge to visit, and ensure that the New Towns are not dormitory towns. Ensure children & teenagers are involved at design stage.	203786 (A Carpen)

Develop Bourn Airfield as a retail and Business Park rather than more houses. No provision for entertaining these extra people or providing services for them	207462 (A Parfitt)
Natural England welcomes the strategic priorities of the Local Plan and are pleased to note that the Vision for Greater Cambridge, includes the aspiration for a big decrease in climate and environmental impacts, and increase in the network of nature, wildlife and multi-functional green spaces. We would encourage your authority to add wording to the Nature section of this policy about sensitive lighting strategies and providing dark habitats/corridors where possible, particularly if these can link with those planned in Policy S/CBN, and around the outer edge of the settlement.	207616 (Natural England)
There are no designated heritage assets within the site but there are some grade II barns to the north of the Grange I the Strategic Enhancement Area to the south of the site allocation. Great Common Farmhouse (also grade II listed) lies to the west of the site. Bourn Village and Hall Conservation Area lies to the south of the site. Any development of this site has the potential to affect these heritage assets and their settings. There does not appear to be an HIA for this allocation. It is important that the policy identifies on-site and nearby heritage assets and any mitigation and enhancement measures required to address any impact. Amend policy accordingly. We welcome reference to the grade II listed barns at criterion 9. We recommend that Criterion 9 should also reference Great Common Farmhouse (also grade II listed). Figure 88 This should also identify nearby heritage assets (much as the other Spatial Frameworks do)	210143 (Historic England)
The Wimpole Estate, including Eversden and Wimpole Woods SAC/SSSI is located approximately 6km to the south of Cambourne. It will inevitably draw visitors from the new developments at Cambourne and Bourne Airfield. However, it is currently poorly connected to these locations by sustainable transport. Policy S/CBN promotes better connections and sustainable modes of transport to surrounding villages, facilities and open spaces. The National Trust would welcome discussions with the LPA and developers about the opportunity to work in partnership to deliver sustainable transport options between Cambourne/Bourn and Wimpole.	211079 (The National Trust)

Barratt Northampton is currently progressing a Reserved Matters application forming Phase 1 of the Bourn Airfield new settlement. The representations focus solely on the Development Management policies, as they are of direct relevance to the delivery of the Bourn Airfield new settlement.	210501 (Barratt Homes Northampton)
EWR Co is proposing to route the new railway through a mined tunnel under the A428 and the Bourn Airfield site, much of the tunnel is within land that has planning permission. However, part of the tunnel may be located under land identified for mixed use/residential-led development in the land use parameter plan and Spatial Framework. It is important that proposals for any built development above or near to the tunnel are suitable for such a location and would not conflict with or prejudice the delivery of EWR. There may also be a requirement for EWR to utilise land within the site in order to construct the proposed tunnel, mitigate impacts on A428, and/or undertake utilities diversions. To avoid a conflict between the proposed allocation and the EWR Safeguarding Directions, EWR Co requests that draft Policy S/BA is amended in Para 15 and 3.3.110.	211895 (East West Rail)

Summaries of Representations: Sites New Settlements

New Settlements

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments on the new settlements introduction have been grouped to draw out the issues raised.

General comments

Essex County Council welcomed joint working on accessibility and connectivity on the cluster of sites south of Cambridge. National Highways highlighted the need for transport modelling to reflect anticipated development timing. Natural England suggested an alternative approach to the red-line mapping of sites. Historic England highlighted the need for Heritage Impact Assessment to also influence the detailed planning stage of sites. Other comments highlighted the need to consider the landscape impacts of new settlement sites, and it was questioned why site policies did not identify building heights. Comments expressed concern about the qualities of exiting new settlements. Cambridgeshire Local Access Forum raised the importance of building in active travel networks

and connectivity Cambridge Past, Present and Future said that garden town principles should be applied. Cambridge Acre said the development strategy risks drawing investment and services away from existing rural villages. Endurance estates considered they should be supplemented with additional village development sites. Thakeham Homes proposes sites which together would form a major new settlement.

Comments focused on Infrastructure

National Highways highlighted the need for transport modelling to reflect anticipated development timing. Anglian Water Services and NHS Cambridgeshire and Peterborough Integrated Care Board identified the need to plan for infrastructure to meet the needs of sites. Other comments were concerned with infrastructure delivery, and the impacts of planned infrastructure.

Comments focused on Land adjacent to A11 and A1307 at Grange Farm

Comments expressed concern regarding the proposal, and considered that it should be removed from the local plan. Reasons include: Would create Isolated car reliant community, limited public transport, lack of infrastructure capacity, loss of agricultural land, Impact on water and chalk streams, landscape and visual harm. Site previously rejected, inadequate evidence base to demonstrate benefits. Focus on completing the existing new settlements.

Comments focused on Cambourne

Comments expressed concern about the development being used to help justify East West Rail. It was seen as acknowledgement that failures with the current Cambourne site needed to be rectified. Where Cambourne could attract jobs to go with the homes. Development should not take place until public transport measure are in place.

Comment on Northstowe

One comment requested that land providing green separation and public access should be identified for protection.

Response to the main issues raised in representations

On the general comments, we will continue to engage with adjoining authorities, building on the engagement captured in our statement on duty to cooperate activities. Heritage consideration will be a detailed matter to consider at the planning application stage of the site development process, as will detailed design issues including building heights. The emerging plan includes a comprehensive set of polices to ensure high design quality. Proposals for additional sites have been considered through consideration of the development strategy, and testing of individual site proposes in the Housing and Economic Land Availability Assessment.

The Proposed Submission Local Plan is accompanied by further evidence exploring transport infrastructure needs and delivery, which have informed the Infrastructure Delivery Plan.

Comments on Land adjacent to A11 and A1307 at Grange Farm and North Cambourne echo those made against the site policies themselves. Response to issues raised have been provided on against those policies later in this document.

Table of representations

Comments raising general new settlement issues.

Summary of issues raised in comments	**Comments highlighting this issue**

ECC notes that the Local Plan states “We also have evidence that locating homes close to existing and proposed jobs at the cluster of research parks to the south of Cambridge would help reduce commuting and associated carbon emissions and congestion”. ECC welcome joint working to ensure consideration is given and actively planned to ensure accessibility and connectivity to key services and facilities that will benefit Cambridgeshire and Greater Essex residents, visitors and those investing in these localities.	210473 (Essex County Council)
We note that some of these allocations SEAs, particularly where SSSIs and other sensitive habitats are within or adjoining the sites. Whilst we welcome this, we also wish to make you aware of the case of Uttlesford District Council (UDC), who took a similar approach, but were directed by the PINS inspector to merge the development and non-development areas into one red line boundary for increased flexibility in masterplanning, in order to overcome constraints. Whilst this may not happen here, it would be prudent to be prepared, and we advise that a minimum buffer area adjacent to SSSIs should be decided upon in case the quantum of Green Infrastructure provision eventually becomes fragmented into smaller parcels across the wider red line boundary. We would be happy to provide more information and discuss this further with your authority in our ongoing meetings.	207608 (Natural England)
For some sites the policy wording states that a Heritage Impact Assessment will be required (e.g. North Cambourne/Grange Farm). This is a helpful requirement, but we suggest adding the words ‘more detailed HIA’, given that an HIA has already been prepared for these sites. The policy should also make clear that the HIA is needed to inform the masterplanning / proposals.	208920 (Historic England)

The policies should set parameters consistently and should respect the rural character of the open countryside. Storey heights do not appear to be controlled at Grange Farm and other new allocated development sites, which would have a significant and potentially detrimental effect on the open countryside. They have been partially set at Bourn Airfield New Village, however, it is unclear why the edge of the settlement is considered important at Bourn but not elsewhere, and why the Local Plan proposes no control over the height of the rest of the development on these very prominent sites in the open countryside.	210987 (C Newell)
The new settlements being proposed on former WW2 airfields are functionally prominent hilltop sites. The current Plan is not sufficiently robust to show this will be achievable sustainably within the environmental thread of sustainability.	210988 (C Newell)
It is unclear why the proposed Spatial Framework plans of these sites have excluded the perimeter buffers, as the Plan should retain control over these. These would be better controlled by inclusion within the site boundary and hatching as non-developable / open space / tree buffer areas as appropriate. The boundaries to these buffers should be reconsidered to be simple and clear to achieve the purposes of buffering and provide most efficient use of land (NPPF129). The development should maintain an area's prevailing character and setting (NPPF129). There are conflicts in the CBA Townscape reports, some of which are significant (such as Great & Little Abington villages having modest prevailing 1½ storey housing and being assessed as 4 storey prevailing heights).	211918 (C Newell)
Other recent large-scale developments, such as Waterbeach, have proved to be unattractive places to live. We are lucky to enjoy village life in a rural setting. A large scale, fairly high-	206600 (A Butchart)

density development so close to us would likely deliver a socioeconomic decline which may negatively affect South Cambridge's status as a sought-after place to live. It may not draw science and technology workers, who, like us, would choose to live elsewhere.	
For new development sites, particularly on the edge of Cambridge, in new settlements, and in the rural southern cluster, CLAF expects: •Early engagement with rights of way teams and access stakeholders during site master planning. •Provision of safe, convenient, coherent and attractive routes that connect new communities to existing path networks, services, public transport nodes and green spaces. •Routes designed to enable a range of non-motorised users, recognising that multi-user access benefits health, wellbeing and social inclusion	208167 (Cambridgeshire Local Access Forum)
Policies should require new settlement to conform with Garden Town Principles as defined by the tcpa (Town and Country Planning Association)	203007 (Cambridge Past, Present and Future)
The focus on creating well connected, self-sufficient new settlements is positive, but the strategy risks drawing investment and services away from existing rural villages. While strong public transport links to Cambridge are highlighted, there is little reference to how surrounding villages will connect to these new hubs or benefit from new facilities. The cumulative impact on rural roads, health services and schools is not addressed. Stronger rural proofing would include explicit links between new settlements and nearby villages, shared service planning and safeguards to avoid weakening existing rural centres.	203160 (Cambridgeshire ACRE)

South Cambridgeshire is becoming increasingly urbanised and losing its rural character	202427 (P Deer)
My main concerns are as follows: Increased traffic on local roads from the new housing and railway; Destruction of countryside and ancient sites; Cambridgeshire's very poor record on new towns - both Cambourne and Northstowe are cultural deserts with insufficient services and what services they have lagging development; Pressure on local services.	205254 (T Meyer)
Endurance Estates endorses the proposed New Settlement Allocations, including Cambourne North, as these locations represent excellent opportunities to capitalise on recent growth in a way which materially enhances the existing settlements. The new settlements should continue to have a significant role in the delivery of the overall housing need, however, Endurance Estates are of the view that these new settlements should be supplemented by additional development on the edge of Cambridge and within the sustainable villages in the district.	209708 (Endurance Estates)
HELAA Reference 208915, HELAA Reference 208916 and HELAA Reference 208917. Thakeham controls circa 1,800 hectares of land in South Cambridgeshire, located between Shepreth to the east and Kneesworth to the west, that is intended to deliver a zero carbon new town of more than 25,000 new homes, alongside new employment, services, amenities and requisite infrastructure to support a thriving community, the details of which can be found in our accompanying Vision Document. Furthermore, we have the potential ability to increase this to circa. 40,000 homes with the inclusion of the adjacent Ministry of Defence land at Bassingbourn. The 40,000 homes proposed are therefore an upper limit on the	209757 (Thakeham Homes)

potential for Wetherbrook. Wetherbrook New Town will support the growth spirations of the region, providing much needed housing to support economic growth but also provide production and manufacturing facilities, incubator and flexible workspace supporting the life science, biotech and medical sectors.	

Comments on Infrastructure issues

Summary of issues raised in comments	**Comments highlighting this issue**
It is National Highways understanding that new strategic sites, including North East Cambridge, Grange Farm, Cambridge East and Cambourne construction would be limited until 2032 therefore, National Highways recommend that traffic modelling reflects the expected delivery timescales.	209012 (National Highways)
Please note that specific comments regarding wastewater treatment at our WRCs has already been addressed under Policy S/DS. We support the requirements for a Foul Drainage Strategy to support the delivery of these settlements and consider that this requirement should be consistent across the new settlement policies (dependent of the stage of planning consent each site has progressed to).	210193 (Anglian Water Services Ltd)
Site allocations lacking explicit on-site health facility requirements should mention the need for financial contributions for health and infrastructure mitigation, aligning with the IDP approach. Engagement with Council Officers during early plan preparation and input into the	205091, 205093 (NHS Cambridgeshire and

Infrastructure Delivery Plan is Welcomed. An additional assessment by the ICB in Stage 2 of the IDP process will provide targeted evaluations of key site allocations and health infrastructure needs	Peterborough Integrated Care Board)
I am concerned about the number of trees and fields that have been used for the new A428 and now for the North west railway. If we keep building on farm land, there won't be enough fields for food and wildlife. As a resident of Papworth Everard, we don't want to be surrounded by roads railway's and housing it's not what we moved to a village for. We have had a lot of upheaval with the new A428 constantly changing and diverting traffic and then it will be the railway.	201170 (T Carter)
Strategic sites: test against lived reality Large allocations must be judged on: • real travel behaviour, • realistic public transport delivery, • and actual timelines — not optimistic assumptions. Development should not proceed where: • key infrastructure is speculative, • impacts are pushed onto existing communities, • or road access is constrained without alternatives. Sustainability that depends on "future fixes" is not sustainability.	208879 (D Smith)

Comments focused on Land adjacent to A11 and A1307 at Grange Farm

Summary of issues raised in comments	**Comments highlighting this issue**
The allocation of land at Grange Farm should not proceed. The site is greenfield with negligible connection to existing built up areas. As such any development would result in an	201296 (J McGill)

isolated community heavily reliant on outside resources; it would be strongly car-reliant; it would represent a "foot-in-the-door" for further unsustainable neighbouring development.	
Grange Farm needs to be taken out of the plan and existing new developments e.g. Cambourne, Waterbeach and Northstowe completed. The brownfield site at Cowley Road should be revisited. Grange farm site is on prime agricultural land within the green belt. The proposed urban development, situated on a rise, will dominate the landscape of surrounding local communities and significantly change the character of the area. Other approaches to SCDC's housing requirements can be met as set out in the consultation documents. Grange Farm was previously proposed for development and disregarded by GCSP on the grounds of being unsustainable; there have been no change in circumstances since that decision. No access is proposed between Grange Farm and the A11; additional traffic exiting onto the A1307 will cause increased congestion.	201860 (J Carter)
I find the plan to build 6-8000 new homes on productive farm land a disgrace, we have a population large enough For our fragile infrastructure Hospital at capacity, roads a bloody disgrace, schools at capacity, no appointments at health centres, The proposed development will dominate the landscape and will be visible from as far as Ely, Below the farm land is a chalk Aquifer feeding a chalk stream ,which would be destroyed.	201922 (G Johnson)
This draft Policy relies on a series of unsubstantiated assertions and claims about evidence. There is simply inadequate analysis and information to support what is claimed. This proposed Policy has all the hallmarks of having been added in at a late stage, which is exactly what has happened with the requirement to find additional homes to replace those	203569 (B Haydensmith)

originally in the Plan at the existing wastewater treatment works adjacent to Cowley Road. It is also highly opportunistic, with the unusual situation of one landowner providing an easy alternative for the location of homes the draft Plan seeks to identify	
These public transport-led developments from other new settlement sites all offer a marked contrast to the Grange Farm development, which despite claims that it will be sustainable and served by public transport, falls far short of the above examples. There is an attempt in the Draft Plan to deal with this when it says, “the new settlement will play a critical role extending the South-East Transport Scheme.” This is a highly speculative comment and even if some sort of extension to the main scheme can be provided, would fall far short of the public transport alternatives offered in Cambourne, Northstowe and Waterbeach.	208534 (B Haydensmith)
Grange Farm is severely constrained by major roads (A11 and A1307) and the protected Roman Road. Only one access is proposed—via a new roundabout on the A1307. The proposal lacks proper traffic modelling and data on existing network performance. Comparable settlements with similar or smaller populations have multiple access points. Highways England is unlikely to allow another junction on the A11. Even a link to the Worsted Lodge layby would increase pressure on FourWentways and risk queueing onto the A11. A1307 already carries heavy traffic, including many HGVs, and will face additional pressure from Haverhill’s growth. Queueing from the new roundabout is likely to extend into Little Abington. This will encourage rat running through the village to reach the A11/A505.	208535 (B Haydensmith)
Traffic is increasingly backing up due to congestion near Babraham Research Campus, Fourwentways and queues already extend to the A11/A505 slip roads at peak times. There	208536 (B Haydensmith)

are existing issues on the A505. A505 is highly congested and set to worsen with expansions at the Genome Campus and new housing nearby. Grange Farm traffic will add substantial pressure, with the A505 being the only viable westbound route. The respondent has doubts about the CSET extension. The extension requires crossing the A1307 and a new bridge over the A11—expensive and disruptive. Uncertainty whether this extension will ever be delivered. The respondent has concerns about walking / cycling routes. Only the southern end of the site has a realistically walkable route; northern areas would be too far. The respondent has concerns that the congestion and transport issues cannot be mitigated.	
Criticism that the allocation of this site was driven by the loss of the waste water plant site. This brownfield Cambridge site was ideal for new housing. The housing shortfall is marginal. Excluding the waste water site from future plans is inefficient, especially given likely lower long term costs compared to delivering infrastructure for alternatives like Grange Farm	208537 (B Haydensmith)
Policy S/GF is misaligned with strategic objectives, unsustainable, and transport problematic. The site should be removed and replaced with a better aligned alternative. There is a lack of evidence to allocate this site. There are no sufficient alternative site assessments and better alternatives have been ignored. The claim that proximity to research parks will reduce commuting is unsupported. Evidence shows limited job growth at nearby research parks, many of which already have associated housing allocations. No data is provided on expected travel behaviour or vehicle movement estimates, despite critical transport implications.	208538 (B Haydensmith)

The respondents have concerns about landscape and visual harm. Development would remove productive farmland and dominate gently rising landscape. Intrusive visual impact over a vast area (views as far as Ely Cathedral). High density flats needed due to constrained land area would worsen this impact. The development is too large for the available land, leading to overcrowding and inadequate green buffers. Boundary mitigation is inferior to that of other new settlements. The proposal threatens heritage assets including the Roman Road and Little Abington Conservation Area. Sewage infrastructure proposed on the village side of the A1307 would negatively affect existing residents	208539 (B Haydensmith)
Plan for sustainable travel is unrealistic. Most people working at the science parks already reside within Cambridge, These are unlikely to all relocate to grange farm. The plans for expansion within granta are less than the capacity at grange farm, therefore it is likely that at least some residents will be commuting elsewhere. It also ignores the fact that most families do not just go straight to work, they also need to drop off children. 6000 houses with an average of 1 car per household, commuting between 7-9 would be about 1 car per second being added to the a1307. Changes to plan: If this size project goes ahead, a junction needs to be added to a11 to protect the a1307 and the villages from excessive noise and air pollution from the inevitable congestion. This will also be more suitable for the Lorries for the storage facilities. I think grange farm rather than having a protected strip to the north of the area, should have it to the south along the a1307 so that little abington is not consumed by the new development	202599 (B Stapleton)

and the wastewater that runs off the hill that is planned for grange farm has got somewhere to be absorbed and stops abington being flooded. It will also help to shield grange farm from the noise of the a1307. The sewage works for the new town should not be in little Abington. There is a Bronze Age cemetery at the planned site, it is a danger to the protected chalk stream and destroys the pleasant rural charm of the properties along Bourn bridge road.	

Comments focused on Cambourne and Cambourne North

Summary of issues raised in comments	**Comments highlighting this issue**
The integration of Cambourne North with the existing town would seem not wholly unconnected with rectifying the failures of existing Cambourne (e.g. the lack of a town centre). Whether integration will be “supporting services and facilities“ in anything but the long term seems unlikely (see above). Regarding the “northern forest”, see remarks on Policy S/CBN.	201905 (C Deer)
Building on Currently farmed agricultural land is Wrong in ecological, sustainability, land utilisation and economic terms. The development North of Cambourne towards Elsworth is a prop to help justify the EWR rail line.	205368 (J Daffarn)

EWR has not produced a costed Feasibility forecast or Business plan, and to most local people it is an outrageously expensive white elephant that does not justify a station at Cambourne at all. Without that station there is NO reason for the development area almost linking Cambourne with Elsworth and Knapwell. National need for self-sufficiency means it is madness to lose this area.	
Cambourne North is a new settlement, separated from the existing town by a trunk road and a railway; it is anything but an organic outgrowth of existing Cambourne. The insistence on achieving integration between Cambourne North and the existing town would seem to acknowledge that things were not got quite right before (e.g. the lack of a town centre). Whether integration will be “supporting services and facilities“ in anything but the long term seems unlikely (see above). With regard to the “northern forest”, see remarks on Policy S/CBN.	202344 (P Deer)
The juxtaposition of commercial properties and housing is hoped to create jobs, but the success of attracting skilled jobs remains uncertain based on past experiences in Cambourne.	210451 (P Deer)
I support the expansion of house building in Northstowe, Waterbeach and Cambridge Airport, which are close enough to Cambridge for some people to cycle, which have adequate public transport provision and where it is possible to make further improvements to public transport. However, further expansion of Cambourne (too far from Cambridge and employment centres for most people to cycle, and currently lacking adequate public transport) is unwise until the rail link is in place and this will only create more motor trips into	203292 (J Palmer)

Cambridge, adding to existing congestion along all of the arterial routes into the city from the west – including Barton Rd/A603 where I live.	

Comment on Northstowe

Summary of issues raised in comments	**Comments highlighting this issue**
Northstowe Openspace The Northstowe Site allocation as delineated on the map includes area bounded by Rampton Road, Long Lane, Mills Lane and Woodside (Longstanton Meadows). This area overlaps the Longstanton Conservation Area and forms part of the green separation between Longstanton and Northstowe. It has recently been opened up for public access and provides substantial amenity value for the inhabitants of Longstanton and future inhabitants of Northstowe. It should be removed from the Northstowe Site allocation to make it clear that land to the west of Long Lane is not available for development	201164 (A Helliwell)
Homes England are fully supportive of the continued allocation of Northstowe as a sustainable new town and are committed to its ongoing delivery alongside Greater Cambridge Shared Planning and other key stakeholders. Key to this is ensuring that the existing planning permissions and local plan policy continues to support the delivery of housing and community facilities in the right way and in good time.	203984 (Homes England)

Northstowe is a New Homes Accelerator Site and policy should not introduce complexity or constraints which would slow delivery.	

Policy S/CBN: Cambourne North

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments focused on scale, landscape and transport impacts, and the relationship of the development with surrounding villages. Many respondents emphasise that development north of the A428 represents an excessive expansion into open countryside, eroding rural character and risks overwhelming existing settlements. Concerns highlighted the risk of coalescence with Elsworth, Knapwell, Boxworth and Papworth Everard, with calls for much stronger landscape buffers, early and substantial tree planting, and clearer guarantees that no built development will encroach toward the villages. Several comments also note previous Planning Inspectorate decisions have already identified the site's elevated topography and visibility as highly sensitive, and argue that these constraints have not been adequately addressed.

Environmental and ecological issues were also raised where respondents stress the importance of protecting ancient woodland, arable habitats, and species such as Barbastelle bats, with Wildlife Trust and RSPB highlighting that there should be explicit recognition of ecological constraints, stronger mitigation, and acceptance that off site compensation is likely to be required. Comments also noted that the proposed "Cambourne Forest" is too narrow, insufficiently defined, or risks becoming tokenistic unless planted early, managed professionally, and expanded to provide meaningful separation and biodiversity gain.

Transport and traffic concerns form one of the largest themes. Respondents highlight the likelihood of significant increases in car journeys, pressure on rural lanes, and rat-running through Elsworth, Knapwell and Boxworth. Many argue that the road network is already inadequate, with narrow bends, congestion, and no capacity for additional flows. Comments call for clearer traffic modelling, early delivery of active travel routes, binding mode-share targets, as well as a bypass for Elsworth. Several comments also questioned whether East West Rail will meaningfully reduce car use, with some questioning the viability of the station itself, the route choice, and the environmental cost of construction.

Infrastructure capacity and phasing were also major concerns. Respondents question whether water supply, drainage, schools, healthcare, emergency services and community facilities can support a development of this scale. Many stress that services must be delivered upfront, not after housing occupation, and that surrounding villages should benefit from S106/CIL contributions. Flooding concerns are prominent, particularly in Elsworth, Conington and Swavesey, with calls for robust attenuation, long-duration storage, and improvements to existing drainage systems.

Comments relating specifically to Elsworth, Boxworth, Knapwell and Papworth Everard emphasise the close proximity of the new settlement, fears of becoming suburbs of an expanded Cambourne and the impact on their conservation areas, historic landscapes and rural lifestyles. Suggested amendments include widening buffers, improving routes around Papworth, restricting access and ensuring that development boundaries are fixed to prevent future creep.

A smaller number of comments address housing numbers, employment provision and overall justification. Some argue that too many homes are proposed, that demand is unproven, or that Cambourne already has unsold properties. Others note that without strong employment strategies the area risks becoming a dormitory settlement, increasing commuting pressures.

Response to the main issues raised in representations

The councils have undertaken additional evidence since the draft Greater Cambridge Local Plan consultation on a number of themes which were identified in the comments. These relate to landscape, ecology, heritage and transport and are addressed in more detail below and within the Site Allocations Topic Paper.

The Councils have worked in collaboration with the Highways and Transport Authorities as well as National Highways as it has developed additional transport evidence. Through a series of detailed transport modelling exercises, it has been possible to identify the transport implications generated by the development during the plan period and the necessary mitigation measures required to ensure there are no significant adverse impacts on both local roads and the strategic road network (SRN) (A428/A14). This includes active travel (walking and cycling), public transport and access measures both within the site but across the wider local area. At this stage, the transport evidence is not recommending that a by-pass for the northern villages is required. Through this work, the Trip Budget has also been revisited to provide a more accurate limit on the number of peak hour trips that the highways network can accommodate and has also taken into account other development proposals in the local area to understand the cumulative impacts.

The policy requires a number of additional transport assessments to be undertaken as a development proposal is being prepared as part of a planning application. It is at this stage that more detailed testing and transport interventions will be identified and secured. The transport evidence and Local Plan recognise that additional mitigation measures may be necessary beyond the plan period in order to facilitate the full build out of the site.

The comments regarding the East West Rail proposal are noted however this is a project that is not being delivered by the Councils. The Councils are statutory consultees to that project and are also not the determining authority as it is being brought forward as a Nationally Significant Infrastructure Project (NSIP) and will be reviewed and determined by an independent government inspector. The merits of the overall project as well as key decisions relating to costs, route alignment and environmental considerations will be for EWR Co. to set out as part of their NSIP application. The Councils, through this allocation, are seeking to respond to the proposed new railway station at Cambourne in line with the requirements set out in national planning policy.

Through the additional evidence work undertaken, the Councils have revisited the boundaries of the allocation and the supporting Strategic Enhancement Area. The Landscape Visual Appraisal has identified the most visible and therefore sensitive parts of the developable area, and the allocation boundary has been amended by increasing the gap between Cambourne North and Elsworth. There have also been some minor amendments to the boundary near to Knapwell and on the eastern edge of the site. The Landscape Visual Appraisal also identified that the land to the west of the site is less sensitive in landscape terms and therefore this has been included within the development area. Additionally, the Heritage Impact Assessment has also been updated and identifies the necessary mitigation measures required to protect the setting of the adjacent conservation areas.

The matters relating to coalescence have sought to be addressed by the amendments to the allocation red line boundary. Additionally, the policy wording in relation to the role and function of the Strategic Enhancement Area (SEA) has been developed further to provide a clearer indication of the types of uses/activities and mitigation measures that are acceptable within it. The supporting text to the policy identifies that as new types of spaces are delivered within the SEA, these would gain planning status such as Protected Open Space or a Local Wildlife Site.

The phasing of mitigation measures, such as tree planting, will need to be coordinated and phased accordingly. The policy requires this to be set out through a Place Book approach in combination with other studies including a Phasing Strategy and Biodiversity Enhancement, Implementation and Management Plan. Based on the construction rates identified in the Housing Delivery Study, it is anticipated that Cambourne North will continue to be built over several decades, providing sufficient time for landscape mitigation measures to be implemented and for them to become established. Given the scale of the Cambourne North SEA and the opportunities it presents, there is significant potential for a forest to be provided in this location as part of a mosaic of landscape typologies. The allocation also recognises the RSBP Hope Farm and seeks to further their environmentally friendly approach to arable farming within the SEA.

Whilst the allocation will reduce the amount of arable farmland in this location, the policy seeks to minimise this through compact forms of development, focused around the proposed railway station and key areas of activity within the development. It also supports the continuation of farming within the SEA.

Whilst the site contains some Public Rights of Way, much of the land north of the A428 is not publicly accessible. The policy wording requires publicly accessible spaces and footpaths to be provided within the SEA.

Cambourne North contains and is adjacent to a number of ecologically sensitive and important sites, including Ancient Woodland and Sites of Special Scientific Interest (SSSI). As part of the additional evidence undertaken, the councils have engaged with local and national bodies and organisations including the RSPB, Wildlife Trust and Natural England to develop an evidence led approach to protecting existing sites, habitats and species and identifying the necessary policy requirements which will inform future planning

applications within the site. This includes management and monitoring requirements, the provision of new woodland buffers around protected sites, dark corridors across the site to form part of a wider ecological network and minimum buffer zones around sites and existing vegetation which are in excess of national standards. The existing ecological assets and the necessary mitigation and enhancement measures form a key element of the updated Spatial Framework and policy wording.

The timely provision of necessary supporting infrastructure will be required to support the development. This relates to all forms of infrastructure, including transport, water, sewage, community and cultural facilities and education. This is required in the policy to align with the phasing of development and agreement will need to be sought with the relevant bodies/authorities during the planning application process. Currently, no development is anticipated to come forward at Cambourne North until 2032 when there is sufficient water capacity to serve the development. The policy identifies the broad infrastructure areas that will need to be delivered through the development of the site, informed by the Infrastructure Delivery Plan. However, this will need to be kept under review based on the emerging land uses, quantum and housing mix. The Councils will continue to keep under review the most appropriate way to secure financial contributions from development across Greater Cambridge.

Known areas of flood risk have been taken into account through the updated evidence, all of which fall outside of the developable area. The policy wording in relation to the SEA notes that this area would need to address flooding issues and the policy now addresses site specific flooding requirements. In addition, Policy CC/FM: Managing flood risk sets out clear requirements for new development proposals.

The Councils are required by national planning policy to meet their identified housing needs through the preparation of the Local Plan. Cambourne North contributes towards meeting the need during the plan period but the policy looks beyond 2045 to set out

the council's longer-term aspiration for the town. The introduction of new transport projects as well as a wide range of services and facilities as part of Cambourne North will continue to make this location a desirable location for people to live, work and visit.

The policy sets an ambitious but realistic amount of new commercial floorspace for the development but notes that the councils would broadly support more employment development subject to meeting policy tests. This also does not include wider employment opportunities generated by the development such as construction, retail and supporting services like education.

The Councils agree that new developments should be multi-generational and designed to accommodate the needs of everyone. This is supported by a range of policies across the Local Plan including the design of new homes and public spaces.

The councils, through the Cambourne Spatial Options Assessment (2025) and Housing and Employment Land Availability Assessment (HELAA) (2026) rejected the option to develop to the south of the existing town and subsequently the sites in this location due to their suitability. Additionally, other sites submitted to the councils as part of the Local Plan process have been considered through the HELAA.

Table of representations

Summary of issues raised in comments	Comments highlighting this issue
Support • Very positive step for my children and those growing up here. • Development feels proportionate and rational.	**Individuals:** 203676 (N Woods), 201414 (J Carey), 200987 (R Howard)

Summary of issues raised in comments	Comments highlighting this issue
• The site of Cambourne North is appropriate for new development provided EW Rail proceeds. If it does proceed there would be less need for the busway via Coton. • Site can be extended westwards, utilising the remaining land between the A428 and the East West Rail corridor up to the new junction between the A428 and the A1198. • Plans attached to representations show potential additional development areas to the west which Endurance consider to be suitable for development and potential additional access from the new A428 / A1198 Junction currently under construction and utilising land under Endurance Estates' control. • Provision of new development both to the north and south of Cambourne, would have substantial benefits in sustainability terms and boosting housing supply in the short term, and that it is clearly the most suitable option when considered against the alternatives. • Commend strategic vision for promoting balanced growth by increasing sustainable employment opportunities alongside residential development, reducing car reliance, and supporting sustainable transport. • Emphasis on low-carbon development and biodiversity net gain is seen as a positive reflection of national priorities.	**Other organisations:** 204152 (Endurance Estates), 204253 (Richborough), 205149 (Taylor Wimpey East Anglia), 205158 (Taylor Wimpey East Anglia), 207609 (Natural England), 209976 (Endurance Estates), 211892, 211887 (East West Rail Company)

Summary of issues raised in comments	Comments highlighting this issue
• Welcome positive approach taken to shaping and planning this new settlement so far, and we will continue to work with you as you develop and refine the policies around this allocation. • Endurance strongly support and welcome the identification of Cambourne North as a New Settlement proposal with scope to contribute significantly to Greater Cambridge's long term housing needs over the Plan period and beyond. Taken together with the existing Cambourne settlement, the combined new town will have sufficient critical mass to enable it to support a wide range of employment, retail, leisure, cultural and other services and facilities that will ensure it can become a desirable, vibrant and sustainable place to live and work. • EWR Co strongly supports the proposed allocation and spatial framework and the vision for Cambourne North which aligns with an EWR station at Cambourne and which will maximise the benefits of this highly sustainable location served by the new station and EWR services. EWR Co agrees that the EWR project will make the town one of the 'best-connected places in the region', providing an opportunity to grow and enhance the town and increase the critical mass of population, employment and services available to the existing and future communities in the area.	
General	**Individuals:**

Summary of issues raised in comments	Comments highlighting this issue
General concerns raised about proposed new settlement: • Sprawl of development across A428 • Increase in crime • Doesn't fit in with plans for neighbouring settlements • How will developers be stopped from building poor quality homes • Build on brownfield sites rather than agricultural land • Prime agricultural land would be lost • Increased noise and light pollution • Development north of A428 previously been refused by Planning Inspectorate due to planning constraints and negative landscape impact • Focus on urban agglomerations and interests of rural South Cambridgeshire subservient • Policy should be strengthened to ensure Cambourne evolves into a cohesive town rather than a series of fragmented developments. • Comprehensive masterplan is essential. • Must prioritise seamless integration to prevent physical and social severance caused by the A428, • Integration with Cambourne impossible due to A428 barrier and EWR	201318 (M Meyer-Kelly), 201426 (E Chavida), 201496 (V Lebedeva), 201502 (C Meads), 201546 (L Payne), 201680 (C Davies), 201771 (I Claydon), 201807 (K Rhodes), 201877 (M Goldberg), 201891 (C Deer), 201953 (R Milns), 202000 (I Claydon),202027 (D Askew), 202161 (H Fordham), 202280 L Meyer), 202322 (P Deer), 202348 (C Farquharson-Robert), 203332 (R Jamieson), 203562 (D Pope), 203605 (R Askham), 203639 (J Tanner), 204236 (G Tanner), 204531 (I Chamberlain), 204656 (N Woods), 204710 (H Rhodes), 204776 (C Drummond), 204782 (I Maddison), 204964 (M Jordan), 205506 (D Brown), 205184 (J Cowdrey), 205189 (L Hanzi),

Summary of issues raised in comments	Comments highlighting this issue
• Reliance on higher density housing and specific requirements for the applicant to address integration issues is viewed as inadequate. • Environmental damage that may result from the development, is suggested to be justified by anticipated economic benefits. • Danger of failing the tests of “scale…appropriate to the location” “protect and enhance local features of green space”, “landscape” and “the necessary infrastructure capacity to support the development” • Plan lacks detail. • Houses aren’t being built close enough to the main part of Cambourne for it to be connected, • Houses will be of poor quality and with no or little gardens and what green space there is supposed to be won’t be looked after properly. • Essential that existing and future growth, and the implications on wider area, are taken into consideration, with any required mitigation identified and planned for from the outset. • Overly vague and the proposed Cambourne North development is excessively large. • Vital information is missing throughout draft plan, hindering consultees' ability to make informed decisions. The plan lacks transparency and has not provided meaningful information to local communities about the proposal's full impact.	205369 (S Keep), 205592 (E & J King), 205594 (I Chamberlain), 204656 (N Woods), 204765 (K Seifert), 205023 (J Cowdrey), 207404 (N Woods), 204795, 208652 (C Drummond), 208703 (J&C Collins), 211212 (C Askham), 211215 (C Askham) **Other organisations:** 202124 (Elsworth PC), 203016 (Cambridge Past, Present and Future), 204226 (Richborough), 204655 (Papworth Everard Parish Council), 204951 (Papworth Everard Parish Council), 204957 (Papworth Everard Parish Council), 205149 (Taylor Wimpey East Anglia), 206106 (Elsworth Parish Council), 207070 (Cambourne Town Council),

Summary of issues raised in comments	Comments highlighting this issue
• Based on scant research with dubious projections around, for example, expected employment figures in Cambridge and the requirement for more housing. • No consideration of development and impact of AI. • Building heights must be tightly controlled and not exceed reasonable heights for a rural setting • Development scope should meet local, not national needs • GCP has not complied with its duty to co-operate (SCI). Has been no engagement with Papworth Everard Parish Council despite being a statutory consultee for planning applications and an important stakeholder that is materially affected by what is proposed by GCP. • Should establish point of contact for local residents during large developments to help address concerns and keep community informed. • Not easy to accept such a significant impact this proposal will have on everyone. • Naming of Cambourne North and Cambourne Forest is seen as inappropriate; suggestions include New Elsworth or Elsworth South. • Should insist on solar panels on all utility buildings to help achieve net zero. • Expansion entering new territories of farmland and countryside which should be left alone. Cambourne getting too big for unnecessary reasons. This settlement needs to be stopped.	207074 (Cambourne Town Council), 208257 (Martin Grant Land Limited), 208500 (Central Bedfordshire Council), 208503 (Central Bedfordshire Council), 208504 (Central Bedfordshire Council), 208505 (Central Bedfordshire Council), 209332 (Cambridge Past, Present and Future), 209979 (Endurance Estates), 209980 (Endurance Estates), 209988 (Endurance Estates), 209989 (Endurance Estates), 209992 (Endurance Estates, 209999 (Endurance Estates), 210004 (Endurance Estates), 210005 (Endurance Estates), 210008 (Endurance Estates), 210020 (Endurance Estates),

Summary of issues raised in comments	Comments highlighting this issue
• Should include environmentally friendly houses with solar panels, heat pumps, and trees along roads, prioritising sustainability and nature. • If the space between the A428 and the railway is wide enough to allow playing fields, the distance between Cambourne South and Cambourne North makes it very difficult to envisage how the communities can be integrated. • Requires stronger policy wording, clearer evidence, and binding commitments on various issues before it can be supported. • Community led stewardship / strategy bodies must include the surrounding villages as equal partners with resources allocated to the village bodies to enable this democratic equality. The new development must be of benefit to all, not just the railway and builders. • For each section of the proposals, complete a 1 to 10 scoring system which summarises the real confidence of the writers of these plans that the promises they speculate on will be: 1 legally committed to by developers and other bodies responsible for this area without any future retraction/renegotiation 2. 100% funded long term after allowing for contingencies/inflation 3. Of genuine benefit to existing residents in the area 4. All will be sustainable and funded for at least 25 years ahead 5. The additional wealth created will be retained for the benefit of the local communities affected in the form of quality schools, doctors, emergency services,	210022 (Endurance Estates), 210025 (Endurance Estates), 210030 (Endurance Estates), 210044 (Endurance Estates), 210058 (Endurance Estates), 210063 (Endurance Estates), 210064 (Endurance Estates), 210066 (Endurance Estates), 210067 (Endurance Estates), 210068 (Endurance Estates), 210830 (Elsworth Parish Council), 210831 (Elsworth Parish Council), 211412 (CALA Group Ltd), 211594 (Places for People), 211721 Cambourne Town Council), 209331 (Cambridge Past, Present and Future)

Summary of issues raised in comments	Comments highlighting this issue
care homes etc as well as the quality Forest. 6.Timescales .Any promise must be qualified with a score. • Rise in crime associated with more people and lack of activities. • Will have massive impacts on surrounding villages, with potential benefits like improved bus services, but also significant adverse effects and inadequate mitigation measures. • Plan addresses well-being and social inclusion, but Cambourne North may face social and behavioural challenges due to its scale and development pace. • Land north of A428 is in Elsworth not Cambourne. • Land to the South of Lower Cambourne presents a viable option for immediate development, requiring less infrastructure and allowing for short to medium-term growth. • Planned development is far too large for the locality and if it does go ahead should be reduced in scale. • Insufficient discussion about the very significant impact of a prolonged construction phase on existing residential communities. • Encourage LPA to provide clear guidance on phasing and infrastructure delivery to ensure timely provision of transport and community facilities.	

Summary of issues raised in comments	Comments highlighting this issue
• Some of our residents, businesses and other bodies, benefits could flow from the location of a station for Cambourne and the creation of a new centre for the town north of the A428. • Concern how North Cambourne will operate as part of a single, coherent town, particularly given physical barrier created by the A428. • Architectural approach for North Cambourne must be sensitive to established character and identity of Cambourne and wider Cambridgeshire context and should inform scale, materials, proportions and public realm. • Overly distinctive or self-contained architectural theme risks creating an isolated development that feels disconnected from the existing town and would be inappropriate for new development. • Should adopt an architectural language that respects local history and townscape, demonstrated through a context-led, human-scale set of Design Codes. • MGL have provided a series of recommendations and suggestions in relation to the policy wording, supporting text and Spatial Framework diagram of Policy S/CBN. • Will contribute to food insecurity. • Endurance object to proposed site allocation boundary. It is too prescriptive at this stage and insufficient work / evidence has been undertaken/provided on key constraints such as landscape and heritage to support such a precise approach. This	

Summary of issues raised in comments	Comments highlighting this issue
is a long-term development that will take place over decades, and greater flexibility is therefore required to enable proposals to respond to more detailed assessment and masterplanning along with changes in circumstances over time. Consistent with policies in the Adopted Local Plans, we feel that the scheme should be design led and that the Concept Spatial Framework is too prescriptive at this early stage in process. • Considered that there is scope to extend development framework further west whilst still maintaining a suitable buffer to Papworth to the north west and without unduly impacting on known constraints or aspirations for Strategic Enhancement Area. This is illustrated through the additional areas shown in orange on the attached Masterplan Spatial Framework Strategy (Drawing Ref: 19-237-SGP-STE-XX-DR-A-011003-P03), which shows potential additional development areas to the west which Endurance consider to be suitable for development as part of the Cambourne North proposals. • Important that masterplanning approach learns lessons from original Cambourne settlement by not making neighbourhoods too separate from one another as this can reduce community cohesion and walkability. • Number or neighbourhood centres, their composition, mix of uses, scale, and timing of their delivery needs very careful consideration to ensure they are vibrant and integrated parts of the new community. This should be evidence driven and determined at the masterplanning stage and secured through appropriate	

Summary of issues raised in comments	Comments highlighting this issue
conditions/legal obligations. This detail should therefore be left to masterplan and planning application stage. • Getting right balance between homes and jobs is essential to creating a mixed and balanced community that its prosperous and has a high degree of self-containment. The town's accessibility by rail and strategic highway network provides an opportunity to be more ambitious in order to achieve the prosperous, thriving community set out within the overall vision. • Whilst there are a number of constraints as identified within the policy, these have been taken into account through the concept masterplanning work to date and it is considered that there is sufficient land within the site to allow for appropriate buffers to the relevant designations and protected features to be delivered. • It is important that flexibility is maintained on the precise boundaries of the development areas to ensure these can be adjusted to reflect more detailed assessment and design work as the design of the scheme progresses. • Endurance support need for various strategies to be developed based on robust evidence to inform overarching approach to land use and to ensure that a mixed, balanced, prosperous and sustainable new settlement is achieved. Accordingly, Endurance support in principle the need for a report covering an Intergenerational Housing Strategy to inform the level of housing typologies to meet the local need.	

Summary of issues raised in comments	Comments highlighting this issue
• Endurance also support in principle the provision of a report covering a Place Activation, Culture and Events Strategy. • Endurance consider there is a degree of overlap between a number of requirements for supporting evidence and that some rationalisation of policy requirements would be beneficial to ensure a more streamlined and legible application submission. • Endurance support provision of mixture of densities within site, with highest focussed around proposed new station and Town Centre. Neighbourhood centres and employment locations whilst being higher in density than most of the site are likely to be at a lower density than the Station Quarter and Town Centre given their less fee central location and function. • Part 14c) Whilst Endurance understand the need to deliver higher density development to make best use of land, this should not compromise the objective of creating a high-quality new community with design that responds to its setting and constraints and a range of house sizes and house types to meet a variety of needs. It is considered that the density range proposed is ambitious, and with a narrow range that is too limited and risks being unduly prescriptive. This could inhibit the place-making aspirations, resulting in a homogeneous development, lacking character and variety, or worse, render development unviable before the development even gets underway.	

Summary of issues raised in comments	Comments highlighting this issue
• Part 16) Endurance agree with general intent and consider that it is important that residential neighbourhoods provide a coherent built form that creates a distinct character for the different neighbourhoods. Whilst aspiration to incorporate complementary employment uses in each neighbourhood is generally supported, it is considered that some flexibility should be built into the policy through addition 'where possible'. This will allow a more flexible and evidence led approach, reflecting needs and the character of each area. • Part 33c) Endurance support and welcome a holistic approach to Cambourne's environmental, economic, social sustainability. Important that balanced approach is taken to prioritising these aspects of sustainability to ensure successful, vibrant economically viable, attractive and sustainable new settlement is created. • Part 45) Endurance are generally supportive of the principles set out and agree with the need to develop a sustainability focussed masterplan. Important that the aspirations are realistic. It should be noted that the policy context may no longer be applicable in light of proposed revisions to the NPPF. • Part 48) Whilst the ambition of achieving a highly sustainable new town is supported, further consideration of the feasibility and viability of the specific requirements is required, particularly as these go far beyond existing legislative and policy requirements. Endurance consider it important that the policy allows for flexibility, particularly in the earlier stages of the development recognising how requirements	

Summary of issues raised in comments	Comments highlighting this issue
and technologies will change over the 30-year implementation period. The requirement for rigid compliance to 'day 1' principles may otherwise impact viability and prevent delivery of the wider scheme. Also considered that there is unnecessary overlap and duplication with point (45) above. • Part 49) Endurance support this approach and consider that a clear phasing strategy that sets out the phased delivery of infrastructure and services alongside the delivery of new housing, commercial and other uses is essential to the successful delivery of the project. It should be recognised that this may need adapting and adjusting over time in response to changes of circumstances given the long-term nature of the development. • Part 51) Endurance support this approach in principle and consider it important to ensuring the long-term successful delivery and ongoing management of the new town, ensuring that its benefits are maximised and will endure for future residents over the long term. • Part 52) Endurance support the preparation of a Meanwhile Strategy in general terms subject to incorporating the proposed report into a more general Economic and Employment Strategy to also include inter alia measures to avoid empty or unused spaces and facilities, and to ensure early provision of amenities and facilities that foster a culture of inclusivity and encourage early community building.	

Summary of issues raised in comments	Comments highlighting this issue
• Part 53) Endurance support this approach and consider that this is essential to the successful delivery of the project. • Will give rise to issues of local governance. While development will take place within the parishes of Elsworth and Knapwell, Cambourne North will presumably fall under the aegis of Cambourne Town Council. What this mean for the continued existence of the parishes thereafter and how will they benefit from, for example, s106 monies also needs to be clarified at the earliest opportunity. Do not only wish to have put in place measures to mitigate the impacts of development. We also want to realise benefits for our communities from them, particularly in relation to improvements in infrastructure such as flood management, bus services, digital connectivity, etc. • Continued engagement by SCDC with our community/ communities is vital. EWR and Cambourne's growth is part of the Oxford to Cambridge corridor national infrastructure project involving stakeholders other than the parishes and the District Council and also the DCO process. Our small community/communities we have no direct interaction and little influence in these and look to the SCDC to represent our interests and therefore we welcome and wish to continue to have dialogue with SCDC. • Whilst this Government is fully committed to the delivery of East West Rail, there are no guarantees that a future government would be as committed. Emerging Local Plan	

Summary of issues raised in comments	Comments highlighting this issue
should focus more growth in Rural/Minor Rural Centres, which are considered sustainable, such as Melbourn. • East West Rail will be complicated to deliver and it is not feasible for Cambourne North to be delivered until such time as the new rail line and station have been completed. Accounting for the substantial uncertainty and major infrastructure required, it is plausible that delivery of the site could slip into the 2040s and the number of dwellings to be delivered as part of this plan period will be very limited. In this regard, the proposed 2,550 dwellings to be delivered in Cambourne North within this plan period is considered to be optimistic. The lack of certainty regarding the delivery of Cambourne North further strengthens arguments for additional small-to medium site allocations. • Inclusivity must be designed into all aspects of development if North Cambourne is to achieve a genuine place-making outcome. Provision should be made for all life stages. Designing inclusivity into developments from the outset is more effective and significantly more cost efficient than attempting to retrospectively add or adapt features once homes and spaces are already built. LPAs must adopt M4(2) standards, and M4(3) for wheel-chair accessible homes and the Plan must clearly address these standards. • The policy must be strengthened to ensure that Cambourne evolves into a cohesive, successful town rather than a fragmented series of developments. The policy should	

Summary of issues raised in comments	Comments highlighting this issue
ensure that Cambourne North is not merely an add-on, but a vital component of a well-integrated, economically vibrant, and self-sustaining town, providing a balance of jobs, services and housing.	
Transport and traffic • Significant number of car journeys generated. • Increased traffic through villages to north to reach A14. • Village roads are inadequate and no proposals for increased capacity. • Impact of new housing at Cambourne North, Bourn and continued development of Northstowe on highway infrastructure around the Swavesey area. • Insufficient consideration of traffic impact on local roads, particularly affecting communities along the A1198, including villages like Longstowe, Arrington, and Kneesworth. • Lack of provision for safe and sustainable alternative transport options along the A1198 corridor. • Little appreciation that for many people use of a vehicle a necessity • There are no cycle paths in villages. • This is the way the village has always been. We do not want to be beside a huge town. This is not what we bought into moving here. The distance of greater	**Individuals:** 200992 (T Roberts), 201325 (M Lester), 201495 (J Brinkman), 203639 (J Tanner), 201411 (Cllr P Sandford), 201452 (C Barnard), 201453 (C. Barnard), 201454 (P Deer), 201486 (E & J King), 201749 (S Barnard), 201680 (C Davies), 201770 (G O'Connell), 201757 (P Safranek), 201759 (N Safranek), 201768 (R Crowther), 201775 (D Meyer), 201786 (J Bennison), 201797 (N Hall), 201807 (K Rhodes), 201911 (W Parker), 201914 (C Deer), 201953 (R Milns),

Summary of issues raised in comments	Comments highlighting this issue
Cambourne is coming far too close and will impact the rural feel and traffic through the village • Development must unlock better walking, cycling and public transport for existing residents • Current road congestion is already severe, and claims of excellent connectivity are unrealistic. • Traffic calming measures is not a viable solution. • Need more details on traffic management. • Should be binding transport mode share targets. • Insufficient evidence that active travel and public transport will reduce car use. • Active travel and improved bus services welcomed, but do not meet all residents' travel needs. • Those requiring access to distant destinations or carrying goods. • Robust assessment of traffic flows through Elsworth and surrounding areas is lacking. • Need faster / easier connection to A14W. • Absence of traffic plan to handle extra traffic. • Need more station parking. • Need diversion road needed for local villages for railway traffic. • Unrealistic to expect new residents to not own cars.	202006 (D Langley), 202027 (D Askew), 202189 (M Stevenson), 202280 (L Meyer), 202901 (J Williams), 202348 (C Farquharson-Robert), 202441 (P Deer), 203208 (S Hughes), 203562 (D Pope), 203572 (A Pope), 203573 (G Pope), 203599 (J Fordham), 203602 (H Passan), 230674 (C Roberts), 203702 (S Wyer), 203834 (N Thornton), 203840 (A Chan), 203896 (R Chamberlain), 203981 (L Richards), 204095 (C Davies), 204100 (N Turton), 204141 (R McClure), 204526 (I Claydon), 204602 (A Watson), 204604 (R Hoadley), 204607 (D Potts), 204656 (N Woods), 204952 (C Gouldsbrough), 207403 (N Woods), 205165 (J Grantham), 205189 (L

Summary of issues raised in comments	Comments highlighting this issue
• Already traffic delays in Elsworth at peak times. • Traffic volume on Brockley Road, Elsworth has increased significantly, causing difficulties for residents turning onto the road, especially during peak hours. • Cambourne crossing two major roads is illogical from an urban planning perspective and creates divided car bound communities further increasing traffic. • Limit car access between Cambourne and Cambourne North. • Should enable improved active and public transport links for current residents, with binding mode share targets, early delivery of the active travel network, and restrictions on car access between Cambourne and Cambourne North. • Cumulative impact of consented and proposed development required. • Public transport proposals are uncertain and unlikely to reduce car use. • Area's sustainable transport options and liveability must be improved. • Urge council to ensure that the "high quality public transport route" provides good coverage at reasonable times. • Local villages should have relief roads before development commences. • Sustainable transport infrastructure needs to be in place early. • Road network needs careful planning. • Reconsider the reliance on private transport for reducing CO2 emissions.	Hanzi), 205307 (C Smith), 205441 (A Williams), 205446 (R De Beaux), 205507 (D Brown), 207382 (C Deer), 207396 (L Skerritt), 207403 (N Woods), 207460 (L Payne), 207466 (A Mitchell), 208609 (Quod), 208642 (S Keep), 208643 (S Keep), 208644 (S Keep), 204264 (J Brown), 202158 (M Shrosbree), 202495 (G Stevenson), 204236 (G Tanner), 204782 (I Maddison), 204817 (J Harris), 202517 (H Brown), 202610 (J Rolfe), 202740 (L Turton), 207422 (N Thornton), 207767 (R McClure), 207768 (R McClure), 208018 (P Crisp), 208708 (J&C Collins), 209350 (D Pope), 209361 (B Skerritt), 209365 (C Roberts), 209456 (C Davies), 211214 (C Askham),

Summary of issues raised in comments	Comments highlighting this issue
• The proposed 'Landbridge' would need to be enormous to be effective and I can't locate it on the plan. • Requirement to 'consider connections to all parts of Cambourne and to surrounding villages' runs counter to the no-coalescence argument • We are concerned that these roads should not become greater rat-runs to the new station and development. Elsworth and Knapwell village roads cannot cope with current levels of traffic. • Policy currently focuses on travel between Cambourne and Cambourne North, neglecting traffic routes through Elsworth and the implications of relocating the rail station. • Lacks sufficient measures to mitigate traffic impacts through the villages, with reliance on traffic calming measures deemed inadequate without more effective solutions. • Connections between North Cambourne and existing areas of Cambourne require detailed review and careful design to prioritise permeability, legibility, and safety for all users • There is little detail on roads which will be used for traffic to and from the railway station and Cambourne centre as well as local traffic. A bypass or similar is necessary for Elsworth. Current roads are totally unsuitable.	**Organisations:** 203076 (Swavesey PC), 203438 (Juniper Propco (Bourn) Limited), 203608 (British Horse Society), 206107 (Elsworth Parish Council), 206108 (Elsworth Parish Council), 206111 (Elsworth Parish Council), 208637 (Swavesey PC), 211078 (National Trust), 207070 (Cambourne Town Council), 207072 (Cambourne Town Council), 207078 (Cambourne Town Council), 207079 (Cambourne Town Council), 207080 (Cambourne Town Council), 208036 (Railfuture East Anglia), 208500 (Central Bedfordshire Council), 208503 (Central Bedfordshire Council), 208504 (Central

Summary of issues raised in comments	Comments highlighting this issue
• Expansion must unlock better walking, cycling and public transport for existing residents • Limit car access between Cambourne and Cambourne North. Set binding mode share targets. • Require early delivery of the main active travel network and crossings • With 13,000 homes and an estimated 1.5–2 cars per household, this equates to around 19,500 additional cars. If just 5% pass through Elsworth, Boxworth or Knapwell, that is approximately 975 extra vehicles. • Assumed that budget of 2,500 trips in peak hours relies on significant investment in sustainable transport, which although proposed, cannot be guaranteed to be the preferred method of travel for future occupiers. • Reservations about assumption as it appears to suggest what the modelling says the network can accommodate, rather than the result any sustainable transport interventions might have. • Further work needed in relation to traffic impacts of combined proposals at Cambourne on local and strategic road network, both within and beyond the Greater Cambridge area. Given proximity of the proposals to Central Bedfordshire, essential that CBC are engaged in process as soon as possible, so we can help to identify the issues arising within our administrative area, understand the implications for our	Bedfordshire Council), 208505 (Central Bedfordshire Council), 209001 (National Highways), 209002 (National Highways), 209003 (National Highways), 209004 (National Highways), 209996 (Endurance Estates), 209997 (Endurance Estates), 209998 (Endurance Estates), 210028 (Endurance Estates), 210028 (Endurance Estates), 210029 (Endurance Estates), 210045 (Endurance Estates), 210046 (Endurance Estates), 210047 (Endurance Estates), 210048 (Endurance Estates), 210049 (Endurance Estates), 210050 (Endurance Estates), 210051 (Endurance Estates), 210052 (Endurance Estates),

Summary of issues raised in comments	Comments highlighting this issue
residents and communities, and help to identify where, and the extent to which, mitigation is required. • There is no clear consideration of the increased traffic through peripheral villages, particularly northern, that this will generate. This will come through its employment zone, cultural zone and as a dormitory town for any industrial sites, particularly those being developed along A14. • Policy S/CBN promotes better connections and sustainable modes of transport to surrounding villages, facilities and open spaces. The National Trust would welcome discussions with the LPA and developers about the opportunity to work in partnership to deliver sustainable transport options between Cambourne/Bourn and Wimpole. • Motorised quick access routes North/South for aged people/ambulances/police/fire etc across or into new development facilities not shown. • Clarification requested on vehicle trip budget referenced in policy in terms of whether this evidence base has already been prepared and is available to review or, if not, confirmation on when it will be produced. • New transport and active travel infrastructure linking Cambourne North with Cambourne, surrounding villages and the wider countryside should be required to function as inclusive, multi-user routes, accommodating pedestrians, cyclists and equestrian.	210053 (Endurance Estates), 210054 (Endurance Estates), 210055 (Endurance Estates), 210056 (Endurance Estates), 210517 (Cambridgeshire County Council), 210811 (Elsworth Parish Council), 210812 (Elsworth Parish Council), 210813 (Elsworth Parish Council), 210814 (Elsworth Parish Council), 211776 (Camcycle)

Summary of issues raised in comments	Comments highlighting this issue
• Concerned that existing and already-committed transport improvements—such as the Cambourne–Cambridge bus service and other measures intended to address current transport pressures—could be delayed or deprioritised as a result of the scale of new development. These commitments must be delivered as planned and not deferred. • Essential that parking strategy is fully future-proofed and grounded in realistic patterns of behaviour rather than idealised assumptions about modal shift. • Parking provision must reflect actual car ownership levels, household composition, servicing and delivery requirements, and transitional period before public transport and active travel networks are fully mature. • Any parking strategy must be supported by a clear, deliverable, and enforceable management framework, aligned with Cambridgeshire County Council parking guidance and regularly reviewed against observed demand rather than projected best-case scenarios. Failure to plan for realistic parking demand from the outset would create long-term pressures on the public realm and undermine the overall success of the development. • The Cambridge to Cambourne busway should be extended to directly serve Cambourne station enabling high quality bus services between Cambourne railway station and existing parts of Cambourne and the proposed Bourn Airfield housing allocation.	

Summary of issues raised in comments	Comments highlighting this issue
• As currently drafted, Cambourne appears likely to bring significant and potentially unacceptable adverse impacts on the safe and efficient operation of Cambourne Junction on the A428. The Transport Evidence Report identifies that there is still significant congestion on the highway network (with DS2 proposed improvements) around the site meaning that the model suggests high levels of trips will still remain within the sector. • National Highways are unable to agree to the proposed approach (managing SRN impacts through an indicative trip budget prior to an outline application) at this stage without the benefit of further modelling work for the proposed development. If a trip budget is to be proposed this needs testing within an operational model, with detailed timings/parameters identified and a monitoring approach agreed to enable NH to confirm whether proposals are deliverable in SRN terms. As identified in Circular 01/22, SRN capacity enhancements need to be identified as part of the plan making process, because this provides the best opportunity to consider the cumulative impacts of development and identify appropriate mechanisms for delivery. • National Highways endorse the Local Plan work on 'Transport Vision and Principles' for Cambourne. We support the report's identified next steps, highlighting that additional work is required to consider achievability of vision assumptions and to ensure a robust evidence base is established to support a site allocation of this	

Summary of issues raised in comments	Comments highlighting this issue
significance; we note that even with an ambitious shift to alternative modes demand still exceeded the trip budget. • The emerging Local Plan text and Figure 78 identify a number of additional active travel crossings over the A428, with mention of potential bus provision in associated documents. We recommend further discussion with National Highways regarding emerging crossing locations / existing bridge improvements to consider feasibility and to ensure suitable commitments and costings are included in the Infrastructure Delivery Plan. It may be practical, demonstrated through further modelling work, to consider the need for additional A428 bridge crossing options for private cars, to remove local trips from Cambourne Junction. • Support proposed approach which seeks to integrate the two halves of settlement and consider this to key design challenge for the scheme. A key aspect to this will be maximising potential crossing points across the A428 and future East West Rail, both in terms of road and pedestrian & cycle routes to ensure effective integration. Character and usability of these links will also be important to promote integration. • Comprehensive Transport and Movement Strategy for town as a whole is required which will integrate both the existing and new community with one another and with the planned improvements to be delivered through East West Rail and the C2C Busway.	

Summary of issues raised in comments	Comments highlighting this issue
• Benefits of addressing existing transport and movement challenges with existing Cambourne community are plentiful but particularly manifest in the consideration and setting of a trip budget where the shifting of existing trips is a lever which North Cambourne can use effectively. • The trip budget needs to be better evidenced through detailed and collaborative further working before specificity can be provided and agreed. Monitor and Manage can be employed effectively to ensure compliance through scheme delivery but this control mechanism should also be used to ensure the scheme's Vision is being met. It is considered that Monitor and Manage is the mechanism to ensure preferable outcomes. • Part 18) Endurance consider that wording and interpretation of policy is unclear and whether it is referring to the approach into the town from Elsworth to the north or into the existing part of the town from Cambourne North. It is also unclear why this route should be a focus over others. Further clarity in the wording of the Policy is requested. • Support need to ensure necessary mitigation from A428 and East West Rail and consider the appropriate location of employment uses of one means of securing this. • Part 34) Endurance broadly support proposed policy approach as currently set out and consider that it establishes appropriate principles for the movement strategy.	

Summary of issues raised in comments	Comments highlighting this issue
Policy wording should be adjusted to specifically reference a Vision-led approach for the transport and movement strategy for Cambourne North. • Part 36) Endurance consider that reference to delivery of landbridge being in the early phases of the development should be removed to provide more flexibility. Further consideration of this requirement is required in terms of how this might work and when it could reasonably be delivered having regard to both placemaking and viability considerations. In any event, it is considered that further flexibility is required as to the nature of this and the timescales for delivery. • Part 37) Endurance support the proposed approach in principle, and consider that it is important that the design encourages walking and cycling and makes appropriate provision for active travel throughout both within the settlement itself and through its connections with the existing community, surrounding villages and providing appropriate access to the countryside. • Part 38) Endurance consider proposed policy approach as currently set out is too prescriptive. Considered policy wording should provide flexibility and have regard to what is necessary and allow for alternative approaches where these would achieve similar outcomes. Final bullet point should include the words ‘endeavour to’, recognising that this requires cooperation from other parties.	

Summary of issues raised in comments	Comments highlighting this issue
• Part 39) Whilst Endurance broadly support the approach the words "…minimise duplicated parking provision" should be deleted such that the focus is on reducing vehicular trips. • Part 40) Endurance consider amendments are required to the detailed wording and requirements to ensure that it is clearer and includes more flexibility. Our proposed wording is set out in the document entitled Cambourne North GCLP Reg 18 Reps Final. • Parts 41 & 42) A new vehicular access should be provided from the new junction between the A428 and the A1198 south west of the site currently under construction and as illustrated on the attached plan. Employment Development Access Off Proposed Northern Dumbbell Roundabout General Arrangement Plan (Drawing Ref 48168-P005-001) utilising land under Endurance Estates' control. New junction could serve employment uses between the A428 and East West Rail whilst also helping to separate and reduce heavy goods traffic from entering via existing Cambourne A428 dumbbell access junction, improving the design, character and amenity of these areas and ensuring they are more welcoming for pedestrians and cyclists on the key gateway into Cambourne and assisting with the integration of Cambourne north with the existing settlement. Provision of this secondary access would provide more flexibility in terms of phasing and construction arrangements as part of the implementation of the scheme as well as improving emergency access to the town.	

Summary of issues raised in comments	Comments highlighting this issue
The following change to the policy wording is proposed: c. Vehicle access from two existing junctions on the A428 (at Cambourne and Caxton Gibbet) and the Broadway overbridge. Possible further access from Ermine Street to support later phases. • Part 42) the following change to the policy wording is proposed in red: 42. All expansion proposals at Cambourne will be subject to a monitored and enforceable peak-hour vehicular trip budget, to be agreed with the Local Highway Authority. The indicative trip budget is approximately 2,500 trips in the AM peak and 2,500 trips in the PM peak. Any refinements to this trip budget based on more detailed evidence must be agreed with the Local Highways Authority prior to submission of the outline application. A monitor and manage approach will be undertaken to ensure that the development remains within the agreed trip budget for the site throughout its delivery, and any variations to this monitor and manage approach would need to be agreed with the Local Highway Authority. • Part 43) Endurance support this approach in principle but subject to the comments regarding need to adopt a vision-led approach and review of the proposed trip budgets outlined. Important to ensure that any proposed mitigation is proportionate to the scale and nature of any impacts. • Part 43) The following change to the policy wording is proposed: 43. To support delivery of the agreed masterplan, a strategic and local transport mitigation plan must be prepared by the developer in consultation with the Local Highways Authority and	

Summary of issues raised in comments	Comments highlighting this issue
Local Planning Authority. This will include (but not be limited to) high-quality mobility services that prioritise modal shift and monitor ongoing performance. Innovative measures to drive higher sustainable mode shares, trip internalisation and reduce vehicular trips will be supported. • May also be beneficial to include commitment within part 43 of Policy S/CBN to adding other relevant stakeholders to what is currently a very short list, of those who the developer must consult with on the Strategic and Local Transport Mitigation Plan. • Considered that Policy S/CBN would benefit from clearly stating that the busway link and EWR are prerequisites and development will not commence/continue until these schemes are place, given the trip budget they state. • Transport evidence carried out to date suggests that development here can be mitigated, subject to the delivery of EWR and C2C with relevant extensions into the site at Cambourne North, along with other site specific highway, public transport and active travel improvements. County Council supports development of a stringent trip budget for the new settlement. This mitigation package is not inconsiderable. The County Council would like to continue working on a detailed transport and mitigation strategy for Cambourne. • Camcycle consider cambourne is a way of catering for the growth envisaged by the plan, but only if the Local Plan is honest about the scale of the challenge and willing	

Summary of issues raised in comments	Comments highlighting this issue
to embed enforceable requirements that make sustainable travel the default rather than an assumption.	
East West Rail (EWR) • Development is to justify the EWR rail line. • EWR not produced costed feasibility forecast or business plan. • East West Rail should be completely cancelled or at least postponed until a full business case is made for it which can be publicly scrutinised and challenged • Outrageously expensive white elephant that does not justify a station at Cambourne at all. • Without station there is no reason for development area almost linking Cambourne with Elsworth and Knapwell. • Should be focus on impact of traffic on villages related to the EWR station. • Site is appropriate for new development provided EWR proceeds. • Reliance on EWR for transport capacity is questionable, as evidence suggests only a small percentage of residents will use it for commuting, leading to increased road usage. • Idea EW will support 13,000 more Cambourne households is crazy.	**Individuals** 200987 (R Howard), 201286 (M Jordan), 202348 (C Farquharson-Robert), 203562 (D Pope), 205368 (J Daffarn), 203939 (A Parfitt), 204486 (D Brown), 204696 (D Sampson), 204765 (K Seifert), 205307 (C Smith), 205590 (C Meads), 207345 (K Rhodes), 207382 (C Deer), 208639 (S Keep) **Organisations** 202004 (Haslingfield PC), 203438 (Juniper Propco (Bourn) Limited), 203628 (Cambridge Approaches), 204226 (Richborough), 206107 (Elsworth Parish Council), 207078

Summary of issues raised in comments	Comments highlighting this issue
• Will lose huge amounts of money. The wrong route. Longer than needed and very expensive. The tunnel will be a disaster. • Railway line should take the original rail route as the infrastructure is mostly already there. • Station should be in South Cambourne, away from the A428. • There's an old disused railway that could be reintroduced at a fraction of the cost. • Long-distance guided bus and freightway would be more cost effective. • Contradiction between the environmental aspirations in the Plan and the carbon footprint of constructing EWR and the concreting over of a substantial area of green fields. • Funding for the railway station should not come from Section 106 monies from house builders. • Greater clarity should be provided about the provision of East West Rail and the Cambourne to Cambridge bus link. • the County Council's Transport Evidence Report shows only 1% of trips from extended Cambourne would go to Cambridge Biomedical Campus, contradicting EWR's justification for the route. • EWR would contribute minimally to Cambridge's economic growth. • Development of 13,500 houses appears viable without EWR.	(Cambourne Town Council), 208036 (Railfuture East Anglia), 208938 (Cambridge Growth Company), 209000 (National Highways), 209981 (Endurance Estates), 209982 (Endurance Estates), 209983 (Endurance Estates), 210015 (Endurance Estates), 210016 (Endurance Estates), 210017 (Endurance Estates), 210031 (Endurance Estates),

Summary of issues raised in comments	Comments highlighting this issue
• Insufficient justification for linking the housing development to the railway project, potentially wasting public funds through lack of accountability between planning authorities and EWR Company. • Completion of East-West Rail Stage 3, crucial for Cambourne North, is unlikely before the late 2030s, impacting deliverability of land to the north of Cambourne. • Proposed railway station is likely to attract additional vehicular traffic from neighbouring towns and villages seeking park-and-ride or informal commuter parking. Without adequate and well-planned provision, there is a significant risk of overspill parking impacting residential streets, local centres, and surrounding neighbourhoods. • Support significant housing growth around new station, but this development must be dense enough to ensure the railway can serve it effectively. • CGC recommends that consideration is given to building in flexibility for a greater level of employment ambition at Cambourne West and North linked to the provision of an EWR station. It could be clearer how the Local Plan draws from this evidence to set the vision for the role of the employment land in terms of the sectors catered for and on the amount of development that would optimise employment growth. The additional scale of growth is supported by the Council's evidence base and East West Rail. • National Highways are engaged in ongoing discussions with East West Rail (EWR) regarding the delivery of a new railway station at Cambourne, north of the A428.	

Summary of issues raised in comments	Comments highlighting this issue
Highway improvements needed to facilitate the station and associated track are currently being considered, and implications for futureproofing are being reviewed with the need for further meetings to discuss cumulative impacts. • Support East West Rail and C2C infrastructure schemes and consider that these provide a huge opportunity to create a truly sustainable new settlement subject to their future integration with North Cambourne development. • Considered important that EE, MGL and GCSP continue to engage with East West Rail to ensure that design ambitions for project are appropriately taken into account in design of the EWR alignment, station, and associated infrastructure. • EWR should be encouraged to design with new town in mind. • Support the new station interchange becoming focal point for new town. East West Rail's proposal to move the station towards the A428 roundabout is welcomed and ambition supported, ensuring that it is more central within the town and thus more accessible to both new and existing residents. • Fits with Government objectives of focussing development around train stations and using these as drivers of sustainable development. • Creating a hub around new station will ensure that a high-density mixed-use development can be delivered around station, providing a range of services and facilities in the most sustainable and accessible location, whilst also ensuring through	

Summary of issues raised in comments	Comments highlighting this issue
improved connectivity the scheme is properly integrated with the existing community at Cambourne. • Unclear why Part 11 (e) of policy is necessary. Since major infrastructure (EWR, C2C and A428 enhancements) are to be delivered by others and schemes will likely be implemented, approved and or advanced prior to submission of an application for Cambourne North, this is a difficult requirement to meet. • important to recognise that delivery of new station will be carried out by East West Rail rather than site promoters and it is therefore important that the Local Plan policy should recognise this and incorporate flexibility given that design is progressed by the East West Rail Co. and will be consented via the DCO process.	
EWR Co has reviewed the proposed Cambourne station location and updated its design proposals to move the station 700m west to a location north-east of the A428/Cambourne Road double roundabout. The updated station is expected to enable a greater degree of growth, be more consistent with adopted Local Plan (avoiding constructing on Local Green space), have lower environmental impact (further away from Knapwell Wood), be preferred by communities and stakeholders. EWR Co is in the process of identifying how the new entrance would integrate with the wider masterplan area and how it will interface with existing and new local transport services, and walking and cycling routes, including the proposed extension to the Chisholm Trail.	211882, 211893, 211894 (East West Rail)

Summary of issues raised in comments	Comments highlighting this issue
Land within the S/CBN allocation site identified as being required for the delivery of EWR, and includes land needed for the new railway, Cambourne station, and associated development. This land is included in the EWR safeguarded area. EWR Co supports the principle of criterion 12, but requests the following minor amendments for clarity and to ensure the proposals do not conflict with the Safeguarding Directions. EWR Co agrees that seamlessly integrating Cambourne with the new railway station to the north of the A428 and the EWR route will be critical. To this end, it supports criteria 50-54 of draft Policy S/CB, which sets out that Cambourne and Cambourne North (draft S/CBN) will be planned. In order to integrate the new station with Cambourne, EWR Co is proposing a new footbridge over the A428 to the north of Cambourne Sports Centre. The land required to deliver this new crossing within the S/CB allocation site. This land is included in the EWR safeguarded area. To avoid any potential for conflict between development within the proposed allocation site and the EWR Safeguarding Directions, EWR Co requests additions to draft Policy S/CB.	
Coalescence • Need green belt around Cambourne North to better protect the villages against coalescence.	**Individuals** 201807 (K Rhodes), 201907 (C Deer), 201909 (C Deer), 201914 (C Deer), 201307 (J Turner), 201763

Summary of issues raised in comments	Comments highlighting this issue
• Opposed to destruction green belt land at Cambourne North. • Proposal impinges on neighbouring villages. • Too close to Knapwell. • Would ultimately join with Scotland Farm and Hardwick. • Development boundaries should be fixed to ensure no creep resulting in reduced space between Cambourne North and neighbouring settlements. • Proposal too close to existing settlements and would compromise character of conservation areas and listed buildings. • Parish boundaries must remain intact. • Loss of identity of villages. • Should be a minimum 1km buffer around existing villages, managed by parish council or woodland trust. • Landscape buffer should preserve the open aspect around Elsworth, not act like a fence. • Concern about long term stewardship of landscape buffer and forest. • Houses will be 400 metres from Elsworth and will not prevent coalescence. • Should be a more even distribution of housing. • Cambourne will be isolated due to the railway and A428 with no connections to the existing centre.	(A. Irvine), 201953 (R Milns), 202441 (P Deer), 203702 (S Wyer), 200992 (T Roberts), 200993 (T Roberts), 201470 (C Blencowe), 202347 (P Deer), 202354 (Boyd), 202610 (J Rolfe), 203599 (J Fordham), 203641 (B Skerritt), 203896 (R Chamberlain), 203981 (L Richards), 204095 (C Davies), 204572 (A Watson), 204656 (N Woods), 204765 (K Seifert), 204952 (C Gouldsbrough), 204817 (J Harris), 205189 (L Hanzi), 207176 (W Parker), 207399 (N Woods), 207382 (C Deer), 207539 (D Wood), 207422 (N Thornton), 207526 (P Deer), 208638 (S Keep), 208707 (J&C Collins), 210884 (R McClure)

Summary of issues raised in comments	Comments highlighting this issue
• The evidence base does not demonstrate that the full extent of the non-developable area is necessary, proportionate, or the most effective means of achieving settlement separation. • The strategic enhancement area covers land not in the control of the Authorities or land promoter and so brings into serious question the environmental enhancement promoted by the policy and the soundness and effectiveness of the Cambourne North allocation. • Imposition of extensive designations across land owned and controlled by Varrier-Jones Foundation, without any engagement with the landowner, is unduly restrictive and risks prejudicing the ability of the emerging Local Plan to respond flexibly to future development needs. • Scale and large extent of draft strategic enhancement area allocation is disproportionate and covers land that could sustainably accommodate future development without compromising the separation of Papworth Everard and Cambourne North. • Object to Strategic Enhancement Area which extends over a significant portion of the • C/CBN. It would inhibit any future complimentary development potential offered by the Site Ref. 48096.	**Organisations** 202124 (Elsworth PC), 202127 (Elsworth PC), 202133 (Elsworth PC), 203385 (The Varrier Jones Foundation), 207024 (Mac Mic Land),

Summary of issues raised in comments	Comments highlighting this issue
Environment • Placing adventure playground in new 'forest' area is perceived as a desperate measure to mitigate impact on more sensitive environments. • Green belt destroyed, protected species homeless. • Early proposals referenced a “forest” as a natural buffer. More recent plans fail to reflect commitment and offer no satisfactory or meaningful boundary. Critically important to shield the village from new development, prevent visual intrusion, and preserve its rural setting. • Expansion threatens to erode countryside and green spaces and related mental health and wellbeing benefits, diminishing opportunities for children to enjoy nature and for communities to maintain balance and wellbeing. • Insufficient consideration of environmental impacts and weak defence of removing important arable land which will be increasingly important in a changing climate. • Hope Farm should be preserved in its entirety due to its successful nature-friendly farming practices and positive impact on local wildlife. • 'Forest' is a misnomer. It's just a few trees. • Trees planting must start before any building.	201411 (Cllr P Sandford), 201807 (K Rhodes), 202000 (I Claydon), 202027 (D Askew), 202280 (L Meyer), 202348 (C Farquharson-Robert), 202354 (D Boyd, 202441 (P Deer), 202610 (J Rolfe), 203599 (J Fordham), 203602 (H Passan), 203702 (S Wyer), 204236 (G Tanner), 204526 (I Claydon), 204611 (A Watson), 204614 (A Watson), 204656 (N Woods), 204710 (H Rhodes), 204730 (A Watson), 204817 (J Harris), 204964 (M Jordan), 205307 (C Smith), 205505 (D Brown), 205591 (E & J King), 205672 (M Meyer-Kelly), 205674 (S Barnard), 207405 (N Woods), 207422 (N Thornton), 208647 (S Keep), 208648 (S Keep),

Summary of issues raised in comments	Comments highlighting this issue
• Tree planting for Cambourne Forest needs ongoing professional care, unlike all the dead sticks along the A14. • Countryside to the North of the A428 will be destroyed and the integrity of historic villages threatened. Ancient woodland and sites of historical importance will be compromised. • Impacts on local SSSIs and County wildlife sites, given length of time it will take to establish a Cambourne 'forest'. • Proposed Cambourne Forest is too narrow to effectively prevent coalescence; increasing its depth is recommended. • Visitor access and parking for the proposed forest should be carefully planned to avoid negative impacts on local villages. • Green/forest zones for Cambourne expansion are excessive and should be restricted to allow continued productive arable farming. Infrastructural details are scant and offer no mitigation for expected increase in traffic through Elsworth for rail travel. Elsworth already has intermittent flooding and proposals to improve drainage in the village and downstream to Fenstanton, Swavesey etc are required to cope with rapid runoff from housing developments. • There is no landscape buffer in the south east corner.	202801 (P Gladders), 210991 (C Newell), **Organisations:** 201542 (RSPB), 211078 (National Trust), 206112 (Elsworth Parish Council), 207610 (Natural England), 207611 (Natural England), 209332 (Cambridge Past, Present and Future),

Summary of issues raised in comments	Comments highlighting this issue
• Loss of 100+ trees (aged 40 to 100) along St Neots Road unacceptable and will increase noise and sound pollution for some residential neighbourhoods in Cambourne. • Significant concerns regarding proximity to RSPB Hope Farm, which is within the Strategic Enhancement Area. • Should be contractual commitment for developers to plant woodland before construction, in collaboration with local authorities to ensure successful management. • The National Trust strongly supports the provision of on-site SANGs and new woodland. In accordance with guidance from Natural England, SANGs must be developed and available for use prior to the occupation of the new dwellings which they are intended to serve. The provision of new recreational space and woodland would help ease pressure on these sites and their designated features. However, it is not clear where the woodland would be located or how it would be delivered. This needs to be made clear in the proposed Submission Plan. • Forest should be managed/owned by independent professionals from day 1 to be of any value • To deal with environmental issues such as light pollution we want to see measures such as warm light, low spill light fittings being mandated. • Noise, light and visual pollution.	

Summary of issues raised in comments	Comments highlighting this issue
• Note policy specifies that development must ensure ancient woodlands and SSSIs are kept free from public access and that measures that minimise ecological pressures from domestic animals must be identified and delivered. Whilst we agree with this in principle, have questions about how these points will be achieved in practice. There should be a requirement to monitor effectiveness of measures put in place and a commitment to implementing alternative solutions if initial measures are ineffective. • Support detailed consideration given to incorporating dark corridors into new settlement. This will be especially important for avoiding and mitigating potential impacts to bats associated with Eversden and Wimpole Woods SAC but will equally be of benefit to many other species. • The term ‘SANG’ has a specific definition and set of criteria associated with it and the authority should carefully consider whether to use very prescriptive term, or whether alternative GI phrases should be used for a more bespoke approach e.g., 'SANG-like'. • Cambourne GBI Framework currently proposes 60ha of semi-natural greenspace, but to meet 3ha/1000, 93.6ha would be required. • To meet the official SANG standard of 8ha/1000, 249.6ha semi-natural greenspace would be required. We advise that 3ha/1000 greenspace which meets the Natural England GI Framework Standards criteria should be an absolute minimum,	

Summary of issues raised in comments	Comments highlighting this issue
particularly where mitigation for recreational pressure is needed, and that more should ideally be required. • Support for significant new greenspace and habitat, with consultation with RSPB Hope Farm to achieve nature conservation objectives, and recognition of impacts on Barbastelle bats and ancient woodlands.	
Habitats • Development threatens protected habitats, local character, and ecology and local wildlife. • Should be a detailed acknowledgement of what will be lost with a measured assessment of the inevitable damage • Imperative that the site is developed to enhance biodiversity. • Area is home to protected species, including multiple varieties of bats, turtle doves, barn owls, foxes, badgers, hares and tawny owls • Species rely on undisturbed countryside for survival, and their displacement would represent an irreversible loss to local biodiversity. Such environmental damage contradicts commitments to conservation and sustainable development. • Will not achieve the plan's biodiversity ambitions	201807 (K Rhodes), 203639 (J Tanner), 207176 (W Parker), 201452 (C Barnard), 204095 (C Davies), 204584 (A Watson), 205645 (C Deer), 205674 (S Barnard), 207468 (D Meyer), 208640 (S Keep), 208703 (J&C Collins), 208705 (J&C Collins), 209349 (D Pope), 211213 (C Askham) **Other organisations:**

Summary of issues raised in comments	Comments highlighting this issue
• Mature native plants should be used for forest planting, it should occur before building works to ensure proper growth. • Need to ensure policy supports long-term viability of Hope Farm, which has demonstrated significant increases in biodiversity. • Provision must be made for addressing the ecological impact, both in the construction phase and longer term, through early evaluation and ongoing management and taking remedial action such as the creation of alternative wildlife habitats. • Concerns currently remain about how impacts to these sites will be avoided. • Part 33 of this policy is supported, although we advise that ecological survey and monitoring should also be added as a requirement for specific sensitive locations outside of the site's red line boundary that may be impacted by development. This would help to inform the requirements of part 22, and the suggestions mentioned above relating to this. • Endurance support approach in principle. This will require careful consideration through further assessment work and masterplanning. Extent and scale, delivery and management of the Cambourne Forest requires further consideration and clarification. This must be considered in the context of the wider package of greenspace, biodiversity and infrastructure enhancements. Expectations need to be realistic, and the Councils must also recognise that as woodland does not positively contribute to BNG calculations, some trade-offs may be required.	201542 (RSPB), 202987 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 202990 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 207086 (Elsworth PC), 206112 (Elsworth Parish Council), 207609 (Natural England), 207612 (Natural England), 210043 (Endurance Estates), 210555 (Cambridgeshire County Council), 210556 (Cambridgeshire County Council), 210557 (Cambridgeshire County Council),

Summary of issues raised in comments	Comments highlighting this issue
• Concerned that location and scale of the allocation site and adjacent to Cambourne North SEA have potential to adversely impact irreplaceable habitat (ancient woodland) and protected sites (including Special Area of Conservation). Do not believe this potential impact on biodiversity has been adequately considered. The allocation does not comply with the NPPFs notion of 'sustainable development' and there will be significant conflict with draft BG/BG. It also appears to be wholly at odds with the two Council's draft biodiversity strategies and their support of the LNRS. Urge that the current form of the site allocation is reviewed, including more detailed rigorous ecological investigations, reworked and potentially removed / relocated / scaled back to avoid significant impacts to biodiversity and avoid blocking the delivery of the LNRS. • Site may support functionally linked land for barbastelle bat population of Eversden and Wimpole Woods Special Area of Conservation (SAC). Surprised not to see baseline study of bat usage in the landscape to inform the site allocation process, or a draft Habitats Regulations Assessment. Currently, there is not sufficient publicly available information to ascertain the usage of this landscape by bats and therefore, we recommend a more detailed assessment, potentially including detailed bat survey work, is complete to determine whether the proposed site allocation for Cambourne North is appropriate, in the correct location or of the correct type / scale.	

Summary of issues raised in comments	Comments highlighting this issue
• Areas where natural and ecological considerations necessary for development of a sustainable new town will be extremely challenging, including loss of functional foraging habitat of Barbastelle bats and avoiding impacts on ancient woodlands. • Will not be possible to avoid or mitigate on site all impacts on the ancient woodlands. • Policy correctly acknowledges potential for adverse impacts on land used for foraging by Barbastelle Bats and is functionally linked to the internationally important maternity roost at Wimpole. Policy does not provide connectivity from Elsworth Wood and Knapwell Wood ancient woodlands to the south and south-west towards Wimpole. This is a major failing. • Providing proper landscape connectivity for Barbastelle bats will require strategic green infrastructure corridors across the A428 and East West Rail (EWR), including potentially a green bridge “dark corridor”. Even with these it will not be possible to include complete dark corridors particularly across the A428. • Inclusion of buffer zones and strategic green infrastructure network will provide some mitigation for impacts on the ancient woodlands within Cambourne North, but not sufficient to avoid recreational impacts on the woodlands, which may be significant. • Policy and supporting text should acknowledge it will not be possible or will be highly challenging to avoid or mitigate impacts on-site and there is high likelihood that compensatory measures will be required to address impacts on the ancient woods and Barbastelle bat population.	

Summary of issues raised in comments	Comments highlighting this issue
• The LNRS Local Habitat Map, shows approximately half of the Cambourne North & adjacent SEA being allocated for habitat creation, primarily woodland. Strongly recommend these areas are excluded from the allocation site – if they continue to be included, then we would suggest they are allocated as woodland creation within the SEA, but it would be essential that woodland creation is secured in advance of urban development. Suggest to further minimise impact to biodiversity, that the allocation site if focused immediately adjacent to existing urbanised areas (e.g. A428, Cambourne and potential railway station), rather than sprawling into the rural countryside.	
Landscape • Loss of agricultural land • National need for self-sufficiency means it is madness to lose this area. • Valley south of Elsworth should be protected. ○ Planning Inspectorate rejected development on site due to: Elevated location contributing to its visibility from surrounding roads and villages, making any development highly noticeable. Despite potential mitigation measures like open space and landscaping, the proposed development would significantly adversely impact the rural landscape.	203939 (A Parfitt), 205368 (J Daffarn), 200987 (R Howard), 201770 (G O'Connell), 201771 (I Claydon), 201773 (I Claydon), 202441 (P Deer), 203509 (L Greenwood-Davies), 203519 (A Martins), 203543 (L Greenwood), 203602 (H Passan), 203605 (R Askham), 203702 (S Wyer), 204526 (I Claydon), 207470 (D Meyer),

Summary of issues raised in comments	Comments highlighting this issue
• The Inspectorate concluded that the negative landscape impact of the proposal outweighs other considerations, including the possibility of establishing a Park and Ride site. • New forest should be planted before development, including EWR. • New 'forest' tiny compared to housing, should be more gain for nature like original Cambourne. • The topography shows that the Cambourne is 260 feet or so higher than Elsworth so any building will tower over the village. • Area contains historical sites, including mounds, an abandoned village, and ancient woodland, which may be adversely affected by the development. • Given extent of proposed development we struggle to see how there will be any space left for arable fields. • Endurance support need for strong and robust landscape framework to be incorporated into proposed masterplan for scheme. However, it is considered that the extent and approach to the SEA needs further consideration to ensure the approach is supported by robust evidence and is deliverable. It is also important that detailed extent of development area is informed by the landscape framework to ensure a robust and integrated approach. Flexibility should be provided within the policy to enable departures from the indicative development envelope to enable this.	208019 (P Crisp), 208704 (J&C Collins), 208705 (J&C Collins), 208706 (J&C Collins), 209349 (D Pope), 209354 (A Pope), 209359 (B Skerritt), 209363 (B Skerritt), 209455 (C Davies), 210456 (P Deer), 210844 (R McClure), 210991 (C Newell), **Other organisations** 201542 (RSPB), 206110 (Elsworth Parish Council), 210009 (Endurance Estates), 210010 (Endurance Estates), 210011 (Endurance Estates), 210012 (Endurance Estates), 210013 (Endurance Estates), 210033 (Endurance Estates), 210034 (Endurance Estates), 210035 (Endurance Estates), 210036 (Endurance

Summary of issues raised in comments	Comments highlighting this issue
• Policy requirements and context for S/SEA/CBN Cambourne North Strategic Enhancement Area seem unclear and it is considered that a specific policy / policy section should be set out for this rather than just being shown on the Policies Map and referenced within the Cambourne North policy. • Masterplanning process should secure objectives of Strategic Enhancement Area, allowing RSPB to manage Hope Farm effectively and continue monitoring nature. • Green Infrastructure should buffer Hope Farm to reduce disturbance impacts and support local wildlife, while recreational access should be limited to existing public footpaths. • Land-use and management in the surrounding SEA should complement wildlife populations on Hope Farm, with appropriate habitat creation. • Access restrictions and provision of SANGS are welcomed to protect ancient woodlands, but effective design measures must be ensured. • The land to the north, where the majority of the forest is planned (noting that this would be a mixture of different landscape typologies and not just planted trees), falls away from the ridge that the A428 is on. Therefore, planting in this buffer can only offer a limited visual buffer to the village to the north. However, Papworth has limited intervisibility with much of the site and there is scope to reduce the buffer here and increase the development envelope subject to detailed landscape assessment – due to the undulating nature of the land.	Estates), 210037 (Endurance Estates), 210038 (Endurance Estates), 210039 (Endurance Estates), 210040 (Endurance Estates), 210041 (Endurance Estates), 210042 (Endurance Estates), 210195 (Anglian Water), 210815 (Elsworth Parish Council), 210829 (Elsworth Parish Council), 211078 (National Trust),

Summary of issues raised in comments	Comments highlighting this issue
• Endurance considers there is no reason to include a buffer at western edge of proposed settlement between the A428 junction land at the East Rail Route. It is considered that this land should be incorporated into the scheme, providing additional employment land a further point of access directly onto the new A428 junction. Our suggested approach is illustrated further on drawing Masterplan Spatial Framework Strategy (Drawing Ref: 19-237-SGP-STE-XX-DR-A-011003-P03) which shows potential additional development areas to the west which Endurance consider to be suitable for development as part of the Cambourne North proposals. • Part 22) Constraints identified within the policy have been taken into account through concept masterplanning work to date and it is considered that there is sufficient land within the site to allow for appropriate buffers to the relevant designations and protected features to be delivered. Important that flexibility is maintained on the precise boundaries of the development areas and buffer zones to ensure these can be adjusted to reflect more detailed assessment and design work as the design of the scheme progresses. • Endurance support principle of creating dark corridors within development. Extent and nature of these will require careful consideration through further assessment work and masterplanning.	

Summary of issues raised in comments	Comments highlighting this issue
• Support principle of providing appropriate buffers to woodlands and watercourses within development. Extent and nature of these will require careful consideration through further assessment work and masterplanning. • Endurance support principle of retaining existing trees, hedges and water features within development wherever possible. Extent and nature of these will require careful consideration through further assessment work and masterplanning. • Parts 30, 31, 32 33a) Endurance support this approach in principle. This will require careful consideration through further assessment work and masterplanning. • Anglian Water supports landscape-led design to deliver ecological enhancement, and multi-functional green and blue infrastructure, which will contribute towards integrated water management and mitigating flood risk. • Support requirements within clause 19 under the Resources section of the policy regarding sustainable water management. Whilst the quantum of growth is lower than Cambourne North, we question why the approach in the Resources section, is not aligned with Policy S/CBN which includes the preparation of a Climate and Sustainability Innovation Delivery Plan and a Foul Drainage Strategy. • Want geographical ‘separation’ between the villages and Cambourne North. Hope that this could be achieved through the planning process (with red lines on development, provisions in planning consents that are enforced, section 106	

Summary of issues raised in comments	Comments highlighting this issue
agreements, etc.) and by physical means such as screening with tree planting and the preservation of existing SSIs. • Not clear where the woodland would be located or how it would be delivered. This needs to be made clear in the proposed Submission Plan.	
Heritage • Endurance agree that a proportionate and phased amount of desk based, and field evaluation will be required to determine impact on both known and unknown heritage assets. Whilst extensive archaeological features were identified during the survey work before the Caxton Gibbet to Black Cat extension works began, these did not impact upon the layout and route significantly. • Welcome preparation of Strategic Cambourne HIA and site specific HIA. However, not all the recommendations for the HIA have been fully reflected in the draft policy wording. Please check and ensure that these are included. • Broadly welcome criterion 11 but recommend some re-ordering of bullet points. In particular, Historic Landscape Characterisation and Archaeological assessment need to be undertaken first to inform the preparation of the comprehensive landscape strategy. Therefore, we would recommend that you move criterion 11c to 11a.	210014 (Endurance Estates), 210138 Historic England)

Summary of issues raised in comments	Comments highlighting this issue
• In 11 c we would suggest referring to a '…more detailed Heritage Impact Assessment…' given that an HIA has already been undertaken. We recommend the wording could be amended to read: Historic Landscape Characterisation and Landscape Character Assessment, more detailed Heritage Impact Assessment, and Archaeological Assessment must be undertaken to understand the impacts of development on landscape character, long range and local views and heritage assets and their setting, identifying appropriate mitigation and enhancement measures. The Council's HIA and the results of these further assessments must inform the masterplanning for the site. • In 11c i recommend inserting following '…that respond to topography, historic landscape characterisation and archaeological constraints. • In 11 c iii recommend the policy could allow for the conversion/restoration of the farmhouse and barns and finding a suitable use together with a conservation management plan for the assets going forward. Criterion should also state that development should be excluded from a buffer area immediately surrounding these assets as shown in the framework plan. • 11d Recommend further discussions concerning the timing of desk based archaeological assessment. • Areas of known archaeological sensitivity should be highlighted in the policy and shown on figure 78.	

Summary of issues raised in comments	Comments highlighting this issue
• Welcome criterion 15. • Figure 78 should show heritage buffer identified in HIA around New Inn Farmhouse and Barns and the areas identified for strengthened landscaping in the HIA. • Figure 78 – concerned that the eastern most area shown as a Local Centre might be in the area of archaeological sensitivity. • Figure 78 should show the areas of archaeological sensitivity identified in the HIA. • Figure 78 concerned at the proposed location of employment development in close proximity to the listed New Inn farmhouse. The likely scale of the employment development may not provide a suitable setting for the listed buildings. • Supporting text is light on heritage (for example in comparison to the natural environment.). Suggest that the imbalance should be addressed. • Paragraph 3.3.25 The phrase 'to the south is potentially ambiguous – it could mean to the south of Childerley Hall whereas we think you mean within the southern portion of the site.	
Infrastructure • Development would overwhelm existing infrastructure.	201026 (F Panrucker), 201410 (M Eidevik-Skinner), 201680 (C Davies), 201953 (R Milns), 202027 (D Askew), 203639 (J Tanner),

Summary of issues raised in comments	Comments highlighting this issue
• Must accommodate all resulting needs within the proposed allocation, so that there are not detrimental, or cumulative impacts on services, facilities and infrastructure outside Greater Cambridge area. • Will there be sufficient water supply? • Services and access to them need to be provided at the same time as houses. • Will require safe, high-quality education provision. • Cambridgeshire schools rank poorly in funding per pupil - why add to this burden? • Insufficient water supplies. • Infrastructure should be delivered first. • Culture, performance and leisure facilities must be built before the houses. • New housing should not be considered until schools and early years provision is expanded. • Infrastructure will not enhance quality of life. • Local NHS hospitals and GP surgeries are already under significant pressure. They do not have the capacity to absorb the needs of residents from 13,000 new dwellings. • Build out speed crucial to delivery of services and facilities. • Plan silent on how CIL/S 106 might benefit parishes around Cambourne North. • Uncertainties on delivery of new infrastructure. • Services in Cambourne are insufficient, suggesting new area will face similar issues.	202280 (L Meyer), 202354 (D Boyd), 203602 (H Passan), 203674 (C Roberts), 203702 (S Wyer), 203939 (A Parfitt), 204236 (G Tanner), 204588 (A Watson), 204591 (A Watson), 204598 (A Watson), 204656 (N Woods), 204776 (C Drummond), 205184 (J Cowdrey), 205593 (E & J King), 205645 (C Deer), 207400 (N Woods), 207397 (L Skerritt), 207467 (D Meyer), 207539 (D Wood), 207770 (R McClure), 208020 (P Crisp), 208641 (S Keep), 208709 (J&C Crisp), 208710 (J&C Collins), 208711 (J&C Crisp), 208712 (J&C Crisp), 209358 (J Fordham), 209360 (B Skerritt), 209362 (B Skerritt), 209365 (C Roberts), 210454 (P Deer), 211211 (C Askham)

Summary of issues raised in comments	Comments highlighting this issue
• Infrastructure of areas like Elsworth and Knapwell cannot cope with the proposal. • Live performance hub should be assessed with local residents to address potential negative impacts. • Lack of clarity on community governance and how developer contributions will be allocated among affected parishes, raising concerns about the impact on Elsworth. • Should provide detail on investment to safeguard and provide facilities within villages. • Cambourne and Northstowe are cultural deserts. Expect N Cambourne to be the same. • Presents significant opportunity to enhance public rights of way network but this is not clearly reflected in the policy requirements. Existing public rights of way should be safeguarded and fully integrated into the masterplan. • Explicit policy support is needed to ensure connectivity, health and wellbeing benefits, and alignment with green infrastructure inclusive objectives. • Add doctors and dentists surgeries to plan from outset. Potentially even a local out of hours surgery, which would also serve surrounding villages. • Significant increase in population brings increased risk of crime, yet there is no robust infrastructure proposed to mitigate this. Expanding housing on this scale without parallel investment in safety and enforcement risks undermining the security and cohesion of an established, close-knit rural community.	**Other organisations** 207086 (Elsworth PC), 203608 (British Horse Society), “06109 (Elsworth Parish Council), 207071 (Cambourne Town Council), 207478 (Cambridgeshire Constabulary), 209224 (Sport England), 209982 (Endurance Estates), 209984 (Endurance Estates), 209985 (Endurance Estates), 209986 (Endurance Estates), 209987 (Endurance Estates), 210007 (Endurance Estates), 210017 (Endurance Estates), 210018 (Endurance Estates), 210019 (Endurance Estates), 210032 (Endurance Estates), 210061 (Endurance Estates),

Summary of issues raised in comments	Comments highlighting this issue
• Concerned by references to a “new” town centre for North Cambourne and reference to the existing High street to be a secondary High street. • Cambourne does not yet have a fully realised town centre, and there is a clear risk that proposals for an additional centre could undermine or delay delivery of the existing town centre strategy. • Under the subheading ‘Uses’ Section 9 – add a new criterion e. as follows; “e. Contributions to fire & rescue, police and ambulance facilities provision/ funding”. • Proposed development will put further pressure on an already stretched local NHS workforce. Many NHS employees at our local hospitals live in local area and therefore the increased stresses and pressures that they are put under could have a negative impact on their personal wellbeing which seems at odds to your wellbeing strategic priority of “to lead healthier and happier lives, ensuring that everyone benefits from the development of new homes and jobs. • Sport England raises concern regarding the use of the term “leisure” and not explicitly referring to indoor and outdoor sport provision. To ensure clarity Sport England recommends criteria a(f) refers to indoor and outdoor sport provision explicitly. The policy should also set out that the indoor and outdoor sports provision should be informed by an up-to-date PPS. Sport England recommend a Sports and Open Space Strategy is also sought as part of the policy.	210062 (Endurance Estates), 210065 (Endurance Estates), 210194 (Anglian Water), 210588 (Cambridgeshire County Council),

Summary of issues raised in comments	Comments highlighting this issue
• Framework for North Cambourne should also have sufficient flexibility to ensure that future development is not compromised by infrastructure and that the necessary roads, bridges and other infrastructure required for the new community can be delivered appropriately. • Support provision of a network of neighbourhood centres across the wider Cambourne North development to ensure all residents have suitable access to day-to-day services and facilities within walking or cycling distance, ensuring creation of walkable neighbourhoods and sustainable living patterns. • Incorporation of a range of high quality open spaces is supported, but suitable balance needs to be sought between open green spaces and higher density living and working spaces around the station. This balance will need to be explored further through masterplanning. • Part 10 (d) regarding provision of Infrastructure improvements is vague and unclear in terms of nature and geographic scope of potential requirements. Accordingly, this aspect should be subject to review as part of a clearer infrastructure policy and supported by an Infrastructure Delivery Plan. • Up to date economic data on employment and retail demand should be used to inform the proposals for a station quarter – such that it can become a lively and well-used gateway to the wider development from early on in the delivery of the scheme.	

Summary of issues raised in comments	Comments highlighting this issue
• Whilst Endurance generally support the idea of providing flexible spaces, it is considered that this level of detail on the design of the frontages is too detailed and prescriptive for this initial stage. These matters should be addressed through future applications when detailed design considerations can be fully considered. It is also important that the Policy does not unduly prejudice market interest from retailers by being too prescriptive about retail formats whilst recognising that creation of active frontages and a balance of uses within the centres will be important. • Endurance support principle of providing active frontages within centres and providing flexible spaces at ground floor that enable future adaptation. It is considered the level of detail on design of frontages are too detailed for this initial stage and should be addressed through future applications and Design Codes. • Part 46) Endurance support this approach in principle. This will require careful consideration through further assessment work and masterplanning in support of future applications. Endurance, MGL and GCSO should engage further with Anglian Water to ensure there is a deliverable strategy for the life of the development, given well publicised capacity constraints in the short term. • Part 47) Endurance support this approach in principle. This will require careful consideration through further assessment work and masterplanning in support of future applications and detailed assessment in urban design and transport terms. Endurance question whether the proposed Street Space and Kerbside Strategy is	

Summary of issues raised in comments	Comments highlighting this issue
necessary. It is currently unclear what this is trying to achieve and it is considered in any event that it can be covered by other documents. • Part 50) Endurance support this approach and consider it essential to the successful delivery of the project. There needs to be recognition that delivery of some of the infrastructure is dependent upon 3rd parties and beyond the promoter's control. Further discussions with stakeholders will be required to ensure that the full range of requirements, anticipated costs and responsibilities for delivery are appropriately assigned. • Quantum of development, which will be delivered beyond the lifetime of the plan, will need to be appropriately phased to align with delivery of supporting infrastructure. • The strong framework for delivering green and blue infrastructure, aligned with the Local Nature Recovery Strategy, provides important multi-functional benefits, including water management and mitigating flood risk. • Support the robust requirements for managing surface water run-off and provision of foul drainage and sewerage proposal. • Agree that the preparation of a Climate and Sustainability Innovation Delivery Plan sets out the key expectations for delivering a climate resilient community and ensures the sustainable use of natural resources, including high standards of water efficiency and on-site water use. • Requirement for a Foul Drainage Strategy is also welcomed.	

Summary of issues raised in comments	Comments highlighting this issue
• Item 9c should include provision of special school, which is likely to be required to mitigate impact of such a large allocation. For Northstowe and some other developments there is a separate reference to education needs in the “Uses” list, so a similar approach is suggested for Cambourne North and amend to "Education facilities to meet the needs of the development including early years, primary schools, secondary schools, sixth form and for special educational needs”.	
Flooding • Flood mitigation measures to be implemented before construction begins. • Flood prevention needed as Elsworth floods frequently. • Elsworth was subject to a major flood event in 2001 when more than 20 homes were flooded • Conington and Fen Drayton already flood from surface water. Future-proofing flooding impact is vital. • Concerns regarding increased flood risk from developments within Swavesey surface water catchment area, as the existing drainage system is already at capacity. Water from large-scale developments should be conditioned to include attenuation basins capable of holding water for up to 4 weeks when the Webb’s Hole Sluice is closed.	201452 (C Barnard), 201519 (A Brown), 201680 (C Davies), 201768 (R Crowther), 201770 (G O’Connell), 201807 (K Rhodes), 202441 (P Deer), 201953 (R Milns), 202348 (C Farquharson-Robert), 202354 (D Boyd),203460 M Passan), 203639 (J Tanner), 203519 (A Martins), 203562 (D Pope), 203702 (S Wyer), 204526 (I Claydon), 204579 (A Watson), 204656 (N Woods), 204765 (K Seifert), 204776 (C Drummond),

Summary of issues raised in comments	Comments highlighting this issue
• Major developments should negotiate S106 contributions for onsite and offsite mitigation to address local flood risk concerns and improve existing infrastructure. • Flood and drainage management plans essential to address existing flooding risks in Elsworth, Knapwell, and Conington, particularly with the proposed increase in housing. • This policy should refer to the need to adopt a sequential approach, prioritising the location of more vulnerable development outside areas at risk of surface water flooding. Recommend that this policy refers to the requirement for the site-specific FRA to include hydraulic modelling of ordinary watercourses within the site to inform site layout and design levels. The policy should also refer to the recommendation to consider the integration of water management and SuDS at the site into the wider strategy for Blue and Green Infrastructure for Cambourne and how the site can contribute to wider flood and water management benefits across the sub-catchment. The policy could highlight that the adjacent Strategic Enhancement Area may offer opportunities to reduce flood risk through water storage or nature-based solutions. • Better to acknowledge that Cambourne and North Cambourne are separate and plan accordingly (this does not mean there shouldn't be bridges, cycleways etc.). • Part 44) Endurance support this approach in principle. This will require careful consideration through further assessment work and masterplanning.	204782 (I Maddison), 204817 (J Harris), 204952 (C Gouldsbrough), 207398 (L Skerritt), 207402 (N Woods), 207465 (A Irvine), 207482 (N Hall), 207769 (R McClure), 207929 (H Sutton), 208649 (S Keep), 208703 (J&C Collins), 208704 (J&C Collins), 209351 (D Pope), 209353 (A Pope), 209355 (G Pope), 209364 (B Skerritt), 211216 (C Askham) **Other organisations** 203059 (Swavesey PC), 211183 (Environment Agency), 210057 (Endurance Estates), 210816 (Elsworth Parish Council), 211183 (Environment Agency),

Summary of issues raised in comments	Comments highlighting this issue
• Development presents an opportunity to implement effective flood prevention measures in Elsworth, with an invitation for further discussions on this issue. • Policy should refer to need to adopt a sequential approach, prioritising the location of more vulnerable development outside areas at risk of surface water flooding. • Recommend policy refers to requirement for site specific FRA to include hydraulic modelling of ordinary watercourses within the site to inform site layout and design levels. • Policy should also refer to recommendation to consider the integration of water management and SuDS at the site into the wider strategy for Blue- Green Infrastructure for Cambourne and how the site can contribute to wider flood and water management benefits across the sub-catchment. • Policy could highlight that adjacent SEA may offer opportunities to reduce flood risk through water storage or nature-based solutions.	
Housing • Too many houses • No evidence of need for more, houses than currently in pipeline.	203939 (A Parfitt), 205189 (L Hanzi), 205590 (C Meads), 204952 (C Gouldsbrough), 207401 (N Woods),

Summary of issues raised in comments	Comments highlighting this issue
• 100 houses in Cambourne for sale (127atm) and no buyers - no desirability to live there. • Current rates of housebuilding are insufficient to meet demand and are delivered too slowly. Alternative construction methods - such as modular or modern methods of construction - should be actively encouraged to accelerate delivery. • Current approach of developing small parcels over extended periods (often around 18 months), as seen in West Cambourne, is not acceptable for North Cambourne. • Clear delivery targets should be established, with an ambition to complete individual parcels within six months where feasible. • All new housing should be delivered as zero-carbon or near-zero-carbon and include Renewable-based heating systems, High standards of insulation and energy efficiency, Solar panels and battery storage installed as standard, rather than merely “provisioned for”. measures should be mandatory rather than optional to ensure genuine long-term sustainability. • concerned that many homes are built with little regard for future adaptation. North Cambourne should adopt similar principles, ensuring homes can evolve as residents’ needs change over time.	**Other organisations** 207073 (Cambourne Town Council), 207076 (Cambourne Town Council), 207077 (Cambourne Town Council), 207511 (Cambridge Fire and Rescue Service), 209977 (Endurance Estates), 210000 (Endurance Estates), 210001 (Endurance Estates), 210004 (Endurance Estates), 210023 (Endurance Estates), 210024 (Endurance Estates),

Summary of issues raised in comments	Comments highlighting this issue
• Provision of approximately 13,000 homes at Cambourne North is supported and welcomed and it is considered that there is sufficient land available for development to deliver this, though further consideration of density assumptions is advised. • Endurance support aspirations of policy but consider that further flexibility is required in relation to a number of aspects set out to ensure the scheme is responsive to changing needs over time, reflective of the long-term nature of the proposal. For example, Endurance consider that requirement for 10% specialist accommodation is too specific. We support the need for a range of accommodation types for all needs, but10% of 13,000 homes would give rise to 1,300 specialist homes. Our suggestion is that such prescription is not necessary and should be evidence driven by documents such as updated Housing Needs evidence at the time, recognising the long term nature of these proposals with need likely to evolve over the 30-year implementation period. • Prescribed levels of specialist and Gypsy and Traveller pitch accommodation is not justified by Council's evidence base. Policy requires further flexibility to ensure that proposals can respond to changes in need over time as scheme matures and more up-to-date evidence on these needs becomes available. Council's evidence identifies alternative means to deliver pitches for G&T which are preferred to allocations on strategic sites. An approach which includes additional text policy such as	

Summary of issues raised in comments	Comments highlighting this issue
'approximately' 'or at levels as determined through an up-to-date assessment of local needs at the time', would allow for anticipated changes in need over time. • Endurance support in principle the need for a report covering an Intergenerational Housing Strategy to inform the level of housing typologies to meet the local need. • Part 14c) Challenging market conditions, cost of finance, and implications of Building Safety Act have created very challenging conditions for housebuilders to deliver apartments. Whilst these circumstances may adjust and improve, our view is that the policy should be flexible enough to account for changing circumstances over time through to 2060. Such a prescriptive density range in today's market, in this location, is considered a challenge. • A greater range of densities will aid overall delivery with lower densities in edge of settlement and other sensitive areas (such as near heritage assets) and higher densities in the town centre / the new Station Quarter. Suggested that a density range of 40-90dph, would allow for more design flexibility to respond to the various placemaking objectives and allow for a scheme that can deliver 13,000 dwellings. •	
Employment • Few local jobs will be created, increasing commuting pressures. • Incentives required to attract higher skilled jobs/companies to Cambourne North.	203639 (J Tanner), 205645 (C Deer)

Summary of issues raised in comments	Comments highlighting this issue
• Support inclusion of mixed industrial, laboratory, and office campus uses. However, a different approach to delivery is required. In Cambourne, employment sites have too often been delivered late in the development cycle, undermining local job creation and increasing commuter travel. • Concerned about imposition of unreasonable planning conditions, such as mandatory residential units above commercial premises. In many cases, commercial sites should remain wholly commercial. • Given increasing viability pressures on local commercial development, particularly from online retail, planning policy should focus on removing barriers to delivery rather than introducing additional constraints. • The opportunity at Cambourne allows one or more specialised clusters to be planned for from the outset allowing room for future expansion of businesses. • CGC recommends that consideration is given to building in flexibility for a greater level of employment ambition at Cambourne West and North linked to the provision of an EWR station. It could be clearer how the Local Plan draws from this evidence to set the vision for the role of the employment land in terms of the sectors catered for and on the amount of development that would optimise employment growth. The additional scale of growth is supported by the Council's evidence base and East West Rail.	**Other Organisations** 207086 (Elsworth PC), 207075 (Cambourne Town Council), 208938 (Cambridge Growth Company), 209978 (Endurance Estates), 209990 (Endurance Estates), 209991 (Endurance Estates), 209993 (Endurance Estates), 209994 (Endurance Estates), 209995 (Endurance Estates), 210002 (Endurance Estates), 210003 (Endurance Estates), 210006 (Endurance Estates), 210021 (Endurance Estates), 210026 (Endurance Estates), 210027 (Endurance Estates),

Summary of issues raised in comments	Comments highlighting this issue
• Insufficient allowance is currently being made for employment development to ensure a balanced, self-contained and prosperous new town is ultimately achieved. The proposed 108,000sqm of floorspace is not considered to be sufficient to support these aspirations to achieve a balanced, self-contained community consistent with the requirement to operate within a limited trip budget. • Employment is critical part of development mix to ensure a mixed, balanced and prosperous new community, with sustainable travel patterns and high degree of self-containment. • The proposed jobs target and amount of land provided for employment is considered to be too small to support size of the new town and ensure a self-sustaining town which minimises out-commuting. Revise the approach to employment development to be delivered as part of the allocation. • Number of movements from existing settlement, as well as from future residents, can be reduced if a large number and wide range of high-quality jobs are provided as this will have the impact of reducing number of in/out commutes for a proportion of the future population. This has material relevance to working within a limited Trip Budget. • Important that allowance is made for a wide range of employment provision that reflect different market demands and provide flexibility as needs and demand will evolve over time, particularly given the long term nature of the proposals.	

Summary of issues raised in comments	Comments highlighting this issue
• Additional land between A428, EWR and A1198 is considered to be ideal for further employment, facilitated by an additional access onto new A428/A1198 roundabout currently under construction and as illustrated on the attached plan Employment Development Access Off Proposed Northern Dumbbell Roundabout General Arrangement Plan (Drawing Ref 48168-P005-001) showing a potential additional access from new A428 / A1198 Junction currently under construction and utilising land under Endurance Estates' control. Proposed additional access can have significant benefit in reducing pressure on the main Cambourne A428 dumbbell access junction whilst also helping to separate and reduce heavy goods traffic from residential access arrangements and station approach, improving character and amenity of these areas and ensuring they are more welcoming for pedestrians and cyclists. • Endurance would support working with MGL and GCSP to develop an Economic and Employment Strategy at an early stage to help define parameters for this critical ingredient of the project, as part of a compelling overall vision for Cambourne. • Part 14b) Endurance consider approach is too inflexible and does not currently provide sufficient flexibility to reflect wide range of potential commercial uses appropriate to support a town of this size and market demands. Whilst such an approach will be appropriate for office and research and development uses, it would be less appropriate for industrial and logistics or mid-tech uses or many commercial and retail uses. The stacking of some employment uses has not, to our knowledge,	

Summary of issues raised in comments	Comments highlighting this issue
been achieved in the Greater Cambridge market and we would question whether this requirement is realistic, justified or necessary and we are concerned that it would make the site less attractive in the market and therefore be contrary to the aim of achieving an economically prosperous new town. More flexibility should be incorporated to enable different approaches to be taken to enable a wide range of employment uses to come forward in response to market demand. • The need for co-working spaces should be considered further as part of the Employment Strategy as it is important to avoid over-provision with spaces that then sit empty. The policy needs flexibility to enable the scheme to respond to market demand, viability and changes in way people work/live. • Endurance support intention to encourage a flexible range of mixed-use and employment uses which respond to their context. It is important that sufficient flexibility is built-in to the wording of the policy to reflect different types of employment uses that may come forward in different parts of the site.	
Elsworth The proposal will have a detrimental impact on Elsworth and its residents due to: • Close proximity of new settlement to village. • Risk of coalescence.	201174 (K Smith), 201303 (A Brown), 201307 (J Turner), 201396 (S Ireland), 201519 (A Brown), 201765 (A Mitchell), 201773 (I

Summary of issues raised in comments	Comments highlighting this issue
• Increased traffic through village, including during construction. • Loss of natural and historic landscape. • Impact on rural lifestyle. • Forest should be as wide as possible and planted early. • Do not want active travel links to new settlement. • Elsworth will become a suburb of “Cambourne City”. • Visual, noise and light pollution. • Negative impact on conservation area. • Effectiveness of landscape buffer. • Impact on character of Elsworth, a conservation area with grade II listed properties • Increased risk of flooding. Amendments suggested include: • Increasing buffer between Elsworth and new development. • Improve alternative routes around Papworth to alleviate traffic through Elsworth. • Provide bypass for Elsworth.	Claydon), 201891 (C Deer), 202212 (M Stevenson), 203460 M Passan), 203651 (L Skerritt), 203923 (T Hegan), 203939 (A Parfitt), 204765 (K Seifert), 207421 (N Thornton), 207422 (N Thornton), 207423 (N Thornton), 207469 (D Meyer), 207769 (R McClure), 207771 (R McClure), 208645 (S Keep), 208646 (S Keep), 209352 (D Pope), 209356 (G Pope), 209357 (G Pope), 201754 (K Smith) 206109 (Elsworth PC)
Boxworth • Concerns at impact of traffic accessing A14 through village.	201283 (J Witherow)

Summary of issues raised in comments	Comments highlighting this issue
Knapwell • Increased traffic through Knapwell, which would negatively impact residents on the narrow High Street which cannot be widened. • Traffic calming needed. • Rural approach to Knapwell would be urbanised, with village dominated by development, obscuring detailed landscape to the north. • Knapwell's historical significance, with its medieval layouts and field patterns, must be preserved by expanding the conservation area to prevent detrimental infill. • Potential for flash flooding due to road sealing and roof run-off, as Knapwell is located at the bottom of a geographic funnel.	203981 (L Richards), 204526 (I Claydon), 207463 (A Irvine), 207464 (A Irvine), 207465 (A Irvine), 207771 (R McClure),
Papworth Everard • Papworth Everard doesn’t want to be surrounded by roads railways and housing. • Concerns at what will happen in Strategic Enhancement Area. • Routes around Papworth should be improved to alleviate traffic through Elsworth. • Development boundaries should be fixed to ensure there is no creep during development delivery, or over subsequent years which would result in the reduction of spacing between Cambourne North and in Papworth Everard. • Papworth area is likely to build houses in the 'Cambourne Forest'.	201170 (T Carter), 201414 (J Carey), 201426 (E Chavda), 201470 (C Blencowe), 201501 (C Meads), 201519 (A Brown)

Summary of issues raised in comments	Comments highlighting this issue

Policy S/CB: Cambourne

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments focus on the adequacy of infrastructure, services and overall place-making of the town, with many respondents questioning whether Cambourne can sustainably accommodate further large-scale growth. Comments note that the existing town already lacks key facilities, with references to limited retail, absence of a post office, insufficient healthcare provision and poor accessibility to everyday services. Several comments describe Cambourne as a “dormitory town” and car-dependent design, raising concerns that new development risks compounding these issues unless community facilities, employment space and town

centre functions are delivered early and alongside the provision of new housing. There are also calls for stronger planning obligations to ensure essential services and infrastructure are operational before occupation thresholds are reached.

Transport and connectivity were raised by several people, with mixed views on the proposed policy. Many respondents support the principle of improved sustainable transport, particularly the early delivery of the Cambourne railway station, enhanced bus provision, and high-quality walking and cycling networks. However, significant concerns were raised about the deliverability of mode-share assumptions, the limited expected uptake of East West Rail, and the risk that most trips will continue to be car-based. Comments highlight potential increases in congestion, pressure on local roads, and safety risks, particularly around schools and junctions. There are several comments requiring clearer transport modelling, binding mode-shift targets, early provision of infrastructure (including crossings of the A428), and stronger integration between development phasing and transport delivery.

Environmental constraints and impacts are also frequently highlighted. Respondents raise concerns about habitat loss, impacts on designated sites including ancient woodland, and the need for stronger buffer zones and biodiversity net gain. Issues relating to water resources and aquifer capacity are also noted, with suggestions to delay development until sustainable water supply solutions are secured. Other environmental concerns include impacts on landscape character, and the need for dark corridors and sensitive lighting. Several comments also stress the importance of protecting and enhancing green infrastructure to mitigate recreational pressure and ensure meaningful ecological outcomes.

A further theme relates to the scale and form of development and its relationship with surrounding communities. Many respondents express concern that continued expansion risks coalescence with nearby villages and the erosion of rural character. This is coupled with criticism of design quality, with some describing proposed development as bland or poorly conceived, and calling for stronger

design standards, health considerations, and better integration with existing neighbourhoods. While some developers and stakeholders support the strategic growth of Cambourne and its role in meeting housing need, they emphasise the importance of clear phasing, coordinated infrastructure delivery, and high-quality placemaking to ensure that growth is balanced, deliverable, and beneficial to both new and existing communities.

Response to the main issues raised in representations

The policy supports the continued delivery of services and facilities required to support the existing town. This includes within Cambourne West, Cambourne Business Park and Cambourne Town Centre. Through the further provision of new facilities, as well as the proposed development of Cambourne North, the Council's aspiration is that Cambourne continues to grow into a successful town that includes a wide range of amenities to meet existing and future needs.

The policy previously required an improved network of Public Rights of Way to surrounding villages as well as throughout the town to enable people to travel into and around the town using active modes. This has been retained within the policy. Additionally, development at Cambourne West has been permitted and continues to be built out with most streets near the Village College providing traffic free routes for non-motorised users.

The policy notes the importance for connections (including by active travel and public transport) to Cambourne North and the proposed Cambourne railway station. It is important that these connections are delivered to minimise the use of private vehicles within the town and maximise the opportunities presented by new active travel infrastructure. Similarly, the policy wording has been amended to reflect the requirement for Cambourne West to financially contribute to the Cambourne to Cambridge public transport corridor. Whilst the merits of the East West Rail and Cambourne to Cambridge projects will be considered as part of a separate

planning process, the councils have undertaken further transport modelling to understand the impacts of development in this area on the local and strategic road network and the necessary mitigation measures required during the plan period. This has been undertaken in collaboration with the Highways and Transport authorities as well as National Highways and considers both the local and wider network, including within areas covered by other authorities. This evidence demonstrates that development in this area can be accommodated based on highways capacity and that an ambitious, yet deliverable, mode share is required to ensure compliance with the proposed Trip Budget for Cambourne North.

The quality of new buildings, design considerations and the impact of heat island effects are considered by other policies in the Plan and so are not repeated in this policy.

The provision of employment uses within the town continues to be an important part of the policy, both within Cambourne West but also the Business Park and Town Centre. There is significant potential for Cambourne to provide employment opportunities close to existing and planned homes, as supported by the policy. The Housing Trajectory for the Local Plan has been underpinned by the Housing Delivery Study (2026) and confirms that the council's housing needs will be met during the plan period.

The Defined Development Extent of the town has been reviewed and set out in the Policies Map. The site submitted close to the Caxton Gibbet junction of the A428 has been considered through the Housing and Employment Land Availability Assessment (2026).

Support from the house builders at Cambourne West is noted. The Cambourne North policy sets out clear requirements in relation to the coordinated design and delivery of infrastructure of that site and how it must provide movement connections with the existing

town. The Indicative Spatial Framework for Cambourne and Cambourne North has been updated and reflects the further evidence undertaken by the councils in relation to transport/movement, ecology, landscape and heritage.

Financial contributions to emergency services is addressed through Policy I/ID: Infrastructure and delivery whilst the management and maintenance of sports facilities is addressed in Policy WS/CF: Community, Sports and Leisure Facilities and so are not repeated in this policy.

The policy has also been updated to reflect the comments in relation to dark corridors and local heritage assets that could be impacted by development proposals within the site.

The landscape, transport, environmental and ecological impacts of the Cambourne North allocation have been considered and addressed against that policy. Water availability is a known issue in the Greater Cambridge area, and the Local Plan identifies that new development will only be able to come forward providing the necessary water infrastructure is in place, anticipated from 2032.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**
Cambourne lacks the amenities and facilities which were previously promised.	129984 (A Wilson)

No easy way to get to Cambourne to catch the bus or visit shops. One muddy pathway which is not lit at night and is impossible to use for anyone who is vulnerable. Bins are never emptied. Also need more pharmacies locally.	201158 (G Whitehouse)
Cambourne whilst being well connected with the A428, train and bus, is a failure of a town. It has very limited town services, for example no post office, only a single small super market, no centre. It's a town by design split by its infrastructure which limits non vehicle mobility and increases car use, it's currently and in future best described as a dormitory town.	201294 (T Roberts)
Support Cambourne railway station and believe its early delivery is essential. Local Plan should prioritise station and clearly link major development phases to secured funding and a defined delivery timetable. Without early provision, growth risks increasing car dependency and congestion, contrary to sustainability and climate objectives.	201346 (S Olechowski)
In the same manner as the Bourn outline planning permission, the section 106 agreement for Cambourne West secures funding towards CtoC. However, we note there is no reference to the requirement for a contribution within draft Policy S/CB (Cambourne West). This should be inserted to ensure consistency across the policies.	203435 (Juniper Propco (Bourn) Limited)
Designs look ugly and bland. Developers should not be allowed to impose identikit maximum profit minimum cost design. On "Key principles" please add reference to neuroarchitecture (in particular research findings in this field on the impact of building facades on mental stress levels in the brain) and ensure that building designs are subject to health impact assessments and demonstrate minimal impacts on raised mental stress generation. Also, urban heat islands.	203578 (A Carpen)

Highlights that adding 13,500 houses would triple trip demand, yet EWR's own 2023 data shows only 3% of Cambridge commuters would use the railway – remaining 97% would drive. The plan lacks quantitative evidence that roads won't exceed capacity. While EWR's business case claims credit for 25,000 new houses, it only serves 3% of commuters. The response argues GCSP must prove rail mode share can reach nearly 100% to avoid overwhelming the road network, warning that ideology-driven planning may fail commercially, citing poor Northstowe sales as a cautionary example.	203621 (Cambridge Approaches (William Harrold))
Active travel and public transport provision must be increased: - permeability for walking, cycling and public transport (e.g. via bus gates) must be a primary objective to connect the settlement together, with links open to private motor traffic an exception rather than a default choice - early delivery of strategic bus and active travel crossings across the A428 and rail corridor must be required - a protected and well-designed cycle network between neighbourhoods, the station, town centre, school and employment must be planned - introduce binding mode-share targets with penalty if not met	203745 (T Preud'homme)
Cambourne's perimeter bridleway provides excellent community facility for horse riders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.	204057 (S Rogers)
We moved to Elsworth to be in a rural location as it’s quiet and surrounded by the countryside. This is the way the village has always been. We do not want to be beside a huge town. This is not what we bought into moving here. The distance of greater Cambourne is coming far too close and will impact	204264 (J Brown)

the rural feel and traffic through the village. This is not acceptable for residence whiting to remain in a quiet village.	
Concerns raised about habitat destruction, particularly the loss of ancient sites like Coton Orchard and recreational pressure on SSSIs such as Overhall Grove and Elsworth Wood. Buffer Zones for SSSIs: Expansion of "green gaps" between development parcels and ancient sites like Overhall Grove to mitigate recreational pressure and 20% or higher BNG.	204302 (L Allpress)
The Environment Agency has objected to large-scale housing due to risks to the local water environment and underground aquifers. No further housing occupations should be permitted until the Environment Agency confirms that new sustainable water sources (such as the proposed Fens Reservoir) are operational to prevent chalk stream depletion.	204302 (L Allpress)
Opponents argue that expansion and infrastructure, including the C2C busway, will cause irreversible damage to the Green Belt and rural landscape.	204302 (L Allpress)
Local schools, including Cambourne Village College, have expressed concerns that planned road layouts will lead to severe congestion and safety hazards for cycling pupils. For sites near Cambourne Village College (e.g., Parcel 2.3), planners must replace narrow residential lane access with a dedicated, high-capacity link road to separate school traffic from residential streets. Implement LTN 1/20 schemes.	204302 (L Allpress)
Calls for growth to be halted until the East West Rail station location and delivery dates are confirmed, as current plans may not integrate well with future rail links.	204302 (L Allpress)

Cambourne Town Council has noted objections regarding insufficient employment uses within the allocation of some proposals. Mandatory Employment Space: Amending applications to strictly enforce the ratio of employment land (offices/light industrial) to housing, preventing Cambourne from becoming a "dormitory town."	204302 (L Allpress)
The Cambourne to Cambridge busway has been criticized for a low benefit-cost ratio and high estimated costs exceeding £200 million. Realigning the C2C Busway to follow existing road corridors (like the A1303) instead of cutting through the Coton Orchard and the Green Belt.	204302 (L Allpress)
Experts question the feasibility of delivering the required 400 dwellings per year to meet 2041 targets.	204302 (L Allpress)
Residents fear that continued sprawl will cause surrounding villages to lose their distinct identity and merge into a single urban area. Redesigning the Cambourne North masterplan to revolve around the future East West Rail station, ensuring high-density development is centred on the rail hub rather than spread out as car-dependent sprawl. Establishing permanent, legally protected "green wedges" between Cambourne West and Caxton/Bourn to ensure these villages do not lose their individual character to urban coalescence.	204302 (L Allpress)
Changing the "Section 106" agreements to ensure that community facilities (shops, GPs, and community centres) are built and operational before a certain threshold of houses (e.g., the first 500) are completed.	204302 (L Allpress)
The policy is not justified as the policy maps require amendments to include additional land within the development framework boundary for Cambourne West. The settlement boundary currently follows the Outline Planning Permission for Cambourne West and needs to be adjusted to include land north of this boundary up to the A428 road. Should include site 115583 and Oak Tree Cottage.	204369 (Abbey Properties Cambridgeshire Limited)

Vistry welcomes Policy S/CBN: Cambourne North, supporting its strategic approach to balanced growth, sustainable transport, low-carbon development, and biodiversity net gain. Vistry endorses Policy S/CB: Cambourne, recognising Cambourne as a strategic growth location with planned transport infrastructure improvements to meet Greater Cambridge's housing needs.	205053 (Vistry Group)
Vistry appreciates the policy's focus on linking new development with existing settlements, highlighting the importance of coordinated design, timely infrastructure delivery, and strong placemaking.	205053 (Vistry Group)
Vistry encourages the Local Planning Authority to provide clear guidance on phasing and infrastructure delivery to ensure timely development of transport and community facilities. Vistry requests that the policy be retained and strengthened as the plan progresses, and welcomes ongoing engagement with planning officers.	205053 (Vistry Group)
Map and especially section near Cambourne playing fields between Great and Upper Cambourne is confusing and not clear. The lack of clarity means it's not a sound or legally robust plan. It is not clear if three bridges are proposed or just one and why it is needed when there is one nearby already. This is an important wildlife area and corridor and will also impact local residents in this area.	205100, 206811 (M Jordan)
The whole orange-circled area and its surroundings constitute an important wildlife corridor, yet this is not recognised in the plan.	206812 (M Jordan)
There has been no direct consultation with residents in the yellow area of the orange circle, despite the likely noise, air-pollution and safety impacts from construction and early bridge works to an empty field and a non-operational East West Rail station.	206813 (M Jordan)

Support Policy S/CB: Cambourne. The policy provides a clear and consistent framework for managing future development in Cambourne.	205171 (Taylor Wimpey East Anglia)
Cambourne is rightly identified as a strategic location for growth, supported by significant planned improvements to transport, road, rail, and public transport corridors. This means it is well placed to help meet Greater Cambridge's substantial future housing needs identified in the draft plan.	205610 (Taylor Wimpey East Anglia)
Welcome policy's holistic approach to integrating new development with existing town. Its emphasis on coordinated design, infrastructure delivery, and strong placemaking principles will ensure growth benefits both established and future communities across Cambourne.	205611 (Taylor Wimpey East Anglia)
Current town centre is dominated by a supermarket, namely Morrisons. There is no permanent Post Office which is ridiculous and no real thought has gone into how to develop Camborne as a town in the past. Frankly it is far too big already to be considered a village.	207461 (L Payne),
Under the subheading 'Uses' – add a new criterion k. as follows; "k. Contributions to fire & rescue, police and ambulance facilities provision/ funding".	207479 (Cambridgeshire Constabulary), 207512 (Cambridge Fire and Rescue Service)
We would encourage the authority to add wording to the Nature sections of this policy about sensitive lighting strategies and providing dark habitats/corridors where possible, particularly if these can link with those planned in Policy S/CBN, and around the outer edge of the settlement.	207613 (Natural England)

Benefits of locating growth at Cambourne recognised due to proposed busway, improvements to the A428 between Black Cat and Caxton Gibbet, as well as the proposals for East West Rail (EWR) providing rail services between Oxford, Bedfordshire and Cambridge. What work has been undertaken to date to identify impacts on the local and strategic road network outside of the Greater Cambridge area, and the mitigation identified to combat these impacts.	208501 (Central Bedfordshire Council)
Vision led approach to transport, with the emphasis on delivery of sustainable transport schemes such as EWR and the Cambourne to Cambridge busway is supported, as recognition in Policy I/ST, point 3, of the need to address transport infrastructure in the wider area including across the district boundary. There will inevitably be an impact on the A1 corridor and local road network within Central Bedfordshire, which does not appear to be reflected within the impact assessment or Infrastructure Delivery Plan (IDP).	208502 (Central Bedfordshire Council)
Strongly supports EWR but that Cambourne would be better served by light rail mass transit linking to Cambridge, with EWR rerouted south avoiding Cambourne. This would support accessibility to key employment sites in Cambridge.	208757 (Cambridge Connect)
Opposes Cambourne to Cambridge on strategic and environmental grounds. A regional travel hub should be provided at the Girton Interchange.	208757 (Cambridge Connect)
There are a number of Conservation Areas to the south of Cambourne, all of these contain numerous listed buildings. There are other listed buildings to the west and the east of Cambourne. There are a number of scheduled monuments in the area as well as two further registered parks and gardens in the area at Bourn Hall (grade II) and Longstowe Hall (grade II*). Any development of this site has the	210139 (Historic England)

potential to affect these heritage assets and their settings. There does not appear to be an HIA for this allocation. It is important that the policy identifies on-site, and nearby heritage assets and any mitigation and enhancement measures required to address any impact. Amend policy accordingly.	
Are you planning to build three new bridges (road, cycle and foot) within the orange-circled 500 m stretch, or just one, and where exactly will it be located?	206810 (M Jordan)
Why is a new cycle/footpath route to Cambourne North required when an existing route is only 500 m away – the proposed route seems an unnecessary expense.	206812 (M Jordan)
Sport England supports the ambition for significant sports and leisure provision, including a regionally significant facility. However, the type and quantity of provision must be informed by a robust, up-to-date PPS, BFS, FPM. Sport England recommend that the policy also includes a requirement for management and maintenance plans for indoor and outdoor sports facilities.	209223 (Sport England)
Expansion to the south of Cambourne should be planned for, either as a stand-alone extension to the settlement, or in combination with development in another direction. As detailed in the submitted documents and plans, Land South of Lower Cambourne is unconstrained and could provide a highly sustainable extension to Cambourne. The benefit of developing multiple areas is considered to be underestimated in the document, particularly in the deliverability section and this is considered to clearly be the preferred option for growth. This needs to be reassessed and it is considered that provision of new development both to the north and south of Cambourne, would have substantial benefits in sustainability terms and boosting housing supply in the short term, and that it is clearly the most suitable option when considered against the alternatives.	204253 (Richborough)

Cambourne doesn’t have the amenities and infrastructure promised from last 20yrs! and now bursting. Will old promises be kept to restore any kind of faith and trust in councils and developers before our support is expected?	200980 (A Wilson)
Cambourne is one of the most challenging locations in Greater Cambridge in which to deliver genuinely sustainable travel at scale. The Local Plan does not yet demonstrate that this challenge has been fully confronted. Plan relies too heavily on future public transport investment to meet transport needs. Without binding mode share and trip internalisation targets, a clear pipeline of transport interventions, and wider changes to the fabric of Cambourne such as new local amenities, trip budgets risk becoming aspirational rather than effective. The Local Plan should: Make permeability for walking, cycling and public transport the primary objective of stitching the settlement together, with a presumption against vehicular permeability between the existing and expanded Cambourne Require early delivery of strategic bus and active travel crossings across the A428 and rail corridor, tied to clear phasing triggers Secure a continuous, protected and legible primary cycle network linking neighbourhoods to the station, town centre, schools and employment. Strengthen the trip budget approach by introducing binding mode-share targets and clear consequences if these are not met	211774, 211775 (Camcycle)

Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There was acceptance of the need to deliver more housing in Greater Cambridge. There was some support for the allocation of development in new settlements. The allocation was supported by multiple respondents.

Concerns were raised about the oversupply of lab space and the empty sites at local science parks, and therefore a need for homes in this area.

Concerns were raised about the need for housing in this location, how the site was selected, if the site is appropriate for this level of development and the evidence that supports its allocation.

Concerns were raised about impact on landscape as this area is predominately rural and the site has varied typography and how this could create a challenge for a development of this scale in this location.

Concerns were raised about impacts on heritage, on the Conservation Areas in Great and Little Abington, on local Listed Assets and on the Scheduled Monument at the Roman Road.

Concerns were raised around local infrastructure provision, including schools, and impacts on surrounding local businesses.

Concerns were raised about utilities such as water supply, waste water treatment and electricity to ensure that there is enough

provision to accommodate new growth and minimise impacts on existing development.

Concerns were raised about flooding and management of sewers. Concerns were raised about timing of infrastructure delivery.

Concerns were raised about the impacts on existing communities of development of this scale, and how deliverable this site is. Concerns were raised about impacts on the chalk stream and pollution.

Ecological concerns were raised, comments were made about impacts on ecological network and habitats, SSSIs, hedgerows and protection of trees.

Transport concerns from local residents centred around traffic congestion, impact on the local road network, deliverability of CSET, and active travel connections.

Concerns were raised around impact on wider surrounding settlements including Hildersham, Abingtons and other nearby villages.

Concerns were raised about the design of the development. Concerns were raised about the housing delivery mix and impact of Traveller's site.

Further responses were raised by statutory consultees on protection of the Roman Road, Barrows and SSSI.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- Support noted, including the need for new homes, the benefits of planned housing, jobs, and infrastructure over ad hoc rural developments.

- The Councils have considered the representations made and have been working with the site promoters to develop further evidence to support the allocation and address the concerns raised during the consultation. The Councils have engaged with statutory consultees to iterate the wording of the policy and ensure the impacts of the development are managed and mitigated. Cambridge City Council and South Cambridgeshire District Council are working in partnership to produce a joint local plan.

- Through the development of the joint plan, the Councils have had to consider a range of development strategy options, from sites on the edge of Cambridge through to developments in villages, to consider the most sustainable way development needs could be met. This included reviewing freestanding new settlement site options, noting in our evidence that new settlements located on public transport corridors can be sustainable locations for development.

- South of Cambridge, the area around the M11 and the A1307 corridor is home to a range of major business parks with world-leading facilities and has some excellent and improving public transport links. The Government, Combined Authority and Local Partners have made clear the expectation for continued economic growth in the knowledge intensive sectors that already have space and plans to grow south of the City. The nationally significant science and digital cluster located in this area will require more employees – and suitable housing to realise its potential. A new community at Land adjacent to A11 and A1307 (Grange Farm) provides an opportunity to deliver new homes near to existing KI based campuses, and where planned improvement to public transport which would offer connections to the Cambridge Biomedical Campus. The homes could be supported by services and green spaces that respond to its setting.

- The strategy of the Local Plan is informed by selecting sites that are in the most sustainable locations. Sites that are in locations in areas of high quality public transport and connected to existing defined development extents are selected as a priority for development. The strategy looks first to allocating brownfield sites in the City and Edge of Cambridge and in sustainable locations and then looks to meeting housing need with new settlements at Cambourne North and Grange Farm for example. Of the proposed options for new settlements, Grange Farm is the best of the available options for development, as demonstrated by the HELAA and SA assessments. Options higher up the hierarchy have been prioritised

first and selected considering impacts on the environment, public transport and deliverability. Grange Farm as a site allocation has been selected through the evaluation of sites.

- The Housing Target for Greater Cambridge is calculated via the standard method, and this has given an identified need figure of 48,195 minimum dwellings to be delivered over the plan period. This is also similar to the figure that Greater Cambridge has an identified need for and therefore is the number of homes that the Local Plan is looking to deliver. Through all the sites allocated in the Local Plan, this delivers a figure of 48,065 dwellings to 2045 which is the end of Plan Period. Grange Farm will need to contribute 2,550 dwellings in the plan period to continue to demonstrate a 5 year land supply and deliver the number of units needed in Greater Cambridge in the most sustainable locations. The allocation of Grange Farm addresses the acute Housing Need in Cambridge, as identified in the Housing and Accommodation Needs Assessment.

- The Employment and Housing Evidence Update (2023) by Iceni Projects sets out that there is demand for lab floorspace. GCSP have undertaken engagement with landowners at these campuses where they have ambitions to expand, there is evidence that development is needed in this location for development. Development at Wellcome Genome Campus in Hinxton is allocated for predominately expansion of research and development floorspace and the delivery of 1,500 campus workers to support the function and expansion of the campus. The research campuses in this location are all looking to grow and expand, and therefore further housing is required to provide housing for the workers. Land at Grange Farm, east of A11 & north of A1307 Grange Farm is close to the committed 1,500 homes at Wellcome Genome Campus expansion, but those homes are specifically for staff at Wellcome Campus and as such that there shouldn’t be the same level of impact on delivery rates were both sites to be for market housing. Both sites are required to meet the identified need for homes in Greater Cambridge over the plan period.

- To sustain a development of this size, and to offer employment opportunities within the site, 35,000 sqm of employment floorspace has been identified as an appropriate mix of uses for the site. Greater Cambridge sustains a pipeline of an oversupply of employment floorspace to encourage job creation and ensure there is robustness and flexibility in the meeting needs of the market in terms of employment floorspace. Furthermore, this site is in close proximity to a number of expanding campuses such as Wellcome and Babraham, and will be well connected to Cambridge via the CSET connection.

It therefore proposes a settlement that can provide additional employment floorspace and be well connected to local employment opportunities.

- The Greater Cambridge Local Plan sets a vision for delivering sustainable development for the City and South Cambridgeshire. It is a joint Local Plan responding to cross-boundary issues. The site scored an overall red following the HELAA assessments. This is not untypical for large scale strategic sites where impacts on matters such as landscape will be significant compared with the existing baseline situation. Cambourne North, for example, also scored an overall Red in the HELAA. The process is site specific evidence and testing that will identify how these reds and other impacts can be mitigated as much as possible. For example, through landscape and heritage studies, we would identify specific sensitivities (like local or strategic viewpoints) and feasible mitigation measures, which are then incorporated into the policy.

- The initial HELAA assessment of the Grange Farm proposal reflects the initial site boundary submission from the landowner. Additionally, the Councils also tested a larger site within the HELAA which is aligned with the draft allocation and Strategic Enhancement Area boundary which was in the draft Local Plan. The supporting documents submitted by the landowner can be found on our consultation platform, please see the Supporting Evidence tab. Please note that the landowner did previously request that the initial site submission documents, submitted in 2021, be withdrawn from the HELAA process as it was prepared and submitted on their behalf by their former site promoter. These documents have therefore been withdrawn and superseded by the documents in the link above. It is common for site promoters to withdraw sites, supersede supporting studies/evidence and change promoters/planning agents during the course of the Plan making process, and this process is commonplace.

- The development strategy has allocated this sire as a suitable location for development. The potential sites have been considered and assessed by the HELAA and then if appropriate for development were assessed as reasonable alternatives in the Sustainability Appraisal. Then this informed the list of allocated sites. Then for each allocated site further evidence has been prepared to support its allocation. The development of evidence is underway and will continue. There is no pre-determined development at Grange Farm. Options are being worked through with site promoters to work out how development can be accommodated in the most sustainable way.

- The use of new settlements to meet housing demand has been assessed and evidenced through the HELAA, Sustainability Appraisal and Strategy Topic Paper. It is the approach that will reduce carbon emissions from transport emissions the most and ensure there is sufficient critical mass to be able to support critical infrastructure such as schools, healthcare and transport to ensure the development is sustainable and meets the needs of its residents.

- The site has been demonstrated to be deliverable, as set out in the Housing Delivery Study Addendum. The development is phased from 2034 to ensure sufficient water and transport infrastructure is in place, as well as based on out standard assumptions for delivery timescales of a site of this size. It is demonstrated that 2,550 units are deliverable at Grange Farm within the plan period, and this is set out in the Housing Delivery Study Addendum.

- On balance, when considering the site against the reasonable alternative options, the councils are therefore of the view that this site presented a deliverable and sustainable growth option for the emerging Local Plan.

- In response to concerns that this is the wrong location due to transport, officers are working with the site promoter and statutory consultees to plan work through options to deliver a transport mitigations for the site that will align with the trip budget that has been identified for the site to ensure that impacts on the wider transport network are minimised. This trip budget has been refined by the preparation of further evidence and the development of options to prioritise active travel and public transport to reduce the number of vehicles entering the wider network. The wider Transport Strategy for Cambridgeshire will also seek to manage wider transport issues, considering development and growth across Cambridgeshire.

- The councils have undertaken additional evidence since the draft Greater Cambridge Local Plan consultation on a number of themes which were identified in the comments. These relate to heritage, ecology in the HIA, viability and infrastructure in the IDP. In consultation with the Councils' and statutory consultees, the site promoter has undertaken additional evidence since the draft Greater Cambridge Local Plan consultation on a number of themes. These relate to primarily to landscape, ecology, heritage and transport and are addressed in more detail below and within the Site Allocations Topic Paper. This evidence

includes undertaking landscape assessments, heritage baseline assessments, preliminary ecological assessments and transport assessments and placemaking studies to demonstrate how homes can be delivered sustainably in this location. This has been developed in consultation with officers and statutory consultees.

- To be feasible and viable, it has been identified that 4,200 units is required to be delivered at Grange Farm to sustain a critical mass large enough to support the infrastructure needed for a sustainable settlement. The use of new settlements has been identified as being more sustainable than individual extensions to existing villages because it ensures that infrastructure can be developed to sustain the development and limits the amount of pressure on existing infrastructure. The site capacity has been reviewed in the context of the scale of development that is feasible to be delivered and the impact on the landscape.

- Further capacity testing has been completed by officers and by the site promoters to refine the capacity for the site. Officers have considered the impacts on landscape, ecology, requirement for delivery of biodiversity and green space and the number of units required to establish a critical mass to make infrastructure deliverable. The site capacity has been refined to approximately 4,500 homes, a reduction from 6,000 to minimise the impact of the development.

- There is an identified need to deliver sites for Gypsy and Traveller's in Greater Cambridge. The strategy to meet this need is a combination of optimisation of existing sites to ensure that these sites are occupied by Gypsy and Travellers at safe densities with correct utilities provision and then creating new Gypsy and Traveller sites adjacent to New Settlements. Policy H/GT sets out clear criteria to deliver Gypsy and Traveller sites in a way that minimises impacts on existing development and provides good quality pitches for Gypsy and Travellers. The delivery of sites for Gypsy and Travellers is part of the identified need for housing in Greater Cambridge and sites must be made available for them. The optimal capacity for a traveller site has been identified as 12 pitches per hectare. This figure has been identified as an appropriate scale to ensure that each pitch has sufficient amenity, access to utilities and a safe scale for occupants. This is set out in Policy H/GT as well as being a standard scale of delivery of G&T sites on strategic sites.

- The provision of homes at Grange Farm will be a mix of types, tenures and sizes to provide for a wide range of residents. There is a requirement for 10% of the total homes as specialist accommodation (within Classes C2 and C3), particularly for older people or those with disabilities. Housing affordability is an issue across Greater Cambridge and the delivery of this mix on strategic sites will contribute to meeting the need for affordable homes.

- The IDP has identified the school provision for the site. Further discussions with County have refined the details of this ask and the outputs have been included in the policy wording. At this point, it is assumed that Grange Farm will provide enough school places for the development at Grange Farm. The education and healthcare infrastructure projects identified in Chapters 11 and 12 of the IDP will also mitigate the additional demand on these services arising from planned population growth. Whether residents decide to pursue education and healthcare facilities within or outside of Greater Cambridge is a matter of personal choice, but the IDP identifies projects within or in close proximity to areas of planned housing growth to mitigate the additional demand in full. Local authorities are also legally obliged to cooperate with NHS bodies to secure the provision of healthcare facilities.

- The councils are acutely aware that developments identified in the local plan will need to be accompanied by the right infrastructure. The draft Local Plan consultation in 2025 was accompanied by assessments of infrastructure that would be needed to support proposed developments. Work on the infrastructure requirements is continuing for the next phase of the local plan process. The phasing of the delivery of Grange Farm will align with the construction of transport infrastructure and wider infrastructure delivery.

- The IDP has been developed using an evidence-led methodology that evaluates current infrastructure capacity and increased demand resulting from planned housing and commercial development. Working with delivery stakeholders including Cambridgeshire County Council, Cambridge and Peterborough Combined Authority, the Greater Cambridge Partnership and more, the Council has identified a range of priority transport measures in section 5.3 of the IDP. These transport measures are therefore planned to mitigate the transport impacts of growth brought forward by the emerging Local Plan, ensuring sustainable growth across Greater Cambridge throughout the plan period.

- In terms of infrastructure impacts on the Abingtons and Hildersham and the surrounding area, Grange Farm is designed to not impact on facilities through the provision of its own infrastructure aligned to the phasing of the development including healthcare facilities and schools. The Council welcomes collaborative working with West Suffolk Council on the infrastructure requirements arising from growth planned at Cambridge East, Grange Farm and any other developments proximal to West Suffolk to identify the potential need of cross-boundary infrastructure requirements. The Council also welcomes further engagement with West Suffolk Council on strategic cross-boundary matters and infrastructure issues during the preparation of the next stage of the emerging Local Plan.

- Whilst the Council understands that the Greater Cambridge Transport Strategy (GCTS) is progressing, the GCTS will assess major transport infrastructure projects taking into account the overall impacts of all identified schemes and cross-boundary impacts are considered where they are likely to occur. The Council will continue working with the Combined Authority to identify the potential impact of demand arising from Greater Cambridge on the transport network external to the area.

- Engagement with statutory consultees and the evidence will continue to iterate progressing towards the creation of planning application and considering the full transport strategy for Cambridgeshire. The phasing of infrastructure has informed the phasing of homes including the delivery of CEST and the extension to CSET. This has been agreed in discussion with statutory consultees. An initial trip budget has been prepared for the site as well as a list of infrastructure improvements needed as set out in policy to inform the transport strategy for the site.

- The site promoter has been developing further transport evidence in consultation with National Highways and the Highways Authority and planning policy officers to develop an evidence base for the transport strategy at Grange Farm and to further refine the policy requirements under the movement section including a refinement of the trip budget. Modelling has been undertaken to understand impacts on the Fourwentways Roundabout to consider the impacts of wider transport congestion in the area.

- The trip budget identified by GCSP evidence has been refined by further evidence completed by the site promoter in consultation. The policy requires a number of additional transport assessments to be undertaken as a development proposal

is being prepared as part of a planning application. It is at this stage that more detailed testing and transport interventions will be identified and secured. The transport evidence and Local Plan recognise that additional mitigation measures may be necessary beyond the plan period in order to facilitate the full build out of the site.

- Given the inherent scale of new growth required, the local plan site assessment process (including our Housing and Economic Land Availability Assessment) acknowledges that proposals such as new settlements could result in significant landscape and other impacts. However, given the sustainability benefits the Councils have determined that new settlement proposals that met evidence-based location and scale criteria should nevertheless be subject to consideration for allocation.

- The development strategy and consideration of spatial options and assessment of reasonable alternatives have contributed to the consideration of the configuration and setting of Grange Farm in its wider context. The spatial framework has been prepared to also recognise the interrelationships with existing settlements and the wider area, and this will be used to inform the masterplan.

- The acknowledged impact on the landscape is being mitigated by the use of the use of SEA to provide a buffer. The SEA will be predominately used for agricultural uses, GI and provision of new habitat and restoration. The Strategic Enhancement Area will contribute to retaining a clear green buffer between settlements and it is intended that some of this land remain in agricultural use to respond positively to the local setting. This has been reflected in the policy wording. The boundary of the Land adjacent to A11 and A1307 Grange Farm has been revised to mitigate impacts on the landscape. This includes mitigating views from the site to Roman Road which were identified in the GCSP HIA. These have been reflected in the spatial framework. The management of impacts on the landscape is not just about creating a barrier but also positively contributing to the landscape by being able to see through to the town to enhance the changing landscape. The Eastern Boundary aligns with the typography of the site and slopes down to a buffer created by the SEA. Agricultural uses are encouraged in the SEA to further minimise the impact on development on the landscape by retaining similar uses.

- The spatial framework has been drafted to set out mitigation measures required to minimise impacts on the Abington's and Hildersham. The Strategic Enhancement Area is proposed to contribute to creating a buffer between the developments to

reinforce the integrity of the distinct defined development extents. The use of screening and green buffer in appropriate locations will also contribute to maintaining these edges. The wording of the policy has been further iterated to specify what is acceptable in the SEA. This will improve the clarity of the role of the SEA. The PRoW are being considered in the development of the assessments of the site and will be reflected and protected in the Masterplan. The PRoW along the Roman Road has been identified on the spatial framework.

- The spatial framework has also been developed to set out key constraints, design considerations and a high level indicative layout to inform the design of the site. This contributes to ensuring that the design is of high quality and is suitable in its context- key design principles are established in policy. The policy wording also specifies that this development must be site wide Masterplan led and this Masterplan must be agreed with the Councils' ahead of any planning application approval. Furthermore, a side wide Design Code must be submitted alongside the Masterplan. This will ensure that development follows a clear overarching design and placemaking objectives and principles which will contribute to a high quality settlement. A range of densities have been suggested for this site to ensure that the building heights are reflective of the landscape and align with the typology of the development, with the tallest buildings being in the lowest parts of the sites. These will continue to evolve as plans go into more detailed planning stages. This will be done in collaboration with the Council to ensure design is of a high standard. The site promoter is proposing a unique stewardship model and their current plans for continued local interest in the site that will contribute to a high quality design.

- GCSP has produced a Heritage Impact Assessment (HIA) to support the allocation of the Grange Farm. This document identifies any impacts on heritage assets, listed buildings, scheduled monuments and any key viewpoints and provides mitigation suggestions which have been brought into policy wording and the Spatial Framework to ensure mitigation is considered in the masterplan of the development. GCSP have also been continually engaging with Historic England and the County Archaeology team to work through and agree any mitigation measures for the impact of the development on assets. The Bronze Age Barrows to the west of the site have been reviewed for listing and these are now a Scheduled Monument. These are indicated on the Spatial Framework with a setback for development to minimise impacts. A Geophysical Survey for the Roman Road and the Bronze Barrows has been undertaken by the site promoter and the findings of this has been reflected in the GCSP HIA. GCSP will continue to work with the site promoters and statutory consultees to further discuss

and mitigate against impacts and produce further archaeological evidence as needed, including a site wide DBA and successor surveys as identified by this document.

- GCSP is continually liaising with Anglian Water and the Environment Agency through the water scarcity group to ensure that options are being evaluated to set out a clear strategy on how waste water will be managed to manage impacts on the chalk stream and aquifers. Through the Integrated Waste Water Management Study and Site Specific Flood Risk Assessment to set out strategies for managing impacts of flooding and runoff from greenfield sites.

- The site promoter has engaged independently with Environment Agency, Anglian Water and Cambridge Water to understand how impacts can be reduced. This includes exploring options for sanitisation of water to recharge the aquifer. The options for mitigating impacts on the chalk stream and the River Granta will continue to develop through the development of evidence through to the planning application submission, in consultation with the Environment Agency and Anglian Water.

- Whilst the allocation will reduce the amount of arable farmland in this location, the policy seeks to minimise this through compact forms of development, and key areas of activity within the development. It also supports the continuation of farming within the SEA. The planning application for the site will also be required to complete a site specific flood risk assessment including the sequential test and exemptions test where relevant to ensure that the correct flood risk mitigation measures are in place.

- Grange Farm has been assessed in the Habitat Regulation Assessment and mitigation measure identified in this document have been incorporated in the policy wording, as well as suggested mitigations from engagement with Natural England. The policy and spatial framework has been revised to include policy wording to divert footpaths to just the PROW and not impact on the SSSI. Enhancements to the SSSI are also required in policy.

- The site promoter will be required to complete a preliminary ecological assessment, a cohesive stewardship strategy through early phase community engagement including through conservation groups to deliver community-based enhancement stewardship as endorsed by Natural England; and a recreation pressure assessment for the SSSI to support any planning

application. The Councils' and the site promoter will continue to work with Natural England to minimise the impacts on the SSSI and local ecology. Furthermore, ecological survey and monitoring is required for specific sensitive locations outside of the site's red line boundary that may be impacted by the development is required in the policy to minimise impacts on local habitat and ecological networks.

- Policy WS/HS Pollution, health and safety will apply to all development. This policy will require assessments to mitigate against the impacts of development and its construction. Mitigations through buffers will reduce impact on noise and light pollution. In terms of air pollution, an air pollution assessment will be required, and the prioritisation of active ravel and public transport will reduce impacts on air quality.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support • Really good proposal. people crying out for more homes • Benefits of planned housing, jobs, and infrastructure over ad hoc rural developments. • Support development that aligns with the local area's character, advocating for lower density and height of properties, particularly near existing buildings. • Do not object in principle to the development of a small new town instead of expanding existing villages.	201460 (D Watts), 201750 (J Hall), 201889 (W Cooper), 201804 (R Zimmern), 201889 (W Cooper), 201924 (M Dance), 202876 (C Pippen), 208420 (K Franklin), 208421 (K Franklin), **Other bodies:** 201556 (Stapleford PC), 201669 (Linton PC),

• approve principle of having developments near places of work and understand that they have to be of a certain size. • Contingent on adequate water, education, healthcare, and transport links. • Promotes active and sustainable travel methods, which is viewed positively. • BioMed Realty supports the allocation of Grange Farm as a new settlement. • Supports vision and objectives for Grange Farm as a new settlement that will serve existing and future communities, enhancing sustainability and infrastructure in surrounding areas, including Linton. • Open to exploring how land at Ley Rectory Farm could be sensitively assimilated into the wider development. Wish to stress the importance of ensuring that our residual farm remains viable for the long term. Please continue to liaise directly with The Pampisford Estate and its Trustees. • Pampisford Estate welcome suggestion that delivery will be within the Local Plan period and beyond. PE note Council's updated Greater Cambridge Housing Delivery Study Addendum assumes delivery of 2,550 new homes in the period to 2045. This is lower than position set out within our initial Delivery Strategy and we remain committed to this objective (c. 4,750 dwellings). PE do welcome ambition to plan for a coherent, well planned new town, with a scale and mix of uses to promote self-containment, with range of uses and amenities provided on site to support the needs of all residents. As landowner, PE look forward to working	203371 (BMR Granta Park Propco Limited), 204840 (Vistry Group), 209252 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 209254 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 209256 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 209264 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210722 Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210905 (Great Shelford Parish Council),

constructively with GCSP and wider stakeholders to determine the most appropriate form of development for the site. • As landowner, PE have been stewards of farm for generations. Committed to ensuring that scheme is sensitive to character and context, and is distinctive and separate from the surrounding settlements. PE look forward to working with GCSP to develop masterplan principles which will achieve this shared objective. • PE support ambition for mixed use town centre, and early delivery of amenities to support community integration from earliest stages of development. • Pampisford Estate Farms Limited and the Trustees of the James Binney Will Tr are very supportive of the principle of allocation, broad scale and location of the development and mix of uses proposed. Highlighted a number of areas where more work is necessary to achieve level of precision required for allocation at Regulation 19 stage.	
Do not support • I'm a resident of great Abington and I am not happy about this at all I moved from the city to get away from it and to enjoy a nice quite village now the village is going to be like the city and residents comments need to be respected in this matter I oppose this and do not wish for this to go ahead what so ever.	201310 (K Middleton), 201399 (W Bailey), 205486 (R Sainsbury); 208559 (Abington Residents Campaign), 209069 (Camcycle)

• We were horrified to discover that you are proposing to build a development at Grange Farm which would involves the construction of between 6,000 and 8,000 houses. • Request that the council remove or significantly reduce to respect exiting communities and environmental limits • Abington Residents Campaign (ARC) are completely opposed to Policy S/GF which proposes the introduction of a new Town at Grange Farm. • . In Camcycle's view, the site fails to meet the core requirements of a genuinely sustainable community and should not proceed.	
Not needed • Strategy is wrong and underpinned by an optimistic growth forecast. • Appears to surplus development capacity in the local plan. • Staff of the large science sites in the area already have houses. • Need for the development is not made, it is in excess of housing requirement. • What evidence is there that a development of this magnitude is required? Demand based on current evidence is nowhere near the level indicated in Plan. • Up-to-date forecasting model is required to reflect the future more accurately. • Is a supply of housing being developed near the Hinxton Genome campus, questioning the need for further housing in area. • Focus should be on brownfield sites.	201368 (J Lawrence), 201480(G Brookman), 201624 (D Farrant), 201624 (D Farrant), 201782 (J Tanner), 202022 (A Marns), 202142 (M Turner), 203123 (J Searle), 204111 (J Batchelor), 204201 (P Williams), 204586 (R Elston-Green), 204725 (C Gill), 204733 (M Appleton), 205360 (M Hardinge), 205741 (G Saunders), 205746 (C Feenan), 205947 (S Zmigrod), 206193 (R Barnes), 206199 (R Barnes), 206323 (C Cameron),

• Consultation material indicates the Draft Local Plan allocates materially more homes than the stated local need. • Not "justified" or "positively prepared." Remove allocation or significantly reduce and treat as long-term contingency, pending clearer evidence that optimistic growth scenarios are being realised. • Projections in the Draft Plan for additional population growth and corresponding supply of homes are asserted without any presentation of evidence underpinning those or the relevant sensitivity analysis. • Lack of concrete evidence that there is demand to live at Grange Farm from real individuals involved at local centres of economic activity.	207672 (T Collett), 207783 (P Williams), 207789 (P Williams), 208531 (C Alda), 208629 (G Jones), 210488 (C Gill), 210489 (C Gill), 211647 (G King), 211725 (P Seddon), **Other bodies:** 204707 (Little Abington PC), 204948 (Robinson College),
Should be somewhere else • Inappropriate location, threatening the 'necklace village' concept and damaging the South Cambs landscape. • Should consider brownfield sites. • Edge of city would be better. • There are better and more suitable sites. • Would be more prudent and flexible to continue the sustainable development of existing communities in the area of which Little Abington is a good example. • Inconsistent with national planning policy	201031 (R Smith), 201348 (K Christodoulides), 201367 (M Joslin), 201368 (J Lawrence), 201400 (J Wingfield), 201480(G Brookman), 201494 (J Tharby), 201518 (J Jackson), 201530 (I Rogers), 201531 (H Rogers), 201538 (T Davenport), 210539 (A Patterson Lee), 201542 (L Davenport), 201539 A Patterson-Lee), 201544 (L Davenport), 201577 (G Smith), 201591 (L Menzies), 201624 (D Farrant), 201635 (J

• Does not adequately assess or rule out alternative safeguarded locations further from existing settlements, suggesting a lack of a robust site selection process. • Other locations such as the "Duxford Triangle" bounded by the M11, A11 and A505 should be considered. • Alternatives have not been fully or robustly explored or justified. • Should be relocated to near Horningsea where the sewage farm would have been put. • Should be away from our settlement and built on level ground away from 1307. • Consideration should be given to other sites, e.g. junction off A11. Land near to Fulbourn? • Site is wrong side of A11. • North or South of A11 close to Wilbrahams. • Proximity of this site to Hinxton, Babraham and Granta Park seems to be only reason for choosing it. • More appropriate and sustainable alternative sites exist, including land at Hinxton adjacent to the Wellcome Genome Campus. • Will just provide expensive commuter belt housing as it's close to access roads to London.	Shaw), 201684 (S Bowen), 201694 (S Bowen), 201706 (R James), 201747 (B Seddon), 201753 (L Dav), 201756 (G Sharman), 201762 (D Turnidge), 201766 (F Snell), 201785 (G Farrant), 201798 (J Thirkettle), 201803 (S Fryer), 201804 (R Zimmern), 201821 (Y Arkwright), 201846 (E Goodyear), 201855 (J Hudson), 201884 (L McNicholas), 201887 (K Lander), 201890 (K Cooper), 201912 (J Dodd), 201952 (J Hann), 202009 (D Langley), 202020 (J Rivers), 202023 (P Cullimore), 202067 (D Milns), 202082 (D Palmer), 202092 (R Harman), 202142 (M Turner), 202337 (S James), 202477 (J Herbert), 202518 (H Brown), 202608 (C Cameron), 202708 (D Golding), 202737 (A&L Pepperell), 202796 (S McDonnell), 202907 (J Williams), 202912 (R King), 203141 (V Jury), 203187 (M Jury), 203188 (S Hughes), 203190 (M Furlow), 203389 (G Brookman), 203459 (L

• Needs to be focused on areas where sustainable transport is practicable from the start, not on constrained and remote sites such as this, which virtually demand use of cars. • Should be a plan for sustainable 'infill' developments in existing settlements to secure local schools, shops, services. • Alternative nearby sites, such as Bancroft Park, should also be considered to meet urgent accommodation needs. • Brownfield sites and other alternatives have not been fully explored, particularly the Cowley Road site which could accommodate over 8,000 homes. • If costs of delivering a viable Grange Farm settlement are comparable to — or exceed — the WWTW relocation costs, then decision to abandon NEC should be reconsidered. • Appears to have been rushed, likely as a reaction to Anglian Water wastewater treatment plant at North East Cambridge. • Greater Cambridge HELAA from 2025 shows that Grange Farm Site is not suitable or appropriate - overall suitability was "RED". • Publish a transparent reappraisal of reasonable alternative sites, including locations capable of accommodating new settlements, such as land at Six Mile Bottom, and any additional growth areas identified through forthcoming Cambridge Growth Company work.	Lambourne), 203582 (S Hatchell-Watson), 203648 (E Pimblett), 203653 (S Appleton), 203751 (T Preud'homme), 203797 (R Nagasaki), 203803 (J Cutting), 203805 (A Butchart), 203839 (T Solomonides), 203868 (M Broadhurst), 203911 (E Lambourne), 203931 (A Ross), 203961 (S Somerville), 204015 (J Fairs), 204111 (J Batchelor), 204147 (L Paine), 204156 (B Barkataki), 204196 (A Cooke), 204415 (J Fairs), 204586 (R Elston-Green), 204608 (R Hoadley), 204612 (D Potts), 204617 (J Mannion), 204644 (L Sainsbury), 204682 (E Lane), 204733 (M Appleton), 204759 (M Huntsman), 204783 (R Smith), 204810 (E McKeown), 204871 (V Valge-Archer), 204919 (K King), 205018 (J McDonald), 205020 (S Lee), 205092 (M Whittaker), 205147 (I Sainsbury), 205170 (J Graham), 205249 (K Brightwell), 205400 (S Nuttall), 205443 (A Williams), 205454 (R DeBeaux), 205512 (S Somerville),

• Would be more appropriate for North Cambridgeshire, where infrastructure is already established. • Should be located within walking distance of a mainline train station where all travel to work needs would be addressed. • Consider other locations with better road access and ones that would not cause dreadful congestion to surrounding areas. • Choice of an appropriate site should be led by results of an open presentation on all the alternative irrespective of the land ownership and the clear individual benefit. It appears that the current proposal has been promoted by local landowners without enough consideration of the alternatives. • Allocations to the north of Cambridge demonstrably optimise spatial alignment between new homes and the city's primary employment growth areas—Cambridge Science Park, St John's Innovation Park, the North East Cambridge district, and the Cambridge Biomedical Campus. • Further along A11 towards Fulbourn. • There is so much open land between existing villages to the east that it is closer to the M11, Whittlesford Station and the planned Transport Hub. • Turning Sawston into a town is both logical and beneficial for all. • Housing need could be met by 80 villages each having small developments that would be beneficial to increasing the footfall for businesses and providing an	205540 (G Minhas), 205733 (W Bailey), 205922 (C Paton), 205924 (J Snell), 205925 (J Snell), 205926 (F Snell), 205927 (F Snell), 206595 (A Butchart), 206606 (S Solomonides), 206892 (I Sainsbury), 206899 (I Sainsbury), 207226 (E Lane), 207227 (E Lane), 207235 (S Appleton), 207236 (S Appleton), 207237 (S Appleton), 207238 (S Appleton), 207406 (H Rogers), 207503 (K Lester), 207560 (L Sainsbury), 207561 (L Sainsbury), 207562 (L Sainsbury), 207563 (L Sainsbury), 207564 (R Elston-Green), 207593 (V Valge-Archer), 207597 (R King), 207605 (V Jury), 207673 (T Collett), 207675 (T Collett), 207679 (T Collett), 207921 (H Sutton), 208477 (D Pimblett), 208478 (D Pimblett), 208481 (G Crowe), 208527 (G Brookman), 208528 (G Brookman), 208529 (G Brookman), 208530 (G Brookman), 208547 (D Fraser), 208548 (D Fraser), 208549 (D Fraser), 208550 (D Fraser), 208551 (D Fraser), 208552 (D

increased reservoir of volunteer activities needed to sustain such groups as the scouts, youth groups, village halls and community activities. • Suggest between Babraham and Sawston or land between Pampisford Hall, Sawston, SW to Hinxton. • So much open land between existing villages to the east that it is hard to fathom why Grange Farm could be considered favourable. • Hildersham Parish Council (and a significant number of the residents) cannot help but feel that site near Cambridge North would be a much better choice. • When compared with Land at Hinxton (HELAA Reference 200765) as a reasonable alternative, Grange Farm appears less well aligned with the aim of directing development to locations where active and public transport are the natural choice and where there is a strong relationship with existing (and proposed) major transport infrastructure.	Fraser), 208556 (T Solomonides), 208569 (A Ross), 208570 (A Ross), 208571 (A Ross), 208572 (A Ross), 208573 (A Ross), 208574 (A Ross), 208575 (A Ross), 208576 (A Ross), 208578 (J Bowen), 208666 (E Taylor), 208667 (E Taylor), 209048 (J Darrell), 209717 (J Darrell), 209740 (J Barnes), 210385 (M Cookson), 210432 (B Davies), 210477 (W Bailey), 210486 (E Lambourne), 210664 (F Snell), 210665 (F Snell), 210817 (A Marns), 210826 (C Paton), 211020 (M Hardinge), 211034 (T & A Bradford & Jedrzejewski), 211734 (P Seddon), **Other bodies:** 201603 (Great Abington Parish Council), 203371 (BMR Granta Park Propco Limited), 204112 (P Gill), 204707 (Little Abington PC),

	208111 (Sawston Parish Council), 208153 (Great Abington Parish Council),208159 (Great Abington Parish Council), 209965 (Granta Land Ltd), 210707 (Great Abington Parish Council), 210963 (Great Abington Parish Council), 211676 (Smithson Hill),
Deliverability • No guarantee site can be available since there is an agricultural tenancy. • without clear delivery pathway, timescale, or funding strategy is deemed ineffective and risks long term planning blight, failing to meet national policy requirements. • Relies heavily on future studies, strategies, and mitigation measures to address known and significant impacts, including transport capacity, ecological protection, heritage impacts, wastewater treatment, and already strained healthcare, small schools/education facilities with lack of funding, and policing. • The Local Plan should not overly depend on new settlements for housing delivery in the early and middle stages, as medium-scale sites like Balsham Road, Linton can contribute effectively.	201367 (M Joslin), 201494 (J Tharby), 201542 (L Davenport), 201544 (L Davenport),207920 (H Sutton) 204840 (Vistry Group), 207790 (P Williams), 208322 (PX Land Ltd), 208781 (Axis Land Partnerships Ltd), 209965 (Granta Land Ltd), 211104 (Hallam Land Management), 211414 (CALA Group Ltd),

• Housing trajectory expects delivery of completed dwellings to start within 8 years of adoption of new Local Plan. Drawing on experience from other new allocations in the region, this would not appear to be realistic. • Questioned whether Grange Farm will be capable of delivering any new homes within the plan period and its inclusion within the GCLP therefore becomes untenable. • Requires a binding Delivery Strategy committed by promoter. • Dependent on, amongst other new infrastructure, the Cambridge South East Transport scheme which is not due to even be at public inquiry until later this year. This raises questions over its deliverability. • Deliverability Paper submitted for Grange Farm as part of 'call for sites', confirms that 3,560 dwellings (market and affordable) can be delivered during Local Plan period with the first dwellings being delivered in 2030. Councils' housing trajectory states that only 2,550 dwellings can be delivered during Plan Period. Question how accurate these figures are by both Councils and promoter for Grange Farm. • Discrepancy between number in Housing Trajectory provided by Council (up to 300 dwellings in 2040) and 275 dwellings in promoters Housing Deliverability Paper. Concerns that Council will not be able to deliver that number of dwellings across Plan Period.	

Unsustainable • Size and concentration of proposed development in this rural area deemed undesirable and unsustainable. • Bringing the city to the villages. • New town rather than a proportionate extension • Scale of development is not appropriate at this location. • Lacks explanation for selecting land adjacent to Abington for safeguarding. • Failing to provide proportionate and transparent evidence. • Relies excessively on future mitigation, rendering it unjustified, ineffective, and inconsistent with national policy. • Will function more as a large suburb rather than a self-sufficient town. • Does not provide sufficient positive benefits. • Area is already overpopulated. • An impact (positive and negative) assessment on local areas and towns - and further detail of what will be required to overcome negative impacts. • 6,000 homes identified to be built nearer to Granta Park, Babraham and Biomedical Campus in one block is not sustainable. There are not 12,000 jobs at these sites therefore people need to travel elsewhere for work which is not possible by foot or bike.	201281 (C Wolverson), 201311 (M Donovan), 201330 (J Sharman), 201480(G Brookman), 201482 (A Cameron), 201494 (J Tharby), 201681 (J Weston), 201689 (F Irwin), 201730 (C Paton), 201740 (G Lee), 201753 (L Dav), 201756 (G Sharman), 201764 (J Snell), 201795 (R Barker), 201805 (J Dowling), 201912 (J Dodd), 202142 (M Turner), 202163 (R Livermore), 202726 (A Victory), 202737 (A&L Pepperell), 203734 (D Fraser), 203773 (A Russell), 204111 (J Batchelor), 204810 (E McKeown), 205032 (A Spicer), 205457 (M Fentiman), 205741 (G Saunders), 205745 (R Lee), 205919 (C Paton), 205920 (C Paton), 207235 (S Appleton), 207236 (S Appleton), 207237 (S Appleton), 207238 (S Appleton), 207504 (P Hayden-Smith), 207573 (M Howes), 207927 (H Sutton),207967 (S Trueman), 208546 (D Fraser), 208547 (D Fraser), 208548 (D Fraser), 208549 (D Fraser), 208550 (D Fraser), 208551 (D

• Does not represent a sustainable development and in spite of proximity to the biomedical campus and proposed park & ride / guided busway schemes, will become a car-based commuter settlement, with easy access to London to the south. • Too small to be a sustainable new town or to deliver the scale of facilities on-site to prevent significant additional car journeys. • Inappropriate, being too small to be self-sustaining and too large to fit comfortably within the landscape, necessitating a reduction in size and ambition. • In transport terms, the site is not sustainable. • No plans to make new settlement a self-sufficient community, instead it is envisaged that residents will travel to work and presumably also for shopping, schools etc., • In transport terms, site is not sustainable. • Not in alignment with GCLP strategy to direct development to where active and public transport is the 'natural choice'. • Allocation not a logical conclusion when evidence on sustainable patterns of development around Greater Cambridge area are taken into account.	Fraser), 208552 (D Fraser), 208667 (E Taylor), 206602 (S Solomonides), 210820 (C Newgreen), 211645 (G King), **Other bodies:** 201556 (Stapleford PC), 203001 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 203060 (Cambridge Past, Present and Future), 207393 (Cambridge Past, Present and Future), 207384 (Cambridge Past, Present and Future), 207385 (Cambridge Past, Present and Future), 208322 (PX Land Ltd), 208781 (Axis Land Partnerships Ltd), 209698 (CEG Land Promotions Ltd), 209965 (Granta Land Ltd), 210905 (Great Shelford Parish Council),

Size of development • Needs to be considerably scaled back. • More modest development in keeping with the local need, natural environment and market. • Scale of development should be dramatically reduced to a level the area can realistically support and must not be 10x larger than the existing village population. • Disproportionate to the local settlement hierarchy and risks urbanising a rural area. • Should be at reduced scale as a village not a new town, and without warehouse land. • Too large for a rural area, risking unsustainability in local services such as shops, schools, and healthcare. • Already huge development in this area. • Out of character for rural setting. • Scale it down by at least 50%. • Scale and form are inconsistent with the settlement hierarchy and do not support the plan's strategy of focusing growth in sustainable, infrastructure supported locations. • Site seems wholly inappropriate for a development of the proposed scale and density.	200994 (M Logan), 201407 (G Sanders), 201517 (C Woodward), 201538 (T Davenport), 201542 (L Davenport), 201544 (L Davenport), 201545 (J Yarker), 201577 (G Smith), 201591 (L Menzies), 201635 (J Shaw), 201684 (S Bowen), 201696 (S Tossi), 201706 (R James), 201716 (C Rodgers), 201747 (B Seddon), 201753 (L Dav), 201756 (G Sharman), 201798 (J Thirkettle), 201855 (J Hudson), 201892 (R Berry), 201919 (G Menzies), 201952 (J Hann), 202337 (S James), 202616 (I Smith), 202696, (S Roberts), 202731 (J Barnes), 203123 (J Searle), 203141 (V Jury), 203190 (M Furlow), 203459 (L Lambourne), 203512 (R Tovey), 203636 (W Dott), 203648 (E Pimblett), 203652 (T Randle), 203653 (S Appleton), 203680 (S Jarvis-Dott), 203683 (D Simmons), 203797 (R Nagasaki), 203911 (E Lambourne), 204201 (P Williams), 204785 (R Foale), 204871 (V Valge-Archer), 204891 (D Newgreen),

• Expansion of the Draft Local Plan allocation beyond the originally promoted Grange Farm scheme raises questions about the necessity and role of newly included land. • Inappropriate, being too small to be self-sustaining and too large to fit comfortably within the landscape, necessitating a reduction in size and ambition. • Scale of development threatens the viability and identity of existing communities, potentially leading to commuter dormitory scenarios. • Inconceivable that a development of the scale proposed at Grange Farm, which is 75,000% larger than what the Draft Plan considers appropriate for category of settlement which Draft Plan itself prescribes for Little Abington, should proceed in light of this. • Significant overdevelopment in close proximity to Grange Farm development. • Disingenuous to bring forward site without detailed reference being made to the already contemplated additional plan to develop site further should adjacent Ley Rectory Farm become available. • The proposed development of approximately 6,000 dwellings is likely to generate between 9,000 and 12,000 private vehicles, in addition to buses, delivery vehicles, and commercial traffic required to support residential and employment uses. This level of traffic generation is wholly incompatible with the existing highway infrastructure.	204895 (J Clifford), 204931 (P Seddon), 205271 (P Dsantos),205486 (R Sainsbury) 205640 (L McNicholas), 205875 (C Randle), 205908 (A Hutchings), 205917 (M Rusted), 205923 (J Snell), 205967 (R Randle), 206164 (C Newgreen), 207138 (T Davenport), 207139 (T Davenport), 207140 (T Davenport), 207141 (T Davenport), 207142 (T Davenport), 207143 (T Davenport), 207144 (T Davenport), 207145 (T Davenport), 207146 (T Davenport), 207147 (T Davenport), 207148 (T Davenport), 207386 (W Dott), 207387 (W Dott), 207406 (H Rogers), 207685 (T Collett), 207925 (H Sutton), 207968 (S Trueman), 208601 (M Appleton), 208602 (M Appleton), 208607 (M Appleton), 208629 (G Jones), 205724 (F Goad), 210387 (M Cookson), 210390 (M Cookson), **Other bodies:**

• Not large enough to provide 6000 houses and all the infrastructure of a town – shops, offices, churches, library, fire station, police station, pub, restaurants, parks, museum, health centre care home etc. • New settlement as massive as the Grange Farm Development must be completely self-contained • Area is characterised by organic, incremental village growth over long periods, creating diversity in scale, design, and character. A large, single phase new settlement cannot replicate this. More appropriate approach would be small seeded settlement, followed by incremental, demand led development that reflects local character and avoids the “instant town” problem. • We were horrified to discover that you are proposing to build a development at Grange Farm which would involves the construction of between 6,000 and 8,000 houses. Based on the average figures from the Office of National Statistics these would be homes for about 2.35 people per household or between 14,000 and over 18,000 people	203060 (Cambridge Past, Present and Future), 204948 (Robinson College), 207383 (Cambridge Past, Present and Future), 207384 (Cambridge Past, Present and Future), 207385 (Cambridge Past, Present and Future), 208585 (Little Abington PC), 208588 (Little Abington PC), 208594 (Little Abington PC),
Infrastructure, Services and Facilities • Must be retail outlets (shops, pubs and restaurants) on the site. • Access to general practitioners is already limited and will likely worsen with the development.	200994 (M Logan), 201031 (R Smith), 201203 (A King), 201275 (E Pepperall), 201281 (C Wolverson), 201311 (M Donovan), 201312 (M Cookson), 201316 (M Craven), 201323 (H

• essential infrastructure—including roads, public transport, schools, NHS provision, policing, waste management, utilities, and mobile connectivity—to be fully funded, approved, and delivered before any housing is built. • More detail needed on timescale for facilities delivery. • Current infrastructure will note cope. • Existing schools do not have capacity for this growth. • GPs do not have capacity. • Lack of detail. • No mention of policing. • Addenbrookes does not have the capacity for this growth. • Increased demand for electricity. • Local shops and amenities are insufficient to support the anticipated increase in population. • Essential infrastructure delivery is unproven, risking housing ahead of services. • residents will need to travel for essential services and amenities, exacerbating congestion and reliance on cars. • Have facilities on site, Doctors, School, allotments, small general store/Post office. Picnic area, swimming pool, skate park. • Provide a partner led GP practice and plan effectively with Addenbrookes.	Biggs), 201330 (J Sharman), 201340 (G Broad), 201348 (K Christodoulides), 201358 (R Parkin), 201360 (V Hefford), 201369 (G Marshall), 201375 (B Spencer), 201398 (Francoise Goad), 201434 (G Moore), 201459 (T Stone), 201482 (A Cameron), 201483 (J Sneddon), 201517 (C Woodward), 201518 (J Jackson), 201529 (M Cooper), 201533 (A Smith), 201538 (T Davenport), 201541 (T Davenport), 201542 (L Davenport), 201544 (L Davenport), 201545 (J Yarker), 201570 (R Perucchini), 201577 (G Smith), 201580 (S Fraser), 201591 (L Menzies), 201665 (K Hefford), 201681 (J Weston), 201689 (F Irwin), 201696 (S Tossi), 201706 (R James), 201716 (C Rodgers), 201720 (J Fairs), 201723 (A Hutchings), 201725 (J Carr), 201726 (J Mayes), 201731 (L Scott), 201740 (G Lee), 201747 (B Seddon), 201748 (M Radcliffe), 201750 (J Hall), 201753 (L Dav), 201761 (B Gutteridge), 201764 (J Snell),

• Businesses and shops in the new town may require a larger catchment area to thrive. • Similar developments in Waterbeach and Northstowe were promised shops, schools and doctors and they are still waiting. • numerous examples both locally and around the country where infrastructure provision that was promised at the start of a project has been slow in coming or in many cases yet to materialise in spite of houses being built and people moving in • Fails to adequately address cumulative impacts. • No mention of additional emergency services. • Build swimming pool; climbing centre; pump track for bikes. • Proposed retail and postal facilities at Grange Farm could undermine existing village services. • Should include a specific policy safeguard that retail provision at Grange Farm is limited in scale and does not include a supermarket or competing postal facility, in order to protect existing village services. • Successful delivery of Grange Farm depends on resolving significant infrastructure interventions and funding arrangements. • Under the subheading 'Uses' Section 7– add a new criterion n. as follows; "n. Contributions to fire & rescue, police and ambulance facilities provision/ funding".	201772 (H Howe), 201782 (J Tanner), 201788 (H Cornwell), 201790 (S Ackerman), 201795 (R Barker), 201798 (J Thirkettle), 201802 (R Cornwell), 201804 (R Zimmern), 201846 (E Goodyear), 201850 (S Zmigrod), 201848 (R Allum), 201882 (N Rumble), 201883 (A Quinn), 201887 (K Lander), 201890 (K Cooper), 201892 (R Berry), 201912 (J Dodd), 201919 (G Menzies), 201921 (E Crutchington), 201943 (J Dowling), 201952 (J Hann), 201996 (S Fordham), 202017 (J Reynolds), 202020 (J Rivers), 202023 (S. Byatt), 202024 (S Byatt), 202047 (M Tiplady), 202067 (D Milns), 202092 (R Harman), 202142 (M Turner), 202299 (R Barnes), 202325 (E George), 202477 (J Herbert), 202568 (K Deeming), 202605 (Z Smith), 202638 (C Yeomans), 202696, (S Roberts), 202699 (K Russell), 202701 (K Russell), 202727 (A Annis), 202737 (A&L Pepperell), 202876 (C Pippen), 202915 (A Batty), 203123

• Lacks funded commitments for essential infrastructure, risking unsustainable stress on existing water supply, transport, and healthcare services. • New settlement would have a peak electricity demand of some 15MW requiring a 33kv supply from National Grid. More than one feeder connection would be required, and this would undoubtedly be above ground on posts or pylons making further intrusions into the landscape. • Object to Policy S/GF relating to the proposed new settlement at Grange Farm, for the reasons set out below. In its current form, the proposal is unsound due to unresolved transport constraints, poor accessibility to strategic public transport infrastructure, and serious flood risk implications for surrounding communities. • CCC note that Grange Farm is likely to require a new special school or expansion to Granta school, add special educational needs to Item 7k. • First phase should include community space and shop (even if on a temporary basis until further phases have been completed and purpose built community space and retail units built). • Policy should be modified to ensure that the quantity and type of indoor and outdoor sport provision onsite are informed by an up-to-date PPS, BFS, FPM. Sport England recommend that a management and maintenance plan is required for the indoor and outdoor sport facilities, and a Sports and Open Space Strategy is submitted if these were not secured as part of the outline planning permission.	(J Searle), 203407 (P Allum), 203459 (L Lambourne), 203529 (O Barnes), 203615 (A Palmer), 203636 (W Dott), 203648 (E Pimblett), 203803 (J Cutting), 203911 (E Lambourne), 204147 (L Paine), 204181 (S Morgan), 204201 (P Williams), 204725 (C Gill), 204773 (G Boselli), 204807 (P Munns), 204821 (Abington Stores and Post Office), 204871 (V Valge-Archer), 204919 (K King), 204921 (R Rix), 205032 (A Spicer), 205142 (N Whittaker), 205164 (T Stone), 205425 (S McDonald), 205457 (M Fentiman), 205482 (M Brattesani), 205602 (S Richards), 205606 (S Goodhart), 205616 (M Whittaker), 205618 (S Lee), 205632 (R Rix), 205641 (L McNicholas), 205660 (K Cooper), 205679 (S Fordham), 205681 (R Gilmour), 205732 (W Bailey), 205740 (G Saunders), 205766 (J Sneddon), 205814 (R Perucchini), 205815 (R Perucchini), 205823 (E Scott), 205940 (R Barker), 206035 (J Dowling), 206036 (J

• PE support desire to include primary and secondary education. Should be extended to include early years provision. Note in particular that these should be delivered “from the early phases” of development. We support sentiment but are aware that there is considerable experience in the Greater Cambridge area of careful management of timing of opening new schools (both primary and secondary), with implications for other nearby schools. • PE support in principle the desire to see provision of a new healthcare facility on the development. We wish to encourage early dialogue with the Integrated Care Board to understand the likely requirements and land take. • PE support intentions of policy, noting further work is required to establish the scale of each element of open space, sports provision and to work through how best to integrate into a landscape led masterplan. • A&E facilities at Addenbrookes hospital already under strain and cannot take any further capacity until it is developed and expanded. • Major infrastructure such as energy and roads should be comprehensive but other services and facilities should be in response to demand. Would not need large out of town grocery store to support first seeded development as would destroy viability of stores in existing local villages. • Proposal does not include any meaningful comparative analysis of facilities, amenities, public services, open space, or infrastructure required to sustain a	Dowling), 206204 (R Barnes), 206252 (P Brown), 206320 (G King), 206604 (S Solomonides), 206605 (S Solomonides), 201048 (R Sainsbury), 207049 (R Sainsbury) 207050 (R Sainsbury) 207138 (T Davenport), 207139 (T Davenport), 207140 (T Davenport), 207141 (T Davenport), 207142 (T Davenport), 207143 (T Davenport), 207144 (T Davenport), 207145 (T Davenport), 207146 (T Davenport), 207147 (T Davenport), 207148 (T Davenport), 207236 (S Appleton) 207386 (W Dott), 207386 (W Dott), 207543 (R Allum), 207544 (R Allum), 207545 (R Allum), 207555 (C Rodgers), 207585 (D Donohue), 207594 (V Valge-Archer), 207597 (R King),207963, 207975 S Trueman), 208012 (J Logan), 208428 (N Brown), 208481 (G Crowe), 208530 (G Brookman), 208533 (C Alda), 208554 (T Solomonides), 208581 (J Bowen), 208599 (M Appleton), 208663 (E Taylor), 209049 (J Darrell), 209718 (A Spicer), 209728

population of this size, nor how these would be delivered in an area currently characterised by rural villages and agricultural land. • Concerned that policy does not prejudge appropriate uses, or timing, which will be negotiated application stage. PE committed to ensuring early provision of community facilities to encourage and foster strong sense of community, potentially through some meanwhile uses. However, desire to see this in place “from the outset” could infer this is required before any occupiers and demand. We are keen to learn from best practice in other successful new communities, in places such as Welbourne, Nansledan and Poundbury, for inspiration. • PE support planning for essential services, facilities and infrastructure and we are committed to working with all statutory undertakers, GCSP and other interested parties to ensure timely delivery of infrastructure. Viability will be an important consideration.	(E Jones), 209745 (J Barnes), 210076 (V Cox), 210394 (M Cookson), 210395 (M Cookson), 210408 (M Cookson), 210425 (O Barnes), 210437 (R Wells), 210484m (E Lambourne), 210808 (A Marns), 210809 (A Marns), 210819 (C Newgreen), 210828 (R Barnes), 211016 (R Froment), 211656 (G King), 211709 (J Dowling), 211710 (J Dowling), 211718 (J Clifford), 211728 (P Seddon), Other bodies: 201556 (Stapleford PC), 202029 (Weston Colville PC), 202041 (Weston Colville PC), 202042 (Weston Colville PC), 202043 (Weston Colville PC), 204840 (Vistry Group), 207480 (Cambridgeshire Constabulary), 207513 (Cambridge Fire and Rescue Service), 210589 (Cambridgeshire County Council), 208112 (Sawston Parish Council),

	208115 (Sawston Parish Council), 208158 (Great Abington Parish Council), 208774 (Croudace Homes), 208947 (CPRE Cambridgeshire and Peterborough), 209225 (Sport England), 209265 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 209266 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 209267 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210495 (Robinson Collage), 210724 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210771 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210906 (Great Shelford Parish Council), 211413 (CALA Group Ltd),

Sewer and Flooding • Sewage plant is planned as a prominent feature on a main access route to Little Abington. • Impact of odours on nearby dwellings. • Run-off poses a flooding risk for the A1307 and the Abingtons. • Location for the new water treatment plant is undesirable due to potential odours affecting nearby housing. • How large an area of land will need to be allocated for the sewerage treatment works and when will the anticipated location be mapped out? • No discharge to River Granta. • Rainwater recycling. • Will treatment plant have facility to accept tankers to discharge effluent/sludge from other sources. • Will treatment plant be exclusively for the use of Grange Farm development. • Will large area of land be needed for treatment works and when will location be mapped out. • Should not be used for replacement Cambridge sewerage treatment works. • Would cause unpleasant smells which would disproportionately impact Abington residents due to the location. • Move water treatment plant to the side furthest from the Abingtons.	201031 (R Smith), 201281 (C Wolverson), 201316 (M Craven), 201330 (J Sharman), 201360 (V Hefford), 201369 (G Marshall), 201375 (B Spencer), 201415 (M Fryer), 201416 (M Fryer), 201417 (M Fryer), 201418 (M Fryer), 201459 (T Stone), 201482 (A Cameron), 201518 (J Jackson), 201529 (M Cooper), 201539 (A Patterson-Lee), 201554 (R Martin), 201624 (D Farrant), 201665 (K Hefford), 201681 (J Weston), 201694 (S Bowen), 201696 (S Tossi), 201724 (M Rusted), 201761 (B Gutteridge), 201785 (G Farrant), 201790 (S Ackerman), 201795 (R Barker), 201804 (R Zimmern), 201805 (J Dowling), 201821 (Y Arkwright), 201848 (R Allum), 201881 (R Randle), 201883 (A Quinn), 201919 (G Menzies), 201952 (J Hann), 202017 (J Reynolds), 202067 (D Milns), 202092 (R Harman), 202142 (M Turner), 202296 (R Barnes), 202299 (R Barnes), 202477 (J Herbert), 202699 (K Russell),

• Loss of natural drainage. • Surface water flooding already a problem. • Fails to adequately address cumulative impacts. • Development should not proceed unless assessments demonstrate no harm to the chalk stream or increased flood risk. • No detailed, independent and verified flood, water and waste water impact assessment. • The proposed site and much of the adjoining area is in the drainage field for the protected Granta river and a treatment plant here would present a clear threat to it. • River through village often bursts its banks in winter, following heavy rainfall. • PE note requirement to ensure that foul water can be appropriately managed, as part of overall water cycle. Have commissioned work in this area from a suitably qualified expert, and we expect that this will help shape an appropriate policy for the site, based on what is practical and deliverable. We are clear that ultimately the Water companies have a statutory duty to provide for waste water collection and recycling, but we are aware of constraints locally and environmental pressures, and are committed to exploring what we can do to ensure integration into the wider network.	202701 (K Russell), 202726 (A Victory), 202731 (J Barnes), 203190 (M Furlow), 203389 (G Brookman), 203407 (P Allum), 203459 (L Lambourne), 203680 (S Jarvis-Dott), 203805 (A Butchart), 203934 (L Donahue), 204015 (J Fairs), 204201 (P Williams), 204395 (P Klein-Ensminger), 204617 (J Mannion), 204635 (M Starr), 204664 (S Haynes), 204807 (P Munns), 204810 (E McKeown), 204879 (J Dowling), 204891 (D Newgreen), 204919 (K King), 205032 (A Spicer), 205147 (I Sainsbury), 205164 (T Stone), 205387 (M Hardinge), 205432 (N Marshman), 205482 (M Brattesani), 205508 (M Victory), 205601 (S Richards), 205620 (J McDonald), 205712 (A Wells), 205713 (A Wells), 205726 (F Goad), 205764 (R Wells), 205822 (C Randle), 205911 (M Rusted), 205939 (R Barker), 205974 (R Randle), 206029 (J Dowling), 206168 (C Newgreen), 206198 (R Barnes), 206322 (G

	King), 206326 (C Cameron), 206597 (A Butchart), 206896 (I Sainsbury), 206897 (I Sainsbury), 207068 (L Cookson), 207149 (M Huntsman), 207179 (S Bowen), 207227 (E Lane), 207237 (S Appleton), 207387 (W Dott), 207408 (S Haynes), 207504 (P Hayden-Smith), 207543 (R Allum), 207557 (G Smith), 207559 (G Smith), 207562 (L Sainsbury), 207571 (P Gill), 207574 (M Howes), 207585 (D Donohue), 207590 (D Donohue), 207596 (R King), 207599 (P Brunning), 207653 (A&C Soares), 207659 (P Lester), 207680 (T Collett), 207786 (P Williams), 207965 S Trueman), 208430 (N Brown), 208432 (N Brown), 208532 (C Alda), 208543 (K Auckland), 208572 (A Ross), 208603 (M Appleton), 208605 (M Appleton), 208629 (G Jones), 208555 (T Solomonides), 208664 (E Taylor), 209719 (A Spicer), 209721 (A Spicer), 209743 (J Barnes), 210075 (V Cox), 210403 (M Cookson), 210431 (B Davies), 210485 (E

	Lambourne), 210660(S Zmigrod), 210705 (G Saunders), 210797 (D Marns), 210802 (D Marns), 210819 (C Newgreen), 210841 (G King), 211015 (R Froment), 211017 (R Froment), 211021 (M Hardinge), 211033 (T & A Bradford & Jedrzejewski), 211036 (T & A Bradford & Jedrzejewski), 211655 (G King), 211699 (J Dowling), 211720 (J Clifford), 211732 (P Seddon), 211786 (H Sutton) Other bodies: 207743 (Whittlesford Parish Council), 208119 (Sawston Parish Council), 208590 (Little Abington PC), 208592 (Little Abington PC), 210769 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust),

Drinking Water • Existing concerns regarding the supply of drinking water in the area. • Chalk aquifer and sewage system will not support an additional 6000 homes. • Abington is the driest area of an already dry part of UK. The site is on chalk which supplies our drinking water and keeps the river Granta as a rare chalk stream. • Lack of water locally with solution to come from a new reservoir which is north of Cambridge (pumping costs). • Proposal of more houses without a plan to supply potable water is of great concern. • Water is a vital commodity that requires long term planning and protection. • No mention of a water management plan. • Grange Farm requires 3-4 million litres daily by 2032. Grafham Water Transfer will not be online until 2032. Suspend allocation unless Cambridge Water confirms water supply for 2025-2032 in writing, or defer to post-2032. • Site is over major aquifer highly sensitive to contamination from pollutant runoff. Extent to which risk can be mitigated is unclear, but a major development in this location is clearly undesirable in this water-stressed region.	201031 (R Smith), 201281 (C Wolverson), 201316 (M Craven), 201369 (G Marshall), 201375 (B Spencer), 201459 (T Stone), 201482 (A Cameron), 201624 (D Farrant), 201655 (P Zimmem), 201681 (J Weston), 201785 (G Farrant), 201804 (R Zimmern), 201805 (J Dowling), 201848 (R Allum), 201881 (R Randle), 201882 (N Rumble), 201883 (A Quinn), 201952 (J Hann), 202017 (J Reynolds), 202022 (A Marns), 202477 (J Herbert), 202600 (L Cameron), 202737 (A&L Pepperell), 203459 (L Lambourne), 203680 (S Jarvis-Dott), 203911 (E Lambourne), 204181 (S Morgan), 204196 (A Cooke), 204201 (P Williams), 204395 (P Klein-Ensminger), 204664 (S Haynes), 204725 (C Gill), 204773 (G Boselli), 204810 (E McKeown), 205387 (M Hardinge), 205387 (M Hardinge), 205432 (N Marshman), 205618 (S Lee), 205731 (W Bailey), 205767 (J Sneddon), 205914 (M Rusted), 206030 (J Dowling), 206896 (

	Sainsbury), 207237 (S Appleton), 207408 (S Haynes), 207504 (P Hayden-Smith), 207550 (B Garnish), 207562 (L Sainsbury), 207566 (S Fryer), 207590 (D Donohue), 207681 (T Collett), 207784 (P Williams), 207924 (H Sutton), 207964 S Trueman), 208016 (J Logan), 208429 (N Brown), 208481 (G Crowe), 208529 (G Brookman), 208578 (J Bowen), 208599 (M Appleton), 208629 (G Jones), 210431 (B Davies), 210485 (E Lamborne), 210490 (C Gill), 210796 (D Marns), 210801 (A Marns), 211651 (G King), 211701 (J Dowling), 211732 (P Seddon), **Other bodies:** 203005 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 207743 (Whittlesford Parish Council), 208118 (Sawston Parish Council), 208587 (Little Abington PC), 208947 (CPRE Cambridgeshire and Peterborough),

Landscape & countryside • Views and vista from Roman road need to be considered. • Too close to Roman Road. • Near ancient woodland. • Loss of countryside • Loss of best and most versatile (Grade 2/3) agricultural land. • Questions if loss of land can be compensated by increased open spaces and biodiversity. • Topography makes it unsuitable. • Will be visible many miles away. • Impact of high rise properties. • Undermines national policy aimed at preventing the coalescence of settlements and preserving countryside character. • Coalescence of Abington, Hildersham and Pampisford • Cumulative impact of nearby developments, including Babraham and solar projects, will further harm the local environment. • Would scar the landscape, harming the character of the Abington villages and the A1307 corridor. • Insufficient Mitigation and Landscape Capacity.	200994 (M Logan), 201031 (R Smith), 201275 (E Pepperall), 201281 (C Wolverson), 201323 (H Biggs), 201330 (J Sharman), 201357 (K Battom), 201367 (M Joslin), 201372 (A Wells), 201375 (B Spencer), 201408 (R Lee), 201434 (G Moore), 201467 (R Wells), 201482 (A Cameron), 201483 (J Sneddon), 3201494 (J Tharby), 201518 (J Jackson), 201530 (I Rogers), 201531 (H Rogers), 201538 (T Davenport), 210539 (A Patterson Lee), 201541 (T Davenport), 201542 (L Davenport), 201544 (L Davenport), 201545 (J Yarker), 201591 (L Menzies), 201624 (D Farrant), 201651 (M Mannassi), 201681 (J Weston), 201690 (J Kelly), 201691 (C Randle), 201694 (S Bowen), 201696 (S Tossi), 201706 (R James), 201723 (A Hutchings), 201726 (J Mayes), 201753 (L Dav), 201756 (G Sharman), 201782 (J Tanner), 201785 (G Farrant), 201788 (H Cornwell), 201790(S Ackerman), 201803 (S Fryer), 201805 (J

• Evidence supporting site selection admits the boundary is too constrained to properly mitigate harm to sensitive environmental assets. • Site is not suitable for a new town of this size. • Erosion of the rural landscape that currently provides a clear and valuable break between settlements. • Strong, enforceable protections for countryside, must be guaranteed. • Cannot be in keeping due to its scale. • Proximity of Grange Farm to the Kingsway Solar Farm a potential issue. • Concrete over more arable land increases reliance on food imports. • Jeopardising the green belt and the rural landscape south of the city. • Land outside the development boundary may remain in agricultural use and not default to informal open space. • Policy should ensure built forms are well-screened and integrated into the landscape with significant tree planting to mitigate visual impact. • Policy should restrict development to low rise to reduce impact on landscape. • Make clear that ancillary development, such as the bridge, is subject to the same policy requirements regarding landscape, heritage and ecology. • Would cause irreversible harm to a sensitive chalkland, rural-edge location. • Damaging views from the High Street's heritage assets, the Gog Magogs, and the wider Hertfordshire Chalk Downs.	Dowling), 201846 (E Goodyear), 201855 (J Hudson), 201881 (R Randle), 201882 (N Rumble), 201892 (R Berry), 201898 (R Pargeter), 201912 (J Dodd), 201943 (J Dowling), 202015 (D Marns), 202017 (J Reynolds), 202020 (J Rivers), 202023 (P Cullimore), 202055 (P Snow), 202067 (D Milns), 202092 (R Harman), 202104 (M Barry), 202162 (L Crisp), 202163 (R Livermore), 202296 (R Barnes), 202337 (S James), 202359 (A-M Melloy), 202481 (P Brown), 202571 (R Haining), 202600 (L Cameron), 202696 (S Roberts), 202708 (D Golding), 202726 (A Victory), 202731 (J Barnes), 202737 (A&L Pepperell), 202792 (A McDonnell), 203002 (S Price), 203141 (V Jury), 203187 (M Jury), 203389 (G Brookman), 203417 (F Davis), 203512 (R Tovey), 203529 (O Barnes), 203615 (A Palmer), 203680 (S Jarvis-Dott), 203730 (K Auckland), 203797 (R Nagasaki), 203805 (A

• Must require a full Landscape and Visual Impact Assessment (LVIA). • Note that an amount of greenspace has not yet been specified. Natural England advise 3ha/1000 greenspace which meets the Natural England GI Framework Standards criteria should be an absolute minimum, particularly where mitigation for recreational pressure is needed, and that more should ideally be required. For a site of 6000 homes, a minimum of 43.2ha semi-natural greenspace would be needed. • Precautionary, landscape-led approach that reduces development intensity, strengthens environmental protections, and aligns growth with environmental and infrastructure capacity is required. • Impact on local and wider views. • No detailed, independent and verified visual impact assessment. • Will be visible from further away than Trumpington, Duxford, Great Chesterford and Bartlow. • Council's own Skyline and Tall Buildings Strategy concludes site is unsuitable for tall or visually prominent development and identifies a high residual risk of harm even with mitigation. • Soft landscaping proposals will not mask development. • Boundaries of "green" shown on the drawing within the Grange Farm plan does not specify the size of these or how they will be protected.	Butchart), 203807 (S Solomonides), 203839 (T Solomonides), 203934 (L Donahue), 204111 (J Batchelor), 204147 (L Paine), 204156 (B Barkataki), 204586 (R Elston-Green), 204617 (J Mannion), 204635 (M Starr), 204803 (E Jones), 204807 (P Munns), 204895 (J Clifford), 204919 (K King), 204921 (R Rix), 204994 (V Cox), 204999 (D Stephen), 205142 (N Whittaker), 205193 (V Silvey), 205271 (P Dsantos), 205401 (B Davis), 205425 (S McDonald), 205430 (E Davies), 205457 (M Fentiman), 205487 (G Minhas), 205512 (S Somerville), 205544 (G Minhas), 205607 (S Goodhart), 205619 (J McDonald), 205635 (M Furlow), 205680 (S Fordham), 205705 (A Wells), 205730 (W Bailey), 205734 (J Wingfield), 205742 (R Lee), 205749 (C Feenan), 205750 (C Feenan), 205751 (C Feenan), 205757 (R Wells), 205759 (R Wells), 205762 (R Wells), 205763 (R Wells), 205765 (J Sneddon), 205813 (R Perucchini), 205876

• The development would significantly affect the distinctive chalk landscape, open views and rural approaches. Supply of electricity would be via above ground post or pylons making further intrusions on the landscape. • PE are concerned about lack of clarity about purpose, appropriate land uses, location, definition/purpose and spatial extent of proposed SEA. The term Strategic Enhancement Area is potentially misleading given wide-ranging nature of policy intention and its generalised use across different contexts and boundary interfaces. PE are fully supportive of a landscape led design, but consider that further work is required to establish size and nature of proposed SEA, the purposes and land uses for this area. As long term landowners, both PE and Mr Franklin intend to continue to farm their residual land holdings, and therefore definition over the proposed SEA and consideration of impacts on the residual farm will be important considerations for both landowners. • Support in principle need for robust landscape framework. We have commissioned expert consultants on landscape, ecology and heritage to explore these issues further. Remain concerned about current definition of SEA and agree that this should be devised based on a more detailed evidence driven understanding of site constraints and opportunities, and a landscape led masterplan proposal. • Policy should require legal mechanisms that prevent buffer at the Ley Rectory Farm Barns interface being thinned, repurposed or built upon in future years	(C Randle), 205905 (A Hutchings), 205912 (M Rusted), 205920 (C Paton), 205921 (C Paton), 205945 (R Barker), 205955 (S Zmigrod), 205968 (R Randle), 206027 (J Dowling), 206150 R Livermore), 206153 (R Livermore), 206196 (R Barnes), 206197 (R Barnes), 206202 (R Barnes), 206250 (P Brown), 206314 (G King), 206315 (G King), 206595 (G Butchart), 206602 (S Solomonides), 206603 (S Solomonides), 206605 (S Solomonides), 206900 (I Sainsbury), 207653 (A&C Soares), 207139 (T Davenport), 207140 (T Davenport), 207141 (T Davenport), 207142 (T Davenport), 207143 (T Davenport), 207144 (T Davenport), 207145 (T Davenport), 207146 (T Davenport), 207147 (T Davenport), 207148 (T Davenport), 207149 (M Huntsman), 207178 (S Bowen), 207227 (E Lane), 207235 (S Appleton), 207238 (S Appleton), 207406 (H Rogers), 207504 (P Hayden-Smith), 207556 (C Rodgers), 207559

	(G Smith), 207563 (L Sainsbury), 207565 (S Fryer), 207569 (P Gill), 207580 (J Weston), 207591 (D Stephen), 207591 (D Stephen), 207593 (V Valge-Archer), 207595 (V Valge-Archer), 207599 (P Brunning), 207679 (T Collett),207922 (H Sutton), 208011 (J Logan), 208425 (N Brown), 208433 (N Brown), 208527 (G Brookman), 208543 (K Auckland), 208544 (K Auckland), 208547 (D Fraser), 208548 (D Fraser), 208549 (D Fraser), 208550 (D Fraser), 208551 (D Fraser), 208552 (D Fraser), 208570 (A Ross), 208578 (J Bowen), 205579 (J Bowen), 208582 (J Bowen), 208605 (M Appleton), 208629 (G Jones), 208663 (E Taylor), 208665 (E Taylor), 208667 (E Taylor), 208739 (F Orgee), 208748 (T Orgee), 209047 (J Darrell), 209188 (T & A Bradford & Jedrzejewski), 209257 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 209272 (Pampisford Estate Farms Limited

	and the Trustees of the James Binney Will Trust), 209724 (E Jones), 209731 (J Barnes), 209732 (J Barnes), 209739 (J Barnes), 209741 (J Barnes), 210396 (M Cookson), 210409 (M Cookson), 210416 (O Barnes), 210417 (O Barnes), 210418 (O Barnes), 210419 (O Barnes), 210420 (O Barnes), 210649 (S Zmigrod), 210650 (S Zmigrod), 210654 (S Zmigrod), 210661 (S Zmigrod), 210681 (G Saunders), 210706 (G Saunders), 789210791 (R Perucchini), 210803 (A Marns), 210819 (C Newgreen), 210822 (C Paton), 210836 (R Barnes), 210850 (N Brown), 211027 (T & A Bradford & Jedrzejewski), 211033 (T & A Bradford & Jedrzejewski), 211652 (G King), 211654 (G King), 211694 (J Dowling), 211695 (J Dowling), 211716 (J Clifford), 211717 (J Clifford), 211732 (P Seddon), 2117323(P Seddon), 211787 (H Sutton),

	Other bodies: 201602 (Great Abington Parish Council), 202029 (Weston Colville PC), 202031 (Weston Colville Parish Council), 203060 (Cambridge Past, Present and Future), 207383 (Cambridge Past, Present and Future), 203266 (Horseheath Parish Council), 204948 (Robinson College), 207384 (Cambridge Past, Present and Future), 207385 (Cambridge Past, Present and Future), 207614 (Natural England), 208114 (Sawston Parish Council), 208154 (Great Abington Parish Council), 208155 (Great Abington Parish Council), 208592 (Little Abington PC), 208947 (CPRE Cambridgeshire and Peterborough), 209272 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210906 (Great Shelford Parish Council),

Impact on chalk stream (Granta) • Threatens one of only 260 chalk streams in the World which runs through our village. • Strong, enforceable protections for chalk stream must be guaranteed. • Chalk aquifer and sewage system will not support an additional 6000 homes. • The site is on chalk which supplies our drinking water and keeps the river Granta as a rare chalk stream. • No amount of water management on site will prevent contamination. • Chalk streams are internationally important and are already impacted by existing agriculture and sewage plants upstream at Linton. • Policy must provide robust evidence on how the development can proceed without further jeopardizing the fragile local water table and the health of these rare chalk stream habitats. • No detailed, independent and verified environmental and hydrogeological impact assessment. • Development should not proceed unless assessments demonstrate no harm to the chalk stream or increased flood risk.	201368 (J Lawrence), 201372 (A Wells), 201407 (G Sanders), 201467 (R Wells), 201482 (A Cameron), 201538 (T Davenport), 201541 (T Davenport), 201542 (L Davenport), 201544 (L Davenport), 201554 (R Martin), 201570 (R Perucchini), 201624 (D Farrant), 201655 (P Zimmem), 201662 (N Ockendon), 201706 (R James), 201761 (B Gutteridge), 201762 (D Turnidge), 201790 (S Ackerman), 201795 (R Barker), 201855 (J Hudson), 201882 (N Rumble), 201912 (J Dodd), 201985 (J Sainsbury), 202017 (J Reynolds), 202142 (M Turner), 202337 (S James), 202600 (L Cameron), 202731 (J Barnes), 202737 (A&L Pepperell), 203190 (M Furlow), 203417 (F Davis), 203868 (M Broadhurst), 203911 (E Lambourne), 204181 (S Morgan), 204196 (A Cooke), 204725 (C Gill), 204807 (P Munns),

• Under strategic plan green infrastructure initiatives number 1 is the revitalisation of the chalk stream network - part of the same area as the Grange farm development - nothing mentioned in the Grange Farm plan on how the chalk streams will be protected or affected by this development. • The allocation sits above the river Granta chalk-stream catchment where ecological status is not good, and where regional plans recognise water scarcity and the need to avoid increases in abstraction until new strategic resources come on line. Large scale developments here risks run-off a water - quality impacts on a nationally rare Habitat. • The site sits on a shallow chalk aquifer and adjacent to the rare River Granta chalk stream; construction runoff could pollute these highly sensitive ecosystems. • In the absence of clear, robust and enforceable evidence demonstrating no adverse effect, permission should be refused at Grange Farm. • Exhibits laudable elements and characteristics (being up-slope) so that it could, if all the proposed mitigations and water handling systems are included, be neutral to positive in overall impact on the River Granta. • Trustees have for years been very concerned about impact of CSET proposals, particularly on Nine Wells and the Brook. The Trust supports on-road alternative being put forward by Better Ways for Busways group.	204891 (D Newgreen), 204895 (J Clifford), 204919 (K King), 205147 (I Sainsbury), 205164 (T Stone), 205387 (M Hardinge), 205401 (B Davies), 205430 (E Davies), 205546 (G Minhas), 205601 (S Richards), 205706 (A Wells), 205711 (A Wells), 205731 (W Bailey), 205737 (J Wingfield), 205748 (C Feenan), 205758 (R Wells), 205767 (J Sneddon), 205805 (R Martin), 205942 (R Barker), 205949 (S Zmigrod), 205950 (S Zmigrod), 206168 (C Newgreen), 206898 (I Sainsbury), 207786 (P Williams), 207138 (T Davenport), 207139 (T Davenport), 207140 (T Davenport), 207141 (T Davenport), 207142 (T Davenport), 207143 (T Davenport), 207144 (T Davenport), 207145 (T Davenport), 207146 (T Davenport), 207147 (T Davenport), 207148 (T Davenport), 207150 (M Huntsman), 207237 (S Appleton), 207387 (W Dott), 207564 (R Elston-Green), 207571 (P Gill), 207574 (M Howes), 207583 (G Brookman), 207591 (D

	Stephen), 207592 (D Stephen), 207599 (P Brunning), 207659 (P Lester), 207928 (H Sutton), 208016 (J Logan), 208429 (N Brown), 208532 (C Alda), 208543 (K Auckland), 208599 (M Appleton), 208605 (M Appleton), 208629 (G Jones), 208752 (T Ogree), 206026 (J Dowling), 208429 (N Brown), 206898 (I Sainsbury), 208752 (T Ogree), 210074 (V Cox), 210403 (M Cookson), 210413 (O Barnes), 210492 (C Gill), 210678 (G Saunders), 210679 (G Saunders), 210792 (R Perucchini), 211651 (G King), 211693 (J Dowling), **Other bodies:** 201609 (Great Abington Parish Council), 203005 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 203060 (Cambridge Past, Present and Future), 207383 (Cambridge Past, Present and

	Future), 207384 (Cambridge Past, Present and Future), 207385 (Cambridge Past, Present and Future), 208157 (Great Abington Parish), 208592 (Little Abington PC), 209017 (Hobson's Conduit Trust),
Pollution • Noise and air pollution • Such light and noise pollution in such a rural setting is not something that should be promoted by any local authority, or body representing it. • Extensive public lighting will create light pollution and ensure the settlement will be visible from afar night and day. • Introduce a “quiet zone” on the south‐eastern edge that excludes high‐impact, noise‐generating and HGV‐intensive uses. • Development will be subject to high levels of traffic noise for most of the 24 hour day. • Construction lasting up to 20 years will generate prolonged noise, dust and mud, adversely affecting nearby residents and wildlife.	201368 (J Lawrence), 201375 (B Spencer), 201635 (J Shaw), 201696 (S Tossi), 201821 (Y Arkwright), 202047 (M Tiplady), 202142 (M Turner), 202296 (R Barnes), 202699 (K Russell), 204773 (G Boselli), 202701 (K Russell), 204879 (J Dowling), 204891 (D Newgreen), 205715 (A Wells) 205877 (C Randle), 205951 (S Zmigrod), 205954 (S Zmigrod), 205969 (R Randle), 207559 (G Smith), 207566 (S Fryer), 208547 (D Fraser), 208548 (D Fraser), 208549 (D Fraser), 208550 (D Fraser), 208551 (D Fraser), 208552 (D Fraser), 208604 (M Appleton), 208629 (G Jones), 206034 (J Dowling), 206041 (J Dowling), 210680 (G Saunders), 210805 (A Marns), 211708 (J Dowling),

	Other bodies: 202029 (Weston Colville PC), 208591 (Little Abington PC),
Habitats and Wildlife • Impact on habitats. • Strong, enforceable protections for wildlife must be guaranteed. • Impact on SSSIs. • Increased pressure on existing open and biodiverse spaces in Stapleford parish, including Magog Down, Chalk Hill Down, and Wandlebury Country Park. • Established open spaces may become overcrowded, negatively impacting natural assets, and recommend using CIL/S106 funds to manage the impacts of increased footfall. • impact on precious flora and fauna especially Grey Partridge populations. • Sufficient and sufficiently robust and legally binding safeguards are essential to ensure commercial developers are held to the requirements, both during construction and for the long term maintenance of, for example, biodiversity mitigation.	201311 (M Donovan), 201316 (M Craven), 201357 (K Battom), 201372 (A Wells), 201467 (R Wells), 201538 (T Davenport), 201541 (T Davenport), 201542 (L Davenport), 201544 (L Davenport), 201662 (N Ockendon), 201753 (L Dav), 201762 (D Turnidge), 201785 (G Farrant), 201788 (H Cornwell), 201790(S Ackerman), 201803 (S Fryer), 201821 (Y Arkwright), 201898 (R Pargeter), 201915 (G Battom), 201919 (G Menzies), 202023 (P Cullimore), 202047 (M Tiplady), 202082 (D Palmer), 202481 (P Brown), 202912 (R King), 203407 (P Allum), 203934 (L Donahue), 204999 (D Stephen), 205164 (T Stone), 205271 (P Dsantos), 205457 (M Fentiman), 205618 (S Lee), 205678 (J Sainsbury),

• Must include specific mitigation strategies and funding to manage the impacts of increased recreational activity on the important ecological, heritage and amenity assets on the adjacent Gog Magog Hills – so that they continue to contribute to the quality of life of the wider Cambridge population. • Item 11d should be revised to replace ‘minimise’ with ‘avoid’ and to take into account Wandlebury and Magog Down by adding 'and other nature and heritage sites’ • How will the development prevent unofficial access points to the Roman Road being created? • Welcome inclusion of SEA to buffer Roman Road SSSI from development, but concerns currently remain about how impacts will be avoided. • Grange Farm is taking away from a natural environment and whilst the plan acknowledges various things as previously mentioned there is no specific detail on how this will be protected or enhanced with only throwaway lines like ”consider these assets” “deliver enhancement wherever possible” these mean nothing and will allow the developer to ignore. • Will the houses have eaves for swallows and house martins, and purpose-built bricks for swifts, and areas for sparrows etc.? • Ecological survey and monitoring should also be added as requirement for specific sensitive locations outside of the site’s red line boundary that may be impacted by	205680 (S Fordham), 205709 (A Wells), 205710 (A Wells), 205878 (C Randle), 205970 (R Randle), 206250 (P Brown), 206316 (G King), 206599 (A Butchart), 207068 (L Cookson), 207653 (A&C Soares), 207138 (T Davenport), 207139 (T Davenport), 207140 (T Davenport), 207141 (T Davenport), 207142 (T Davenport), 207143 (T Davenport), 207144 (T Davenport), 207145 (T Davenport), 207146 (T Davenport), 207147 (T Davenport), 207148 (T Davenport), 207227 (E Lane), 207564 (R Elston-Green), 207565 (S Fryer), 207566 (S Fryer), 2307567 (J Wallace), 207584 (G Brookman), 207585 (D Donohue), 207591 (D Stephen), 207592 (D Stephen), 208527 (G Brookman), 208547 (D Fraser), 208548 (D Fraser), 208549 (D Fraser), 208550 (D Fraser), 208551 (D Fraser), 208552 (D Fraser), 208569 (A Ross), 208629 (G Jones), 206028 (J Dowling), 205913 (M Rusted), 210403 (M Cookson), 210414 (O Barnes),

development. Should be requirement to monitor effectiveness of measures put in place to combat recreational disturbance on SSSI, for example, and commitment to implementing alternative solutions if initial measures are ineffective.	210791 (R Perucchini), 210824 (C Paton), 211652 (G King), 211694 (J Dowling), 211696 (J Dowling), 211728 (P Seddon), **Other bodies:** 201556 (Stapleford PC), 201604 (Great Abington Parish Council), 201605 (Great Abington Parish Council), 202029 (Weston Colville PC), 203001 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 203060 (Cambridge Past, Present and Future), 207383 (Cambridge Past, Present and Future), 207384 (Cambridge Past, Present and Future), 207385 (Cambridge Past, Present and Future), 207614 (Natural England), 2207615 (Natural England), 08592 (Little Abington PC), 210906 (Great Shelford Parish Council),

Historic Assets • Impact on local heritage. • Evidence supporting site selection admits the boundary is too constrained to properly mitigate harm to sensitive heritage assets. • Strong, enforceable protections for heritage assets must be guaranteed. • Impact on Roman Road. • Impact on scheduled ancient monument and Fleam Dyke. • Heritage buildings should be protected from being overshadowed by new developments, requiring careful and sympathetic consideration. • Concerns regarding the archaeological significance. • Impact on Abington's Conservation Area • Preservation of heritage assets have not been fully assessed or mitigated. • Must include specific mitigation strategies and funding to manage the impacts of increased recreational activity on the important ecological, heritage and amenity assets on the adjacent Gog Magog Hills – so that they continue to contribute to the quality of life of the wider Cambridge population. • How will the development prevent unofficial access points to the Roman Road being created? • No Heritage Impact Assessment.	201316 (M Craven), 201483 (J Sneddon), 201531 (H Rogers), 201538 (T Davenport), 201541 (T Davenport), 201542 (L Davenport), 201544 (L Davenport), 201591 (L Menzies), 201624 (D Farrant), 201690 (J Kelly), 201731 (L Scott), 201753 (L Dav), 201762 (D Turnidge), 201782 (J Tanner), 201795 (R Barker), 201803 (S Fryer), 201805 (J Dowling), 201821 (Y Arkwright), 201898 (R Pargeter), 201919 (G Menzies), 202023 (P Cullimore), 202092 (R Harman), 202163 (R Livermore), 202414 (M Whitcombe), 202481 (P Brown), 202616 (I Smith), 202675 (N Fraser), 202726 (A Victory), 202731 (J Barnes), 203407 (P Allum), 203512 (R Tovey), 203931 (A Ross), 204181 (S Morgan), 204196 (A Cooke), 204201 (P Williams), 204465 (H Sutton), 204617 (J Mannion), 204810 (E McKeown), 204939 (G Brown), 205016 (G Dalton), 205457 (M Fentiman), 205487 (G Minhas), 205387 (M Hardinge), 205545 (G

• Must acknowledge and assess cumulative landscape harm of Grange Farm alongside Kingsway Solar Farm and CSET corridor. It should state that development will be refused if the combined impact creates a continuous "urban wall" across the southern landscape. • Scale of proposed development and its proximity to designated and sensitive sites mean that significant adverse impacts are still likely, despite mitigation. • Impact on Roman Road, Brent Ditch, Fleam Dyke, the A11, the Henge next door to the Bronze Age Barrows, • Does not “preserve or enhance” designated heritage assets, nor the appearance of the Conservation Area of Little Abington (and Great Abington), nor the views into or out of them. • Would be contrary to Planning (Listed Buildings and Conservation Areas) Act 1990 as it would dominate and damage the conservation area's character and appearance due to the proposed size and population density and dominant elevated location on the hill overlooking Little Abington. • There is an historic ancient right of way from the A1307 into a chalk pit which lies within the development. This path was used for centuries by villagers to obtain chalk and clunch to maintain and repair their homes. This heritage should be preserved.	Minhas), 205635 (M Furlow), 205760 (R Wells), 205768 (J Sneddon), 205820 (E Scott), 205821 (E Scott), 205943 (R Barker), 206250 (P Brown), 206317 (G King), 206901 (I Sainsbury), 207051 (R Sainsbury), 207068 (L Cookson), 207138 (T Davenport), 207139 (T Davenport), 207140 (T Davenport), 207141 (T Davenport), 207142 (T Davenport), 207143 (T Davenport), 207144 (T Davenport), 207145 (T Davenport), 207146 (T Davenport), 207147 (T Davenport), 207148 (T Davenport), 207227 (E Lane), 207235 (S Appleton), 207504 (P Hayden-Smith), 207563 (L Sainsbury), 207565 (S Fryer), 207653 (A&C Soares), 207788 (P Willaims), 208011 (J Logan), 208013 (J Logan), 208481 (G Crowe), 208528 (G Brookman), 208569 (A Ross), 208570 (A Ross), 208629 (G Jones), 210389 (M Cookson), 210397 (M Cookson), 210409 (M Cookson), 210824 (C Paton), 210836 (R

• PE support Heritage Impact and Historic Landscape Character Assessments. We support in principle the need for robust landscape and masterplanning framework. Have commissioned expert consultants on landscape, ecology and heritage to explore these issues further, to ensure that we can respond to these key issues. • Whilst there are no designated heritage assets within the site boundary there are a number of designated heritage assets nearby. Any development of this site has potential to affect these heritage assets and their settings. • HIA notes there will be a high risk of residual harm to heritage given scale and nature of proposals. Essential that every opportunity is taken to mitigate impacts and also maximise enhancements for heritage. • Criterion 6 change 'historic assets' to 'heritage assets' and 'Scheduled Ancient Monument' to 'Scheduled Monument'. Amend 'Abington Conservation Area' to 'Great and Little Abington Conservation Area'. • b i Delete Ancient • bii Good to mention GII listed Worsted Lodge but other nearby listed buildings should also be mentioned e.g. 8 Cambridge Road • Needs to reference nearby Great and Little Abington Conservation Area and associated listed buildings. • B iii barrows, not burrows.	Barnes), 211027 (T & A Bradford & Jedrzejewski), 211653 (G King), 211694 (J Dowling), **Other bodies:** 201669 (Linton PC, 203060 (Cambridge Past, Present and Future), 203268 Horseheath Parish Council), 207383 (Cambridge Past, Present and Future), 207384 (Cambridge Past, Present and Future), 207385 (Cambridge Past, Present and Future), 208584 (Little Abington PC), 208596 (Little Abington PC), 209273 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210140 (Historic England), 210727 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210728 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210729 (Pampisford Estate Farms

• Suggest referring to a '…more detailed Heritage Impact Assessment…' given that an HIA has already been undertaken. • Do you mean Historic Landscape Characterisation? Purpose should be to inform the masterplanning. • Recommend re-ordering of the bullet points. • Recommend wording could be amended to read: 'Historic Landscape Characterisation and Landscape Character Assessment, more detailed Heritage Impact Assessment, and Archaeological Assessment must be undertaken to understand the impacts of development on landscape character, long range and local views and heritage assets and their setting, identifying appropriate mitigation and enhancement measures. The Council's HIA and the results of these further assessments must inform the masterplanning for the site.' • Include reference to 'improve understanding and legibility of Worstead Street Scheduled Monument and links to other Roman networks through interpretation and public art' (as recommended in the HIA). • 11 c should mention scheduled monument designation of Roman Road • 11 g should also mention that 'the open character of the landscape buffer should be maintained' (as recommended in the HIA). • 23 Lifespan – needs to include reference to the need for a Conservation Management Plan for the heritage assets.	Limited and the Trustees of the James Binney Will Trust), 210730 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust)

• Figure 82 Spatial Framework We welcome the identification of green space, landscape features around heritage assets. • The Town Centre is shown quite high up the hill. Given that heights of buildings are likely to be taller at the town centre, there is the potential for the built form to be visible above the ridge. We therefore recommend that Centre is moved lower down slope. • Paragraph 3.3.66 Long term Conservation Management Plan also needed for Roman Road and other heritage assets. This should also be included in the Policy. • Further work required to understand heritage importance of Roman Road, and area south of Roman Road and its interface with development. As landowner, geophysical survey work has been commissioned to aid our understanding of the site's heritage significance. Whilst it is recognised that there will be a need to provide some buffer to sensitive heritage and landscape features, there is further work required to determine the most appropriate way to achieve this. Design approaches, such as framing buried remains of interest to give them a visual setting, thereby enhancing their significance, may also be appropriate. • Further work required to determine most appropriate location for "centre" accounting for range of factors. Site topography and building heights will be important considerations, but there will be wider considerations including proximity and access to nearby communities, mix of uses proposed, phasing of	

development and infrastructure required to support delivery of such facilities. Policy should therefore be amended to support identification of a site for a new local centre, but leave flexibility in policy to find the appropriate design led response. • PE support variety of built form as set out in draft policy but conflicts with 7 A) which promotes an average density target of 50 – 55 dwellings per hectare. • PE support landmark features and buildings in appropriate locations, taking account of landscape and other technical work which will provide guidance on appropriate locations for taller buildings.	
Highways • Impact on A1307. • Impact on Four Wentways. • Exit onto A1307 will cause problems. • Consideration should be given to a new junction onto the A11. • Impact on A505/A1301 roundabout • will likely lead to more 'rat running' through Little Abington. • A505 needs increased capacity • Need safe continuous cycle links to other villages • A505 and A1307 are already badly congested during am/pm rush hours. • A1307 is high casualty road which will be made worse.	200994 (M Logan), 201011 (M Lunn), 201031 (R Smith), 201231 (M Sims), 201275 (E Pepperall), 201281 (C Wolverson), 201311 (M Donovan), 201312 M Cookson), 201316 (M Craven), 201323 (H Biggs), 201330 (J Sharman), 201340 (G Broad), 201348 (K Christodoulides), 201357 (K Battom), 201358 (R Parkin), 201360 (V Hefford), 201367 (M Joslin), 201368 (J Lawrence), 201369 (G Marshall), 201372 (A Wells), 201375 (B Spencer), 201407 (G Sanders), 201408 (R

• Timescale needed for adding/upgrading junctions. • No guarantee residents would walk or cycle to Welcome or Babraham Institute. • Scale of development warrants own highways infrastructure. • Underpass or bridge to new P&R • Dedicated lane on A1307 to Addenbrookes for emergency vehicles. • Buses already full. • Put park and ride near housing. • Will site be able to access Balsham Road junction on A11. • Transport estimates are widely optimistic with no scientific backing. • Claiming improved buses and cycling will fix this is unrealistic • Traffic analysis conducted just after post-Covid at the height of people still working from home. • Reliance on the proposed CSET scheme is speculative at best: it may never be approved or funded, and it would not connect most residents to their workplaces, meaning car use will remain inevitable. • Residents will need to travel for essential services and amenities, exacerbating congestion and reliance on cars. • Site is easily accessed from North London and commuting by train from Whittlesford. • Huge volume of traffic now as many staff at Addenbrooke's live in Haverhill.	Lee), 201415 (M Fryer), 201419 (M Fryer), 201434 (G Moore), 201443 (T Randle), 201459 (T Stone), 201482 (A Cameron), 201517 (C Woodward), 201518 (J Jackson), 201529 (M Cooper), 201530 (I Rogers), 201533 (A Smith), 201541 (T Davenport), 201542 (L Davenport), 201544 (L Davenport), 201545 (J Yarker), 201570 (R Perucchini), 201580 (S Fraser), 201584 (E Scott), 201591 (L Menzies), 201624 (D Farrant), 201635 (J Shaw), 201655 (P Zimmem), 201662 (N Ockendon), 201665 (K Hefford), 201667 (A Eleftheriou), 201668 (R Roberts), 201690 (J Kelly), 201691 (C Randle), 201694 (S Bowen), 201696 (S Tossi), 201697 (H Ward), 201720 (J Fairs), 201723 (A Hutchings), 201725 (J Carr), 201726 (J Mayes), 201731 (L Scott), 201748 (M Radcliffe), 201750 (J Hall), 201753 (L Dav), 201756 (G Sharman), 201761 (B Gutteridge), 201762 (D Turnidge), 201782 (J Tanner), 201785 (G Farrant), 201788 (H

• Only 2 routes directly onto the 1307 which doesn't auger well for a steady flow along the road. • Should be new traffic survey. • Should be different access to and from site. • Assuming all will take the bus or cycle is unrealistic. • Impact on those travelling to/from Haverhill. • Introduce additional frequent bus services into Cambridge. • Lack of understanding that it will attract visitors from surrounding villages, necessitating adequate transport provisions. • Concerns about accessibility and connectivity, making it feel more like an enclave. • Fully evaluate the impact of this development on the existing roads. • Need to take account of planned development further along A1307 at Haverhill and villages in-between. • Planned travel hubs would not alleviate impact as they are north on the A1307. • Already dangerous country lanes terrifying to walk and ride on. • Already congested area, with the A1307 at capacity, experiencing peak traffic of 1200 vehicles per hour in one direction. • Whittlesford Station is small and current transport plans, including the travel hub and Linton Greenway, are incomplete. • Enlarge Whittlesford train station.	Cornwell), 201790 (S Ackerman), 201798 (J Thirkettle), 201802 (R Cornwell), 201803 (S Fryer), 201805 (J Dowling), 201821 (Y Arkwright), 201846 (E Goodyear), 201848 (R Allum), 201855 (J Hudson), 201881 (R Randle) 201882 (N Rumble), 201883 (A Quinn), 201887 (K Lander), 201889 (W Cooper), 201890 (K Cooper), 201895 (A Cassidy), 201898 (R Pargeter), 201912 (J Dodd), 201919 (G Menzies), 201921 (E Crutchington), 201923 (D Rogers), 201924 (M Dance), 201952 (J Hann), 201996 (S Fordham), 202017 (J Reynolds), 202020 (J Rivers), 202022 (A Marns), 202023 (S. Byatt), 202024 (S Byatt), 202034 (D Reed), 202047 (M Tiplady), 202055 (P Snow), 202067 (D Milns), 202082 (D Palmer), 202092 (R Harman), 202299 (R Barnes), 202142 (M Turner), 202162 (L Crisp), 202163 (R Livermore), 202296 (R Barnes), 202325 (E George), 202359 (A-M Melloy), 202477 (J

• If transport hub at Babraham does not proceed, Grange Farm will just put even more traffic on the already overcrowded A1307. • Need mixed-use pedestrian/cycle path to the proposed research centre at Duxford Air Museum. • Plan to create a community of this size that is less dependent on the car may be slightly naive. • Access to the local train stations at Audley End, Whittlesford and Chesterford would only reinforce those congestion issues along with the lack of parking at those locations. • Allow for more private car parking spaces. • Relies entirely on major new transport infrastructure that is not consented, does not have secure finance and is technically challenging. • In transport terms, the site is not sustainable. • Public transport is future-dependent and not clearly committed (i.e., CSET). • Commission detailed modelling of the transport impacts of this development to identify the full suite of transport interventions required to make the development acceptable in planning terms, and to test its viability. • Design supporting bus infrastructure and services to link this development to destinations along the A11 and A505, potentially as far as Royston.	Herbert), 202481 (P Brown), 202568 (K Deeming), 202583 (H Pimblett), 202600 (L Cameron), 202616 (I Smith), 202632 (J Doncaster), 202638 (C Yeomans), 202675 (N Fraser), 202675 (N Fraser), 202699 (K Russell), 202701 (K Russell), 202708 (D Golding), 202726 (A Victory), 202731 (J Barnes), 202737 (A&L Pepperell), 202792 (S McDonnell), 202876 (C Pippen), 202915 (A Batty), 203010 (J Wallace), 203141 (V Jury), 203188 (S Hughes), 203359 (B Garnish), 203362 (A Hoare), 203389 (G Brookman), 203407 (P Allum), 203417 (F Davis), 203459 (L Lambourne), 203512 (R Tovey), 203529 (O Barnes), 203582 (S Hatchell-Wilson), 203586 (H Thomas), 203636 (W Dott), 203648 (E Pimblett), 203652 (T Randle), 203677 (E Randle), 203680 (S Jarvis-Dott), 203734 (D Fraser), 203773 (A Russell), 203798 (C Alda), 203805 (A Butchart), 203807 (S Solomonides), 203842 (A Chan), 203911 (E

• Does not explicitly identify A505 as critical infrastructure, nor does it set out a clear, funded and deliverable strategy for mitigating impacts of proposed new settlement and other growth on this corridor. • Test the feasibility and viability of this site allocation without CSET, given that scheme is both unfunded and at risk of not securing the order required for its construction. • Does not explicitly require public rights of way or equestrian access to be considered. Existing rights of way, including byways and footpaths, should be safeguarded and embedded within the masterplan. • Transport and active travel infrastructure linking Grange Farm with surrounding communities must be designed as inclusive, multi-user routes accommodating pedestrians, cyclists and equestrians. • Severe cumulative impact on the already-failing A11 Fourwentways roundabout and A1307(34 accidents in 10 years, one fatality), creating unacceptable danger to schoolchildren, elderly, and cyclists. • Should ensure that there is a fast through route for buses that stops right at the centre of the development site to foster frequent bus services that serve both Haverhill and Grange Farm without slowing passengers down. • Centre of Grange Farm too far from CSET for pedestrians.	Lambourne), 203931 (A Ross), 203934 (L Donahue), 203961 (S Somerville), 204015 (J Fairs), 204111 (J Batchelor), 204147 (L Paine), 204156 (B Barkataki), 204181 (S Morgan), 204196 (A Cooke), 204395 (P Klein-Ensminger), 204617 (J Mannion), 204635 (M Starr), 204664 (S Haynes), 204773 (G Boselli), 204785 (R Foale), 204807 (P Munns), 204810 (E McKeown), 204879 (J Dowling), 204891 (D Newgreen), 204895 (J Clifford), 204921 (R Rix), 204931 (P Seddon), 204977 (P Sainsbury), 205016 (G Dalton),205018 (J McDonald), 205020 (S Lee), 205032 (A Spicer), 205142 (N Whittaker), 205147 (I Sainsbury), 205154 (R Froment), 205164 (T Stone), 205187 (S Goodhart), 205193 (V Silvey), 205218 (S Richards), 205227 (P Mc), 205271 (P Dsantos), 205387 (M Hardinge), 205387 (M Hardinge), 205425 (S McDonald), 205430 (E Davies), 205432 (N Marshman), 205457 (M

• Full modelling of traffic volumes, junction capacity, and realistic travel behaviour must be completed before site is allocated. • The current draft cannot show whether the A1307 and A11 can safely or efficiently support the development. • Potential for 'rat-running' through villages. • Ensure any transport infrastructure which is critical to accommodating sustainable growth in this location is secured and adequately planned for. • Allocates land at Grange Farm based on transport provisions (CSET bus□way and A11/A1307 crossing) that have no confirmed consent or funding, making the allocation unrealistic. • Reliance on a future A11 transport hub to manage increased demand lacks a tested design, clear access strategy, and evidence of capacity beyond current needs. • Impact on public rights of way. • Grange Farm not suitable to service nearby campuses. • The IDP does not clearly indicate how CSET busway is to be funded, but it is assumed that the entirety of that cost will fall on the Grange Farm allocation. • Relies entirely on major new transport infrastructure that is not consented, does not have secure finance and is technically challenging.	Fentiman), 205502 (M Victory), 205545 (G Minhas), 205547 (G Minhas), 205606 (S Goodhart) 205633 (M Furlow), 205634 (M Furlow), 205642 (L McNicholas), 205662 (R Berry), 205707 (A Wells), 205708 (A Wells), 205714 (A Wells), 205725 (F Goad), 205727 (F Goad), 205729 (W Bailey), 205736 (J Wingfield), 205738 (J Wingfield), 205747 (C Feenan), 205769 (J Sneddon), 205810 (R Perucchini), 205811 (R Perucchini), 205812 (R Perucchini), 205816 (E Scott), (205879)n C Randle), 205880 (C Randle), 205906 (A Hutchings), 205907 (A Hutchings), 205915 (M Rusted), 205941 (R Barker), 205948 (S Zmigrod), 205971 (R Randle), 205972 (R Randle), 206031 (J Dowling), 206032 (J Dowling), 206033 (J Dowling), 206149 (R Livermore), 206154 (R Livermore), 206248 (P Brown), 206203 (R Barnes), 206249 (P Brown), 206251 (P Brown), 206319 (G King), 206327 (C Cameron), 206328 (C Cameron),

• Success of Culina transport company means an increase articulated lorry movements on A1307 and this will only increase as they use Haverhill depot as a dock location between the ports and the Midlands/London area. • Assumes that transport impacts can be resolved through later-stage interventions and modal shift, rather than demonstrating that sufficient, deliverable capacity exists at the outset to accommodate development. • Lacks clarity on how traffic would realistically move through A11/A1307 corridor, how peak-hour volumes would be managed, or how congestion would be avoided during construction and early occupation. • Reconstruct A11/A1037 junction. • Widen carriageway, junction improvements, bus priority of A1307 to Cambridge. • Provide traffic calming through the Abingtons. • Increase bus frequency. • New railway station at or near site. • Traffic data used to support the allocation appears to include periods affected by Covid-19 travel suppression. Baseline conditions may not reflect current or future traffic levels. • Delivery relies heavily on the successful approval of the Transport and Work Act (TWA) application for the CSET proposals for which no public inquiry date is set and no extension to Grange Farm provided.	206598 (A Butchart), 206601 (S Solomonides), 206602 (S Solomonides), 206605 (S Solomonides), 206689 (R Williams), 206690 (R Williams), 206895 (I Sainsbury), 207006 (B Davies), 207066 (L Cookson), 207067 (L Cookson), 207138 (T Davenport), 207139 (T Davenport), 207140 (T Davenport), 207141 (T Davenport), 207142 (T Davenport), 207143 (T Davenport), 207144 (T Davenport), 207145 (T Davenport), 207146 (T Davenport), 207147 (T Davenport), 207148 (T Davenport), 207150 (M Huntsman), 207178 (S Bowen), 207226 (E Lane), 207236 (S Appleton), 207386 (W Dott), 207389 (R Haining), 207407 (S Haynes), 207504 (P Hayden-Smith), 207523 (R Charles), 207551 (B Garnish), 207555 (C Rodgers), 207558 (G Smith), 207561 (L Sainsbury), 207565 (S Fryer), 207568 (J Wallace), 207570 (P Gill), 207572 (M Howes), 207579 (J Weston), 207582 (G Brookman), 207586 (D Donohue),

• Little evidence that people walk/cycle from South Cambridge villages and Cambridge to existing Science Parks. • Planned CSET route currently stops short of Grange Farm, terminating to the west of the A11 and would necessitate a further extension of the busway and a new Transport Hub to the east of the A11 to serve the new settlement. • Reliance on bus-led public transport strategies alone rarely achieves the desired modal shifts required to make a new settlement of this scale sustainable. • Occupation should be restricted to align with completion of CSET and its proposed extension in order to offer a choice of transport modes on day one. • Growth at Grange Farm could bring significant and potentially adverse impacts but acknowledge the generation of further evidence. • Has proposed segregated public transport connection been fully costed, and has necessary land been secured? Connection is presented as a fundamental dependency for viability of Grange Farm site. If it cannot be delivered, would the site be withdrawn? • National Highways require the CSET connection over A11 to be grade separated and not rely on the A11 junction. • CCC agrees that Grange Farm can be delivered in transport terms with sufficient mitigation, it is only deliverable if CSET Phase 2 is built as well as the extension to	207592 (D Stephen), 207594 (V Valge-Archer), 207597 (R King), 207605 (V Jury), 207653 (A&C Soares), 207659 (P Lester), 207667 (K Brown), 207674 (T Collett), 207785 (P Williams), 207923 (H Sutton), 207969 (S Trueman), 207978 (G Brown), 208017 (J Logan), 208431 (N Brown), 208478 (Pimblett), 208481 (G Crowe), 208482 (S Phipps), 208541 (D Simmons), 208542 (K Auckland), 208547 (D Fraser), 208548 (D Fraser), 208549 (D Fraser), 208550 (D Fraser), 208551 (D Fraser), 208552 (D Fraser), 208553 (D Fraser), 203839 (T Solomonides), 208426 (N Brown), 208546 (D Fraser), 208573 (A Ross), 208583 (J Bowen), 208598 (M Appleton), 208608 (N Brown), 208665 (E Taylor), 208738 (F Orgee), 208750 (T Orgee), 208751 (T Ogree), 209044 (J Darrell), 209045 (J Darrell), 209050 209069 (Camcycle), (J Darrell), 209720 (A Spicer), 209725 (E Jones), 209733 (J Barnes), 209734 (J Barnes),

CSET with grade separation over the A11 with bus priority across a new junction on the A1307. • CCC note that it is important to note that the size and scale of this development is vital in order for this to be deemed a sustainable location. CCC believe that this site would benefit from a detailed transport strategy to refine the trip budget for the site and set out the full mitigation package required. • Only viable if proposal for a Cambridge to Haverhill railway is taken forward, otherwise it will become similar to the original flawed planning many years ago for Cambourne, now only being corrected by East West Rail. • Grange Farm appears likely to bring significant and potentially unacceptable adverse impacts on safe and efficient operation of A11 and SRN junction, based on transport evidence currently available. Acknowledged that testing of Draft Plan in transport evidence currently available, demonstrated development of this site is reliant on introduction of extension to Cambridge South East Transport Scheme over the A11. National Highways require this crossing to be grade separated and not rely on A11 junction as this would likely interfere with operation of the junction. • Pampisford Estates are very supportive of ambitions of CSET project, which would bring improved public transport connections very close to the site, with the Travel Hub to be located south west of Fourwentways roundabout. Full integration with CSET is supported, however, the policy sets out a “segregated connection”, supported by a preliminary study by Mott MacDonald as part of the Council’s	209735 (J Barnes), 209736 (J Barnes), 209737 (J Barnes), 210070 (V Cox), 210071 (V Cox), 210076 (V Cox), 210386 (M Cookson), 210404 (M Cookson), 210405 (M Cookson), 210406 (M Cookson), 210409 (M Cookson), 210421 (O Barnes), 410422 (O Barnes), 210426 (O Barnes), 210436 (R Wells), 210483 (E Lambourne), 210490 (C Gill), 210655 (S Zmigrod), 210657 (S Zmigrod), 210658 (S Zmigrod), 210677 (G Saunders), 210685 (G Saunders), 210700 (G Saunders), 210702 (G Saunders), 201703 (G Saunders), 210794 (D Marns), 210795 (D Marns), 210806 (A Marns), 210807 (A Marns), 210810 (A Marns), 210818 (C Newgreen), 210819 (C Newgreen), 210823 (C Paton), 210827 (R Barnes), 211018 (R Froment), 211028 (T & A Bradford & Jedrzejewski), 211648 (G King), 211649 (G King), 211650 (G King), 211697 (J Dowling), 211702 (J Dowling), 2116703(J Dowling), 211704 (J

evidence base. PE feel there is insufficient work undertaken to be certain over deliverability and until work has been undertaken, we think it is premature to conclude that a segregated connection is the right solution taking account of deliverability and viability. PE have commissioned KMC Transport Planning to prepare a transport strategy for the project, and a key focus will be on the options for achieving integration with CSET. • PE support principle of effective integration of new community with proposed Cambridge South East Transport busway. Integration with CSET is supported, having potential to provide frequent, high quality connections into CBC and city. Feel that insufficient work undertaken to date to be certain over deliverability. We think it is premature to conclude that only a segregated connection (i.e. bridge link) is the right solution taking account of deliverability and viability. Alternative systems and integrations may provide same benefits, and these should also be explored. • PE wish to suggest rewording as follows: "Ensure transport and junction modelling is be undertaken to assess and confirm all possible points of vehicular access into the site and the necessary road and junction enhancements required to satisfy the Highways Authority and National Highways." • Have commissioned work to explore potential for direct access/egress from the A11 in north west corner of site, utilising the existing slip road serving the Total Energies filling station and materials recycling facility. We feel that this has a	Dowling), 211705 (J Dowling), 211705 (J Dowling), 211713 (J Dowling), 211726 (P Seddon), 211729 (P Seddon), 211730 (P Seddon), **Other bodies:** 201391 (Babraham PC), 201556 (Stapleford PC), 201610 (Great Abington Parish Council), 201669 (Linton PC), 202029 (Weston Colville PC), 202039 (Weston Colville PC), 202040 (Weston Colville PC), 202333 (Granta Land Ltd), 202540 (Granta Land Ltd), 202656 (Granta Land Ltd), 202670 (Granta Land Ltd), 203060 (Cambridge Past, Present and Future), 203604 (British Horse Society), 204684 (East Cambridgeshire DC), 204948 (Robinson College), 205241 (Axis Land Partnerships Ltd), 206219 (Granta Land Ltd), 207383 (Cambridge Past, Present and Future), 207384 (Cambridge Past, Present

potentially important role to play, and KMC Transport Planning are assessing potential options to provide additional access / egress to the A11. There would be a number of potential benefits if this can be achieved, including separate access/egress for construction traffic, and potential separation of heavy traffic from other road users. We accept that these arrangements would need to be agreed with National Highways as highway authority for the SRN. • PE support principle of a trip budget and welcome opportunity to negotiate this with local planning authority. We feel strongly that it would be premature for policy to seek to fix trip budget, which should be product of detailed assessment of appropriate development mix and transport strategy, taking account of local highway capacity constraints and wider strategy to deliver public transport and active travel connections. • In line with development of a masterplan, PE support development of strategic and local transport mitigation plan, which would form basis of a Transport Assessment in due course. • PE support aspiration that walking, cycling, and public transport will be primary modes - however, greater recognition required to confirm that cars will continue to play a significant role. We would like to see amendments to policy to support integration with CSET without specifying how this is achieved until further work has been completed. • PE support the broad ambitions for a Travel Plan.	and Future), 207385 (Cambridge Past, Present and Future), 207741 (Whittlesford Parish Council), 207742 (Whittlesford Parish Council), 208038 (Railfuture East Anglia), 208116 (Sawston Parish Council), 208117 (Sawston Parish Council), 208156 (Great Abington Parish Council), 208158 (Great Abington Parish Council), 208217 (Pigeon Land & LIH), 208322 (PX Land Let), 208586 (Little Abington Parish Council), 208781 (Axis Land Partnerships Ltd), 208947 (CPRE Cambridgeshire and Peterborough), 209255 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 209698 (CEG Land Promotions Ltd), 209965 (Granta Land Ltd), 208167 (National Highways), 210515 / 210518 (Cambridgeshire County Council), 210519 (Cambridgeshire County Council), 210760 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210763 (Pampisford Estate

	Farms Limited and the Trustees of the James Binney Will Trust), 210764 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210765 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210766 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210780 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210781 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 211593 (Places for People)
Impact on Abingtons and Hildersham • Facilities in Grange Farm could undermine the economic viability of local Abington facilities. • Crime rate will increase. • forcing people to consider moving to get away from it. • Loss of identity. • Coalescence with village.	201031 (R Smith), 201281 (C Wolverson), 201311 (M Donovan), 201330 (J Sharman), 201357 (K Battom), 201358 (R Parkin), 201360 (V Hefford), 201368 (J Lawrence), 201434 (G Moore), 201482 (A Cameron), 201467 (R Wells), 201494 (J Tharby), 201450 (C Feenan), 201518 (J Jackson), 201529 (M Cooper), 210539 (A Patterson Lee), 201584

• Noise, dust and heavy vehicle movement impacts during construction. • Unsettling for residents. • Abington has already absorbed Granta Park with zero benefit to residents. • Fails to protect the character and setting of Abington. • Does not provide clear benefits for current residents, leading to long-term uncertainty and potential negative impacts on traffic, infrastructure, and quality of life. • Is asynchronous with the village and extremely unsightly. • Residents will not interact with the village facilities. • Impact ion property values. • Will jeopardise house prices and cause emotional and financial harm to current residents. There is economic strain, threat to wellbeing and a deterioration in quality of life. • Should complement neighbouring villages rather than overpower and overshadow them. • Greater emphasis should be given to mitigating effect of any development on character of the historic Abingtons. • Bigger buffer zone north of the A1307 to protect Little Abington. • Proposed retail and postal facilities at Grange Farm could undermine existing village services.	(E Scott), 201635 (J Shaw), 201665 (K Hefford), 201690 (J Kelly), 201691 (C Randle), 201696 (S Tossi), 201747 (B Seddon), 201753 (L Dav), 201772 (H Howe), 201785 (G Farrant), 201788 (H Cornwell), 201802 (R Cornwell), 201803 (S Fryer), 201804 (R Zimmern), 201805 (J Dowling), 201821 (Y Arkwright), 201883 (A Quinn), 201892 (R Berry), 201898 (R Pargeter), 201919 (G Menzies), 201943 (J Dowling), 201996 (S Fordham), 202034 (D Reed), 202047 (M Tiplady), 202055 (P Snow), 202067 (D Milns), 202092 (R Harman), 202142 (M Turner), 202162 (L Crisp), 202175 (C Newgreen), 202296 (R Barnes), 202299 (R Barnes), 202337 (S James), 202359 (A-M Melloy), 202568 (K Deeming), 202571 (R Haining), 202608 (C Cameron), 202616 (I Smith), 202699 (K Russell), 202701 (K Russell), 202731 (J Barnes), 202737 (A&L Pepperell), 202915 (A Batty), 202992 (R

• Should include a specific policy safeguard that retail provision at Grange Farm is limited in scale and does not include a supermarket or competing postal facility, in order to protect existing village services. • Any retained allocation must include a clearly defined, policy-protected buffer providing genuine physical and visual separation between new development and the existing villages. • Public spaces in Little Abington and Great Abington would be negatively affected by increased noise, traffic, pollution and loss of rural views. • "Strategic Enhancement Area" too vague. Must explicitly define a minimum buffer width (e.g., 500m) between development edge and Abingtons to genuinely prevent coalescence and preserve village character. • The buffer area between the development and village needs to be widened along its southern edge. • Has been no assessment of crime impact. • Would undermine community cohesion. • It would create a contiguous development and entirely subsume, and therefore destroy, existing villages. • To achieve meaningful separation, plan should reflect historic settlement pattern of South Cambridgeshire. Sawston, Pampisford, Babraham, the Abingtons, Hildersham, Linton, and Great Chesterford have average separation of 3.3 km.	Gilmour), 203123 (J Searle), 203141 (V Jury), 203187 (M Jury), 203407 (P Allum), 203512 (R Tovey), 203516 (M Howes), 203529 (O Barnes), 203652 (T Randle), 203680 (S Jarvis-Dott), 203683 (D Simmons), 203803 (J Cutting), 203807 (S Solomonides), 203839 (T Solomonides), 203868 (M Broadhurst), 203911 (E Lambourne), 203934 (L Donahue), 204586 (R Elston-Green), 204635 (M Starr), 204682 (E Lane), 204783 (R Smith), 204807 (P Munns), 204810 (E McKeown), 204821 (Abington Stores and Post Office), 204871 (V Valge-Archer), 204879 (J Dowling), 204891 (D Newgreen), 205092 (M Whittaker), 205164 (T Stone), 205193 (V Siley), 205271 (P Dsantos), 205425 (S McDonald), 205482 (M Brattesani), 205487 (G Minhas), 205512 (S Somerville), 205635 (M Furlow), 205636 (M Furlow), 205661 (R Berry), 205728 (W Bailey), 205735 (J Wingfield), 205817 (E Scott), 206034 (J Dowling), 206151 (R Livermore), 206152 (R

Grange Farm site cannot meet this standard except by restricting development to the northernmost portion. • PE strongly support objective to avoid convergence of settlements and note that this has been a particularly strong point raised through initial community responses on project. Would suggest that policy wording could be sufficient to ensure settlements do not coalesce, without prejudging the appropriate way of achieving this. Committed to working with GCSP to devise appropriate design solutions to ensure that Little Abington and Great Abington (in particular) retain their own distinct identity. • Policy too vague on protections for existing residents at southern and southeastern boundary. • Policy limb should read “maintain the distinction between the Grange Farm development and neighbouring villages, in terms of character and physical separation.” Note also there are inconsistencies here with land being referred to as “Grange Farm” rather than “Land adjacent to A11/A1307”. Should be a consistent naming convention adopted for clarity.	Livermore), 206165 (C Newgreen), 206167 (C Newgreen), 206194 (R Barnes), 206200 R Barnes), 206250 (P Brown), 206318 (G King), 206324 (C Cameron), 206325 (C Cameron), 206596 (A Butchart), 207069 (L Cookson), 207181 (S Bowen), 207388 (W Dott), 207523 (R Charles), 207543 (R Allum), 207557 (G Smith), 207591 (D Stephen), 207598 (R King), 207599 (P Brunning), 207659 (P Lester), 207678 (T Collett), 207976 (G Brown), 208540 (D Simmons), 208547 (D Fraser), 208548 (D Fraser), 208549 (D Fraser), 208550 (D Fraser), 208551 (D Fraser), 208552 (D Fraser), 208602 (M Appleton), 208603 (M Appleton), 208629 (G Jones), 208664 (E Taylor), 208737 (F Orgee), 209729 (J Barnes), 210073 (V Cox), 210388 (M Cookson), 210398 (M Cookson), 210409 (M Cookson), 210415 (M Cookson), 210433 (P Mc), 210491 (C Gill), 210644 (S Zmigrod),

	210663 (J Snell), 210689 (G Saunders), 210821 (C Newgreen), 211021 (M Hardinge), **Other bodies:** 201608 (Great Abington Parish Council), 202029 (Weston Colville PC), 204948 (Robinson College), 208589 (Little Abington PC), 208590 (Little Abington PC), 209274 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210731 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust),
Wider area: • Fails to consider the wider impacts on surrounding settlements. • Two planned developments (Policy S/GF: Land Adjacent to A11 and A1307 at Grange Farm and Policy S/CE Cambridge East) are expected to impact upon West Suffolk given its proximity and the functioning of the surrounding towns of Newmarket and Haverhill.	208540 (D Simmons), **Other bodies:** 204784 (West Suffolk Council),

• Will require collaborative working with West Suffolk and a full assessment through the preparation of the local plan evidence base. • Nature of proposed connections is not clear and whether they will link to the towns of Haverhill and Newmarket within West Suffolk. • West Suffolk Council would welcome opportunity to work collaboratively and co-operatively to understand the detail of these proposals.	
Design Matters • Object to high density. • Scale is overwhelming. • Will be a disconnected, poor place to live. • Speaks of "high quality and well-designed buildings" but is very short on details - including room sizes, which remain below European standards. • Will have to build dense ugly properties to facilitate the level of development suggested inc probable high rise. • More appropriate design criteria should be applied that respect the rural character of South Cambridgeshire. • Concerns about the proposed housing density of 50/55 per hectare, questioning the fairness compared to the allocation of 12 pitches per hectare for travellers.	200994 (M Logan), 201443 (T Randle), 201459 (T Stone), 201591 (L Menzies), 201651 (M Mannassi), 201696 (S Tossi), 201747 (B Seddon), 201803 (S Fryer), 202067 (D Milns), 202092 (R Harman), 202568 (K Deeming), 202632 (J Doncaster), 202696 (S Roberts), 202876 (C Pippen), 202915 (A Batty), 203141 (V Jury), 203512 (R Tovey), 203931 (A Ross), 204586 (R Elston-Green), 204635 (M Starr), 205487 (G Minhas), 205544 (G Minhas), 205743 (R Lee), 205744 (R Lee), 205752 (C Feenan), 205952 (S Zmigrod), 205953 (S Zmigrod), 205956 (S Zmigrod), 205957 (S Zmigrod), 205958 (S

• Need for housing designs that are appropriate for a village setting, rather than those suited for urban environments. • Make the houses eco-friendly and well insulated. • “green areas” provided by these developments are not used or maintained and they are just paying lip-service to your “holistic” views to keep within planning guidelines. • Ensure the height of the buildings does not overshadow in any way the local area and designs architecturally blend into the local rural landscape. • Infrastructure-intensive uses should be prioritised near the A11 corridor to minimise impacts on agricultural land and maintain a coherent settlement structure. • Strategic enhancement area will be too small to meet strategic green infrastructure needs on-site. Even if the development provided significant financial contributions for strategic green infrastructure, it is highly unlikely that providers would be able to acquire the land required in the right places, as land assembly for strategic green infrastructure on the edge of Cambridge will ultimately depend on the landowners getting at least part of their own development aspirations in return for providing the land for strategic green infrastructure. • Introduce binding and enforceable limits on building height, density and massing to protect skyline views, heritage assets and village setting.	Zmigrod), 206195 (R Barnes), 206195 (R Barnes), 206201 (R Barnes), 207959 (S Zmigrod), 207557 (G Smith), 205818 (E Scott), 205916 (M Rusted), 206166 (C Newgreen), 207580 (J Weston), 207677 (T Collett), 208014 (J Logan), 208570 (A Ross), 208597 (M Appleton),), 208629 (G Jones), 208749 (T Orgee), 209047 (J Darrell), 209723 (A Spicer), 209730 (J Barnes), 209742 (J Barnes), 209744 (J Barnes), 210399 (M Cookson), 210401 (M Cookson), 210402 (M Cookson), 210407 (M Cookson), 210417 (O Barnes), 210424 (O Barnes), 210645 (S Zmigrod), 210646 (S Zmigrod), 210647 (S Zmigrod), 210648 (S Zmigrod), 210651 (S Zmigrod), 210652 (S Zmigrod), 210653 (S Zmigrod), 210659 (S Zmigrod), 210682 (G Saunders), 210683 (G Saunders), 210684 (G Saunders), 210886 (G Saunders), 210687 (G Saunders), 210688 (G Saunders), 210692 (G Saunders), 210693 (G Saunders), 210694 (G

• Advance planting as a pre‑commencement condition • Must include explicit building height limits (e.g., maximum 2 storeys) to ensure development does not visually dominate skyline or Cam valley. Must be specific prohibition on vertical landmarks or industrial structures that would break horizon when viewed from Gog Magogs or Roman Road. • Add mandatory requirement for "Dark Skies" compliant lighting strategy to prevent light spill from this elevated site into the surrounding open countryside. • Lack of detail regarding the sustainability of homes, specifically the inclusion of solar panels and grey water systems. • Tall buildings, skyline impact and failure to impose binding height controls. Policy S/GF does not define what constitutes a tall building, does not prohibit tall or landmark buildings, and does not impose binding height limits across the site. • Site Allocations Topic Paper expects a density around of around 50-55 dwellings per hectare – however, when taking into account site also includes a town centre, warehouses, offices, schools, shops, open and park spaces, and other facilities and amenities, this density may be higher still. In contrast, customary density for even a suburban development of houses would be around 35 dwellings per hectare. • Inclusion of energy efficient homes is essential and should be a stipulation of any new build contract given.	Saunders), 210695 (G Saunders), 210696 (G Saunders), 210697 (G Saunders), 210698 (G Saunders), 210699 (G Saunders), 210704 (G Saunders), 210804 (A Marns), 211029 (T & A Bradford & Jedrzejewski), 211030 (T & A Bradford & Jedrzejewski), 211032 (T & A Bradford & Jedrzejewski), 211707 (J Dowling), 211711 (J Dowling), 211733 (P Seddon), **Other bodies:** 201607 (Great Abington Parish Council), 201669 (Linton PC), 209258, 209269, 209270, 209275 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 203001 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 210723, 210725, 210726, 210732, 210733, 210734, 210735, 210736, 210737, 210738, 210740, 210741, 210742, 210743, 210744, 210745, 210746, 210747, 210748, 210749, 210750, 210751, 210752, 210753, 210754, 210755,

• Design ethos does not accord with character of South Cambridgeshire, which is principally small villages, that radiate from Cambridge. Proposal will create an urban environment, not sympathetic to the setting in its locality or the county context. • Create a continuous landscape buffer along the south‑eastern boundary to provide year‑round visual and acoustic separation, protected as a non‑built zone. • Ensure perpetual ownership and funded management of the buffer. • Design public‑space routes and lighting to minimise spill, glare and intrusion into existing dwellings. • Apply stepped‑down building heights and densities toward the boundary, with low‑rise, low‑intensity forms, frontages that face the buffer and privacy safeguards to prevent overlooking. • Any lighting near the boundary including for walking and cycling routes should be designed specifically to prevent glare and light spill into nearby homes and the countryside, using shielding and appropriate controls. • Descriptions provided regarding landscaping are a token gesture to appease. • Illustrations suggest four storey structures in close proximity create dense urban spaces, with architectural features not part of the South Cambridgeshire vernacular. Proposals are out of character in terms of local vernacular, scale, massing, architectural features and proportions synonymous of an ‘any place	210756, 210757, 210758, 210759, 210761, 210767, 210768, 210770, 210772, 210774, 210779 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust),

anywhere' developer lead approach leading to band, poor quality development and architecture. • Implement a movement strategy that prevents rat□running through Little and Great Abington. • High-impact, noise-generating and HGV-intensive uses should be located away from south-eastern boundary and should not be located at, within, or operate immediately adjacent to south-eastern boundary where allocation meets existing homes at Ley Rectory Farm Barns. • Single Masterplan implies a single phase, uniform development inconsistent with character of South Cambridgeshire villages, which evolved organically around historic centres such as river crossings and manor houses. Create small initial village core, then allow local developers, architects, and individual homeowners to build incrementally in response to demand. • Designs by John Simpson Architects are subjective and fail to safeguard local character. Illustrations suggest dense, four-storey development with architectural features alien to South Cambridgeshire. Comparable nearby towns such as Saffron Walden, Cambridge and Newmarket do not exhibit the proposed forms or styles. The approach is generic and developer-led, lacking local distinctiveness. • Large national housebuilders typically produce uniform, low quality designs that do not reflect local character. • Examine potential for community heating schemes.	

• Public routes and spaces along south-eastern boundary should be designed to respect privacy and minimise disturbance • Could be interpreted that the SF has already determine most appropriate design solutions and mitigation. PE have commissioned full multi-disciplinary team to explore these issues in detail, and to develop a robust masterplan framework for site, which identifies and respects site's ecological and heritage constraints/opportunities. • PE support desire for high quality design, and whilst we share the ambition for an exemplar approach, greater clarity is required on interpretation of what this means. We very much welcome the opportunity to develop a robust masterplan framework and to test the approach to a range of matters to reach common ground with GCSP on these points. • Request clarity on what is referred to by "the landscape within its rural setting". May be interpreted in different ways and therefore would welcome a discussion about what is intended here. • Should include clear spatial principle for south-eastern boundary where the allocation meets Ley Rectory Farm Barns to function as a low-intensity, quiet edge. • Masterplan and design code should be required to demonstrate, with appropriate assessment, that location and operation of non-residential uses and servicing activity will not create unacceptable noise, disturbance, vibration, odour or light	

impacts at existing homes at south-eastern boundary (Ley Rectory Farm Barns interface). • Policy requires “separation” but does not define, secure or prioritise it at south-eastern boundary where rural homes sit directly opposite the proposed allocation. Boundary alignment creates particularly tight interface with existing dwelling and garden, so any ambiguity around “separation” is especially problematic. • Incorporate defined south□eastern boundary buffer, a quiet□edge principle, a sensitive built□form transition, early delivery of screening, dark□sky lighting controls, construction controls and infrastructure/phasing triggers that halt later phases if key transport mitigations are delayed. • Masterplan and design code should be required to demonstrate, with appropriate assessment, that location and operation of non-residential uses and servicing activity will not create unacceptable noise, disturbance, vibration, odour or light impacts at existing homes at the south-eastern boundary (Ley Rectory Farm Barns interface). • Fully supportive of design led approach, and development of comprehensive site masterplan, and (later in the process) design codes, to ensure each development phase comes forward in accordance with overall masterplan vision. • Further work required to understand constraints, the development proposals and appropriate mitigation through set back, design/landscaping or management, in consultation with the relevant consultees.	

• PE support desire to develop high quality buildings that respond to surrounding context with appropriate massing, building heights and densities, as well as building form. Committed to design quality as set out in our vision for the project in our previous Local Plan submission. • PE support principle of town and neighbourhood centres; further work required to establish how many centres and what facilities can be supported by proposed 6,000 homes. Great care will be required to consider appropriate number of centres, their make up, scale and mix of uses, to ensure the objective of a vibrant, walkable new community is achieved. This may require decisions which weigh up the merits of fewer, larger “centres” vs a dispersed approach to amenity provision. This should be design led and not pre-judged by the policy. • PE consider that an average density of 50-55 dwellings per hectare is likely to be too dense in this location. We propose to test a number of scenarios as we begin to set a masterplan framework for project, and propose to test matters raised in the policy and believe at this point a slightly lower density is likely to prove more appropriate to the rural landscape setting. The policy should not need to define a target density until further work has been undertaken. • Further work required to understand constraints and opportunities, development proposals and appropriate mitigation through set back, design/landscaping or management. Consider this is likely to require a review of proposed boundaries of	

the Spatial Framework diagram both in respect of development area, and SEA ahead of the Regulation 19 consultation. • PE support, and are passionate, about need for high quality public realm. Our client's vision is that this development is different and something community is proud to call home. The layout and quality of the public realm will be critical to realising this ambition. • PE support provision of open space – more work needed to establish scale of provision as part of overall land use budget. This is being tested through our masterplan framework. • PE support effective integration of green and blue infrastructure. • PE support preservation and enhancement of significant ecological heritage and natural environment – suggest requirements will inform both extent of built development and scale, location and approach to delivering Strategic Enhancement Area. • PE support principle of maximising opportunities for ecological enhancement and building on special qualities of site. • PE support need to respond to designated historic and ecological sites – but note that further work is required to establish most appropriate design led approach to accommodating and respecting these important features as part of comprehensive approach to masterplanning.	

• PE support minimising recreational disturbance on ecology at the SSSI, but this needs to be looked at in a holistic way, as it may be that additional habitat of equivalent or better quality may be created as part of the scheme. • PE support creating dark ecological corridors. • PE support preservation of existing range of watercourses off-site and intend to develop a landscape led masterplan, with integrated green and blue infrastructure, SUDs and with careful consideration of all aspects of water cycle to ensure scheme sensitively integrates into the area. • PE support creation of clearly defined green buffers between development and established settlements. Role, purpose, extent and definition of SEA is an important consideration here. Welcome discussions with GCSP, and in due course with community, about how we best achieve this objective. • It is not viewpoints that are to be preserved, rather it is important to understand what it is about key views that is important. With a development of this scale, key views and character will change, so it is important to identify and understand what is important to consider and what it is we are trying to “preserve”. We would very much welcome a discussion with landscape officers about the key views that we should be giving particular attention. • PE support protection of existing landscape features, wherever possible and allowing for the most appropriate scheme as a whole. It should be noted that there may be elements of existing landscape features which do need to be removed	

(e.g. hedgerows) to accommodate site infrastructure or development, where justified. • As long term, locally resident landowners for generations, PE have been instrumental in establishing the strong planted treeline buffers around site. Dendrology is a particular passion of the family. We support desire to strengthen planting and enhancement of site boundary but suggest that further work is required to establish appropriate location for such boundary planting. We believe that there is a case for further screening to ensure visual containment and separation from adjoining communities. • PE support need for full ecology survey and biodiversity implementation and management plans throughout development of scheme. Early input from specialist ecologists is being sought to ensure biodiversity is a priority in development of the masterplan. • PE support need for positive management of ecological buffers, and are committed to a strong stewardship model to ensure proactive management and maintenance of all aspects of scheme. • PE are strongly supportive of broad ambitions for a strong connectivity and movement network across site and beyond, for all modes of travel. • PE strongly support need for walking, wheeling, cycling and public transport movements. Streets must be well designed and accord with best practice and guidance.	

• PE agree we should prioritise exploration of opportunities to enhance walking and cycling connectivity to key local employment destinations and public transport hubs. Further work will be required to establish how best to overcome local severance from A1307 and A11. PE is committed to working with local authority partners to achieve ambitions in area to ensure deliverable solutions. • PE feel that further work is required to understand distinctive and important features of Roman Road, and to determine the most appropriate design response. The policy should not seek to pre-judge the approach to Roman Road until a more detailed heritage assessment and design led approach to sensitively integrated development into local area. • PE support principle of promoting active travel connections. For reasons given in our comments on policy limb 13 (d), appropriate design solution should be derived from more detailed assessment and engagement with Cambridgeshire County Council as highway authority. • PE are concerned that policy as drafted pre-determines most appropriate design solution for project. Therefore, suggest alternative wording: “To reduce private vehicle usage from the outset of the development and to improve placemaking, alternative car parking and storage options should be explored at the edge of parcels or plots as part of a strategy of more remote parking solutions.” This does not set this as an absolute requirement, but requires this to be considered in the	

round as part of a robust transport strategy (necessarily with careful controls on car parking). • PE support Council's objective to consider low-carbon energy infrastructure, circular economy principles, and sustainable water management. Including an Integrated Water Management plan and Water Cycle Strategy. We have already commissioned work in these areas from a suitably qualified expert. • PE support need for any development to need to come forward in accordance with an agreed phasing plan. Expect this to be submitted indicatively as part of any outline application, with updates provided in support of each Reserved Matters application. This can be conditioned appropriately. • Whilst we support principle of development, PE wish to object to Spatial Framework diagram as drawn. Further work is required to consider a range of characteristics which we anticipate will give rise to changes. These may include such matters as: Scale, location and extent of the development boundary. Scale, location, purpose/definition and extent of Strategic Enhancement area. Site access points. Location of any on site Waste Water Recycling Centre. Approach to integration with CSET. Location of the "centre" or "centres". Set of distances and proposed design mitigation for any sensitive receptors (e.g. Roman Road SAM and SSSI). Edge treatments to secure separation from the Abingtons. integration of farming activities on residual land holdings.	

• PEe support the principle of a Spatial Framework for Grange Farm (Figure 81) but stress that it needs further work to test that it reflects the optimal / evidenced approach to the allocation. •	
Housing • Presence of site for travellers nearby may exacerbate existing issues in the village. • Insufficient detail on long-term management and integration of travellers' site. • Object to travellers' site. • Question need for travellers' site • Include social housing. • Local youngsters help/incentives to get on the housing ladder. 1,2,3, 4 bed houses and bungalows. • No more than 500 homes for the older generation and young first buyers. • Afraid travellers site will not remain at 12 pitches • How can we possibly need this many houses? • Reduce the number of houses. • Stop building expensive housing which locals cannot afford. • Unlikely that the affordable housing will ever materialise, usually disappear at some point.	201031 (R Smith), 201330 (J Sharman), 201340 (G Broad), 201696 (S Tossi), 201726 (J Mayes), 201802 (R Cornwell), 201846 (E Goodyear), 201889 (W Cooper), 201921 (E Crutchington), 201952 (J Hann), 203512 (R Tovey), 203653 (S Appleton), 203797 (R Nagasaki), 205032 (A Spicer), 205432 (N Marshman), 205482 (M Brattesani), 205608 (S Goodhart), 207606 (V Jury), 207667 (K Brown), 207682 (T Collett), 208629 (G Jones), 208749 (T Orgee), 209722 (A Spicer), 206040 (J Dowling), 210072 (V Cox), 210076 (V Cox), (210391) M Cookson), 210392 (M Cookson), 211019 (R Froment), 211036 (T & A Bradford & Jedrzejewski), 211714 (J Dowling),

• More work needs to be done to establish sort of housing employees of sites of this type want - do they want to live in a new settlement at all? • Remove traveller sites, reduce the overall amount of housing. • Traveller sites appear inappropriate due to recent issues in the village • Housing trajectory expects delivery of completed dwellings to start within 8 years of adoption of the new Local Plan. Drawing on experience from other new allocations in the region, this would not appear to be realistic. • Allocation should be removed or the trajectory should be reduced and pushed back. • Welcomes the inclusion of key worker housing to serve the surrounding life□science cluster. • Long lead□in time means homes may not be delivered until the late 2030s, creating a mismatch with the immediate workforce needs of Granta Park. Clear delivery mechanisms, early phasing and safeguards are required to ensure key worker housing is provided promptly, tied directly to major R&D campuses, and protected over time. • Allocation is unnecessary, with an overprovision of over 3,000 dwellings compared to the identified housing need of 10,330 homes by 2045. • Have housing developments locally that still have unsold properties after several years.	**Other bodies:** 201391 (Babraham PC), 201606 (Great Abington Parish Council), 208590 (Little Abington PC), 209260 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 209261 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210410 (M Cookson), 211022 (L Cookson), 202333 (Granta Land Ltd), 202540 (Granta Land Ltd), 202656 (Granta Land Ltd), 202670 (Granta Land Ltd), 203371 (BMR Granta Park Propco Limited), 210739 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust),

• Unlikely to be affordable for local young people, benefiting only landlords or those on benefits. • Colleagues on BRC campus do not recall being asked if they would be interested in buying housing closer to the site. Most were clear that house prices locally are prohibitively high and they would not look to relocate. This either suggests that site will be too expensive or cause a price crash locally, both of which would be terrible for both builders and local area. • With majority of a local science park employees being high earners it can be assumed that they would not wish to live in high-density housing developments such as at Grange Farm. • Housing numbers and mix of housing typologies and tenure needs to be developed based on further work on character, acceptable building heights, and housing needs (by typology and tenure). Concerned with the suggestion that 10% of dwellings should be specialist accommodation. For a scheme of this scale this will generate a very significant number of these homes, and this should be a product of up to date assessments of need (over time), rather than a policy requirement. • First phase should include both accommodation for young families and for mature and retired residents who will use the community space and shop. • Do not feel that Council has prepared a robust justification for requiring the provision of Gypsy and traveller pitches on site. This is a point that we wish to	

explore further with GCSP. Our reading of Council's own evidence is that it signposts a number of other solutions as being sequentially preferred, with allocations on new development as a last resort. The approach to siting of any G&T site would require great care to ensure effective integration with wider community. • Accept need for affordable housing for Addenbrooke's Hospital and the Biomedical campus. Many existing Addenbrooke's workers currently live in or around Haverhill as it is more affordable. Many argue affordable housing on Grange Farm site would aid Biomedical campus etc which may be true, but would need to be offset by all those workers who would leave because of increased journey times. • Average salary across Granta Park, Babraham Research Campus, and Hinxton Hall is approximately £35,000–£55,000, compared with national median of £37,600. This suggests that the primary housing demand is not for traditional "affordable housing" but for market rate homes suitable for skilled workers. • Assumption that nearby housing will support science campuses requires evidence. • PE support the policy expectation of homes that are adaptable. • Siting of any gypsy and traveller pitches should be a material distance from existing settlement community of Little Abington (and significantly more than is the case in the Proposed Grange Farm Development).	

Employment • Assertion that jobs will be created, aside from infrastructure roles, seems illogical. • No guarantee those moving in would want to work at the Welcome or Babraham Institute. • Accessibility to London may attract commuters rather than local workers. • Capacity issues at nearby science parks. • People who already have jobs will move here & commute. • Most people in Abington would love to work locally but can't find jobs in the two local business parks. • Must be local significant employment opportunity factored into the scheme. • Where will people work? • May be attractive for those working further afield. • Will there be sufficient local employment? • What is Class B2 General Industrial provision? • Asserted proximity to "future jobs" in Granta Park, Babraham and Hinxton is not substantiated beyond current expectations, with multiple major buildings currently vacant at Granta Park. • Logistics hubs appear unnecessary. • If logistics buildings are included, strict controls on height, massing, and traffic impact are essential.	201031 (R Smith), 201360 (V Hefford), 201518 (J Jackson), 201706 (R James), 201748 (M Radcliffe), 201772 (H Howe), 201890 (K Cooper), 201898 (R Pargeter), 202020 (J Rivers), 202067 (D Milns), 202092 (R Harman), 204759 (M Huntsman), 205618 (S Lee), 205881 (C Randle), 205944 (R Barker), 205973 (R Randle), 206037 (J Dowling), 206038 (J Dowling), 206039 (J Dowling), 206321 (G King), 206893 (I Sainsbury), 207560 (L Sainsbury), 207659 (P Lester), 207682 (T Collett), 207787 (P Williams), 208427 (N Brown), 208481 (G Crowe), 208531 (C Alda), 208580 (J Bowen), 208600 (M Appleton), 208629 (G Jones), 208753, (T Ogree), 209726 (E Jones), 209738 (J Barnes), 210393 (M Cookson), 210410 (M Cookson), 210423 (O Barnes), 210690 (G Saunders), 210691 (G Saunders), 211035 (T & A Bradford & Jedrzejewski), 211698 (J Dowling),

• Large warehouses would harm the landscape and increase vehicle movements. Furthermore, emerging technologies such as autonomous aerial vehicles (UAVs) may reduce the need for traditional logistics infrastructure, making large warehouses an outdated solution. • Growth forecasts of greater Cambridge area and particularly in the biomedical research hubs and at Addenbrookes hospital have not taken into account the growing impact of AI. • Little hard evidence for future expansion and development of Granta Park, Babraham and Hinxton Campus • Business / biomedical sites around Cambridge have vacant units and have been reducing staff numbers including Addenbrookes hospital which made over 200 persons redundant in last 6 months with further reductions due in 2026. • No forecast or impact on travel-to- work outcomes. • No allowance made for development to attract London workers. • The immediately proximate research parks at Granta Park and Babraham Research Campus together total no more than 4,800 employees at present. Babraham Research Campus has proposed additional development of 23,000m2 of R&D capacity on-site, however Granta Park is currently advertising for tenants in at least five buildings on-site indicating no requirement for additional site capacity.	211712 (J Dowling), 211731 (P Seddon), **Other bodies:** 202040 (Weston Colville PC), 208595 (Little Abington PC), 209262 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 209263 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210140 (Historic England), 209762 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust),

• Proposed development is of a scale wholly disproportionate and unnecessary to any such purported requirements. • Please provide concrete and specific evidence that this development will definitely make a major contribution to employment and economic benefit both to residents of the proposed Grange Farm development and those of other villages in the locality. • False assumption that Life Sciences will continue to grow. Companies are moving their HQs to mainland Europe. • Proposed warehouse far larger than a last mile facility and unless all the major carriers agreed to share the facility this would be of little benefit of reducing trips, and is anyway not the model operated by many. • Class B2 General Industrial provision - what exactly is this and where is it situated. • Retail and Office space again deliveries, and staff travel not considered and again majority forced onto the A1307. • Grange Farm is 8-10 km south-east of CBC, located in the Wider Catchment (lowest-priority) category pf CBC Housing Study. Remove allocation. If retained, reduce to contingency only and require explicit housing reservation for CBC workers. • PE wish to promote notion that a range of employment uses will be needed on site to create a mixed and balanced new community and also recognising relationship	

of site to nearby science parks in southern cluster. We do not feel that policy at this stage should be overly prescriptive, pending further work on appropriate scale and mix of employment uses. Whilst we are supportive of desire to promote local last-mile logistics hub / warehousing, wording infers that this is only purpose of any employment, which could serve to restrict the market (and prevent delivery). • PE support E(g)(i) office uses appropriate. Question need to be so specific about Use Classes Order. What is the intention here? Consideration should be given to increasing amount of floor space to create a sustainable community – further evidence / justification required to determine appropriate scale/ mix. • Have some concerns about location of particularly B8 uses on this site given the potential scale of development. • Support potential role that site can provide in terms of employment within last mile logistics we wish to encourage GCSP to encourage a wider definition of the employment offer until such time as further work has been undertaken on appropriate mix and quantum of employment to support new community. • Also support inclusion of community concierge as part of community provision in the area but wish to ensure the ambition for a last mile movement hub does not seek to limit the types of employment that development may accommodate more broadly.	

Other • Consider long-term environmental, infrastructural, and social impacts of proposal and conduct thorough scrutiny before proceeding. • Lacks detail and appears rushed. • Ill thought out and wholly inappropriate. • Think long and hard before allowing the planning to be passed. • Just another money making venture with very little thought for the surrounding area and inhabitants. • Living in a town, even one where you plan to give people green spaces, is not healthy or safe. • Prematurity and Planning Policy Conflict. • Conflicts with key principles of the South Cambridgeshire Local Plan. • The 'town' will need a focus to become a known centre for growth and new industry. • The planning team need to be more open and inform residents and businesses in a large surrounding area of Little Abington. • Every chance that the character of this area will be so altered that more development will quickly follow. • Until the evolution of the currently unsustainable Cambridge Green belt has been agreed, including the future of the 6	201312 (M Cookson), 201323 (H Biggs), 201408 (R Lee), 201684 (S Bowen), 201697 (H Ward), 201726 (J Mayes), 201747 (B Seddon), 201753 (L Dav), 201756 (G Sharman), 201772 (H Howe), 201848 (R Allum), 201887 (K Lander), 201915 (G Battom), 202082 (D Palmer), 202571 (R Haining), 202632 (J Doncaster), 202675 (N Fraser), 202696 (S Roberts), 202728 (I Goodhart), 203010 (J Wallace), 203187 (M Jury), 203359 (B Garnish), 203653 (S Appleton), 203677 (E Randle), 203730 (K Auckland), 203931 (A Ross), 204619 (J Fairs), 204783 (R Smith), 204891 (D Newgreen), 205543 (G Minhas), 205605 (S Goodhart), 205761 (R Wells), 205765 (J Sneddon), 205883 (C Randle),205975 (R Randle), 206147 (R Livermore), 206148 (R Livermore), 206313 (G King), 206894 (I Sainsbury), 207183 (S Bowen), 207659 (P Lester), 207676 (T Collett), 207683 (T Collett), 207684

• Current settlement projects (including Shelford and Six Mile bottom), allowing this to proceed will just add yet more, • Unnecessary, damaging, seepage outwards from Cambridge. • The plan needs more accurate and clear diagrams, where are the houses, shops, warehouses etc, the A1307 isn't clearly marked. • Compliance with duty to co-operate is not proven and cross-boundary aspects are high-risk • Concerns about the spatial structure and deliverability of draft policy. • Contains inconsistencies and contradictions throughout indicating that it is a cut and paste of generic planning statements rather than a carefully considered plan for the local area. e.g. access to roman road is sited as an advantage in the same doc that states access will be restricted to protect heritage. • The document does not give details about the actual developments that may or may not arise. • Need for the council to remain open and communicative regarding uncertainties surrounding the project. • Land was identified by landowner not planners so question legality • If a new town is needed then start process by building the case for a new town which is presented to the Council/Region/Secretary of State.	(T Collett), 207926 (H Sutton), 207965 S Trueman), 208477 (D Pimblett), 208545 (K Auckland), 208569 (A Ross), 208574 (A Ross), 208576 (A Ross), 208606 (M Appleton), 208629 (G Jones), 208630 (G Jones), 208631 (G Jones), 208632 (G Jones), 208633 (G Jones), 210400 (M Cookson), 210408 (M Cookson), 210409 (M Cookson), 210435 (C Feenan), 210438 (R Wells), 210493 (C Gill), 210494 (C Gill), 210656 (S Zmigrod), 210701 (G Saunders), 210798 (D Marns), 210800 (D Marns), 210825 (C Paton), 211646 (G King), Other bodies: 208593 (Little Abington PC), 208111 (Sawston Parish Council), 209253 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210084 (Historic England), 210773 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will

• Identify site options with a viable programme for delivery and a clear understanding of costs and risks including a consultation process across possible effected communities. • Fails the tests of soundness, being neither positively prepared nor justified, and conflicts with national policy. • Require transparency by publishing the full site selection evidence base and ensuring assessments are demonstrably independent of landowner funding. • Site scores 'Red' in the HELAA, with significant landscape, transport and environmental constraints, yet is promoted for a development of up to 8,000 homes, far exceeding assessed capacity. • When read alongside Council's own published evidence, including 1st December 2025's Housing and Economic Land Availability Assessment (HELAA) and Greater Cambridge Skyline and Tall Buildings Strategy, Pell Frischman Flood Risk Assessment and 'Grange Farm Promotion Document', Policy S/GF allocates a site assessed as highly constrained, acknowledges the likelihood of irreversible harm, promotes development at a scale that exceeds assessed capacity, and relies too heavily on future mitigation rather than demonstrable deliverability. • Amend the Plan to ensure consultation and engagement processes are accessible, consistent throughout the consultation period, and not reliant on digital-only submission methods.	Trust), 210775 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210776 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210777 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210778 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210782 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust),

• Sketch plan only gives a vague idea of what is proposed. • Should be phased, with enforceable triggers ensuring that infrastructure, environmental protections, and transport measures are delivered before housing occupations occur. • Insufficient time for consultation. • Please clarify what land you are proposing to develop and on what timeframes. • Choice of appropriate site should not as appears in this case to be driven by the landowner Pampisford Estates and desire of Council to re-site main Cambridge sewage plant to the Abingtons to free up more valuable land for housing on the edge of the City. • What has occurred to now make Grange Farm acceptable for development, especially of this size, given it was turned down for good reasons only 4 years ago. • Similar developments at Waterbeach, Northstowe and Cambourne have proven not to have delivered the benefits originally proposed. What makes proposals for Grange Farm likely to result in anything different. • Title of development misleading. While it is described as “Grange Farm” development, the proposal in fact extends beyond Grange Farm and includes neighbouring land at Ley Rectory Farm.	

• Appears to be conflict of interest between vendor of the land and GCSP as former seems to be paying for some of the developments costs viz the memorandum of understanding. This is disturbing and contrary to acceptable practice. • Don't think any of the 'new towns' have been a success. Many New Towns are now at best 'ok' after decades of being lacking. • Prioritises housing numbers over environmental capacity, relies heavily on mitigation rather than avoidance, and greatly underestimates the sensitivity of chalk-influenced rural environments. • Talk of a quality development which I suspect is what every such proposal has promised in the past – the evidence of recent new builds in the locality is that quality is not at the forefront when building starts. • If HELAA red-rated site is to be allocated, Plan must clearly explain why and demonstrate how harm will be avoided. Policy S/GF fundamentally fails to do this. • Policy includes no formal review points, no pause mechanisms, and no ability to reduce scale if impacts exceed predictions. • Consultation Platform was difficult to use and changed halfway through the process to become much more complex. It should have been clearer how to submit a comment via post or email. • Conflicts of interest. Clear that a commercially-driven relationship exists between GCSP and The Pampisford Estate evidenced by memorandum of understanding	

dated 9 September 2025 between GCSP and The Pampisford Estate. Clear and demonstrable conflict of interest in respect of models and assessments commissioned by GCSP, which arises due to the funding of such purportedly independent verification of the development coming from those who stand to benefit from it. • New settlement at Abington was proposed in development of 2003 Cambridgeshire and Peterborough Structure Plan. The proposal was evaluated in the South Cambridgeshire District Council New Settlement Report of Oct 2001 and subsequently rejected. The reasons for rejection have not changed in the intervening years. • In the past Uttlesford District Council proposed land near Great Chesterford as the site of a major new settlement: "North Uttlesford Garden Community" within three miles of Grange Farm. Planning Inspectorate concluded that the proposal was insufficiently justified and it would perform least well against required Garden Community principles. Same should apply to Grange Farm. • Policy written in terms that indicate that development is pre-ordained and consistent with GCSP having already decided that the proposal is to go ahead and is staging a "consultation" merely because one is required, not because any notice will be taken of evidence or mere objections by members of the public. • Smaller, phased, organic approach aligned with South Cambridgeshire's historic growth patterns would be more appropriate.	

• There are three or four houses with gardens on the north side of the A1307. It is not clear from the present plans whether these will be protected from the urban development. • Unclear what site allocation boundary is. • Grange Farm is not part of the broader UK “new town” list. • Goes against every principle of self-determination to develop and impose an urbanised setting upon citizens who had decided, by definition, not to live in or near such a setting. • Developers of existing sites should be encouraged to build according to their original plans. • The requirement for a single “applicant” is concerning. • Must be fully costed. • Development of this scale should only be brought forward following a rigorous and open evaluation of multiple sites, regardless of land ownership, against clear and consistent criteria. • Policy contains numerous open-ended requirements for future studies and mitigation, which indicates that key impacts have not yet been fully understood or resolved.	

• Having not met the Wednesbury standard, the decision to include the Proposed Grange Farm Development in the Draft Plan is open to being struck out on such grounds. • Other new settlements are widely regarded to have failed to deliver amenities, services or social infrastructure benefits. People clearly do not want to live in these developments. Similarly, there is no credible evidence that such new settlements have delivered on-site economic jobs and prosperity. • Policies Map has been drawn such that Grange Farm is outside of “defined development extent” of Little Abington. • Authority already managing growth of three new rural settlements within its area posing the question of whether it has capacity to manage a fourth on an isolated rural site. • Suggest careful consideration is given to term “new town”. Terminology is important and new towns might create an association in people’s minds with some of the larger London overspill towns such as Milton Keynes or Stevenage, which are very much different to our ambition for this proposal. • Figure 9: The symbol for Grange Farm is shown in different locations on the online version and a PDF version of this diagram. • Must require robust Construction Traffic and Environmental Management Plans.	

• Cannot be persuaded that many people will want to live there in the early stages of development. • Cumulative impacts of this and other developments should be assessed. • Existence of memorandum of understanding between planning authority and landowner, including arrangements for landowner-funded verification of evidence, gives rise to concerns about appearance of bias. • PE support indicative list of documents to accompany any outline planning permission. We are not sure these are worthy of listing separately in each strategic allocation, as they would be expected of all major projects and could be covered elsewhere in the Local Plan for succinctness. • PE support inclusion of policy (as a principle) to provide a framework for consideration of future planning applications. As set out in our representations, the policy itself, accompanying evidence base and resulting Spatial Framework will require some further refinement. • PE support need for long term, management and maintenance of development and are committed to developing a leading stewardship model with direct landowner involvement. • Proposed Grange Farm Development would represent a material overhang to the saleability and value of properties in existing settlements of Little Abington and Great Abington – both while under consideration and, notwithstanding the material	

issues set out in this response which clearly demonstrate that such development should not proceed, should such development move forward. Such material detriment where development was subject to demonstrable, grounded objections but proceeded regardless by GCSP and the relevant local authorities would result in legal claims against the foregoing for the detriment suffered – and open the relevant Councils open to financial liability as a result. • Possible additional future development at Ley Rectory Farm would only exacerbate all issues identified. • Despite initial approval being granted for low-rise development at Granta Park which would blend with rural landscape, and which would not dominate rural skyline, permission has subsequently been granted for up to 4 storey buildings, violating the original concept. This raises serious issue of 'trust' between residents and the Planning Authority. • Consultation responses must inform revisions, and evidence shows misalignment with policies on climate resilience and heritage safeguarding.	

Summaries of Representations: Sites Rural Southern Cluster

The Rural Southern Cluster Introduction

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Concerns raised about the cumulative impacts of surrounding areas and criticisms about the strategy to selecting these sites. In particular the impact on transport and traffic, services, water and wastewater. Other comments highlighted infrastructure needs, and the need to invest in rural services and facilities. Whittlesford Parkway Station needed to be properly planned as a strategic transport hub and consider local impacts. It was also questioned why Duxford was not clarified as being in the rural southern cluster given the AV tech opportunities.

Support was expressed for removal of Hinton Way and Mingle Lane as a site allocation between the First Proposals and the Draft Plan stage. Concern about the location and scale of the new community at the A11 and A1307 (Grange Farm). Other comments objected to the non-inclusion of development proposals in a variety of villages. Reasons sites included the relative sustainability of the locations, the opportunities to support services and facilities. A number of comments where sites are in the green belt

considered their site was grey belt, and the plan should have identified grey belt opportunities. Many proposals challenged the findings of the Housing and Economic Land Availability Assessment, and proposed changes to the scoring.

Response to the main issues raised in representations

Comments have been noted and considered.

The development strategy has been informed by evidence which sets out that the impact of larger sites rather than incremental development has less carbon impacts and reduces impacts on villages across Greater Cambridge. This model also supports the focused delivery of infrastructure. Transport impacts and mitigation measures have been considered working with the Local Highways and Local Transport Authorities. Water infrastructure issues have been considered with the Cambridge Water Scarcity Group, which has brought together relevant agencies to ensure issues are properly planed for, including in order to protect the chalk streams.

At Whittlesford Bridge, the policy map incorrectly includes the former scrapyard site and the veterinary surgery car park but omits the demolition site at 39a Station Road West and the re-numbered property at 40 Station Road West, risking mis-allocation of development rights.

Support is noted for removal of Hinton Way and Mingle Lane as a site allocation. The position remains that it is not considered that there are exceptional circumstances for green belt release to meet general needs.

Proposals for alternative site shave been considered though an update to the Housing and Economic Land Availability Assessment where they fit within the broad emerging strategy of the local plan. New evidence submitted has been considered, and where

considered appropriate scoring has been amended. Comments related to strategy choices have also been considered, particularly under the development strategy policies. The deliverability of the plan has been tested through evidence including the Housing Delivery Study. The strategy focusing on other broad locations is considered to be sound. It is not proposed to add additional village sites to the proposed submission local plan. An update to the Green Belt Study has been carried out to consider which areas would meet he governments definition of being grey belt. Whilst some site may meet the definition, exceptional circumstances is still required for green belt release, and the Councils do not consider that exists in light of alternatives available.

Table of representations:

General Comments

Summary of issues raised in comments	**Comments highlighting this issue**
The combined effects of the proposed new settlement, existing committed development, employment growth at the Cambridge Biomedical Campus, and development pressures at and around the Imperial War Museum Duxford site are not properly assessed in the round. This is a significant omission, as these impacts will not fall evenly across the wider area but will be concentrated on specific transport corridors and villages, including Whittlesford, Thriplow, Heathfield and Newton. The Plan therefore risks underestimating impacts on transport infrastructure, water supply, wastewater capacity and local services.	211070 (Cllr R Williams)
The Parish Council remains concerned about the cumulative impact of multiple large-scale allocations within the Rural Southern Cluster. Taken together, these proposals will place significant pressure on strategic roads, village streets, health services and water resources. The Plan’s objective to reduce	207748 (Whittlesford PC)

reliance on the private car must be grounded in realistic alternatives and infrastructure delivered in advance of development. Water availability should be treated as a fundamental constraint on growth rather than an assumed future solution. The PC urges the GCSP to strengthen the Local Plan by aligning development scale and phasing with deliverable transport and water infrastructure, addressing cumulative impacts across the Rural Southern Cluster, ensuring that Whittlesford Parkway Station is properly planned as a strategic transport hub, and securing tangible public benefits through site-specific policies.	
I support the new proposed plan	202019 (H Campbell)
The strategy recognises the economic importance of the southern cluster, but its emphasis on business growth and strategic housing sites risks overlooking the needs of existing rural communities. While some villages are described as well connected, there is limited evidence on service capacity, school places, healthcare access or local transport frequency. Growth could increase pressure on small rural roads and village infrastructure. Stronger rural proofing would ensure investment in local services, safe cycling and walking links between villages and employment sites, and active involvement of parish councils in planning and mitigation.	203162 (Cambridgeshire ACRE)
Concerns were raised about the impact of new housing on local infrastructure, particularly regarding the lack of public transport and walking/cycling routes, which could exacerbate traffic problems. The respondent highlighted the apparent absence of health, education, and leisure provision, suggesting that residents would need to travel by car, increasing pressure on local amenities. A recommendation was made for the development of a cycle and walking route to connect Stapleford, Great Shelford,	203624 (S Berridge)

Whittlesford Parkway, and Duxford. Concerns were expressed about the loss of greenbelt land due to development at the Babraham Research campus, with a call to preserve and enhance the remaining greenbelt area for its beauty and biodiversity.	
Site allocations lacking explicit requirements for on-site health facilities should include wording that mandates financial contributions for health and infrastructure mitigation, aligning with the IDP approach. The respondent appreciates early engagement with Council Officers in plan preparation and the opportunity to contribute to the Infrastructure Delivery Plan. An additional assessment by the ICB during Stage 2 of the IDP process will provide targeted evaluations of key site allocations and health infrastructure needs, offering more detail for each site allocation.	205097 (NHS Property Services Ltd)
The new and expanded satellite industrial / commercial sites within parks and gardens of listed country houses (e.g. Babraham, Hinxton and Granta Park in the Southern Cluster) are not sufficiently robust to show the landscape, townscape, light pollution and heritage implications have been properly considered in principle and that the proposals will be achievable within the environmental thread of sustainability.	210992 (C Newell)
Ickleton PC is pleased that none of the 4 sites in the Parish emerging from the HELAA process are to be taken forward. Regarding Site ID 115965 you were advised at the First Proposals stage that it was unsuitable for the proposed development in the PC's view. The PC agrees that all the plots associated with the refused Agri-Tech Park are not suitable for development.	203453 (Ickleton PC)
These various car dependent sites are completely unsustainable, being far from where most people who might work on them live (i.e. Cambridge city) and relying on already super congested roads to get there. This sort of bioscience development should be focused on the biomedical campus. Create a	203588 (H Thomas)

single super-centre of bioscience rather than dispersed across places meaning that people cannot get from one to another.	
There are serious concerns in communities along the A1301 corridor, of a process of urbanisation from Stapleford to Saffron Walden. Major planning applications have been considered on a standalone basis, with scant consideration for cumulative or incremental impacts on landscape and existing settlements. Cross-border liaison under Duty to Cooperate is required.	203312 (Ickleton PC)
Whittlesford Parkway Station Policy Area, Whittlesford Bridge The policy map incorrectly includes the former scrapyard site and the veterinary surgery car park but omits the demolition site at 39a Station Road West and the re-numbered property at 40 Station Road West, risking mis-allocation of development rights. We are concerned that the proposed development could have a detrimental effect on our lives and the character of the area. Agencies are not working together effectively; representatives from SRW and SRE must be included in the planning process.	207891 207902 207903 (N Denham)
Draft Plan recognises IWM Duxford as being in an “area of major change”, but it raises a question why it is not also included as part of the Rural Southern Cluster, which recognises the associated need for housing, and which could be delivered around Duxford Village to support the sustainable growth of AvTech and the village. Continued investment in AvTech will also play an important role in diversifying the Rural Southern Cluster in South Cambridgeshire, providing some resilience if investment in biotech and life sciences slows.	211424 (Gonville & Caius College)

Comments on Land between Hinton Way and Mingle Lane Great Shelford

Summary of issues raised in comments	Comments highlighting this issue
Land between Hinton Way and Mingle Lane Great Shelford Support the decision to retain the land between Hinton Way and Mingle Lane within the Cambridge Green Belt. This aligns with the Plan's overall strategy, Policy S/GB, national Green Belt policy, the protection of local landscape, the conservation areas and the clearly expressed wishes of the local community. Housing needs are already met by major allocations at Cambourne North, Grange Farm, edge-of-Cambridge sites and new Rural Southern Cluster sites including Spicer's, Hinxton and Babraham, so there is no planning justification for allocating this land for development. I oppose building on Mingle Lane due to concerns about merging Stapleford and Shelford, harming the greenbelt, increasing traffic, and negatively impacting the rural parishes	200989 (A Phillips), 200996 (D Sanders), 201036 (A Kennedy), 201258 (S Ali), 201288 (K Lockhart), 201299 (N Campbell), 201673 (H White), 203166 (D Morgan), 201780 (M Vigouroux), 201808 (V Morgan), 202281 (A Lockhart), 202923 (C Bendelack), 203159 (C Schofield) 201780 (M Vigouroux), 201808 (V Morgan), 203159 (C Schofield), 203565 (N Hilliard) 207532 (S Berridge)

Comments addressing Land Adjacent to A11 and A1307 (Grange Farm)

The respondent expresses concern about the additional housing planned for the edge of Little Abington, citing the existing large development at Hinxton. They highlight that increased traffic from these developments will impact the already busy A505 road. The respondent notes that the planned developments lack access to public transport, even with a potential new park and ride near Babraham. They point out that South Cambs faces significant traffic issues, which will worsen without access to reliable train and bus services. The respondent raises concerns about the reliability of bus services, which are affected by current traffic levels. They conclude that unless strong management solutions are proposed, both sites are considered untenable.	201274 (S OFarrell)
The proposed new settlement does not meet development needs within environmental and infrastructure limits on a number of counts and is not consistent with national and regional policies. The Plan has not shown that reasonable alternatives (brownfield, intensification …) are inferior. Policy S/GF (Grange Farm) should be deleted and removed from the policies map	205360 (M G Hardinge)
Vastly reduce the number of houses. Remove the traveller pitches. Relocate the planned development to an area in need of investment.	201917 (J Coutts)

Comments proposing allocations

Whittlesford: The Walled Garden Whittlesford is right at the heart of the southern cluster (but seemingly left alone). You have a little cluster At Whittlesford Parkway station. However, i don’t think you have added enough housing for all the people that are moving in to the area for these new jobs. We have a small piece of land right beside	204789 (C Forbes-Cable)

the salt works at Whittlesford by the stream that would make a good addition and allow an extension. Please extend to add it in plus re-add an infill development site in Whittlesford:	
Land at Mill Lane in Sawston (HELAA Site Reference 40052) It is requested that land is identified as an additional allocation in Policy S/RSC: Rural Southern Cluster.	204424 (Hill Residential (Great Abington Site))
Land off Cabbage Moor in Great Shelford (Site Reference 40529) It is requested that land is identified as an additional allocation in the Rural Southern Cluster.	201973 (Shelford Investments)
Land off Hinton Way in Stapleford (Site Reference. 40369) It is requested that the development strategy for the Rural Southern Cluster includes an additional residential allocation.	202575 (Ely Diocesan Board of Finance)
Land North of Mill Lane, Sawston, (HELAA SITE ID: 115896) Whilst we do not object to the principle of allocating large new housing developments, we object strongly to the failure to balance this approach with a more diverse approach to housing delivery across Greater Cambridge in the emerging Local Plan. Allocating sites for housing developments in sustainable locations such as Sawston.	203083 (Northwest Biotherapeutics Capital Limited)
Land North of Mingle Lane and East of Hinton Way, Stapleford (HELAA Reference 40369 Site ID: 115763) Proposed development strategy misguided, over reliance on strategic sites. directly adjoins the previous Draft Allocation at Mingle Lane (site reference: S/RSC site HW). Near to Station, CBC, should be identified as grey belt. Comments on HELAA provided.	203092 (Granta Land Ltd)
Land at Mill Lane in Sawston (Site Reference 40052) It is requested that land is identified as an additional allocation in Policy S/RSC: Rural Southern Cluster.	203950 (Hill Residential (Sawston Site))

Land at Bury Farm, Haverhill Road, Stapleford. Proposes the Site for residential development, aiming to cater to local housing needs and complement Stapleford's existing settlement. Near CSETS, grey belt, well related to Shelford rail station.	205344, 210478 (Corpus Christi College)
Land at Whittlesford Walled Garden, Church Lane, Whittlesford The focus on large strategic sites raises concerns about uncertain infrastructure delivery timelines and unrealistic housing delivery rates, impacting affordable housing provision. housing and affordable housing needs would not be met by development strategy based and would not meet the homes strategic priority. Does not support the residents or services and facilities in those villages. Will not deliver the necessary green infrastructure.	208766 208767 208768 208769 (The CLC Trust)
Land to the North of A505, Duxford Allocate Duxford Hub Employment site. site. Responds to HELAA comments.	209703 (B Homent, J Tree & R Smith)
Land to the East of M11 in Duxford, CB22 4RE (HELAA Reference 40095 / Site ID 115180) would meet employment and housing needs both locally and for Greater Cambridge, deliver a sustainable future for Duxford village, and facilitate more sustainable journeys encouraging more walking and cycling from Whittlesford Parkway through Duxford and onto IWM Duxford.	211428 (Gonville & Caius College)
The preferred housing target and development strategy in the draft GCLP are unlikely to achieve the identified strategic priorities related to climate change, biodiversity, and social inclusion. The housing requirement does not align with job growth, potentially increasing car commuting into Cambridge, which contradicts climate change priorities.	202434 (The CLC Trust)

Policy S/WGC: Wellcome Genome Campus

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made by local residents with regard to concerns about selection of sites for development, impacts on local transport networks, a potential reduction in affordable housing. Some local residents have also supported the requirement for housing to go to campus workers. One local resident also raised the issue of leisure facilities and ensuring these are sufficient for local demand.

Historic England seek to correct references to the location of Hinxton Hall, and policy should reference requirement for a more detailed heritage assessment.

Concerns were raised by Uttlesford District Council about transport modelling and impacts on the road network in the Uttlesford District. Historic England raised concerns about the accuracy of some of the details of the heritage assets.

Further responses were received from Cambridgeshire Constabulary about contributions to emergency services.

Concerns were raised by the Environment Agency about the need for a sequential approach to flood risk and an FRA.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- In response to representations about the selection of this site for further expansion over Grange Farm, through the HELAA, the sites suitable for redevelopment for housing and employment uses have been identified and assessed for their acceptability for redevelopment. Grange Farm as a self-contained new settlement can provide residential units in close proximity to good public transport links and connect to existing networks, therefore Grange Farm has been identified for development.
- In response to concerns about impacts on transport, further transport assessments will be completed to support planning applications, and this will assess the impact on congestion. The policy wording encourages active travel within the expansion land, to neighbouring settlements and the main Wellcome Genome Campus which will help to reduce the number of vehicles on the road. The policy area and site allocation for the Wellcome Genome Campus proposes a mix of uses to support a mostly self-contained settlement with co-located jobs and homes to reduce the impact on wider transport networks.
- In response to concerns about reduction of affordable housing, the delivery of 1,500 residential dwellings on the expansion land for campus workers will contribute to the provision of housing for campus workers which ensures that the growth in this area in employment is supported by housing provision and therefore fulfils an identified housing need reflective of the context, even though it does not explicitly deliver affordable housing using conventional routes of delivery.
- In response to concerns about the provision of leisure facilities, the site allocation supports the delivery of leisure uses to support a residential-led mixed use development to co-locate employment, housing and amenities.
- In response to Uttlesford District Council's and Wellcome Genome Campus' concerns about transport. For the impacts on transport networks in Uttlesford and connections to Whittlesford Parkway Station and Great Chesterford Station, the policy area has included a requirement for a transport assessment including modelling impacts on the Uttlesford District Council road network, including Stump Cross junction (A11/B184). The wider modelling requirements have been written into the policy area and the lifespan section of the site allocation to set out what is needed to support further transport mitigations.

- In response to the Cambridgeshire Constabulary, the contributions made to fire & rescue, police and ambulance facilities provision and funding is covered by the IDP and not specifically in each site allocation.
- In response to Historic England, the comments are noted and the policy wording has been amended to reflect Hinxton Hall is within the site and a more detailed Heritage Impact Assessment has been required in the wording.
- In response to David Lock Associates on behalf of the Wellcome Genome Campus Ltd, the ambitions for the campus have been reflected in the new policy area to support the growth of the Wellcome Genome Campus. In terms of the amendments to the site allocation wording, the changes relating to accuracy have been made to reflect the planning permission, and allow for wider changes, and local context.
- In response to the Environment Agency, suggested amends have been made.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
To prevent fragmenting the landscape, the land adjacent to (and north) of the Wellcome expansion would provide a more suitable and sustainable location for new development instead of Grange Farm, Little Abington.	200982 (M&S Bishop)
Concerns about traffic congestion onto A505 and M11 junction 9 and need for more direct access to Wellcome Genome Campus from M11.	201535 (A Smith), 201557 (Stapleford PC),
Concerns raised about not contributing to affordable housing supply.	201557 (Stapleford PC) 210907 (Great Shelford PC)

Concerns raised about pressure on existing biodiversity sites nearby.	201557 (Stapleford PC), 210909 (Great Shelford PC
Development is too small to be sustainable and is not adequately plugged into the public transport network to overcome this without reliance on private cars.	210908 (Great Shelford PC)
Support the occupancy of residential properties being restricted to campus workers.	203066 (Cambridge Past, Present and Future), 203397 (Ickleton PC),
A new Parish Council should be created to serve the Wellcome Genome Campus.	203397 (Ickleton PC)
Leisure facilities are required at the Wellcome Genome Campus.	203788 (A Carpen)
Suggestion that light rail connectivity is needed for Wellcome Genome Campus.	203788 (A Carpen)
Transport modelling is requested to understand implications on Uttlesford road network.	204975 (Uttlesford DC)
Public transport connections should be enhanced, specifically to Saffron Walden, and Great Chesterford.	204975 (Uttlesford DC)
The site allocation should refer to Contributions to fire & rescue, police and ambulance facilities provision/ funding.	207516 (Cambridge Fire and Rescue Services, 207485 (Cambridgeshire Constabulary)
The policy and the vision should reflect the ambition and substantial scale of development now underway at the Wellcome Genome Campus. The focus is on a ‘one campus’ agenda. The plan needs to be permissive to growth and change and should be redrafted broadly to cover the vision, open	211228 (David Lock Associates on behalf of Wellcome Genome Campus Ltd)

connectivity, intensification, enrichment of science ecosystem, exceptional environment and experience, land use, spatial framework, built form, the setting and sustainability.	
In parts, the evidence base remains a little behind the curve on the importance of the Campus within the Southern Cluster. For example, Figure 3.3 in the Infrastructure Delivery Plan, which identifies growth locations does not include Hinxton. WGCL has commissioned a science and technology advisory group, with an external chair and members, to work with it (and major occupiers at the Campus) on a forward-looking 'Science Strategy' which will be shared with stakeholders over the coming months and in advance of the Regulation 19 Consultation.	211229 (David Lock Associates on behalf of Wellcome Genome Campus Ltd)
We suggest land-use and design guidance that sustains research, revitalises the conference centre, provides utilities, allows secondary uses, delivers 1 500 residential units for Campus workers (with scope for more) and protects heritage and biodiversity.	209115 (David Lock Associates on behalf of Wellcome Genome Campus Ltd)
The policy for the campus should be clearer between the expansion land and the modernisation of the existing campus. The quantum and uses expressed are solely on the expansion land, and the policy should recognise the uses on the expansion land and separately the uses supported more generally. The policy wording should recognise the potential of the existing campus and future intensification. The wording around the masterplan requirement should be clearer how it relates to the approved Strategic Design Guide.	209113 (David Lock Associates on behalf of Wellcome Genome Campus Ltd)
WGCL fully support the identification and recognition of the Southern Cluster along with the clear statement of intent with regard to the Campus. This strategy commitment is welcomed. The Plan recognises the potential for the evolved Campus to function as a place with homes, jobs and services,	209112 (David Locke Associates on behalf of

that might underpin classification in the settlement hierarchy in the future (as stated in Policy S/SH). The Campus will increasingly have the characteristics of a small town and WGCL are formulating a compelling Vision for this further evolution.	Wellcome Genome Campus Ltd)
The site includes the Grade II* Hinxton Hall, game larder, stables and North Lodge all listed at grade II as well as Hinxton Conservation Area. St Johns Church, the Old Manor House and The Oak House all listed at grade II* as well as numerous GII listed lie within the wider Conservation Area. To the north of the site lies Hinxton Grange and Stables, both listed at grade II. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of an HIA for this site. We welcome the criterion 10 and 11. Criterion 10a should be amended as Hinxton Hall lies within the site not to the north of the site (that is Hinxton Grange). Similarly, parts of the Conservation Area lie within the site. Therefore, the wording needs to be amended to more accurately reflect on site and nearby heritage assets.	210144 (Historic England)
The planning permission (S/439/18/OL) is for the expansion land only and it is worded in a way that is restrictive in places and does not reflect the planning permission's wording. Specifically, around campus housing, sales and letting system, temporary and meanwhile uses, public open space.	211227 (David Lock Associates on behalf of Wellcome Genome Campus Ltd)
The scope of the sciences supported onsite is too narrow and needs to be reviewed.	211226 (David Lock Associates on behalf of Wellcome Genome Campus Ltd)

We propose a flexible policy framework that defines clear boundaries for “Hinxton Campus” and “Hinxton Village”, encourages mixed-use ground floors, phased redevelopment and aligns with national growth corridors.	209114 (David Lock Associates on behalf of Wellcome Genome Campus Ltd)
Restrictions on intended tied housing for Campus workers should be rigorously applied. Governance issue should be examined at an early stage to avoid swamping of existing Hinxton community by an expanded Genome Campus. For instance, by creation of a new Parish Council serving the area of the Wellcome Genome Campus.	203379 (Ickleton PC)
The issues in this policy are largely covered by the existing S106 provisions of the outline permission granted under S/4329/18/OL. The education requirements may however have been under estimated. Whilst accepting that the demographic of the resident population on this site may not be typical of development elsewhere in South Cambridgeshire. Department of Education pupil yields suggests that for 1,500 homes, 540 primary and 255 secondary school places would be required. This would imply a need for a second primary school at some stage and allowance should be made for this in the masterplan. The provision of secondary education should also be reviewed as nearby schools are oversubscribed.	208104 (Sawston PC)
Hinxton. The proposal for the New Town at Hinxton is problematic and provision is not sufficiently robust, currently being a dominant satellite to be attached to the very small village of Hinxton. It is directly opposite Wellcome Genome Site also identified for expansion (S/AMC/GP) on a narrow but busy route which is already congested at peak periods.	211924, 211925, 210990 (C Newell)

The Plan proposals include very limited infrastructure (a piece of land for a school), which ensures that there will be undue pressure on Hinxton, one of the smallest of the South Cambridgeshire villages. 1.57 The Genome Spa al Framework drawing needs clarity and revision informed by a robust and accurate assessment of all the relevant constraints and appropriate mi ga on for this locality. The proposed uses also need to be clearly defined and robustly justified. The proposal also needs the provision of infrastructure to be increased to be proportionate to the scale of the development site.	
The sites needs to take a sequential approach to flood risk and prepare an FRA.	211180 (Environment Agency)

Policy S/BRC: Babraham Research Campus

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made by Stapleford Parish Council to support the SEA and paragraphs 2.4.25 and 2.4.26. However, the Parish Council raised an issue about the CSET route going through the SEA.

Cambridge Past, Present and Future suggested some editorial amendments to the site allocation.

Babraham Research Campus Ltd support the allocation of the site and highlight some editorial changes to reflect the planning application. They also raise that there is unmet need for further employment and residential development on the campus.

Camcycle asked for more ambition regarding transport measures. Concerns were raised by the Brish Horse Society that the policy does not explicitly address public rights of way or equestrian access.

Historic England raised concerns that the HIA needed to be reflected including in Criterion 8 Replacing ‘or’ with ‘and’, and the need to retain The Lodge.

The Environment Agency commented about flood risk and the need for water compatible development only in Flood Zone 3.

Further responses were received from Sport England who supports the policy and recommends explicit reference to Active Design.

Another comment questioned the impact of change to the SEA area on heritage assets.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- In response to Babraham Research Campus Ltd, with regards to the site boundary, the amendments have been made to the boundary to reflect the land ownership and latest proposals for the site.
- The SEA boundary has not been extended because it is felt that this area may be used for infrastructure works to support the road network and therefore the SEA may impede on that. The SEA as existing is designed to protect and enhance the landscape.
- Homes have not been ringfenced for occupation by campus workers because it is felt that the scale of development proposed here and the proportion of units delivered onsite, it would be disproportionate to request this.
- In response to Babraham Research Ltd, the policy has been worded as approximately, to allow for further
- In response to Stapleford Parish Council, the CSET route does not go through the SEA. The Spatial Framework has been corrected to reflect this change.
- In response to Historic England, the suggested amendments have been made to the wording.
- In response to the Environment Agency, the suggested amendments have been made to the wording.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Supports the need for improvements to environmental quality and accessibility in the SEA due to loss of greenbelt.	201558 (Stapleford PC)

Concerns that the plans by the Greater Cambridge Partnership to construct a busway through the Strategic Enhancement Area are in stark contrast to the goals of improving biodiversity and environmental quality.	201558 (Stapleford PC) 210910 (Great Shelford PC
With the loss of Green Belt that expansion of the Babraham Research Campus will involve, we strongly support the need for substantial compensatory improvements to the environmental quality of, and accessibility to, the proposed SEA. Development at the Campus must also maintain key views, enhance existing tree coverage, relate sensitively to its surroundings, and maintain and enhance the wider landscape	210910 (Great Shelford PC)
Units should be safeguarded for campus workers.	203095 (Cambridge, Past, Present and Future)
Greater consideration in policy is needed for local heritage assets and local views.	203095 (Cambridge, Past, Present and Future), 201558 (Stapleford PC), 207393 (Cambridge Paste, Present and Future)
Improved public transport connectivity is required to support the allocation.	203095 (Cambridge, Past, Present and Future), 207394 (Cambridge Past, Present and Past)
Existing rights of way should be protected and integrated into the site layout.	203611 (British Horse Society)

Amendments to the spatial framework are suggested including site boundary, removal of landscape buffer, commercial led development blocks, local nature reserve, and CSET.	203943 (Bidwells on behalf of Babraham Research Campus Ltd)
Suggestions to the policy wording to reflect the live planning application.	203943 (Bidwells on behalf of Babraham Research Campus Ltd)
BRC supports the continued allocation of Babraham Research Campus under Policy S/BRC for mixed-use development to meet the Campus's future needs to address unmet need for further residential and non-residential development.	203966 (Bidwells on behalf of Babraham Research Campus Ltd)
The site includes the grade I listed Church of St Peters and grade II listed Babraham Hall as well as part of Babraham Conservation Area. There are a number of other listed buildings nearby in the village of Babraham. In addition, there is a series of scheduled monuments on the higher land to the north and north west of the site including a long barrow, bowl barrow at Copley Hill, Wormwood Hill Tumulus, Causewayed enclosure and bowl barrow at Little Tree Hill and Wandlebury Camp a multivallate hillfort, earlier univallate hillfort, Iron Age cemetery and 17th century formal garden remains. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of an HIA for this site. The Policy states that Babraham Hall is grade II*. However, our records show this is listed at grade II. Please check and amend if necessary. We broadly welcome criterion 4 – 9 and 11.	210145 (Historic England)

Criterion 4 Add reference to the Babraham Conservation Area which covers part of the site. We welcome the requirement for a Heritage Impact Assessment. We would suggest referring to a '…more detailed Heritage Impact Assessment…' given that an HIA has already been undertaken. Add in the need to retain The Lodge, as recommended in the HIA. Criterion 8 Replace 'or' with 'and' to read 'Retain or and, where possible, supplement…	
: Sport England supports the policy and recommends explicit reference to Active Design.	209227 (Sport England)
We support the inclusion of point 10, which requires the development to 'apply the sequential approach to flood risk within the site, ensuring any development is subject to appropriate mitigation and does not increase flood risk elsewhere.' We recommend that this is expanded to clarify that only 'water compatible' development should be located within Flood Zone 3, and a site-specific FRA will need to include further assessment of the potential for groundwater flooding to inform the need for appropriate mitigation measures. Consideration should be given to the potential for the adjacent SEA to offer opportunities to reduce flood risk through nature-based solutions.	211178 (Environment Agency)
Expansion of the Biomedical Campus is understandable given its regional and national importance. However, the Local Plan does not yet set out a sufficiently robust spatial strategy to accompany this growth. The policy should: ● Require genuinely mixed-use development at a meaningful scale within and adjacent to the Biomedical Campus, including high-density housing with low car ownership, to reduce the need for long-distance commuting ● Avoid token residential provision and explicitly link employment growth to housing delivery in a walking or cycling distance to the campus	211770, 211771 (Camcycle)

Ensure that boundary treatments associated with Green Belt release do not create long-term physical or spatial barriers to movement, future connections or neighbouring communities ● Identify the active travel connections over the railway line as critical infrastructure and explicitly acknowledge the need for improvement ● Secure firm commitments to upgrade the key walking and cycling corridors serving the campus, including Trumpington Road, Long Road and the busway path with delivery tied to development phasing.	
Proposed Spatial Framework for Babraham Hall provides a very large SEA which is likely to change the countryside designation to residential and/or commercial. The impact in principle on heritage assets, the setting of Babraham Hall and curtilage structures has not been assessed and the reason for change of use of such a large area is not justified. Its removal from the Babraham Hall Framework Plan will not affect the delivery of housing in the Plan as that is shown provided closer to the existing village street.	211920 (C. Newell)

Policy S/RSC: Other site allocations in the Rural Southern Cluster

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made by developers about the nomination of sites. A variety of reasons were suggested, including the need for homes, the additional sites in the rural area, and in some cases, sites being grey belt.

Response to the main issues raised in representations

Proposals for alternative site shave been considered though an update to the Housing and Economic Land Availability Assessment where they fit within the broad emerging strategy of the local plan. New evidence submitted has been considered, and where considered appropriate scoring has been amended. Comments related to strategy choices have also been considered, particularly under the development strategy policies. The deliverability of the plan has been tested through evidence including the Housing Delivery Study. The strategy focusing on other broad locations is considered to be sound. It is not proposed to add additional village sites to the proposed submission local plan. An update to the Green Belt Study has been carried out to consider which areas would meet he governments definition of being grey belt. Whilst some site may meet the definition, exceptional circumstances is still required for green belt release, and the Councils do not consider that exists in light of alternatives available.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Land at Whittlesford Walled Garden Concerns raised in relation to the promotion of Land at Whittlesford Walled Garden for housing. Upward adjustments to the housing target are necessary, with a development strategy focusing on sustainable villages and exceptional circumstances for Green Belt land release.	202371 (Carter Jonas on behalf of the CLC Trust)
Land r/o No.1 Wren Park Whittlesford Cambridge (HELAA reference 52726) Disagreement with decision to categorise this site as Greenfield. Allocate land for development. Detailed comments are provided on the HELAA assessment.	207087 (R Arbon)
Foster's Field Hill Farm Road Whittlesford Cambridge (HELAA reference 52694) Allocate Foster's Field, Hill Farm Road, Whittlesford, Cambridge for development. Detailed comments are provided on the HELAA assessment.	207092 (R Arbon)
Land North of Mingle Lane and East of Hinton Way, Stapleford, Cambridgeshire (HELAA Reference 40369 (Site ID: 115763) and HELAA Reference 200771 (Site ID: 115189) Requested Change – Allocation of land for residential development	209968 (Pegasus Group on behalf of Granta Land Ltd)
Land North of Mill Lane, Sawston, CB22 3BY (HELAA Reference 40341) Allocate for development. Site evidence has bene provided. Reasons include need for additional allocations, site is considered grey belt,	210299 (Bidwells on behalf of Northwest Biotherapeutics Capital Limited)

Land at Dernford Reservoir (HELAA Reference 200751) Allocate for development. For the development of a data centre. Dernford Reservoir has a reservation for 450MW of power and can connect to one of three major substations within a 20-mile radius – a pivotal feature.	210309 (Carter Jonas on behalf of Rusell Smith Farms)
Land off Back Road, Linton (Site Reference 40343) Allocate for residential development. Comments provide a range of reasons including the need for additional allocations, over reliance on larger sites, and the sustainability the location.	210667 (Gladman Developments)
Land off Balsham Road, Linton (Site Ref. 40336) Allocate land for residential development. Comments provide a range of reasons including the need for additional allocations, over reliance on larger sites, and the sustainability the location.	210669 (Gladman Developments)
Land opposite Brewery Field, Duxford (site reference 115069) Despite acknowledgment of the presence of existing research parks and sustainable transport opportunities, there is one allocation within Duxford (a Group Village) for 60 homes and a carried over allocation from the 2018 adopted Plan for 280 homes in Sawston (a Rural Centre). We consider that further sustainable opportunities for growth have been overlooked in this area, including land within Duxford.	211271 (Mr & Mrs Smith)

Policy S/RSC/MF: Land at Maarnford Farm, Hunts Road Duxford

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There was broad support from Historic England for the allocation of this site. Historic England confirmed that there are no designated heritage assets onsite.

Comments were made by local residents with regard to concerns to walkability and whether Whittlesford Parkway was in walking distance to the site.

Concerns were raised by local residents in terms of development pressures in Duxford.

Further responses were received from site promoters with similar sites and were challenging the allocation of this site over other sites.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- Support is noted from Historic England.
- Site allocations are selected in line with the development strategy for Greater Cambridge in locations where there is accessible to public transport and local amenity and infrastructure provision. The sites are assessed through the HELAA to assess their suitability for development and any constraints. Duxford is a group village and can therefore support 60 new homes.

- The HELAA assessment has concluded that in terms of accessibility, there is adequate accessibility to key local services, transport, and employment opportunities. Proposed development would not require delivery of accompanying key services.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Concerns raised about considerations of active travel including connections to Whittlesford Parkway.	201155 (T Clarke)
Support for the allocation.	204310 (KWA Architects on behalf of Waterbeach Instruments Ltd)
Concerns raised about similar site proposed for inclusion in the Local Plan where this site has been rated Green in the HELAA for ecology and the other site has been rated Amber.	204310 (KWA Architects on behalf of Waterbeach Instruments Ltd)
More amenities are needed to support additional development in Duxford.	202541 (R Genillard)
There are no designated heritage assets on this site and whilst the Duxford Conservation Area lies to the south-east of the site it is separated from the site by development and a playing field. We welcome the preparation of the HIA. We welcome the references to heritage assets and building heights in the policy.	210146 (Historic England)

Policy S/RSC/BR: Land south of Babraham Road Sawston

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There was broad support from Historic England. Historic England confirmed that there are no designated heritage assets onsite. But the policy should

Comments were made by Great Stapleford to support clause 1c and amend the policy to reflect improve greenways and cycling and pedestrian access.

Concerns were raised by emergency services to include in the policy wording financial contributions to fire & rescue, police and ambulance facilities.

Further responses were received from Waterbeach Instruments Ltd to challenge the allocation of this site over a similar site.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- In response to Waterbeach Instruments Ltd, site allocations are selected in line with the development strategy for Greater Cambridge in locations where there is accessible to public transport and local amenity and infrastructure provision. The sites are assessed through the HELAA to assess their suitability for development and any constraints. The HELAA assessment has concluded that this site is suitable for allocation.
- In response to cycle access, it is felt that the wording in the policy is sufficient to support these connections.

- In response to Historic England, the support is noted and the policy has been amended to include landscaping on the southern boundary and reference to the Sawston Hall Registered Park and Garden.
- In response to Cambridgeshire Constabulary and Cambridge Fire and Rescue Services, the funding for emergency services is set out in the IDP as a planning obligation and does not need to be repeated in every site allocation.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Concerns raised about allocation of this site over a similar site proposed with similar characteristics.	204481 (KWA Architects on behalf of Waterbeach Instruments)
The site allocation should refer to Contributions to fire & rescue, police and ambulance facilities provision/ funding.	207486 (Cambridgeshire Constabulary), 207517 (Cambridge Fire and Rescue Service),
There are no designated heritage assets within the site boundary. However, Sawston Hall a grade II Registered Park and Garden, lies to the south-west of the site. Development of the site has the potential to impact the significance of this heritage asset through development within its setting. There does not appear to be an HIA for this site. However, we appreciate that this site is largely built out.	210147 (Historic England)

The policy should reference Sawston Hall RPG and the need for landscaping along the southern part of the site.	
Agree with clause 1c.	210911 (Great Shelford PC)
Support for greenway access to link Stapleford / Great Shelford to Whittlesford Parkway Station. Including pedestrian and cycling access to the Former Spicers Site.	210911 (Great Shelford PC)

Policy S/RSC/FSS: Former Spicers Site, Sawston Business Park, Sawston

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made by Whittlesford Parish Council to support the principle of the policy framework but raises concerns about walking and cycling infrastructure and connectivity to Whittlesford Parkway Station. Cllr R Williams considered the policy underplays the exceptional environmental, recreational and active travel opportunities presented by this site and should be strengthened.

Concerns were raised that there are environmental, recreational and active travel opportunities that should be focused on more, although the site allocation itself and specific clauses are supported. Comments set out that development was conditional on a path from Whittlesford to Shelford.

Concerns were raised about the impact on Green Belt, chalk downland and the Borough Hill Scheduled Monument and connectivity to other local villages.

Further responses were received from Historic England to require the HIA recommendations to be included in policy, and to require a more detailed Heritage Assessment, an Archaeological Management Plan, a Conservation Management Plan and to prevent development from occurring on the Borough Hill Scheduled Monument.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- Landscaped buffers have been included in the policy to offset any harm to the Green Belt and the surrounding landscape.
- The 2020 Planning Permission was not conditional of a cycle path explicitly from Whittlesford to Shelford, but with a cycle path to the A1301. The wording amendments in the policy to support connections to wider cycle networks should address this point and comments raised in relation to active travel connections.
- Wording has been included in the policy to improve pedestrian and cycle connections.
- The changes requested by Historic England have been made including the figure showing the developable area around the Scheduled Monument and the requirements for an Archaeological Management Plan and a Conservation Management Plan.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Respondents noted that the council should refer to the original plans by Huawei, which included a pathway along the river and through the woods, providing amenity space for walkers from Sawston and Whittlesford.	201272 (M Meredith)
A previous planning permission in 2020 for a research facility on this site was made conditional on building a new cycle path along the river Cam, connecting the 'blue bridge' on footpath 1 in Whittlesford to Shelford Road. There is currently no good cycle path from Whittlesford to Shelford, limiting opportunities for active travel. If this development goes ahead, it should include a cycle path from Whittlesford to Shelford.	201534 (A Smith)

The respondent is concerned about the lack of mention of community access and biodiversity plans in the new outline for development proposals.	201272 (M Meredith)
The respondent highlights that recent planning permission for the Babraham campus was granted due to biodiversity enhancement plans, contrasting it with the poor management of the land surrounding Spicers.	201272 (M Meredith)
Any development of this site should offset its harm to the Green Belt and in particular seek to improve the quality of the chalk downland between the Borough Hill scheduled monument on this site and the Wandlebury site on the same range of chalk hills.	201309 (M Foote)
Support for requirement for development to contribute to public transport provision.	201559 (Stapleford PC)
Active travel routes should be maintained and improved throughout the site including to Sawston and Shelford, Whittlesford to Shelford, and the Sawston Greenway Network.	201559 (Stapleford PC), 201534 (A Smith),
The site contains part of the scheduled monument. The scheduled monument known as 'Borough Hill' is a large multivallate (multi- ditched) iron age fort. This is an exceptional pre-historic site, of which there are less than a handful of surviving examples around the country. It is also on our heritage at risk register. We have previously raised concerns about the impact of the development on the significance of the designated asset. Our primary concern is the impact of the development upon the significance of the scheduled monument through a development within it setting. The closeness, scale and massing of the new development will significantly increase the quantum of the development in the area immediately adjacent to the monument. The setting of the monument will be irrevocably changed, and the significance of the asset will therefore be eroded and diminished. This development would therefore	210148 (Historic England)

result in harm to this significance. We recognise that the Spicers site is a brownfield site and that some form of redevelopment of this site would be acceptable in principle. However, development will need to be very sensitive to the monument adhering to the recommendations of the HIA. We welcome the preparation of the HIA. Two of the recommendations from the HIA are not reflected in the policy. These are: 1. Archaeological investigation should be undertaken in areas previously not subject to archaeological works. 2. Development should be limited to the area previously subject to development to avoid impacts on potentially significant archaeology associated with the monument. These recommendations should be included in the policy. It is sometimes beneficial to consider including the monument within the site boundary in order that appropriate mitigation and enhancements for the monument can be secured. We would suggest that this is an instance where such an approach could be useful. At the present time, only part of the monument is included within the site boundary. It is our view therefore that the whole of the scheduled monument should be included in the site allocation area.	
Whittlesford Parish Council supports the principle of a policy framework for the Former Spicers Site but considers that it should be strengthened to deliver clear public benefits and to reflect the site's relationship with Whittlesford, Sawston and Shelford. The policy refers to access to the A1301 but does not adequately address access to Whittlesford Road. The Council strongly supports the inclusion of high-quality walking and cycling infrastructure. The policy should explicitly require safe and direct routes connecting the site to Whittlesford village, Whittlesford Parkway Station, and a dedicated cycleway along Shelford-Whittlesford Roads, connecting the site to Little Shelford and improving active travel	207746 (Whittlesford PC)

connectivity between Whittlesford and Shelford. The policy should encourage public access across the wider site for walking, cycling and informal recreation, where compatible with development, to ensure that the site is integrated with surrounding communities rather than functioning as an isolated enclave.	
I welcome the inclusion of a site-specific policy for the Former Spicers Site within the draft Greater Cambridge Local Plan and support the principle of a coordinated policy framework for the site. However, I consider that the current draft policy underplays the exceptional environmental, recreational and active travel opportunities presented by this site and should be strengthened accordingly and need to be strengthened to secure health and active travel benefits in accordance with NPPF policies.	204138 (Cllr R Williams)

Policy S/RSC/CC: Comfort Café, Fourwentways Little Abington

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There is broad support for the allocation from Historic England.

Concerns were raised about the oversupply of employment floorspace where there are lots of unoccupied employment floorspace units.

Further responses were received from Cambridge Past, Present and Future to specify that development 'must' not have any unacceptable adverse impacts on heritage assets.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- In terms of employment floorspace, Greater Cambridge maintains a high level of employment land availability as recommended in the Employment Land Review and the Greater Cambridge EHEU 2023 is a recognisable scenario for Greater Cambridge. The area has historically carried an oversupply of employment land, that is allocated or with planning permission, when compared to the amount of floorspace completed on an annual basis, however strong the economy has been. In planning positively for growth, the plan can continue to reflect the previous trends that have underpinned the successful expansion of the Greater Cambridge economy by providing an ongoing flexible supply of employment land.
- The suggested edits from Cambridge Past, Present and Future have been included within the policy.

- Support is noted from Historic England.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Concerns raised about the need to protect heritage assets.	203099 (Cambridge Past, Present and Future)
There are concerns about the proposal for small R&D and start-up businesses due to the proximity of Granta Park and existing empty buildings, raising the risk of oversupply.	203131 (G Dalton), 204470 (J Searle)
Whilst there are no designated heritage assets on site, there is a grade II listed building, the Temple café and restaurant, to the south of the site. Development of the site has the potential to impact the significance of this heritage asset through development within its setting. We welcome the preparation of the HIA. We welcome criterion 1a,1b 1e and 1f.	210149 (Historic England)

Policy S/SCP: Policy Areas in the Rural Southern Cluster

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Broad support for the allocation from Historic England.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- Support from Historic England is noted.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
We note that the policy for the Babraham Strategic Enhancement Area is within the main policy for Babraham Research Campus, criterion 15.	210150 (Historic England)

Policy S/PA/LN: South of A1307, Linton

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Concerns were raised about light rail connections.

Historic England broadly support this policy area.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- At this stage, it is not appropriate to make reference to a potential Linton Station.
- Support from Historic England is noted.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Make provision for a possible Linton Station / light rail link as per Cambridge Connect.	203789 (A Carpen)
Support for policy.	210151 (Historic England)

Policy S/AMC: Areas of Major Change in the Rural Southern Cluster

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Broad support for the allocation from Historic England.

Response to the main issues raised in representations

Support from Historic England is noted.

The Land east of M11 at Duxford proposal has been considered through the Housing and Economic Land Availability assessment process, and proposals in relation to the aviation sectors have also been considered. The Councils consider that the Avtech aviation related employment uses could be complementary to the existing Imperial War Museum, being a major tourist / visitor attraction, educational, commercial and aviation facility and an important employment site for aviation. The boundary of Policy S/AMC/IWM: Imperial War Museum was expanded to include the Avtech 1 site (the western parcel), to enable proposals to come forward via a policy compliant detailed planning application, if a firm proposal was developed. However, the Councils consider that the proposed aviation technology cluster is extremely nascent and it is not considered that there is a sufficiently strong economic case to allocate Avtech 2 land which lies to the east of the M11.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
We welcome the reference to heritage in criterion 1d.	210152 (Historic England)
Land east of M11 at Duxford (Site Reference: 40095) The draft Plan now recognises IWM Duxford as being in an “area of major change”, but it raises a question why it is not also included as part of the Rural Southern Cluster, which recognises the associated need for housing, and which could be delivered around Duxford Village to support the sustainable growth of AvTech and the village. In this regard, we note at Policy S/AMC/WHD: Whittlesford Parkway Station Policy Area is both within the AMC and RSC. Continued investment in AvTech will also play an important role in diversifying the Rural Southern Cluster in South Cambridgeshire, providing some resilience if investment in biotech and life sciences slows.	211424 (Gonville & Caius College)

Policy S/AMC/GP: Granta Park

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Concerns were raised by local residents with concerns about light pollution and visibility of Granta Park from key viewpoints around the local area. Inconsistency regarding approach to building height was questioned.

Concerns were raised about some minor amendments to the policy area to reflect the ambition and the planning permission at Granta Park by the site owner.

Concerns were raised about Grange Farm not being able to meet the urgent accommodation needs of Granta Park.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- Point 1d has been amended to set out that development should respond positively to the tree line to minimise the impact on the landscape in response to comments.
- The boundary has been amended in response to comments from BMR Granta Park Propco Limited.
- The uses section has been amended in response to comments from BMR Granta Park Propco Limited.
- All new sites of a strategic scale are held back until 2032 in the draft plan to ensure that there is sufficient water supply. Smaller windfall sites are able to come forward to meet urgent needs, this does not require a site allocation. The site allocations for residential use in this location have been allocated in line with the strategy for the Local Plan which minimises carbon emissions through the selection of well-connected sites. This is set out in the HELAA assessment.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Recent buildings on this, notably Site 1 (21/03822/FUL), have been very intrusive to the landscape including light pollution.	203112 (Cambridge Past, Present and Future)
BioMed Realty is concerned that relying on key worker housing at Grange Farm will not meet the urgent accommodation needs of Granta Park.	203553 (Carter Jonas on behalf of BMR Granta Park Propco Limited)
Support for the site allocation.	203553 (Carter Jonas on behalf of BMR Granta Park Propco Limited)
A more flexible approach to housing delivery is needed to deliver more housing to meet the needs of the expanding campus.	203553 (Carter Jonas on behalf of BMR Granta Park Propco Limited)
The planning permission should be better reflected in policy, including the site plan.	203348 (Carter Jonas on behalf of BMR Granta Park Propco Limited)
R&D floorspace should remain the dominant use, with flexibility for enabling facilities that strengthen the life-science ecosystem.	203350 (Carter Jonas on behalf of BMR Granta Park Propco Limited)

Open-space policy should recognise usability, function and operational needs, not just visual or ecological value.	203350 (Carter Jonas on behalf of BMR Granta Park Propco Limited)
The policy should be revised to include clause on delivery of essential infrastructure.	203350 (Carter Jonas on behalf of BMR Granta Park Propco Limited)
Discrepancy in the approach to Granta Park continues regarding ‘townscape’ character of this rural park and the rural villages of Great and Little Abington each side of it. The predominate scale is of 1½ to 2 storeys, even at Granta Park, not 4 storeys. There is an exception building outside the village at Granta park roundabout, at 4 storeys, but that building does not comply with the extant Local Plan.	211921 (C Newell)

Policy S/AMC/WHD: Whittlesford Parkway Station Policy Area, Whittlesford Bridge

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There is broad support for the area of major change from CLC Trust, Great Shelford Parish Council, Imperial War Museum, Stapleford Parish Council, and Cambridgeshire County Council.

Concerns were raised by local residents with concerns about light pollution and visibility of Granta Park from key viewpoints around the local area. Concerns were raised about overdevelopment of the site, traffic congestion and connectivity. Concerns were raised about Grange Farm not being able to meet the urgent accommodation needs of Granta Park.

Detailed feedback was provided by a member of the public on their experiences using the Whittlesford Parkway, and the transport issues apparent in the village.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- The purpose of a policy area is to set the vision for an area, and to set out considerations or high level mitigations for any development proposals in this location. The detail of any mitigations or interventions will develop through the development of a masterplan and the development management process, with the support of statutory consultees and expertise of GCSP to minimise impacts on transport, landscape, heritage and the environment.

- In response to concerns impact on landscape, wording has been added to the policy to set out that development must positively respond to the treeline, to minimise impacts on the landscape.
- In response to traffic and connectivity concerns, a transport assessment will be required for any development for this site. National Highways will be consulted on any significant applications to manage the impacts on the road network. The policy wording reflect the need for cycle routes and improvement to connectivity to Whittlesford Parkway.
- In response to safety concerns and suggestions for traffic management and improvements for pedestrians, GCSP is not the highways authority, and it is the responsibility of the highways authority and national highways to manage these issues. The wording has been revised to set out the safety, and the needs of pedestrians needs to be priority.
- In response to concerns about overdevelopment, this allocation as it is a policy area does not have a capacity, however the policy area is masterplan-led and through the development of a masterplan development can be managed more effectively so it is of a sustainable scale.
- In response to Historic England, the suggested amends have been made.
- In response to KLW Planning, the proposal is a policy area not a site allocation to set out the vision for the area, where there is not sufficient detail on a developed proposal suitable for the site and where a site may be in multiple land ownerships. The area around the station has the potential for higher density development and must align with the delivery of a multi-modal travel hub.
- As a policy area, the site does not need to come through the Call for Sites process.
- In response to concerns about the underestimation of future demand.
- The extension of the policy area to include the site under HELAA reference 115874 / 40097, the land is designated as Green Belt and therefore is not included within the boundary for redevelopment.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Concerns raised over need to be more specific in the policy wording to recognise local context.	200997 (I Beeby) 207899 (N Denham)

Safety concerns raised about active travel routes between Pampisford and Sawston to Whittlesford Parkway.	201504 (J Harvey-Bowman), 204354 (N Denham)
Safety concerns at the A505 roundabout crossing, and pedestrian routes and the impact of lorry parking.	205788 (J Harvey-Bowman), 205789 (J Harvey-Bowman), 205787 (J Harvey-Bowman)
The pedestrian and cycle route between Whittlesford Parkway and Unity Campus feels unsafe and dangerous. Safety concerns of commuting by train, other Campus members opt to travel by car, further increasing demand for safe and sustainable travel options.	205786 (J Harvey-Bowman)
Safety concerns for pedestrians and the need for more public transport and a bus service from Sawston to Whittlesford Parkway.	205793 (J Harvey-Bownman), 205792 (J Harvey-Bowman), 205791 (J Harvey-Bowman), 205790 (J Harvey-Bowman),
Residents and members of the Unity Campus proposed a range of potential solutions including lighting, widening of paths, speed limits, signal control for pedestrians.	205794 (J Harvey-Bowman)
Support for the designation but concerned about underestimation of future demand.	206692 (Cllr R Williams)
The policy should include explicit requirements to secure step-free access and lift provision, improved bus and active travel connectivity, and the use of Section 106 obligations arising from development elsewhere in the Rural Southern Cluster to fund these improvements. The plan policy should also recognise and support local communities in dealing with the impacts of transport hubs.	206693 (Cllr R Williams)

The station design needs reviewing to be more effective. Improved connectivity between the station platforms is needed.	201536 (A Smith), 202607 (R Barrett)
Support for clauses 1 and 2 in the policy.	201560 (Stapleford PC), 210912 (Great Shelford PC)
Support for policy.	202117 (Cambridgeshire County Council), 207531 (Carter Jonas on behalf of the CLC Trust)
Support for cleaning up of the area but concerns about overdevelopment.	204354 (N Denham)
Concerns over nomination of the whole policy area as a policy area if it has not come through the call for sites process.	204912, 211677 (Lichfields on behalf of Smithson Hill)
The respondent notes the need for further site allocations in Whittlesford.	207531 (Carter Jonas on behalf of the CLC Trust)
Land east of M11 at Duxford Site Reference: 40095 Caius would be keen to work in partnership with all relevant bodies and local communities in preparing and adopting a masterplan led approach to the comprehensive development of the policy area. We consider such a policy lead approach would give the GCLP additional flexibility up to an including Examination in Public to demonstrate the Plan has the capacity to meet all objectively assessed needs. It would also offer a partnership approach allowing local communities early stage engagement in the plan making process.	211425 (Gonville & Caius College)

Policy S/AMC/WHD seeks a masterplan approach to bring forward a multi-modal travel hub at Whittlesford Parkway. Broad support is given to the policy as part of the wider strategic infrastructure strategy for the area. Development beyond Whittlesford Parkway should be able to come forward independently.	211455 (Henry Boot Development Ltd)
The Chapel of Hospital of St John the Baptist is a scheduled monument and listed at grade II*. The Red lion Hotel is listed at grade II. Whilst we welcome the reference to the assets on criterion 2, the policy should mention the type and grade of the assets. The policy should include a requirement for a heritage impact assessment.	210153 (Historic England)
We question whether, in view of alternative transport initiatives serving this area, in particular CSET Phase 2, significant further development on this very constrained site, beyond access improvements, is appropriate.	208105 (Sawston PC)
The policy appears to be based heavily on the 'Whittlesford Station Masterplan Stage One, Baseline Report, Final' from 2018 which is out of date. Many of its key proposals were shown to be either unfeasible or not cost-effective. The only potentially available site within the policy area, Land North of 39A Station Road (West), was recently given permission for a residential estate of 48 dwellings (23/01150/FUL). Future use of land which might become potentially available to increase parking provision is likely to be in conflict with the proposed revised NPPF Policy Change 2 – 'Building homes around stations'.	208106 (Sawston PC)
Access from the A505 to both Station Roads East and West is already addressed in the Royston to Granta Park Strategic Transport Study, (Strategic Outline Case, 2025).	208107 (Sawston PC)

A number of the assumptions around the future importance of Whittlesford as a transport interchange have been overtaken by changes in local development policies and the CSET Phase2 proposals for a travel hub at the Fourwentways A1307/A11 junction. Significant drivers for growth in usage of Whittlesford is cited in the 2018 Masterplan report. The Uttlesford Local Plan was withdrawn during the EIP and the Garden Village proposal dropped. The current Uttlesford emerging plan proposes no major development in the North of the District and this aspect of the Local Plan has been considered generally sound. It is noted that the GCP is no longer funding the Whittlesford Station Transport Infrastructure Strategy.	208108 (Sawston PC)
CSET Phase 2 will also offer direct and rapid access to Cambridge and Cambridge South stations and faster, frequent journeys to Kings Cross and Liverpool Street Stations. It will also offer direct access to the East Coast mainline at Hitchin and eventually to Cambourne and Oxford via EWR. Depending on the patterns of service operated by the rail and bus companies, it is likely that if CSET Phase 2 proceeds, Cambridge and Cambridge South will become the stations of choice for users in the South East of the District.	208109 (Sawston PC)
If it is still considered that a major rail-based transport hub is needed in this area, consideration should be given to the relocation of Whittlesford Parkway to a new site adjacent to the entrance to the former Spicers' Site on the A1301 Sawston Bypass. This site is better located to serve both Whittlesford and Sawston to both of which it is well connected by active travel routes. It has better access, is less constrained and would also serve as a major stimulus for the re-development of the former industrial site. Since it would involve a specific green belt release, land acquisition costs would be substantially less than within the proposed policy.	208110 (Sawston PC)

Whittlesford Parkway is a mainline station serving Cambridge, London and Stansted and is a key transport asset for the Rural Southern Cluster. Whittlesford Parish Council supports the designation of a policy area but considers that the policy significantly underestimates future demand and, as currently drafted, failed to recognise the reality of the policy area.	207744 (Whittlesford PC)
Parking pressure already impacts Station Road East, which is both a residential road and the location of industrial units. Policy does not provide a clear strategy for managing increased parking demand or for addressing constrained access at Station Road East, West Royston Road and Moorfield Road. The policy should recognise the residential element of Station Road East and that vehicular access to houses for residents is maintained and resident parking facilities enhanced. Whittlesford Parish Council requests that the policy explicitly commits to step-free access to the station, improved platform connectivity via a lift, enhanced cycle links to local villages, a deliverable commitment to increasing public transport links to the station and village, a clear parking and access strategy that protects residential amenity, and measures to address flooding and highway safety, all developed in consultation with the local community.	207745 (Whittlesford PC) 207900 (N Denham)
The development of Whittlesford Parkway as a travel hub together with employment and housing is wholly supported by IWM. The introduction of a bus turning circle is vital and a fundamental part of making Whittlesford station an effective travel hub to enable any significant mode shift to sustainable travel for IWM visitors and staff, being the nearest rail station.	208283 (Turley on behalf of the Imperial War Museum)
Land west of Duxford Road Whittlesford (HELAA Reference 59397) Inclusion of the station area as a policy area rather than as a formal allocation is not positive planning; the Plan should proactively allocate Whittlesford Parkway station for a range of accessibility and	204262 (KLW Planning)

infrastructure improvements and should allocate sites for residential and employment development around the station area, including Land west of Duxford Road. Croudace Homes should be involved in discussions regarding sustainable development around the station, alongside other willing landowners. A delivery plan with clear timelines for improvements at Whittlesford Railway Station is requested to ensure effective implementation. The recent Government consultation supports residential development near well-connected train stations in the top 60 TTWA, of which Whittlesford Parkway is one. The site meets the criteria for a well-connected station, with services exceeding the required frequency, connecting it to London and Cambridge. The GCP Masterplan highlights the need for improved bus services and cycling infrastructure, which could be supported by residential development around the station. Residential development would also complement planned employment provision. The GCP report suggests potential for a new car park to support station accessibility, which could be supported by appropriate contributions from Croudace Homes. The Plan should develop GCP's work to identify residential and employment allocations within 800m of the station to align with government proposals for development near well-connected stations. We attach a transport appraisal and our vision document for Land west of Duxford Road, both of which demonstrate that the site lies within 800m of Whittlesford Parkway railway station, and that the site is highly accessible to this well connected station, with potential to improve footpath and cycle path connections, to the benefit of existing residents of Whittlesford and new residents of the proposed development.	

The site should be proactively allocated as a site allocation not a policy area. Development is supported near stations in the NPPF.	204262 (KLW Planning)
Land North East of Whittlesford Parkway (HELAA Reference 40097) is located immediately adjacent to the 'Area of Major Change' (Draft Policy S/AMC/WHD), which proposes a comprehensive, masterplan-led redevelopment of the Whittlesford Parkway Station. By incorporating this additional land, the Council can include the wider land holding and fully optimise the opportunity to develop the Area of Change. The site offers an opportunity for immediate, high-density well-connected development, optimising land use to support the viability of the transport interchange and Area of Change. The site could also accommodate community uses as a supported in the Whittlesford Neighbourhood plan.	211097 (No6 Developments on behalf of the James Binney Will Trust)
The policy map incorrectly includes the former scrapyard site and the veterinary surgery car park but omits the demolition site at 39a Station Road West and the re-numbered property at 40 Station Road West, risking mis-allocation of development rights. The map fails to include Nr 40 SWR which was recently converted from the garage to Nr 38. We are concerned that the proposed development could have a detrimental effect on our lives and the character of the area. Agencies are not working together effectively; representatives from SRW and SRE must be included in the planning process.	204354, 207891, 207892, 207893, (N Denham)
The A505 is a very dangerous road. Regarding the junction between Moorfield Road and the A505, it is now far too dangerous to do a right-hand turn towards Duxford due the volume of traffic. This will have to be signalled even if it means standing traffic back to Four Wentways and Royston	207894
• The steps up and down make it extremely difficult for cyclists to get from one side to the other, obviously lifts would be ideal for this and disabled people to use the trains more from this station rather than Cambridge of Audley End.	207895, 207896, 207897, 207898, 207899, 207900, 207901, 207902, 207903,

• Cycles they have to weave in and out of the potholes and parked cars, there is no safe crossing point for cyclists at the bottom of Station Road West • Needs to be considered is the reduction of the speed limit to 20 mph • Bus turning circle requirement not clear. • Notices at the station saying there are no bus services etc. • Major unlawful parking in the area. • Narrow pavements, in some places only on one side. Cars have damages path areas, not well lit. • new entrance road to the proposed housing will make pedestrian access worse • agencies involved have not worked well together in the past and continue to do so. • Need better signage • Flooding due to blockages in railway drains	211877, 211878, 211880, (N Denham)
Agree that it must protect and enhance the Duxford Chapel and Red Lion Hotel heritage assets and their settings	211879, (N Denham)
There is strong, consistent, and well-evidenced demand for a safe, continuous, and well-lit pedestrian and cycle route between Sawston, Pampisford, Duxford, Unity Campus, and Whittlesford Parkway Station. The current route actively discourages sustainable travel, forces residents and workers into cars, and presents unacceptable safety risks. With Unity Campus continuing to grow, the need for improvements is both urgent and strategic. Unity Campus strongly encourage the Council to prioritise this route within the Local Plan and Active Travel programmes, and to work with local stakeholders to deliver meaningful, timely improvements.	210439 (J Harvey-Bowman)

Summaries of Representations: Sites Rest of the Rural Area

Rest of the Rural Area Introduction

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments raised concerns regarding sites on the A1307/A14 corridor for logistics. The largest number of these objected to the Brickyard Farm, Boxworth Farm, Boxworth site north of the A14 services, siting concerns including the size of buildings, relationship with nearby villages, traffic and safety. Newlands respond to comments, stating that their site has transport access benefits over other sites. A smaller number of sites referenced proposals in that area more generally, or other proposals specifically. Historic England asked for more information, in particular on the Slate Hall Farm site identified in the draft plan.

General comments from Parish Councils included Papworth Everard supporting the non-allocation of sites submitted through the call for sites. Little Gransden wanted to ensure if sites were added they addressed highway adoption issues. Great Wilbraham said development in the village was needed to support improvement to services and facilities. Swavesey PC expressed concern about the cumulative impact of development, and the need for it to be assessed.

Other comments included support for removing proposals at the draft plan stage to release of green belt and allocation of development at Mingle Lane in Great Shelford. One comment highlighted concern about protecting villages were not being applied equally to Cambridge. A comment expressed concern about the impact of development at Cambourne on surrounding villages. Another focused on protecting the countryside east of Cambridge.

The majority of comments to this introduction section objected to the non-inclusion of development proposals in a variety of villages. Reasons sites included the relative sustainability of the locations, the opportunities to support services and facilities, the need for the plan to allocate more smaller sites, over reliance on large strategic sites to deliver the numbers required, and the plan simply not allocating enough homes to respond to local needs or national proprieties. A number of comments where sites are in the green belt considered their site was grey belt, and the plan should have identified grey belt opportunities. Many proposals challenged the findings of the Housing and Economic Land Availability Assessment, and proposed changes to the scoring.

East West Rail advise that some sites promoted are where they are exploring provision of a light maintenance depot.

Response to main issues raised in representations:

Having identified a need for logistics space, the draft plan identified sites at the A14 Services and Slate Hall Farm to respond to that need. There are two other proposals in this area that were not selected. Further evidence has explored transport and heritage impacts and other issues. Having explored issues further, including considering comments made in representations, the two sites selected in the draft plan continue to be the preferred allocations. It should be noted however that promoters of all four sites have indicated an intention to submit planning applications ahead of submission of the local plan.

Proposals for alternative sites have been considered though an update to the Housing and Economic Land Availability Assessment where they fit within the broad emerging strategy of the local plan. New evidence submitted has been considered, and where considered appropriate scoring has been amended. Comments related to strategy choices have also been considered, particularly under the development strategy policies. The deliverability of the plan has been tested through evidence including the Housing Delivery Study. The strategy focusing on other broad locations is considered to be sound. It is not proposed to add additional village sites to the proposed submission local plan. An update to the Green Belt Study has been carried out to consider which areas would meet he governments definition of being grey belt. Whilst some site may meet the definition, exceptional circumstances is still required for green belt release, and the Councils do not consider that exists in light of alternatives available.

The representation regarding the Defined Development Extent has been addressed under Policy S/DE: Defined development extents.

Table of representations:

Comments focused on A1037/ A14 corridor Logistics Proposals

Summary of issues raised in comments	**Comments highlighting this issue**
Brickyard Farm, Boxworth Farm, Boxworth, (Newlands) (Site reference: 47353, 115237) Concerns expressed: • I have grave concerns regarding Newlands, as yet not proposed site, north of Boxworth at Cambridge services. Access to site, amount of lorries and other vehicles on an already busy flyover and roundabout system. The size of proposed enormous buildings not compatible with Buckingway B P or proposed Jaynic site to the south. Lack of water to site a problem. Amount	201308 (S Hoyland), 201455 (C O'Connor), 201456 (S O'Connor), 201488 (E and J King), 201758 (P Safranek),

of traffic through small villages and roads to get to it. Proximity to housing at Grapevine. I sincerely hope this is turned down at all planning stage • I am very concerned about the proposed Newlands development which is to the west of the road between Boxworth and the A14 services. The proposal is far too close the village of Boxworth, and the site is far too large. Already the traffic around the three roundabouts in this area are very congested and this will make it significantly worse. On many occasions the A14 service area is completely overloaded, the roundabouts at a standstill with lorries parking for the night on the roundabout itself. Finally, this development is not required for local needs but rather national and regional. • The Swavesey South Roundabout is poorly designed and lacks sufficient space, particularly for lorries, to manoeuvre safely; I have personally witnessed many accidents there. If Newlands proceeds, the additional traffic, especially juggernauts, will make the situation untenable. Furthermore, the proposed warehouses are enormous, of an inappropriate scale and height, and would dwarf our village and its beautiful medieval church • We object to the visual impact of huge buildings. Traffic access to such a large site is problematic as local roads are already inadequate, with no cycle path and no pavement. We are concerned that such a large site will put great strain on water supplies, sewage and drainage. In this region there are many empty warehouses, so the need for this site is not established • The proposed scale of the site and particularly the buildings are not in keeping with rural setting or current restrictions placed on Buckingway site. These will be 24m high boxes. Newlands state this is to serve national and regional needs not local as stated in this plan. Traffic is of great concern, both from lorries and employee traffic. • There is no route through from A428 except through local villages. Roads are very narrow, few pavements and are unfit • for increased traffic. Routes to and from A14 cannot take the traffic	201760 (N Safranek), 202756 (L Turton), 204089 (N Turton), 204184 (Histon and Impington PC) 201789 (J Benninson)

• Size and scale massive, will dominate local rural environment totally inappropriate so close to Boxworth where I live Buildings too high should be max 10m Huge increase in traffic going through Boxworth 24/7 will ruin quality of our quiet village life and increase accident risks Serves national not local needs Concerned Newlands will bypass planning objections by not being included in Local Plan and then will appeal	
A1307 should not be used as an access road to/from a development park. It was provided for local access, to keep local traffic off the A14 and allow a safer route for local residents.	207725 (Swavesey PC)
I agree with the sentiment of the local plan however, I cannot agree or disagree with the proposal as there are many unanswered questions. The plan especially around warehousing looks in isolation and not co-ordinated with the other multiple developments. There are questions on impact of traffic capacity, flooding / drainage and also landscaping with local villages. I am also aware of a warehouse proposal (Newlands) which will be put forward. From what I have seen, there are serious questions on scale and height of the units and traffic management through villages and sustainable commuting which is one of your priorities.	203743 (E McKerrecher)
Land to north west of Cambridge services. Likely access from Boxworth road will greatly impact an already congested roundabout at entrance to services, where traffic at times already tails back onto A14. Coupled with the other proposed development at the services would cause likely gridlock at busy times (early am and evening). The size of warehouses are disproportionate for the area and will greatly impact on visual landscapes. Local roads not suitable, and Boxworth residents in particular concerned about not being able to access a14 at busy times	201261 (C Howlett)
I am most concerned about the plans to develop four logistics, storage and business development sites along the A14 near Bar Hill. The increase in traffic will reduce air quality in the area. There is	205019 (A Bradford), 204477 (Cllr T Bygott),

only one entry and access road to Bar Hill and the siting of the access point to Tritax will exacerbate the already busy and at times congested A14, the roundabout and feeder roads. There will be a significant and detrimental effect on the local landscape. In sum, there are too many developments concentrated in too small an area with significant negative impacts and few benefits. The Newlands (land to the south of J24 of the A14) development is not included in the Draft Local Plan however we wish to make it clear that the proposed development does not meet the policy requirements relating to providing support for Greater Cambridge, the implied restrictions on the size and scale of rural developments (Appendix H) and paragraph 7 of this policy.	203701 (G Chamberlain), 202770 (Boxworth Parish Meeting)
The sheer size and scale of this development is inappropriate with these mega sheds having such an overwhelming and negative impact on the surrounding area. Am estimated extra 4500 daily traffic movements from this site would put severe strain on the local roads especially the A1307	201446 (S Pink)
My concerns against this are to do with: 1. Inappropriate scale and height proposed for the structure 2. The development needs to meet local needs, not be structured to serve regional and national needs 3. Traffic management is a significant concern—roads are too small, would be extremely disruptive to wildlife and would make living here less safe for humans and animals.	201498 (V Lebedeva)
The large commercial developments proposed near Cambridge services seem to ignore the many alternative sites closer to Cambridge including around the relatively newly built Bar Hill which has less natural biodiversity and the housing has less Historic significance. As above the road network through Boxworth already struggles with large lorries inappropriately using and parking on the roads and this will only worsen.	207177 (W Parker)

We appreciate that the introduction of B8 uses (albeit for local use) is something of a departure from previous employment policy in the Cambridge area. This potentially brings additional impacts on the historic environment, given the typical scale and massing of such development. We have some concerns about the employment allocations along the A14, particularly in respect of impacts on some of the churches on the elevated land above the relatively open, flat landscape. The HIA for Slate Farm for example doesn't address this matter, given the assets are at times over 500m, and yet there may still be some wider setting impacts. We need this issue to be explored further by you so that we may be clearer about the potential impacts for these employment sites. In order to do this, we would request revisiting the HIAs, and to explore this matter further so that we may have sufficient information to reach a more informed position. This should also include further evidence in relation to heights and mass informed by some visualisations.	210301 (Historic England)
Site allocation S/RRA/SCS (Land South of A14 Services), would require extensive numbers of HGVs to pass a further 750m through the Junctions to the south of the A14 that link to Boxworth Road and the entrance to the A14 Cambridge Services. The journey time for HGVs to access the westbound A14 Strategic Road Network is therefore over 4 times that of Newlands Park Cambridge (HELAA Reference 47353) and double the time to the eastbound carriageway. The journey times for Slate Hall Farm are significantly longer still. The traffic implications of this additional time/distance travelled by HGV's, upon a congested stretch of road, flagged vehemently in objections to Newlands previous proposal from Boxworth residents, does not appear to have been given due consideration, nor is it evidenced.	211688 (Newlands (Cambridge) Limited)

General Comments from Parish Councils

Summary of issues raised in comments	**Comments highlighting this issue**
Papworth Everard Papworth Everard Parish Council understands that none of the sites submitted by land owners or other interested parties that went on to be assessed in the HELAA in and around Papworth Everard have been brought forward by GCP for the new Local Plan. The Parish Council supports GCP in not bringing forward these sites for the reasons set out in the HELAA assessment.	205476 (Papworth Everard PC)
Little Gransden If the local planning authority is minded to include either or both of the areas adjacent to Primrose Walk, Lt Gransden within the next local plan then we would like the inclusion to be conditioned upon the developers upgrading Primrose Walk to such a standard that it would be adopted by the highways authority.	201420 (Little Gransden PC)
Great Wilbraham The Plan unfairly disadvantages Group and Infill villages like Great Wilbraham and leading to these villages decline. It goes against the Cambridgeshire Corporate Plan because it intentionally restricts who already suffer from loss of local amenities, lack of public transport, no safe cycle routes and pressure on the many social and sporting activities that are maintained, not by the Council, but by hard-working volunteers. Great Wilbraham has changed in recent years with regard to village	206559 (Great Wilbraham PC)

population, a change in housing needs, and almost non-existent public transport. Our community needs an economically diverse population, spread of age groups, primary school, shop, public house, church, access to healthcare, access to social and cultural space and high quality green space.	
Major new housing at Cambourne North, Bourn and continued development of Northstowe will impact both highway and water infrastructure around the Swavesey area. Cumulative impact needs to be a consideration of each individual development site. Site assessments contain general statements that developers would be required to produce traffic management plans or flood risk management plans but there is no point at which these plans are consolidated and their overall effects assessed. We believe this to be a significant shortfall in the Draft Local Plan and needs to be addressed before the next round of consultation	207728 (Swavesey PC)

Other Comments

Summary of issues raised in comments	**Comments highlighting this issue**
This comment relates to the Site Allocations section and its reliance on the Policies Map and inset maps to define development boundaries. In the area between Northstowe, Oakington and Longstanton, allocated sites and adjacent land are not clearly distinguished from areas intended to remain undeveloped. Several areas appear shaded or labelled in a way that is visually similar to allocated land, creating uncertainty about their intended status. This ambiguity risks unintended coalescence between settlements. The Plan should ensure that allocation boundaries are	204404 Cllr Thomas Bygott

unambiguous and that land intended to function as permanent separation is clearly identified and protected.	
Mingle Lane Great Shelford Support the decision to remove the formerly proposed Mingle Lane development from the plan. concerns over increased traffic. Current traffic on Mingle Lane is already heavy, exacerbated by potholes and parking on both sides, making driving dangerous, especially with church traffic. Local dental and GP surgeries, as well as primary and secondary schools, are at full capacity. Poor drainage system, which is compromised by tree roots protected by Tree Preservation Orders (TPOs).	201182 (A Waters) 208184 (J Coppendale)
You care about the aesthetics of these small villages. You don't care at all at what is being done to Cambridge itself. It will be literally unrecognisable, all because the councils get more council tax/business tax? Is it all just about money for you? You are betraying the existing population. Cambridge is going to be a horrible place and the residents have absolutely no way of stopping it happen.	201239 (S Williams),
The proposed housing development linked to the new East/West rail would create a ‘rat run’ through Knapwell, providing insufficient buffering and exposing the village’s protected church, woodland and listed cottages to heavily increased traffic, with speeds over 50 mph and a fatal accident already occurring. There is currently insufficient buffering to protect the village from the massively increased traffic flow. One proposal would be a bypass, which could include Elsworth and Papworth and Knapwell. This has been done locally for some smaller villages. Or a much larger buffer with trees and a separate route which doesn't come through Knapwell at all.	201599, 201600, 201601 (C Grainger)

Site allocations lacking explicit on-site health facility requirements should reference the need for financial contributions towards health and infrastructure mitigation, aligning with the IDP approach. Engagement with Council Officers during early plan preparation and input into the Infrastructure Delivery Plan is welcomed. An additional assessment by the ICB in Stage 2 of the IDP process will provide targeted evaluations of key site allocations and health infrastructure needs.	205102 NHS Cambridgeshire and Peterborough Integrated Care Board
The countryside east of Cambridge is not empty land waiting for development. It offers critical public rights of way, beautiful, ancient open landscapes, dark skies, important historical sites, and ecological connectivity. These resources support health, recreation, heritage, biodiversity, and climate resilience. Policies must be strengthened to stop speculative, large-scale developments and ensure all external proposals align with Cambridge's strategic plans. Without stronger protections, growth could damage rural landscapes and communities beyond the Green Belt. Developers see our countryside as easy pickings. NSIPs such as Kingsway Solar demonstrate how easily local planning frameworks can be bypassed, leaving our community to fight well-resourced external interests with little support. Villages like Weston Colville contribute to Cambridge's identity, food security, jobs and environmental goals but currently bear disproportionate development pressure without receiving benefits.	209246, 209247, 209250 (D Hepworth)
Windfall sites north east and south east of the village of Linton are problematic developments approved due to lack of a 5-year housing supply. They are shown incomplete on the village inset map and have incomplete boundaries. They therefore do not comply with the Plan criteria under Policy S/7 Page 11 Paragraph 30 and should not have been included in the defined development	211929 (C Newell)

extent. These are the Land at Bartlow Road development, and The Land at Horseheath Road development.	

Comments Seeking Additional Allocation sin the Rest of the Rural Area

Summary of issues raised in comments	**Comments highlighting this issue**
Land east of Cambridge Road in Hardwick (Site Reference 40414) It is requested that the is identified as an additional allocation. Comments address HELAA issues.	204203 (Hill Residential)
Land Adjacent to St Georges Way and Woodcock Close, Impington (HELAA Site Id: 115090) Comments made addressing HELAA issues. Site should be identified as grey belt and allocated.	201859 (Chivers Farms Limited),
Land at Branch Road and Long Road, Comberton (HELAA Site reference: 40261 Site ID ref: 115627) Supports the principle of sustainable development locations but concern about the feasibility of delivering homes in these areas due to potential site-specific issues. Need greater flexibility in the Local Plan to accommodate interim growth needs, particularly in Minor Rural Centres, to avoid failing to meet housing demands. Without a balanced approach between strategic and medium-sized sites, the Councils may struggle to maintain a sufficient supply of new homes. Response to HELAA comments provided.	204721 (Beechwood Estates Ltd)
Land west of Duxford Road Whittlesford Development in close proximity to services and facilities, would enhance the viability and vitality of local services and community facilities. Primary school has a capacity of 210 and currently has 185 pupils, so there is some available capacity for any children who would live in the new homes.	204281 (Croudace Homes)

The Walled Garden, Whittlesford Perfect site that could accommodate small houses for those aged 65+ with their needs being met in an infill central village position with specific facilities for their age while being able to enjoy village facilities. Should not be in the green built as it is village central and surrounded by houses, has been taken out of this latest plan having been in earlier stages.	205509, 204628 (C Forbes-Cable)
Land to the South side of West End Road , Whittlesford Include for development as it would be in keeping with the village remaining neat while adding a considerable amount of houses	205510 (C Forbes-Cable)
Crow's Nest Farm (HELAA Site Ref: 48096 and HELAA Site Ref: 208867) Represents a sustainable, deliverable and flexible opportunity for residential development which is capable of contributing positively to the housing supply over the plan period.	207044 (Mac Mic Land)
Ashwell and Morden Highlight the value of the Plan recognising the potential for additional development in the form of railway station growth within the plan period, and the importance of the Plan creating a flexible and positive policy framework that responds positively to the locational opportunities for station related development in Greater Cambridge within the Plan period. I AMLC are commencing a process of exploring the feasibility of such a project over the coming months and therefore a Call for Sites submission has not been made through the current consultation. Whilst the Local Plan will be assessed for soundness under the December 2024 version of the Framework and therefore need to be demonstrated to be consistent with the existing Framework, the Plan has the challenge of also needing to be consistent with the decision making policies of the new version of the Framework. if	208253, 208254, 208256, 211073 (Ashwell and Morden Landowner Consortium)

the land does prove to be available, suitable and viable for a railway station development, the AMLC and its prospective future development partner would welcome the opportunity to engage with GCPS during the Plan process.	
Swavesey In respect of our client's sites in Swavesey these are located adjacent to a sustainable settlement situated on the Cambridgeshire Guided Busway within the A14 corridor. They are suitable, available and could be developed relatively quickly without the need for any major infrastructure improvements. There are not any site-specific constraints for which mitigation cannot be delivered. Therefore, in our opinion these sites, and similar sites in the other sustainable rural villages, should be allocated in the plan to help deliver the growth ambitions for Greater Cambridge in a timely and effective way. We wish to stress the site owners desire to work collaboratively with the Council in respect of their proposed site allocations, and to emphasise the flexibility that exists in respect of this land, to respond to potential local development needs.	208399 (Ceres Property on behalf of land owner at Freisland Farm)
Land South of Horseheath Road Linton Endurance Estates objects to the proposed inset map for Linton on the grounds that it does not allocate Land South of Horseheath Road for residential development.	209752, 209753, 209754, 209755 (Endurance Estates)
Land West of Malton Road, Orwell The draft strategy is flawed due to the over reliance on the delivery of larger complicated sites. The estimated build out rates look to be unachievable based on the need to deliver major infrastructure to unlock these sites, coupled with expected market absorption rates. Growth agenda for Cambridge is likely to see the need for a higher number of houses then currently being projected in the Plan	203079 (Cemex UK Properties)

period. A more balanced delivery approach is required which also meets the requirements of the emerging NPPF which requires authorities plan for a diverse mix of sites across the Local Plan region. Site for 75 dwellings at Orwell has no constraints.	
Land at Long Lane, Fowlmere (HELAA Reference 59408) The Draft Plan's aim to sustain rural villages is supported, but it should proactively allocate growth to village locations. Transportation mode is important but should not be the sole consideration; bus services and the rise of electric vehicles should be acknowledged. The proposed development of around 65 homes in Fowlmere can enhance the village and support local services and infrastructure. The Greater Cambridge Local Plan should ensure proportional housing allocation for rural settlements to promote sustainable growth. This proposal reduces the size of the site and the quantum of development of approximately 65 dwellings.	204734, 210412 (Croudace Homes)
Land south of High Street and west of M11, Hauxton (HELAA site 40283) Redrow objects to Policy S/RRA, plan fails to allocate sufficient land within the rural area to meet the uplifted housing needs. Policy does not provide a mechanism for including additional sustainable village edge sites such as land east of Hauxton. Overall housing requirement should be increased, greater emphasis should be placed on distributing growth to the most sustainable villages, and the Plan should release appropriate areas of Green Belt, including “grey belt” land.	204539 (Redrow South Midlands)
Bedlam Farm, Impington (HELAA site reference 115413) Site can meet the identified need for warehouse development in the emerging Local Plan across a range of potential occupiers. Concerns with the HELAA scoring on the Site, and several elements have been rescored to demonstrate the site scores better.	201982 206046 (Bidwells)

Grange Farm, Girton (HELAA site reference 115388). Site represents a good opportunity for a range of employment uses, including the identified need for warehousing development, across the plan period. In particular, as a result of its location close to the strategic road network and Cambridge fringe. Concerns with the HELAA scoring on the Site.	201983, 206049 (Hardwick Farming Company)
Land North of Pampisford Road, Great Abington (HELAA site reference 40539) Objects to HELAA scoring on the Site. It adjoins the settlement boundary and represents a highly sustainable location, with local services within 500m and excellent access to major employment hubs south of Cambridge via public transport and active travel routes. The Site is not constrained by Green Belt, flood risk, heritage or ecological designations and is suitable, available and achievable within five years. A landscape-led design can enhance the site's integration with the existing village. The site should be reconsidered for allocation in the Local Plan to support growth and maintain the vitality of Great Abington.	204149 (The Trustees of the C Y Nutt Deceased Will Trust)
Land north and south of A428 - Kingsfields (HELAA site reference 51668). Site is capable of delivering circa 3,000 homes and approximately 83 hectares of employment land and would form a logical and well-connected expansion of Cambourne, consistent with the emerging spatial strategy and opportunities for enhanced connectivity. The northern parcel of Kingsfields presents an employment opportunity with a small mixed-use area south of the proposed EWR line and renewable energy to the north. The Southern parcel presents a residential led scheme with a primary and secondary school.	208275, 208276, 208278 (The Church Commissioners for England)
Land east of Balsham Road in Fulbourn (Site Reference 40271)	203899 (Hill Residential)

Identify as an additional allocation 40 dwellings, including affordable housing. The eastern part of the site to be used for an extension to the existing recreation ground or allotments. Upward adjustments are required to the housing target, the development strategy should direct development to the more sustainable villages, and there are exceptional circumstances to release land from the Green Belt. Would help to maintain a sufficient housing land supply in Greater Cambridge until the larger strategic sites start to deliver	
Land South of Lower Cambourne (HELAA Site ID (40447) Site ID 115601) The plan requires amendments to ensure that the level of growth and housing allocations reflect the Vision for Greater Cambridge as set out in the DLP. Expansion to the south of Cambourne should be planned for, either as a stand-alone extension to the settlement, or in combination with development in another direction. Presents a viable option for immediate development, requiring less infrastructure and allowing for short to medium-term growth.	204096 (Richborough)
Land at Six Mile Bottom (HELAA Site Reference 40078).) The Local Plan's evidence base should focus more on the eastern subregion, particularly the growth corridors along the A14/A11/M11, including the Cambridge to Norwich Tech Corridor and London-Cambridge Innovation Corridor. The potential dualling of the Newmarket line and the Cambridge East Transport Strategy are crucial for improving access and promoting sustainable travel in the region. Locations like Six Mile Bottom have significant potential to meet long-term economic and housing needs, addressing the growth and economic opportunity imbalance in the subregion.	204627 (Urban and Civic and Hill Residential)
Land off Bannold Road, Waterbeach (HEELA Site Reference: 115482)	204238 (Bellway Strategic Land)

The proposed site (HEELA Site ID: 115482) offers an opportunity for early delivery of housing and infrastructure, benefiting from proximity to existing and planned services. The allocation of the site would support the expansion of Waterbeach, providing much-needed housing and contributing to biodiversity net gain. Site is grey belt.	
Land East of Bridge Road, Impington (HELAA Site reference 200829) Benefits from strong public-transport and cycling links which will help reduce in-commuting and aligns with the Development Strategy's connectivity objectives. All other planning matters, including landscape / visual effects, can be satisfactorily addressed. Sustainable Grey Belt village sites need to be allocated as part of a blended development strategy to ensure that dwellings are delivered throughout the Plan period to meet all needs.	207906 (Barratt Redrow)
Site located to the east of Shepreth adjacent to the A10 Provides a significant opportunity for employment development. The Site is approximately 24ha and is currently in agricultural use. Unlike many sites in and around Cambridge the Site here is located outside of the Green Belt. Site is in a strategic and well connected location which is particularly suited for providing employment opportunities. The intention is to develop the Site for mid tech uses. The Site is to include a mix of offices, manufacturing and tech facilities to create an all-encompassing holistic location for new and existing businesses to grow.	208173 (Orchestra Land)
Land to the south-east of Cambridge Road, Foxton (HELAA Reference 40408) Land to the north and east of Barrington Road, Foxton (HELAA Reference 40412)	211093 (R2 Developments Ltd)

Concerns about the deliverability of the strategy for growth, and the location of new developments, primarily focused on the north and west of Cambridge, which may not align with employment growth along the A10 corridor. Need for a higher growth scenario in the emerging Local Plan. Call for more ambitious targets to meet government's growth objectives through additional site allocations such as our client's sites at Foxton.	
The following sites should be considered for allocation for development in the Local Plan: • Histon and Impington - NIAB Park Farm, Villa Road, Histon (HELAA 208851) • Girton - Land East of Redgate Road (HELAA 40241) • Histon and Impington - Land West of South Road (HELAA 40232) • Histon and Impington - Land North-East of Villa Road (HELAA 40236) • Histon and Impington - Barn 3, Park Farm (HELAA 200772)	211096 (NIAB Trust)
Land at Broad Lane, Cottenham (site reference 115451.) Committed developments at Cottenham, located off Rampton Road will contribute towards establishing a developed context for the promoted site that will assist in containing the landscape impact of any future development delivered on the promoted site. These committed developments also assist in establishing a direction of growth for future development at Cottenham, establishing a precedent for the further expansion of the settlement to the north. Comments address issues raised in HELAA.	211430 (Woolsington One Ltd)
Land East of Bush Close, Comberton ((HELAA reference 40501) A strategy that includes a particular focus, and reliance, on strategic sites in Greater Cambridge is logical and supported in principle. The current buffer of 6.5% is insufficient and fails to recognise the	211438 (Hopkins Homes)

delivery challenges which have historically held back early delivery on the large-scale strategic sites and should be certainly over 10%, circa 15-20%. As part of a robust sustainable housing supply to meet the needs of all, it is clear that medium sized sites, including sustainable Grey Belt sites, are needed as part of a blended development strategy to ensure that dwellings are delivered throughout the Plan period to meet all needs.	
Land to the South of Station Road, Harston (HELAA reference 115742) Object to Policy S/RRA due to insufficient housing and employment allocations in rural areas, which threatens village vitality and local services. The principle of sustainable development in rural areas is outlined in the National Planning Policy Framework (NPPF), which promotes housing that enhances rural community vitality. The Draft Local Plan's limited rural allocations could lead to an imbalance in housing supply, increasing reliance on strategic sites and undermining village growth. The approach of directing some growth to the villages should also take account of existing and proposed public transport improvements.	203428 (Jesus College)
Land East of Ridgeway and Old Pinewood Way, Papworth Everard (Site Ref. 40439) Land should be allocated.	211617 (Bloor Homes Eastern)
Land at Croxton Garden Village Croxton (HELAA Reference 40288) A new Garden Village in this location would have a highly functional relationship with Cambourne and would look to this expanded settlement to provide a wider range of goods and services. Importantly, the proximity of Croxton Garden Village to Cambourne would also allow for viable transport connections by active modes.	211625 (Vistry group)

Fulbourn area EWR Co is also exploring the opportunity for a light maintenance depot (LMD) to be located alongside the Newmarket Line in the Fulbourn area. EWR Co is aware of the promotion of a potential new housing development to the north of the Newmarket Line in the Fulbourn area and notes the potential for it to be served by a new station. These proposals do not currently form part of the draft Local Plan. EWR Co notes that, in principle it has no objections to exploring the opportunity for a new station to serve a potential development in this location.	211888 (East West Rail Company)
Land off Home End in Fulbourn (Site Ref. 40523) Remove from the Green Belt and identify as an additional allocation.	201951(KG Moss Will Trust & Moss Family)
Land at Court Meadows House off Fulbourn Road in Fulbourn (Site Ref. 40522) Identify as an additional allocation.	201954 (KG Moss Will Trust & Moss Family)
Land between A428 and St Neots Road, Hardwick (HELAA Reference 40550; Site ID: 115093). The respondent does not object to the wording of policy S/RRA specifically but raises concerns about the omission of their site on St Neots Road HELAA has incorrectly scored the site on various matters, including landscape and biodiversity, and believes it should be scored more favourably. The respondent argues that the site, previously promoted for E(g) employment uses, is also suitable for B2 and B8 uses to meet the identified need for warehouse space.	201590 (Paragon Land & Estates Limited)
Land off Ditton Lane in Fen Ditton Identify as an additional allocation in the Rest of Rural Area.	202091 (J Francis)

land east of Glebe Way Histon Identify as an additional allocation in the Rest of the Rural Area	202195 (Cambridgeshire County Council (Strategic Assets))
Land off Glebe Road in Waterbeach (Site Ref. 40372) Identify as an additional allocation in the Rest of the Rural Area.	202578 (Ely Diocesan Board of Finance)
land south of Fulbourn Old Drift, Fulbourn (Site Ref. 40355) identify as an additional allocation for employment uses in the Rest of the Rural Area.	202579 (Ely Diocesan Board of Finance)
Land south of Cambridge Road and north of Shelford Road in Fulbourn (Site Ref. 40354) Identify as an additional allocation in the Rest of the Rural Area.	202580(Ely Diocesan Board of Finance)
Land off High Street in Landbeach (Site Ref. 40361) Identify as an additional allocation in the Rest of the Rural Area.	202581 (Ely Diocesan Board of Finance)
Oakington Road, Cottenham (HELAA site 115443) Development of the Site would provide significant social, economic, and environmental benefits, including affordable housing, enhanced biodiversity, and support for local facilities and businesses. The Site is positioned as a sustainable extension to Cottenham, integrating with existing residential developments and contributing to the area's housing needs. Site should be identified as Grey Belt.	203134 (Christ's College, Cambridge)
Land off Station Road in Willingham (Site Ref. 40527) Identify as an additional allocation in the Rest of the Rural Area.	203320 (J Manning)
Land off Butt Lane in Milton (HELAA Reference 40365) Identify as an additional employment-led allocation in the Rest of the Rural Area.	203392 (Ely Diocesan Board of Finance)

Land at Ermine Street, Caxton (Site ID 115596) It is considered that the sustainability of Caxton (due to its proximity to Cambourne where there are a range of services/facilities) warrants the consideration of site allocations at the settlement. Represents a suitable location for sustainable rural housing growth. Part of the site benefits from outline planning consent for up to 9x self/custom-build dwellings, and so the principle of development on the site has already been established.	204339 (LVA (Mr Matthew McShane, Associate Partner))
Land east of Boxworth End in Swavesey (Site Ref. 40042) Identify as an additional allocation in the Rest of the Rural Area.	204580 (Axis Land Partnerships and Executors of Norman Winfrid Moore)
Land at Crow's Nest Farm (HELAA Site Ref: 48096 and HELAA Site Ref: 208867) Land at Crow's Nest Farm continues to represent a viable and deliverable opportunity to support wider growth, benefiting from its strategic location near Cambourne and its strong connectivity with the proposed EWR Oxford–Cambridge link.	205464 (Mac Mic Land)
Land west of London Road, Fowlmere (HELAA reference: 40116). The site's location within Fowlmere provides a location with access to key amenities such as a Primary School and Bus Services, whilst nearby towns and villages such as Shepreth, Melbourn and Royston provide a full range of required jobs, services, leisure and cultural facilities.	211037 (Wates Developments)
Land to the East Side of Cambridge Road, Melbourn (HELAA: 47757) Melbourn has access to a good range of facilities and services, including public transport as noted below and reflected in its identification as a Minor Rural Centre, able to accommodate additional housing growth	211050 (Wates Developments)

Policy S/SHF: Land north of the A1307, Bar Hill (Slate Hall Farm)

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Concerns were raised around increased traffic and congestion, creating safer cycling routes including a cycle path along Dry Drayton Road into Oakington.

Comments were made to suggest this location is most suitable for a distribution centre.

Comments were made by Huntingdonshire District Council and West Suffolk Council to work together to meet the demand for logistics and delivery.

Concerns were raised about flood risk, impact on landscape with the site being in open countryside, foul water, and that S106 contributions are used for attenuation ponds, water storage and other water infrastructure.

Comments were made to use is restricted to sub-regional logistics and does not become a national facility.

Concerns were raised around clarity around the Mobility Hub and its design, location and transport links.

Further comments were raised by the Environment Agency to support point 19 of the policy, and suggested requirements for FRA modelling to include Oakington Brook and set out that no development should be located within 8m of Oakington Brook apart from permitted access.

Response to the main issues raised in representations

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

- The issue of cross boundary management of logistics and delivery will be picked up in the Statement of Common Ground.
- Evidence regarding the transport impacts and required mitigations for the A14 allocations proposed within the plan is being prepared to inform the Proposed Submission Plan, including drawing on transport modelling and, where relevant, on site promoter material. The transport measures required to enable delivery of each site are set out in the relevant allocation policies and within the Infrastructure Delivery Plan. The Highways Authority at Cambridgeshire County Council have commissioned additional evidence to understand the implications of logistics on traffic congestion and the road network in the A14 corridor.
- In response to concerns about traffic and congestion, and to respond to National Highways comments, a requirement for a Monitor and Manage Approach and a suitable mitigation package to be agreed by National Highways and Highways Authority.
- The policy wording set out requirements for active travel and a mobility hub to support connections to local villages, the policy has been amended to include Oakington.
- Part of the site lies with Flood Zone 3, and this area is proposed to be retained to manage flood risk and utilise for green infrastructure. The site will be subject to a Site Specific Flood Risk Assessment to mitigate against any potential flood risk issues.
- The management of water and foul water is set out in the wider Integrated Water Management Strategy for Greater Cambridge. Specific requirements for the site will be set out in development management Policy CC/IW: Integrated water management, sustainable drainage and water quality
- A HIA has been prepared to ensure that mitigations are suggested for the most design of the development in this location. A landscape buffer has been added to the Spatial Framework to mitigate impacts on landscape. In addition, wording around management of heights by scaling down to the edges and not creating a block effect, and the use of screening has been added to the policy wording.
- In response to Historic England the wording suggestions have been amended in the policy in line with comments. The HIA has been revised to take into account the potential impact on the historic environment of the Listed Building and has confirmed that Slate Hall Farm is a potential non-designated heritage asset and should be retained. This has been reflected in the policy wording.

- The Councils have a separate and agreed process for the consideration of Non-Designed Heritage Assets. Should this particular NDHA be nominated for consideration, the councils would then consider the historic merits of the property in line with this agreed process.
- A Mobility Hub is now defined in the glossary and the requirements for its delivery is set out in policy I/TH Travel Hub Facilities which has been renamed to mobility hub to align with the wider national approach.
- Suggested amends have been included to address comments from the Environment Agency.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Concerns raised about cycle routes to Dry Drayton and Oakington for people commuting.	201214 (G Tregonning)
This prominent site in the countryside is being released to meet the shortfall in Greater Cambridge for industrial and warehousing. The policy needs to ensure that it's use is restricted to sub-regional logistics and does not become a national facility.	201451 (C Barnard), 203115 (Cambridge Past, Present and Future)
Whilst this is development of a Greenfield site it is well placed for the A14 and for local employment. Low-carbon employee commuting could be easily facilitated from Bar Hill and Northstowe. If a distribution centre is required in the area, then this is the most sensible option.	201451 (C Barnard)
Concerns raised about traffic impacts the local road network.	201787 (J Bennison), 202549 (L Miller), 203096 (Swavesey PC)
Huntingdonshire District Council seeks to work with GCSP on masterplanning to ensure the sites offer complementary opportunities rather than create competition.	201658 (Huntingdonshire DC)

Concerns raised over surface water flood risk and runoff risks, water supply and waste water.	203096 (Swavesey PC), 203300 (A Dennis),
S106 funds should be spent on local attenuation projects.	203300 (A Dennis), 203299 (A Dennis)
Encourage bicycle last mile delivery services onsite.	203873 (J Prince)
Object to policy S/SHF due to its heavy reliance on a single strategic site for delivering 220,000 sqm of B2 and B8 commercial floorspace. The capacity of the site should be higher.	204224 (Bidwells on behalf of Tritax Big Box Developments)
Concerns are raised about Slate Hall Farm's access routes and the developer's lack of experience in delivering large-scale logistics developments, and Green Belt assessment completed by the Council.	204224 (Bidwells on behalf of Tritax Big Box Developments)
GCSP should work collaboratively with neighbouring authorities to meet logistics need.	204772 (West Suffolk Council)
Support for the site allocation.	205014 (Lichfields on behalf of Lolworth Developments Ltd)
Policy S/SHF should reflect the 240,000 sq.m of B2/B8 provision identified in policy S/DS and identify that the site’s capacity is to be refined through a landscape-led masterplanning process. Figure errors should be fixed.	205014 (Lichfields on behalf of Lolworth Developments Ltd)

Concerns raised that limitation to small-medium scale units is unnecessary and overly prescriptive.	205014 (Lichfields on behalf of Lolworth Developments Ltd)
Additional information submitted relevant to the HELAA for the site.	211090 (Lichfields on behalf of Lolworth Developments Ltd)
Whilst there are no designated heritage assets within the site, the grade II milestone is located nearby. The grade II * All Saints Church at Lolworth and the Grange (grade II) lie to the west of the site on slightly elevated ground. Whitehall Farmhouse lies to the north eats of the site at the edge of Oakington. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA. However, the HIA does not consider Lolworth Church, the Grange and Whitehall Farmhouse. Given the likely scale of the employment development, we have some concerns regarding this. The policy should also refer to these other heritage assets. The Plan should be clear as to whether Slate Hall Farm is a NDHA or not. We welcome the emphasis on landscape context. Given the likely scale of the employment development, we have some concerns regarding the potential impact on the historic environment of this employment allocation. The HIA should be reviewed prior to Regulation 19 to consider these other assets. This should also include further evidence in relation to heights and mass informed by some visualisations. We need to be able to establish whether there is likely to be an impact on these assets and, if so, what mitigation may be needed.	210154 (Historic England)

This policy allows for an extensive development. Oakington and Westwick is a semi-rural community which has recently seen extensive development from the neighbouring town of Northstowe. The building and commercial operation of yet another, extensive business area will further damage the community and bring few, if any, benefits, but will create significantly more traffic and erode the wildlife and countryside area.	208082 (Oakington & Westwick PC)
We welcome Refs: Heading Vision statements 3 and 5, and Heading Built Form, statement 10; however, the land on which the development is to be built is flat and, as noted earlier, the development will contain extensive B8 storage and distribution buildings B8 storage units can be more than 15 metres high. Clearer guidance is needed within the Local Plan on maximum heights of buildings. In particular, the development should not be visible from Oakington	208083 (Oakington & Westwick PC)
Heading Context statement 11 and Heading Resources statement 19, we welcome the statements regarding the water management from the site but call for a much stronger statement than simply “opportunities for betterment” of water management for Oakington Brook. The Plan should include a requirement that the water management of the site should significantly reduce the risk of flooding in Oakington and Westwick.	208084 (Oakington & Westwick PC)
We support the policy statements regarding Traffic Management, Active Travel and Public Transport. However, as in our comments on Flood Mitigation and Building Heights above, we are of the opinion that the policy statements 2 and 15 a, b tend to be aspirational rather than specific and compulsory.	208085 (Oakington & Westwick PC)
Dry Drayton Road (marked in yellow on Figure 107 below) running from Oakington and providing access to both the site and 1307, is an unclassified road which is already suffering from overuse by vehicles cutting through to the A14/Northstowe from central Cambridge. It will also become an access	208086 (Oakington & Westwick PC)

road to Northstowe and is already to be the subject of various traffic management procedures related to this. What is required is a complete upgrading, restructuring and widening of Dry Drayton Road to include dedicated, safe cycle and pedestrian paths, as well as speed reduction measures. A related ban on heavy lorry travel through Oakington and Westwick also needs to be introduced.	
Policy Statement 15a also refers to a “Mobility Hub”. There is no definition of the term in the document, nor details provided, nor an indication of its location. Currently no buses serve the proposed site and no proposals are made in the draft Local Plan. Dry Drayton Rd in its current state would not support a regular bus service. Therefore, we suggest greater clarity over the design, location and transport links to any Mobility Hub should be included in the document and further, we refer to our earlier point that Dry Drayton Rd must be significantly improved with the inclusion of cycle and pedestrian paths.	210843 (Oakington & Westwick PC)
The proposed allocation is situated adjacent to the A14, providing good access to the SRN. The proposed development capacity for approximately 220,000 sqm and is anticipated to support a range of logistics and industrial uses. Similar approach as to other proposals, suggests that the site could operate with a trip budget. This approach, although in principle is acceptable to National Highways, needs to be subject to a full operational junction assessment of the A14/ A1307 junction to ensure that the trip budget can be accommodated without severely impacting the SRN. This area is known to experience congestion during peak times. The proposed development may need to provide suitable mitigation package, potentially requiring physical mitigation works to the junction to accommodate the planned growth. In addition, the Monitor and Manage approach, along with any mitigation package needs to be approved and agreed with the relevant highway authorities.	209010 (National Highways)

Drainage: The applicant for one of these sites attended a meeting of our planning committee, and it became clear that the official government “Flood map for planning” does not account for the flood protection measures provided for Longstanton during the Northstowe development (aka the Hatton Road ponds). It is essential and mandatory for any developments upstream of this to be designed and considered only against accurate and up-to-date hydrological information.	210842 (Northstowe TC)
Support for policy point 19 and include requirement that the FRA must including modelling of Oakington Brook. No development should be located within 8m of Oakington Brook apart from permitted access.	211179 (Environment Agency)
Part 3 of the Draft Plan sets out the proposed site allocations, and vision for the ‘rest of the rural area’. Section 3.5.1 of the Draft Plan establishes that the Councils are seeking to support the vitality of the rural settlements in the region, however that there is an aspiration to ensure that ‘lots of new homes’ are not delivered in locations where car travel is the easiest or only way to travel such that development within the rural area is proposed to be concentrated in and around the villages that benefit from good transport links and other services.	211279 (Woolsington One Ltd)

Policy S/RRA: Other site allocations in the rest of the rural area

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

One comment supported the allocation in the draft local pan - Land west of Cambridge Road, Melbourn (Policy S/RRA/CR).

The majority of comments to this introduction section objected to the non-inclusion of development proposals in a variety of villages. Reasons sites included the relative sustainability of the locations, the opportunities to support services and facilities, the need for the plan to allocate more smaller sites, over reliance on large strategic sites to deliver the numbers required, and the plan simply not allocating enough homes to respond to local needs or national proprieties. A number of comments where sites are in the green belt considered their site was grey belt, and the plan should have identified grey belt opportunities. Many proposals challenged the findings of the Housing and Economic Land Availability Assessment, and proposed changes to the scoring.

Comments raised concerns regarding the Brickyard Farm, Boxworth Farm, Boxworth site north of the A14 services, siting concerns including the size of buildings, traffic and access.

Response to the main issues raised in representations

Proposals for alternative sites have been considered though an update to the Housing and Economic Land Availability Assessment where they fit within the broad emerging strategy of the local plan. New evidence submitted has been considered, and where

considered appropriate scoring has been amended. Comments related to strategy choices have also been considered, particularly under the development strategy policies. The deliverability of the plan has been tested through evidence including the Housing Delivery Study. The strategy focusing on other broad locations is considered to be sound. It is not proposed to add additional village sites to the proposed submission local plan. An update to the Green Belt Study has been carried out to consider which areas would meet he governments definition of being grey belt. Whilst some site may meet the definition, exceptional circumstances is still required for green belt release, and the Councils do not consider that exists in light of alternatives available.

Having identified a need for logistics space, the draft plan identified sites at the A14 Services and Slate Hall Farm to respond to that need. There are two other proposals in this area that were not selected. Further evidence has explored transport and heritage impacts and other issues. Having explored issues further, including considering comments made in representations, the two sites selected in the draft plan continue to be the preferred allocations. It should be noted however that promoters of all four sites have indicated an intention to submit planning applications ahead of submission of the local plan.

Table of representations

Comments supporting a draft plan allocation

Summary of issues raised in comments	Comments highlighting this issue
Land west of Cambridge Road, Melbourn (Policy S/RRA/CR)	204645 (Vistry at Bidwells)

Vistry supports Draft Policy S/RRA (Site allocations in the rest of the rural area) in as far as it includes the allocation of Land west of Cambridge Road, Melbourn (Policy S/RRA/CR) as a well-located, sustainable and deliverable site	

Comment proposing additional or alternative allocations

Summary of issues raised in comments	**Comments highlighting this issue**
Land south west of Villa Road, Impington (HELAA site ID 40232) Support HELAA conclusions of the site which rates overall suitability of the site as Red. No need for Green Belt release. Site proposal is deeply flawed.	201015 (M Colville)
Valley Farm, Meldreth Additional allocations in rural areas are required to make the plan sound. The site at is sustainable, located close to public transport links, active travel routes and a range of services. It is immediately available and deliverable, without the need for major infrastructure, in early stages of the plan period. It would therefore contribute to the objectives of the Local Plan. 2.7.3 The site could provide 198-266 dwellings. Landscape and heritage impacts can be mitigated. Safe highway access can be provided. 2.7.4 The site meets the requirements of the new draft NPPF for development close to railway	206220 (Lanpro Services at Granta Land ltd)
Land South of Horseheath Road Linton (HELAA Reference 40554) Housing allocations in rural areas are insufficient to meet local needs, particularly in villages. The respondent strongly objects to Draft Policy S/RRA for omitting several proposed site allocations in	205114 (Endurance Estates)

Linton, Balsham, Bassingbourn, and Orwell. Linton is highlighted as a sustainable settlement with adequate services and infrastructure, warranting allocation.	
Land at Hillside in Orwell (HELAA Reference 40496) Housing allocations in rural areas are insufficient to meet local needs, particularly in villages. The respondent strongly objects to Draft Policy S/RRA for omitting several proposed site allocations in Linton, Balsham, Bassingbourn, and Orwell. The respondent argues for the allocation of Land at Hillside in Orwell (HELAA Reference 40496) to support the village's essential services and maintain its vitality.	206834, 206840, 206841, 206842 (Endurance Estates)
Land at Beach Road, Cottenham (Site Ref. 40251) Upward adjustments are required to the housing target, the development strategy should direct development to the more sustainable villages, and there are exceptional circumstances to release land from the Green Belt.	211249 (Manor Oak Homes)
land south of Hauxton Road in Little Shelford (Site Refs. 52732 & 200769) Upward adjustments are required to the housing target, the development strategy should direct development to the more sustainable villages, and there are exceptional circumstances to release land from the Green Belt. All these factors indicate that additional allocations should be made in draft GCLP to meet development needs. Detailed comments provided on HELAA scoring.	211256 (R Harvey)
The Boundary, High Street, Horningsea (Site ID 59410) The HELAA assessment contains factual and procedural inaccuracies that have prevented proper consideration of a sustainable small site. The site was incorrectly assigned a “Red” access rating based on a constrained interpretation of the submitted red-line plan. Infill villages should not be excluded.	202046 (M Asplin)
Valley Farm, Meldreth [130982]]	202335 (Granta Land)

The site at Valley Farm, Meldreth is sustainable, located close to public transport links, active travel routes and a range of services. It is immediately available and deliverable, without the need for major infrastructure, in early stages of the plan period. It would therefore contribute to the objectives of the Local Plan. The site could provide 198-266 dwellings. Landscape and heritage impacts can be mitigated. Safe highway access can be provided. The site meets the requirements of the new draft NPPF for development close to railway stations.	
Land West of Station Road, Meldreth (Site ID: 115017 Additional allocations in rural areas are required to make the plan sound. The site at) is sustainable, located close to public transport links, active travel routes and a range of services. It is immediately available and deliverable, without the need for major infrastructure, in early stages of the plan period. It would therefore contribute to the objectives of the Local Plan. The site could provide 198-266 dwellings. Landscape and heritage impacts can be mitigated. Safe highway access can be provided. The site meets the requirements of the new draft NPPF for development close to railway stations.	202544 (Granta Land)
Land at Sheene Farm, Meldreth [131267]] Additional allocations in rural areas are required to make the plan sound. The site at Sheene Farm, Meldreth is sustainable, located close to public transport links, active travel routes and a range of services. It is immediately available and deliverable, without the need for major infrastructure, in early stages of the plan period. It would therefore contribute to the objectives of the Local Plan. The site could provide 365-521 dwellings. Landscape and heritage impacts can be mitigated. Safe highway access can be provided. The site meets the requirements of the new draft NPPF for development close to railway stations.	202657 (Granta Land)

Land East of Station Road, Meldreth (Site ID: 115143) Additional allocations in rural areas are required to make the plan sound. The site at is sustainable, located close to public transport links, active travel routes and a range of services. It is immediately available and deliverable, without the need for major infrastructure, in early stages of the plan period. It would therefore contribute to the objectives of the Local Plan. The site could provide 198-266 dwellings. Landscape and heritage impacts can be mitigated. Safe highway access can be provided. The site meets the requirements of the new draft NPPF for development close to railway stations.	202671 (Granta Land)
land at Silverdale Close, Coton (HELAA Reference 40079). Comments are made in the attached comprehensive document setting out the planning benefits for the development of 80 dwellings on The site boundary has been amended following comments within the HELAA and should be reassessed accordingly. The site meets the criteria for grey belt as set out in national policy, and the Errata Sheet confirms Green Belt release of parcel CT12 would have a 'negligible impact' on Green Belt land. The site should be considered again for allocation, particularly given the clear benefits set out in the attached.	202772 (Martin Grant Land Limited)
Whilst we do not object to the principle of allocating large new housing developments, we object strongly to the failure to balance this approach with a more diverse approach to housing delivery across Greater Cambridge in the emerging local plan. Allocating sites for housing developments in sustainable location such as Willingham would: • Deliver homes more quickly and in the first half of the plan period; • Provide certainty to smaller housebuilders; • Support the vitality of the rural area; • Delivery affordable housing in areas with pressing need; and • Offer greater flexibility for house buyers. The draft plan is currently placing a lot of risk for housing delivery in a limited number of very large pots, and in particular	202793 (Peter Norman)

the proposed large new allocations at Cambourne North and Grange Farm require the delivery of infrastructure at scale which is likely to delay their delivery. These delays have been experienced across many of the large strategic sites in Greater Cambridge in recent decades. Instead, we suggest a more blended approach, with a more rational approach to sustainable rural development is considered.	
Land West of Malton Road, Orwell (HELAA Reference 40324) Additional information for the site we are promoting.	203383 (Cemex UK Properties)
Land to the south of Rectory Farm, Harston (HEELA 2025 site ID: 115184) Jesus College object to Policy S/RRA due to insufficient housing and employment allocations in rural areas, which threatens village vitality and local services. The principle of sustainable development in rural areas is outlined in the National Planning Policy Framework (NPPF), which promotes housing that enhances rural community vitality. The Draft Local Plan's limited rural allocations could lead to an imbalance in housing supply, increasing reliance on strategic sites and undermining village growth. The approach of directing some growth to the villages should also take account of existing and proposed public transport improvements. With reference to Harston, whilst it is a relatively small village, it benefits from being within the A10 corridor, plus close proximity to further facilities and services available in nearby villages.	203399 (Jesus College)
The rural area policies lack sufficient housing and care home allocations, with only 20 homes at Melbourn, 65 at Caldecote, 200 at Fulbourn, and 120 at Melbourn, totalling less than 1% of the overall housing need in Greater Cambridgeshire as per Policy S/JH. The current allocations are contrary to NPPF paragraph 83, potentially leaving settlements like Girton and Over without meaningful housing	203402 (Abbey Properties)

supply during the plan period. There is a discrepancy with Appendix D of the Plan, which identifies a housing requirement of 90 new homes for Girton's neighbourhood plan, yet no new housing is included in the Local Plan.	
Land to the South of Station Road, Harston (ref: 115742) Jesus College object to Policy S/RRA due to insufficient housing and employment allocations in rural areas, which threatens village vitality and local services. The principle of sustainable development in rural areas is outlined in the National Planning Policy Framework (NPPF), which promotes housing that enhances rural community vitality. The Draft Local Plan's limited rural allocations could lead to an imbalance in housing supply, increasing reliance on strategic sites and undermining village growth. The approach of directing some growth to the villages should also take account of existing and proposed public transport improvements. With reference to Harston, whilst it is a relatively small village, it benefits from being within the A10 corridor, plus close proximity to further facilities and services available in nearby villages.	203428 (Jesus College)
Guilden Morden – HELAA Refs. 40300 (Land south of Church Street, east of High Street) and 40304 (Land off Swan Lane), which have been submitted for consideration as a consolidated proposal. Guilden Morden – HELAA Ref. 40315 (Land at Town Farm) Steeple Morden – HELAA Ref. 40294 (Land to the west of Brook End) Arrington – HELAA Ref. 40292 (Land to the southwest of Ermine Way) Kneesworth – HELAA Ref. 40299 (Land to the east of Old North Road) EW Pepper objects to Policy S/RRA. The following sites should be allocated for housing development, in the following settlements.	204091 (E W Pepper)

Land at Girton Road, Girton (site ID 115170) Not all locations in the Rural Area are equal as is implied by the policy, for example the proximity of Land at Girton Road, Girton to Cambridge and local amenities is strong evidence that sustainable transport options can be viable from rural areas. The residential allocation of Land at Girton Road is well connected to the city centre and aligns with the plan's ambition to support knowledge-intensive sectors by providing homes for employees within sustainable commuting distance. Development at Land at Girton Road would utilise land no longer in agricultural use and provide access to local shops, schools, and high-quality sustainable transport links.	204504 (Wain Estates)
Land south of West Street and west of South Street Comberton (Site ID 115659, HELAA Ref. 40152) The respondent objects to Draft Policy S/RRA due to insufficient site allocations in the Rest of the Rural Area. The respondent identifies as a suitable site to address housing needs in Greater Cambridge. The site is considered Grey Belt land according to the NPPF (2024) and should be reviewed for release from the Green Belt. The respondent recommends that the site be identified as Grey Belt in the forthcoming review, removed from Policy S/GB and Policy I/SI designations, and allocated for housing development.	204609 (Bellway Strategic Land)
Land west of South Street, Comberton (Site ID 115134, HELAA Ref. 40310) The respondent objects to Draft Policy S/RRA due to insufficient site allocations in the Rest of the Rural Area. The respondent identifies as a suitable site to address housing needs in Greater Cambridge. This Site should be allocated for housing development. Representation responds to the HELAA Addendum (2025) and discusses the site's merits in light of national policy changes since 2021, particularly the NPPF. The site is deemed suitable, available, and achievable for residential development, and is grey belt.	204626 (Bellway Strategic Land)

Land west of Cambridge Road, Melbourn (Policy S/RRA/CR) Vistry supports Draft Policy S/RRA (Site allocations in the rest of the rural area) in as far as it includes the allocation of Land west of Cambridge Road, Melbourn (Policy S/RRA/CR) as a well-located, sustainable and deliverable site.	204645 (Vistry)
Land south of High Street and west of M11, Hauxton, (HELAA reference 40283) Redrow objects to Policy S/RRA on the basis that the draft Local Plan fails to allocate sufficient land within the rural area to meet the uplifted housing needs identified elsewhere in these representations, and that the policy does not provide a mechanism for including additional sustainable village edge sites. Overall housing requirement should be increased, greater emphasis should be placed on distributing growth to the most sustainable villages, and the Plan should release appropriate areas of Green Belt, including “grey belt” land.	204767 (Redrow South Midlands)
'Land South of St Neots Road and West of Howells Way, Hardwick The respondent objects to Draft Policy S/RRA, stating that the housing allocations are insufficient to meet local needs in villages and omits ' for residential development. Proposed allocations are overly focused on strategic sites, which risks under delivery due to infrastructure constraints, and calls for a better balance between large and smaller-scale developments. The respondent highlights the importance of including rural locations in the development strategy to support the vitality of village settlements, referencing Paragraph 83 of the NPPF. The respondent promotes the site at Hardwick as a suitable extension for residential development, citing its logical location, existing services, and potential for transport enhancements.	204907 (Pigeon)
Land West of Beach Road, Cottenham (HELAA Reference 48095)	208775 (Croudace Homes)

Additional allocations in rural areas are required to make the plan sound. The site at is sustainable, located close to public transport links, active travel routes and a range of services. It is immediately available and deliverable, without the need for major infrastructure, in early stages of the plan period. It would therefore contribute to the objectives of the Local Plan. Landscape and heritage impacts can be mitigated. Safe highway access can be provided.	
Land at Station Fields, Foxton (Site ID: 115171 and HELAA Ref: 40084) Additional allocations in rural areas are required to make the plan sound. The site at is sustainable, located close to public transport links, active travel routes and a range of services. This site could support growth of the Cambridge Biomedical Campus and new local infrastructure such as a level-crossing bypass, A10 bridge and multimodal travel hub. It would therefore contribute to the objectives of the Local Plan. The site meets the requirements of the new draft NPPF for development close to railway stations.	208782 (Axis Land Partnerships Ltd)
Land off Brook Road, Bassingbourn (Site Ref. 40342) It is requested that is identified as an additional allocation as for the Rest of Rural Area (Policy S/RRA).	210668 (Gladman Developments)
Land off Whitecroft Road, Meldreth (Site Ref. 40338) It is requested that is identified as an additional allocation as for the Rest of Rural Area (Policy S/RRA).	210670 (Gladman Developments)
Land off Station Road, Over (Site Ref. 40551) It is requested that is identified as an additional allocation as for the Rest of Rural Area (Policy S/RRA).	210671 (Gladman Developments)
Land south of Willingham Road, Willingham (Site Ref. 40340) It is requested that is identified as an additional allocation as for the Rest of Rural Area (Policy S/RRA).	210672 (Gladman Developments)

Land South East of Hattons Road, Longstanton (HEELA Site ID 200801) These representations are accompanied by the submission of for consideration as an allocation in the Greater Cambridge Local Plan.	211088 (Hallam Land Management)
Land to the west of Water Lane, Melbourn, Cambridgeshire (HELAA Reference 40274) These representations are accompanied by the submission for consideration as an allocation within the Greater Cambridge Local Plan. Alongside the two already proposed allocation sites, the Site could provide additional housing to support sustainable growth of the settlement, which contributes towards the Councils' overall housing needs as well as providing an opportunity for the village to grow and thrive by supporting local services.	211089 (CALA Group Ltd)
These representations are accompanied by the following site submissions to be considered for allocation as part of the Greater Cambridge Local Plan: - Land to the south-east of Cambridge Road, Foxton (HELAA Reference 40408) - Land to the north and east of Barrington Road, Foxton (HELAA Reference 40412)	211093 (R2 Developments)
The following sites should be considered for allocation for residential development in the Local Plan: Swavesey – Land on the south side of Fen Drayton Road (HELAA Reference 208846). Swavesey – Land North of Home Close and West of Moat Way, Swavesey (HELAA Reference 40415). Swavesey – Land North of Home Close and west of Moat Way (smaller site) (HELAA Ref 208849).	211094 (Ceres Property)
The following sites should be considered for allocation for development in the Local Plan: • Histon and Impington - NIAB Park Farm, Villa Road, Histon (HELAA 208851) • Girton - Land East of Redgate Road (HELAA 40241) • Histon and Impington - Land West of South Road (HELAA 40232)	210096 (NIAB Trust)

• Histon and Impington - Land North-East of Villa Road (HELAA 40236) • Histon and Impington - Barn 3, Park Farm (HELAA 200772)	
Land at Beach Road, Cottenham (Site Ref. 40251). Upward adjustments are required to the housing target, the development strategy should direct development to the more sustainable villages, and there are exceptional circumstances to release land from the Green Belt. All these factors indicate that additional allocations should be made in the draft GCLP to meet development needs. Cottenham contains a good range of services and facilities, and employment opportunities. Key village facilities include a doctor's surgery, pharmacy, primary school, village college, church, shops, village hall, library, and a community sports centre, and access to the Guided Busway for wider transport.	211249 (Manor Oak Homes)
Rectory Farm, to the North-West of Milton (HELAA Reference 54906 / Site ID 115167) These representations have been accompanied by details to support for consideration as an allocation in the Local Plan.	211449 (Gonville & Caius College)
Land to the south west of Hurdleditch Road, Orwell (HELAA Reference 40378) These representations are accompanied by the submission of for consideration as an allocation in the Local Plan. The site is an agricultural parcel of land bounded by Hurdleditch Road to the east, as well as some residential development which wrap around to the southern boundary. Beyond the western and northern boundaries is further greenfield land.	211469 (Hayfield Homes Construction)
Land to the South of Butt Lane, Milton (HELAA Reference 40365) Turnstone Real Estate Limited are promoting as part of this consultation alongside the Diocese of Ely. Turnstone Real Estate Limited object to the site not being allocated as part of the Local Plan.	211590 (Turnstone Real Estate)

Land East of Ridgeway and Old Pinewood Way, Papworth Everard (Site Ref. 40439) Bloor Homes object on the basis that has not been allocated in the Local Plan. The site's suitability as an allocation has been set out in accompanying evidence.	2116117 (Bloor Homes)
Land North of Cambridge Road, Linton (Site Ref. 51654) Bloor Homes object on the basis that has not been allocated in the Local Plan. The site's suitability as an allocation has been set out in accompanying evidence.	211621 (Bloor Homes)

Comments referring to Brickyard Farm, Boxworth Farm, Boxworth, (Newlands) (Site reference: 47353, 115237)

Summary of issues raised in comments	**Comments highlighting this issue**
Strongly object the promotion of the site to the west of Boxworth Road: • Newlands promoting site to west of Boxworth Road, opposite the Cambridge services/Jaynic site. Combined effect would be a disaster for local environment. Traffic chaos would result. Newlands proposal itself wholly inappropriate: area far too large would create distribution monopoly for the area; not aimed at supporting Cambridgeshire; proposed building heights up to 24m (= 7 storeys) wholly inappropriate and incapable of mitigation by trees etc; Swavesey south roundabout can't cope even now. Alleged "community hub" just disguised lorry driver cafe; if it were real would simply compete with local village halls. Water/sewage capacity insufficient; creates flood risk.	201492 (P Rainey)
Very concerned about the potential Newlands development at J24 A14. This is not in the Local plan for good reason but is likely to apply for planning. This project is excessive in size and proposed for	205288 (A East)

National not local need. The access off the Swavesey dumbbell is unsatisfactory for an extra 4000+vehicles /day. There is no credible indication of how 2000+employees will get to the site other than by car - there is no public transport, cycleways or people living close enough to walk! Also I'm concerned about the lack of water and the handling of foul water.	
Proposal at the Boxworth junction with the A14. Obviously Newlands intend to apply, and appeal. Development focussed on unnecessary distribution warehousing. Proposal would involve a multiple of the current HGV use of the A14 junction which does not have capacity for the current HGV use. Inevitable congestion renders the business case for occupying the site for distribution non-viable. Would also create a multiple of the small vehicle use of the local Boxworth road. Scale of buildings proposed is totally inappropriate with no mitigation such as excavation to lower the ground level. Water supply and disposal will inevitably create further issues.	205351 (W East)

Policy S/RRA/ML: The Moor, Moor Lane, Melbourn

Summary of issues arising from Draft Local Plan representations:

The promoter of the site supports the policy and confirms that the site is deliverable, available and viable.

Comments have noted that the site is relatively far from the station and is likely to result in a number of car trips whilst the proposed number of homes on the site could be high density given the modest site area. There is a factual comment about the adjacent land uses and how they are described in the supporting text.

Historic England note that the Heritage Impact Assessment recommends development of no more than 2 storeys, but this is not reflected in the policy wording.

Response to the main issues raised in representations

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

The site is adjacent to the existing Settlement Framework and the proposed Defined Development Extent, and it is within a reasonable walking and particularly cycling distance of Meldreth railway station. It is also within a short walk of Melbourn High Street and the village college. The suitability of the site from a highways perspective has been considered by the highways authority and is considered to be acceptable.

The supporting text has been amended to reflect the allotments and other boundary features whilst the policy includes specific building heights, as evidenced by the Heritage Impact Assessment.

As set out in the Site Allocations Capacity Schedule, the net dwellings per hectare is considered appropriate reflecting the

village location of the site. However, this would need to be tested in greater detail through a planning application process.

Table of representations

Summary of issues raised in comments	Comments highlighting this issue
We fully support allocating The Moor. The landowner has expressed his continued intention to promote the land for development though this Local Plan process. We consider that the site also remains deliverable and viable, when considered against both existing and emerging policy requirements. We are pleased to confirm that Land at the Moor remains both available and deliverable and that we, and our client, would be pleased to work with the Council in the progression of this site.	208350 (Sworders)
The site has no other access to the highway network and that vehicles to and from the site would pass Melbourn Village College and Melbourn Leisure Centre. The closeness of the site to services and facilities is a relative and subjective concept but it is noted that the distance to the railway station is about 1.1 miles and the route runs through the centre of Melbourn and the four way traffic light controlled junction formed by Cambridge Road, High Street, Mortlock Street and Station Road. In terms therefore of access to public transport links it is buses rather than trains which are truly proximate and preferable for those not using cars.	209056, 209057 (Fowlmere PC)
The supporting information also states that the site “is bounded by development on three sides, with screening provided by existing vegetation”. The existing development appears to FPC only to be on two sides, namely on the south-east boundary and across the road on the south-west. On the north-west boundary there are allotments (not traditionally referred to as “development”) and whilst the	209058 (Fowlmere PC)

science park is on the north-east boundary it is open green land rather than buildings across the boundary.	
The density envisaged appears to be high, particularly for housing in a village. It ignores the beneficial effects of private outdoor space and the spaciousness which people expect and seek in villages.	209059 (Fowlmere PC)
Welcome criterion 1b. The HIA refers to building heights of 2 storeys or less. This should be included within the policy.	210155 (Historic England)

Policy S/RRA/H: Land at Highfields (phase 2), Caldecote

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

The developer of the site supports the policy but identifies that the site could form part of a larger allocation. Historic England broadly support the policy whilst a site promoter for an alternative site states that their site should be allocated for development and the HELAA process has not been applied consistently. EWR seek to ensure if does not allocate land required for the railway.

Response to the main issues raised in representations

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

- Alternative sites have been considered through the update to the Housing and Employment Land Availability Assessment (2026) whilst the Development Strategy Topic Paper sets out the council's position on why sites were rejected.
- Noting the broad support in the other representations, there are no proposed amendments to the allocation. The policy wording is broadly consistent with the outline planning permission for the site and does not prohibit it from being implemented.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**
We are disappointed that Site 40509 remains unallocated in the emerging Local Plan, which we consider unreasonable and unjustified. A review of the HELAA shows clear discrepancies between the assessments of allocated sites and Site 40509.	204316 (Waterbeach Instruments)

Vistry Strategic Land supports the allocation of Phase 2 (Policy S/RRA/H) and Vistry has provided comments in favour of it. However, it is recommended that the policy be amended to ensure that it reflects the planning permission for the site.	204046 (Vistry Group)
Site 40011, located on the east side of Highfields Road, is proposed as an additional phase to the draft allocation S/RRA/H, contributing more homes and green infrastructure. Phase 3 is positioned near facilities in Highfields-Caldecote, promoting accessibility by foot or bicycle. Access to Phase 3 from Highfields Road can be achieved through phases 1 and 2, ensuring safe and suitable access. The site is in a sustainable location and can provide additional homes and green infrastructure as an extension to Phase 2.	204954 (Vistry Group)
We welcome the preparation of the HIA and criterion 1d.	210156 (Historic England)
EWR Co is currently developing its proposals for environmental mitigation and temporary Public Rights of Way (PRoW) in this area, which have the potential to interface with the eastern boundary of this allocation site. The land which EWR Co has currently identified as being required for EWR within the allocation site is included in the safeguarded area. EWR project, EWR Co requests that draft Policy S/RRA/H is amended in order to avoid a conflict between the proposed allocation and the EWR Safeguarding Directions.	211897 (East West Rail)

Policy S/RRA/SCS: Land to the south of the Cambridge Services A14

Abbreviations

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

Executive summary:

There is broad support for the site allocation from Carter Jonas on behalf of Jaynic and the University of Cambridge.

Concerns were raised in relation to the need for and suitability of this use in this location.

Concerns were raised in relation to flood risk, water and impact on landscape.

Comments were made in relation to concerns about traffic congestion including impacts on the junction to the A14, roundabout and slip roads. Comments were also made on other sites which were not allocated in the draft plan.

Response to the main issues raised in representations

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

- The need for this site for logistics and industrial uses is identified in the evidence base, the Greater Cambridge Warehouse and Industrial Space Needs 2025 and the Draft Greater Cambridge Employment and Housing Needs Update 2024-2045 20205. These studies outline the need for industrial and warehouse employment uses in Greater Cambridge.
- This site was selected for being in close to key transport route by the A14. The selection of the site was assessed through the HELAA, and the SA has explored the planning merits of the reasonable alternative sites, the Councils' preferred locations for the provision of B2/B8 space are on this site and Slate Hall Farm. Mitigation will be required for air quality, environmental protection, transport and archaeology, and this has been reflected in the policy wording.
- Point 1c has been added in response to representations concerned about building heights and the impact on the rural area. This sets out that -Building heights must be sensitive to the local rural context.
- In response to National Highways, the requirements for Transport capacity assessments have been included.

- In response to Anglian Water, point 1k has been added to the policy to ensure that construction of or route of the Grafham Pipeline is able to accommodate water infrastructure.
- Evidence regarding the transport impacts and required mitigations for the A14 allocations proposed within the plan is being prepared to inform the Proposed Submission Plan, including drawing on transport modelling and, where relevant, on site promoter material. The transport measures required to enable delivery of each site are set out in the relevant allocation policies and within the Infrastructure Delivery Plan. The Highways Authority at Cambridgeshire County Council have commissioned additional evidence to understand the implications of logistics on traffic congestion and the road network in the A14 corridor.
- The site will be subject to a Site Specific Flood Risk Assessment to mitigate against any potential flood risk issues.
- The management of water and foul water is set out in the wider Integrated Water Management Strategy for Greater Cambridge. Specific requirements for the site will be set out in development management Policy CC/IW: Integrated water management, sustainable drainage and water quality.
- In response to Cambridgeshire County Council, the reference to the requirement for an odour assessment and reference to the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) for further information.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Two large employment proposals (Land north of A1307, Bar Hill and Land south of Cambridge Services, A14) are located near the boundary with Huntingdonshire on which collaboration would be appreciated. The Economic and Employment Needs Assessment from Huntingdonshire identifies sector-specific needs to support local business and employment growth. Huntingdonshire District Council expresses a desire to work with GCSP on masterplanning to ensure the proposals complement local opportunities rather than create competition. The aim is to promote and diversify the local economy while supporting employment opportunities for residents with limited travel needs.	201660 (Huntingdonshire DC)

In light of the West Suffolk local plan approach, NPPF and PPG, the council asks Greater Cambridge to work collaboratively with its neighbouring authorities, including West Suffolk to seek to identify and address wider needs for large scale strategic logistics provision and data centres arising from national and regional demand and taking a strategic cross border approach. In particular as no provision for large scale B8 units or those meeting regional or national demand is made in allocations S/RRA/SCS and S/SHF and neither does policy J/NE support such proposals.	204774 (West Suffolk Council)
Proposals for new large logistics and business sites between the A14 Swavesey J24 and Bar Hill J25 junctions would impact Swavesey in the following ways. The Parish Council wishes to raise its concerns and highlight the following points: • There is a concern regarding the increase in traffic volume, including HGVs, delivery vehicles, and cars, leading to rat-running through villages alongside the A14. The integrity of the A14 flyovers is questioned, as they are reportedly sinking under current traffic flows. The respondent highlights the need for additional HGV parking to address existing issues and dangers in and around villages and the A14. Additional HGV parking is vital for any consented developments. A cumulative impact assessment of increased traffic from both consented and proposed housing and business developments in the area is required. • The size and height of proposed logistics buildings in a flat, open landscape near villages must be carefully evaluated for their environmental impact. • Concerns are raised about surface water from the site potentially increasing flood risk in Swavesey, necessitating a condition for attenuation basins. Cumulative data and management plans regarding the effects of developments on the Swavesey drainage system is requested with concerns over water release from basins after high river levels. All foul water from proposed sites will flow into Uttons Drove Treatment Works and then into the Swavesey system, adding to the surface water concerns already mentioned.	203039, 207719, 207720, 207723, 207727, 207728 (Swavesey PC)

• Major new housing at Cambourne North, Bourn and continued development of Northstowe will impact both highway and water infrastructure around the Swavesey area. • Cumulative impact needs to be a consideration of each individual development site.	
The Jaynic site on the land to the south of Cambridge services shows all traffic entering and leaving the site from Boxworth Road, a narrow, single carriageway road which is currently subject to a 7.5 ton weight restriction. Jaynic should be required to show how their site can be accessed from a combination of the A14 slip road (for HGVs) and the roundabout adjacent to the Cambridge Services.	202758 (Boxworth Parish Meeting)
Site is partly located within the Consultation Area for the Uttons Drove Water Recycling Centre. This should be identified as a constraint in the supporting text. The following supporting text is recommended for inclusion.	210601 (Cambridgeshire County Council)
Specific access proposals – Slate Hall Farm/C25 via the A1307, Jaynic via Boxworth Road, Tritax/Noon Folly's new slip-road onto the B1050, and Newlands via the Swavesey south roundabout – would add substantial traffic and are inadequately addressed. Where logistics developments are included in the local plan the relevant Policy should be amended to make specific reference to acceptable access routes to the national road network. We maintain that, far from being 'detail', without site access requirements being set out in the Draft Plan Policies we are unable to assess the cumulative impact on our local communities.	206379 (Boxworth Parish Meeting on behalf of A14 Logistics), 211432 (Boxworth Parish Meeting)
All developers should be explicit about how they will manage HGV parking provision to avoid further impacts on communities along the A14 corridor at Bar Hill and Boxworth.	206380 (Boxworth Parish Meeting on behalf of A14 Logistics), 211433 (Boxworth Parish Meeting)

Lolworth supports development that is planned, allocated, and policy-compliant under the GCLP. However, the Tritax proposal represents an unallocated, disproportionate, and inappropriate form of development that conflicts with the Local Plan's spatial strategy, harms the rural character of the area, and places unacceptable pressure on infrastructure and residential amenity. While Lolworth supports GCLP-allocated growth, the Tritax development should not be permitted on the basis of the above reasons and also that it will exceed the GCLP required capacity and is therefore not needed. For clarification Lolworth also supports the separate submission made or to be made by the A14 Logistics Forum.	201654, 205856 (Lolworth Parish Meeting)
The proposed Tritax development does not form part of the GCLP's spatial strategy and has not been identified as a suitable or necessary allocation through the plan-making process. Allowing a speculative, large-scale logistics development outside of the adopted or emerging plan framework would fundamentally undermine the integrity of the Local Plan system. The Tritax proposal represents a quantum of development entirely disproportionate to Lolworth's scale and function. The Tritax proposal is driven by regional or national logistics demand rather than the needs of Lolworth or its surrounding communities. Introduces traffic volumes and HGV movements that will place undue pressure on transport network. Tritax proposal would result in: Significant landscape and visual harm. Increased noise and air pollution Light pollution inconsistent with a rural setting. Lolworth has accepted and supports development where it is properly planned, justified, and allocated. The Tritax proposal does not meet these tests.	205850, 205851, 205852, 205853, 205854, 205855 (Lolworth Parish Meeting)
Whilst there are no designated heritage assets within the site boundary, there are a number of assets nearby, St Peters Church Boxworth and all Saints Church, Lolworth, both listed at grade II* as well as a	210157 (Historic England)

number of other listed buildings. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA. The HIA refers to the importance of managing heights in relation to heritage impacts. Employment uses have the potential for greater impact due to scale and massing. To that end the need for detailed heritage impact assessment should be included in criterion 1 c. References should also be made to nearby heritage assets in the policy. Given the likely scale of the employment development, we have some concerns regarding the potential impact on the historic environment of this employment allocation. The HIA should be reviewed prior to Regulation 19 to consider this issue in more detail. This should also include further evidence in relation to heights and mass informed by some visualisations. We need to be able to explore further whether there is likely to be an impact on these assets and, if so, what mitigation may be needed.	
Request provision of transport evidence base, appropriate strategic transport model assessment and supporting modelling to be provided.	209011 (National Highways)
Concerns raised around traffic congestion, specifically around the roundabout and slip roads to A14.	201260 (C Howlett), 201284 (J Witherow), 201324 (M Lester), 201445 (S Pink), 201449 (C Barnard), 201497 (V Lebedeva),
There are real concerns about traffic safety at this, already busy junction. With relation to climate crisis any further employment at this site means everyone has to drive to this site which will add more traffic. IF	201751 (S Barnard)

such a site is requited in this area it makes more sense to locale at southern Barhill southern site for distribution/logistics which is more integrated with transport networks.	
In favour of the lorry park increase in capacity if lorry parking is restricted.	201260 (C Howlett)
This is an inappropriate site for development for a number of reasons: Overdevelopment of a predominantly rural site; Access to/from the A14 via the existing junctions is poor and dangerous & unsuitable for additional HGVs; Adds additional freight traffic in a rural location, placing pressure on existing roads, and adding an enormous amount of addition CO2 and local air pollution; It is not served by public transport, therefore will lead to significant additional vehicle journeys by employees; It is contrary to the Climate Change emergency and to policies to reduce carbon and to protect biodiversity; Better alternative sites exist.	201449 (C Barnard)
The site is suitable next to existing services and lorry parking. Conditions are required for height restrictions and use of roundabout for access.	201490 (P Rainey)
The site should retain treeline and plant new trees.	201490 (P Rainey)
In the event that the draft allocation is maintained, we would ask that the site area proposed is revisited to avoid this conflict, and that additional wording is added to the Policy wording to require the future developer to engage with Anglian Water from the outset to agree the design and layout in order to ensure the two developments are compatible including their construction phasing, alongside agreeing appropriate easements and access for long term maintenance. Until such time that appropriate	210196 (Anglian Water Services)

amendments are made to the draft allocation and its wording to safeguard the delivery of the downstream route corridor for the Fens Reservoir, Anglian Water object to the draft allocation. We would welcome the opportunity to discuss the policy area and wording with you further	
This response recognises the drivers behind the principle of allocating land south of Cambridge Services for HGV parking and employment uses, but highlights several tensions and delivery risks. It notes the conflict between the scale and 24-hour intensity of the proposed development and objectives to preserve rural character, alongside under-specified mitigation for landscape, noise, and lighting impacts. It raises concerns about reliance on Boxworth Road for access and recommends a direct A14 slipway to reduce rural traffic impacts. It calls for a full Transport Assessment with junction modelling and an HGV routing strategy. It also seeks clearer definitions of “local needs,” tighter controls on ancillary facilities, stronger energy and drainage requirements.	201781 (A Jackson)
They need to make provision for rail/light rail freight. They haven't.	203791 (A Carpen)
I accept that delivering extra needed lorry parking at the Cambridge services. My concern is the access onto Boxworth Road should be straight off the services roundabout. Also the amount of traffic that will come through Boxworth Village. I also believe that Newlands Development are going to apply for a much larger logistic site opposite the Jaynic site which would completely alter the area of farmland looking towards Boxworth which at present is beautiful rolling countryside. Apart from causing considerable amount of traffic through Boxworth completely ruining one of the better views in Cambridgeshire with warehouses up to 24m high.	201284 (J Witherow)

Jaynic proposal South Boxworth Services. Access needs to be on slip road to services as the road into Boxworth is not suitable for an entrance by lorries. Buildings need to mirror size of Buckingway B P opposite. More info on increase in traffic through villages needed	201306 (S Hoyland)
There is no “local need” for an industrial site here. Note number of unoccupied units at existing sites along A14 corridor. Size of proposed units overbearing and developers are being misleading about actual height! Proposed access not in consultation with Highways.	201321 (R Morley)
It is not clear this development meets local needs. The roundabout level with the bridge over A14 is routinely congested; More HGVs will exacerbate this. Extra road capacity will be needed. Traffic through Boxworth is a concern now. The current weight restrictions are not enforced or policed & routinely ignored. The proposal to increase signage and calming measures is not credible given the failure of the current arrangements. The size of the buildings is not specified – the visual impact on the environment from big blocks is a major concern	201324 (M Lester)
This is an inappropriate site for development for a number of reasons: Overdevelopment of a predominantly rural site; Access to/from the A14 via the existing junctions is poor and dangerous & unsuitable for additional HGVs; Adds additional freight traffic in a rural location, placing pressure on existing roads, and adding an enormous amount of addition CO2 and local air pollution; It is not served by public transport, therefore will lead to significant additional vehicle journeys by employees; It is contrary to the Climate Change emergency and to policies to reduce carbon and to protect biodiversity; Better alternative sites exist.	201449 (C Barnard)
The respondent notes key issues against this proposal:	201497 (V Lebedeva)

Scale and height of proposed structure are inappropriate for this setting. It is scaled at national and regional needs, not local needs. Concerns around increased traffic and roads not being able to cope. This is an inappropriate setting for such a facility.	
The sole access to this site should be from the slip road off the A14, not from the Boxworth local road. Lorry parking spaces should be maximised to reduce illegal parking on local roads and the roundabout at the services. A shelter belt of trees should be planted between the site and Boxworth village, to reduce visual impact. These trees need to be professionally maintained so they become established. Buildings should be low rise and have solar panels to help meet net zero targets.	201487 (Dr E and J King)
Accept need for more logistic space that serves local needs. Scale of buildings and site needs to be in line with pre-existing buildings and planning restraints of Buckingham Way and service area. Service area is well screened and should provide model for this area.	202738 (L Turton)
The road network in South Cambridgeshire is reaching capacity, particularly roads into Cambridge, necessitating urgent attention. The planning, design and construction of the A14 bridges and junctions, including at Cambridge Services, has not worked. The lack of a full junction between the A14/M11 and A428 at Girton is a significant issue that requires resolution. Frequent traffic congestion and accidents at the Cambridge Services junction and roundabouts are concerning, particularly for school bus routes. There is a need for stricter regulations on HGV parking at roundabouts to enhance safety. The increase in lorry traffic from the new sites would be problematic, especially with the planned EWR station and North Cambourne developments. Redesigning junctions from the A14 and stopping HGV traffic going through villages is necessary to manage increased vehicle movements and improve safety.	203575 (G Pope)

The proposed site is not advisable given the current road network. The Newlands site with large warehouses is even less suitable.	
Building heights on this development should be similar to those of the Buckingway development on the opposite side of the A14, max 12/13m The additional lorry parking places are welcome but the access to this parking and the access to the site needs rethinking as traffic already backs up on the Cambridge Services roundabout. The developer has been told that access of the A14 slip road is not possible however National Highways should be engaged to review as there appears to be plenty of space to introduce an access off the slip road. Boxworth Road access in not acceptable	204071 (N Turton)
Although the development will mean additional traffic on local roads and congestion at the junction, it is by far preferable to alternative suggestions such as the Newlands proposal on the NW side of the Boxworth road. There is flexibility to build a separate access road so that vehicles can access and the site without using the Boxworth road, and the proposal includes additional HGV parking. (Currently illegal HGV parking is a cause of inconvenience and a safety hazard. The size and scale of buildings needs to be appropriate (like the development at Buckingham Way opposite) with minimal light pollution.	205246 (W East)
I am broadly supportive of this development but with a few concerns: The access needs to be away from the unsuitable local road - please consider a separate slip road off the A14. The Swavesey dumbbell roundabout on the Boxworth side is unfit for purpose already so will need major improvement. The size and scale of the buildings should be appropriate for the landscape i.e. small to medium size, and for local not national need.	205247 (A East)

There is emphasis employees cycling and walking to work. This will be easier from the Bar Hill developments. I'm in favour of additional lorry parking.	
As a resident of the village of Boxworth I obviously have some concerns with extra commercial building projects that I feel will impact on myself and the residents of the village. It should be plain to see that the area as a whole simply does not require the amount of warehouses being proposed at this time but after saying that, the building of this much smaller site than the one proposed by Newlands is much preferable not only for the aesthetics but far less traffic coming through the local villages and congestion on the A14.	205269 (P Kitson)
After visiting the public consultation held in the village hall close to us (Boxworth) it does seem that the developers have put a lot of thought and effort in to this project but two things stand out. 1. The proposed height of the warehouses (up to 24metres). 2. The considerable amount of extra traffic requiring entrance and exit to the site during building works and also once open for business.	205396 (P Kitson)
Entry and exit routes to site are critical, should not be off Boxworth Road. Swavesey South roundabout is not for purpose now. Provision of more lorry parking is welcome. Increase in traffic along rural roads needs consideration as does the policing of weight restrictions.	205639 (L Turton)
Direct lorry access off A14 into & out of the site only, preventing site movements accessing Boxworth Road. Noise & disruption to local residents (additional tree lines & sound proofing screens). Protect Boxworth Road’s ancient treeline & idyllic access. Protect Boxworth roaming local habitats (muntjaks, badger & black squirrel). Boxworth Road bollard lorry restricting methods, prohibitive signage & ANPR cameras. Screening provisions, protecting sightlines to Boxworth village. Restrict building heights to	203940 (R Chamberlain)

10/12m. Comments are on a compromise basis, with an overall OBJECTION to the adjacent Newlands Development proposals.	
The Local Plan must gather data on a cumulative basis, to show the impact this proposal will have on the wider area. This is for volume of traffic on major and local roads and also for water management, both surface water and treated foul water. Development is proposed in this area for a number of large sites, all of which will send surface and foul water through the same drainage system out to the River Gt Ouse. Cumulative impact must be assessed.	202551 (L Miller)
Proposal at the Boxworth junction with the A14. Obviously Newlands intend to apply, and appeal. Development focussed on unnecessary distribution warehousing. Proposal would involve a multiple of the current HGV use of the A14 junction which does not have capacity for the current HGV use. Inevitable congestion renders the business case for occupying the site for distribution non-viable. Would also create a multiple of the small vehicle use of the local Boxworth road. Scale of buildings proposed is totally inappropriate with no mitigation such as excavation to lower the ground level. Water supply and disposal will inevitably create further issues.	205351 (W East)
The road network in South Cambridgeshire is reaching capacity, particularly roads into Cambridge, which raises concerns about traffic management. The planning and design of the A14 bridges and junctions, especially at Cambridge Services, have not been effective and require reassessment. The lack of a full junction between the A14/M11 and A428 at Girton is a significant issue that needs urgent attention. Frequent traffic congestion and accidents at the Cambridge Services junction, particularly on the roundabouts, highlight the need for improved traffic flow and safety measures. There is a concern regarding HGV parking on roundabouts, which should be addressed to enhance safety and traffic	203568 (A Pope)

management. The potential increase in lorry traffic poses a risk to local villages, particularly with the developments of the EWR station and North Cambourne. Consideration should be given to the impact on school bus routes, such as those servicing Swavesey Village College. Redesigning the junctions from the A14 is necessary to accommodate increased vehicle movements and to improve safety and reduce tailbacks.	
There are real concerns about traffic safety at this, already busy junction. With relation to climate crisis any further employment at this site means everyone has to drive to this site which will add more traffic. IF such a site is requited in this area it makes more sense to locale at southern Barhill southern site for distribution/logistics which is more integrated with transport networks.	201571 (S Barnard)
Access off Boxworth Road should be from A14 or services roundabout, Building heights should be tightly restricted to max 10m, and Development should meet local not national needs.	201784 (J Bennison)
I strongly object to the proposed development. This proposed 24.58-hectare logistics development near Boxworth presents significant risks to public safety, ancient woodland, and rural community wellbeing. The logistics scheme would concentrate HGV traffic on the A14 corridor, worsening congestion, pollution and delaying emergency-service response, posing an unacceptable public-safety risk. • The development would destroy ancient elm woodland and associated species, causing irreversible loss of irreplaceable ecological and heritage assets. Cambridgeshire is already one of the most nature-depleted counties in England; further loss of ancient habitat is unacceptable. • This area is already under pressure from solar farms, housing expansion and other industrial proposals, creating an overbearing concentration of development. The proposal threatens Boxworth's rural community by removing agricultural land, undermining generational farming livelihoods and eroding the village's heritage and wellbeing.	201886, 206006, 206007, 206008, 206009, 210498, 210499 (M Goldberg)

• Even with the proposed 25-metre landscape buffers, the development will generate significant light pollution, air pollution, noise disturbance, surface-water impacts, further congestion on the A14 and increase in emergency services and emergency response times. These harms cannot be offset by planting, drainage adjustments or visual-impact assessments. • This is a high risk logistical rest stop and will have cumulative impacts for the local community.	
The Draft Local Plan lacks a comprehensive assessment of the cumulative effects of proposed developments on traffic, road network adequacy, and flood risk, which is seen as a fundamental flaw.	203556 (D Pope)
The respondent expresses concerns about the proposed allocation under Policy SRRA.2, stating that the site's limited scale and capacity are insufficient to meet the strategic need for B2 and B8 accommodation in Greater Cambridge. The allocation is seen as prioritising specific operational needs over the delivery of modern, large-scale industrial and logistics space that aligns with market demand, raising doubts about its effectiveness.	204233 (Bidwells LLP on behalf of Tritax Big Box Developments)
Large industrial units are incompatible with existing landscape patterns of hedgerows, tree belts and open farmland, causing traffic impacts, light pollution and flooding issues.	204574 (I Chamberlain)
Support for the policy.	204661 / 204675 (Carter Jonas on behalf of Jaynic), 204818 (University of Cambridge)
Extra MSA Group fully support the proposed allocation for additional HGV parking at Cambridge Services, as set out in Policy S/RRA/SCS.	207081, 207082, 207083 207084 (Zerum on behalf of Extra MSA Group)

Policy S/RRA/BBP: Land at Buckingway Business Park, Swavesey

Abbreviations

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

Executive Summary

There is broad support for the inclusion of inclusion of reference to Cambridgeshire and Peterborough Minerals and Waste Local Plan from Cambridgeshire County Council. Cambridgeshire County Council supports the allocation of the site.

Concerns were raised about the pipeline for the Fens Reservoir as it goes adjacent to the site and Anglian Water have therefore requested continued engagement on the site.

Further responses were received from Historic England supporting the HIA and allocation and requesting amends to the requirement for a detailed HIA has been added to point 1d and the timescale for an archaeological assessment has been included in point 1f.

Concerns were raised about the allocation is not large enough to significantly address the identified need for strategic B2 and B8 accommodation as per the supporting evidence base.

Concerns were raised about the impact on traffic particularly around the A14 junction and the need for more public transport.

Concerns were raised by Swavesey Parish Council in relation to traffic and HGV parking.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- Support noted for the inclusion of reference to supporting text and allocation from Cambridgeshire County Council.
- In response to Anglian Water, the policy has been revised to include wording to refer to continued engagement and design around the pipeline for the Fens Reservoir.
- In response to Historic England, the requirement for a detailed HIA has been added to point 1d and the timescale for an archaeological assessment has been included in point 1f.
- The comments from Tritax Big Box Development are noted with regard to employment floorspace supply of B8. There is an oversupply in Greater Cambridge of employment floorspace to provide flexibility in the market.
- Evidence regarding the transport impacts and required mitigations for the A14 allocations proposed within the plan is being prepared to inform the Proposed Submission Plan, including drawing on transport modelling and, where relevant, on site promoter material. The transport measures required to enable delivery of each site are set out in the relevant allocation policies and within the Infrastructure Delivery Plan.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
I have concerns about increase to traffic at the junction to the A14 if this goes ahead due to increased traffic. It makes more sense to site a logistics /distribution hub at the Barhill southern site where there would be better links to transport for employees. Any new employment created would mean that everyone would have to drive to this site as there isn't a good bus network here. With climate crisis council and planners need to be reducing road traffic not increasing it.	201752 (S Barnard)

This makes sense, but adequate consideration needs to be made for employee commuting as there is no public transport, so this will add congestion to local roads as well as increased carbon emissions.	201452 (C Banard)
Support for the allocation. 201451	202121 (Carter Jonas on behalf of Cambridgeshire County Council)
Concerns raised about impact on traffic congestion on local road networks.	203125 (Swavesey PC)
The respondent has no objection to the proposed allocation, noting it may contribute positively, though limited, to the overall supply of employment land. This site allocation is not large enough to meet identified need for B2 and B8 accommodation.	204280 (Bidwells on behalf of Tritax Big Box Developments)
The proposed allocation covers 2.11 hectares at Buckingway Business Park and has capacity for approximately 10,000 sqm of B2/B8 Industrial and Logistics development. This draft allocation is adjacent to the preferred route of the associated water infrastructure. As mentioned above, the design refinement process for the Fens Reservoir is ongoing and the alignment of the pipeline is potentially subject to change which may impact this allocation in due course. Given the proposals are still at an early stage, Anglian Water requests ongoing engagement with the Council throughout the preparation of the Local Plan, and the future developer at the appropriate time. This will ensure that both developments can be progressed and are compatible, including during construction and operation.	210197 (Anglian Water Services)
Whilst there are no designated heritage assets within the site, there is a grade II listed barn for the north-east of the site. There is also a cluster of listed buildings at Lolworth, including the grade II* All Saints Church. Any development of this site therefore has the potential to these heritage assets through	210158 (Historic England)

development within their settings. We welcome the preparation of the HIA. We note that the HIA has given some consideration to heritage assets at Lolworth. We welcome criterion d and the reference to Lolworth church. Employment uses have the potential for greater impact due to scale and massing. The need for a detailed heritage impact assessment should be included in criterion 1 d. We welcome criterion f though it would be further improved by clarifying when the assessment will be required. Given the likely scale of the employment development, we have some concerns regarding the potential impact on the historic environment of this employment allocation. The HIA should be reviewed prior to Regulation 19 to consider this issue in more detail. This should also include further evidence in relation to heights and mass informed by some visualisations. We need to be able to explore further whether there is likely to be an impact on these assets and, if so, what mitigation may be needed.	
Support for inclusion of supporting text.	210602 (Cambridgeshire County Council)

Policy S/RRA/SNR: Land to the north of St Neots Road, Dry Drayton

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

The site promoter supports the proposed allocation but requests that the site includes other employment uses to meet local needs, provide greater flexibility and align the allocation with the emerging National Planning Policy Framework. EWR seek minor amendments.

Historic England support the policy wording in relation to addressing any potential heritage impacts.

Response to the main issues raised in representations

The site remains allocated for E class uses. Through the allocation of other sites, the Local Plan seeks to meet its identified local warehousing and logistics needs and therefore it is not necessary to include these uses on this site. Additionally, the site is adjacent to a number of residential properties, and these types of uses may have adverse impacts on residential amenity.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**
The respondent supports the continued draft allocation of the site for employment uses but with suggested amendments:	201589 (Paragon Land & Estates Limited)

• The site has potential for a wider range of employment uses than those currently proposed in the draft allocation. • Amending the policy to include B2 and B8 uses alongside the proposed E class uses. • Changes regarding site area, capacity, and development requirements	
We welcome the preparation of the HIA and criterion 1e. Any development of this site therefore has the potential to affect the designated heritage assets and their settings. However, there is considerable vegetation and distance between the site and the proposed allocation.	210159 (Historic England)
The land within the site which EWR Co has identified as being required to deliver its proposals is included within the EWR safeguarded area. EWR Co supports the requirements of draft Policy including criterion 1b and 1c. EWR Co request the following minor amendments for clarity and to ensure the proposals do not conflict with the Safeguarding Directions.	211896 (East West Rail)

Policy S/RRA/OHD: Old Highways Depot, Twenty Pence Road, Cottenham

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

One representation received, which notes that the policy does not reflect all of the recommendations from the Heritage Impact Assessment.

Response to the main issues raised in representations

The policy has been updated to reflect the recommendations of the Heritage Impact Assessment.

Table of representations

Summary of issues raised in comments	Comments highlighting this issue
Development of this site has the potential to affect local heritage assets and their settings including views into and out of the Conservation areas. We welcome the preparation of the HIA however not all of the recommendations of the HIA are fully reflected within the policy. In particular, the following recommendations are absent: • Siting of development to avoid obstructing or interfering with views of the church tower from Twenty Pence Road	210160 (Historic England)

• Restricting building heights to limit visual intrusion into the conservation area and in views of the conservation area e.g., 1-2 storeys. These should be included within the policy.	

Policy S/RRA/NW: Norman Way, Over

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There is broad support for the site allocation from Cambridgeshire County Council and Historic England.

Comments were made by Esco Prospect to encourage the allocation of residential uses in this area.

Response to the main issues raised in representations

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

- This site allocation has been assessed as suitable employment uses through the HELAA and has demonstrated to be deliverable through the Housing Trajectory. The scale of development is appropriate for the level of services and amenities in this location.
- In response to Historic England and Cambridgeshire County Council, the support and comments are noted.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue

Support for policy.	202119 (Carter Jonas on behalf of Cambridgeshire County Council)
No residential development is proposed for Over despite being close to new site allocations proposing employment floorspace and therefore more jobs.	203146 (Chaplin Farrant Ltd on behalf of ESCO Prospect)
Whilst the principle of development of this site has already been established and there is a buffer of planting between the site and nearby heritage assets, any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA and criterion 1 a, 1b and 1d.	210161 (Historic England)

Policy S/RRA/CRH: Land Adjacent to Cambridge Road (A10) and Mill Lane, Hauxton

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made by Historic England welcoming the preparation of a HIA, and an image of the landscaped open space in the northern part of the site and no more than 2 storeys (residential) to be included in the policy wording.

Comments were made by the Environment Agency that an FRA and sequential approach are needed.

Response to the main issues raised in representations

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

- In response to Historic England, these comments are noted and the policy has been amended to include wording around restrictions for the landscaped area already in the existing wording for clarity and point 1c has been added to include the restrictions on the building heights for residential development not exceeding two storeys.
- A requirement for an FRA and sequential approach are set out in Policy CC/FM Managing Flood Risk.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
This part of the site lies very close to the cluster of grade II listed buildings at Hauxton Mill. Any development of this site has the potential to affect these heritage assets and their settings.	210162 (Historic England)

We welcome the preparation of the HIA. There are opportunities for design to enhance the setting of the heritage assets. The HIA recommends an area of landscaped open space in the northern part of the site. This is shown in diagrammatic form in the HIA. This diagram should be included in the Local Plan. The HIA also recommends no more than 2 storeys (residential). This should be included in the policy.	
This policy should refer to the requirement for an FRA and need to take a sequential approach to the site layout.	211181 (Environment Agency)

Policy S/RRA/CH: Land at Compass House, Chivers Way, Histon and Impington

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There is broad landowner support for the allocation however they requested that the policy also allow for residential uses, whilst several other comments raised concerns about the impacts of development on adjacent properties including overlooking and environmental factors like light pollution. Comments also noted heritage assets adjacent or close to the site and how development could have an adverse impact on them and their setting if not managed sensitively. The majority of comments requested that the policy include additional criteria so that these issues are addressed through the future design and layout of the development.

Response to the main issues raised in representations

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

- In response to Historic England, these comments are noted and the policy has been amended to include additional heritage assets within close proximity to the site that could be affected by the redevelopment of the site.
- The Councils have a separate and agreed process for the consideration of Non-Designed Heritage Assets. Should this particular NDHA be nominated for consideration, the councils would then consider the historic merits of the property in line with this agreed process.
- The policy has been amended to reflect the comments made in relation to the relationship of the site within adjacent residential properties, requiring the careful consideration of direct and indirect impacts through the planning application process.
- Matters in relation to flooding are already addressed through other Local Plan polices and therefore, are not repeated in this policy.
- An additional requirement has been added to the policy in relation to mitigating any transport impacts in a timely way.

- The NPPF is clear that Local Plan should not impose architectural styles. However, the policies within the Great Places chapter of the Local Plan require development proposals to reflect the site's context, which may include its historic uses and architectural built form.
- The policy has been retained for employment uses only. The site is currently in employment use and therefore the principle of this land use has already been established. The introduction of residential uses in addition to employment uses would require further testing to understand the impacts generated by the proposal and whether they could be suitably mitigated. It is also not clear from the representation whether the introduction of residential development is, in part, replacing the existing office floorspace or in addition to the proposed uplift. Given this uncertainty and that at this stage, it is not clear whether a mixed-use development it suitable or achievable, the policy has not been amended regarding this point.
- The policy also requires development to take comprehensive approach to placemaking when considering adjacent sites, including Vision Park, which is supported by the landowner.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**
I am concerned about the redevelopment of the site: • flooding impacts given existing issues • Overlooking into existing residential properties • Light and noise pollution • Traffic near the Busway junction • Overcrowding on the bus network	201007 (L Cooper), 201008 (R Thomas), 201009 (D Hall)
The car parks already there seem mostly empty, are more offices necessary and will they be used? Would hope that the pond/cafe/trees will remain.	201007 (L Cooper)
The site is located close to a group of older properties that give Histon and Impington its character. I am concerned about how intensification here will affect the conservation area. The policy would benefit	201009 (D Hall)

from clearer limits on scale and type of use, better protection for the cottages facing the site and stronger expectations around drainage, traffic and screening. I am not against redevelopment, but feel the policy needs firmer safeguards so any future scheme fits well with the surrounding homes and the character of this part of Histon and Impington.	
The best bits of the old Chivers factory buildings should be rebuilt and restored - down to the last moss-covered roof tile. Failing that, any new building designs should explicitly demonstrate they have been inspired by the wonderful architecture and design of the old Chivers works.	203831 (A Carpen)
Whilst there are no designated heritage assets within the site, Histon Conservation Area lies to the north of the site. The grade II listed 82-92 Station Road also lies to the north of the site. The Mill Cottage Grade II and Impington Mill grade II* lie to the south of the site. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA. Criterion b should also refer to the Impington Windmill (grade II* and Mill Cottage (Grade II). The plan should be clear about the status of the potential NDHA.	210163 (Historic England)
General support for the allocation. The NPPF 2024 promotes comprehensive and coordinated development and it is considered the policy wording should be amended to include ensuring the development aligns through collaboration with the Mixed Use Development in Histon & Impington Station Area (Area of Major Change) (policy S/AMC/HIS) and with Vision Park (owned by our client). This will help to deliver coherent masterplanning, high-quality design outcomes and long-term	204479 (The Royal London Mutual Insurance Society Ltd)

deliverability with a comprehensive approach to placemaking across Vision Park, Compass House, and Histon & Impington Station Area holistically.	
This draft allocation covers the Site boundary and is currently allocated for Class E(g)(i) and E(g)(ii) uses. It is proposed that the allocation be updated to the following: “Site area of 1.7 hectares Allocated for mixed use employment and residential, including office (E(g)(i)), research and development (E(g)(ii)), residential units (including shared-living forms of residential accommodation) and associated ancillary uses.	211109 (Quod)

Policy S/RRA/CR: Land to the west of Cambridge Road, Melbourn

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Broad support for the policy however the landowner commented that the allocation should either support a residential only scheme or be more flexible to enable a residential led development to come forward, noting the lack of demand for this type of employment uses in this location.

Response to the main issues raised in representations

The policy has been amended to account for the representations received by the site promoter. This site is well served by the existing village, including its services and facilities, and is in close proximity to a large employment location. Given the consented development, the policy has been amended to reflect a change in the proposed land uses.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**
There are no designated heritage assets within and site. The Melbourn Conservation Area and associated listed buildings lies further to the south-west of the site. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA. We welcome criterion 1c and 1d	210164 (Historic England)

Broadly support the proposal for residential development given the site's location within the village and proximity to employment uses. The Melbourn Science Park has planning permission for expansion and there is no other employment requirement in this location. Therefore, request the policy is for housing only, or is amended to mixed use where employment provision can be demonstrated at the time of a planning application submission There is a factual error in relation to the criteria for a landscape edge but that this issue will be addressed at the planning application stage. Given the distance between the site and existing heritage assets, there is no requirement to list them within the allocation. They would already be addressed through the other policies of the Plan.	204704 (Vistry)
Subject to the above comments, FPC supports this policy There is no indication why the site should integrate with the adjacent Science Park. Development will be dependent on the consent of the owners of the existing Science Park to achieve this creating a possible ransom situation. Housing density should be appropriate for village dwellings and recognise the beneficial effects of private outdoor space and the spaciousness which people expect and seek in villages. Generally, supports commercial development where sensibly located. Designating this site for such development, being situated alongside the existing science park, clearly has significant benefits. There will also be increases in traffic along Cambridge Road, the A10 and other nearby parts of the road network. Meldreth railway station is over a mile away from the site so rail access unless supported by shuttlebus and bicycle parking on site is unlikely to be desirable. The policy could usefully specify the need to address that aspect.	209051, 209052, 209053, 209054, 209055 (Fowlmere PC)

Unnecessarily pessimistic view of the design of the development and opportunities presented by the site. Rather than requiring the development to be hidden, the policy should require a high standard of appropriate design. The proposal in the plan gives the opportunity to create a sense of entry with an elegant design and setting which could reflect the presence of science, homes and rural life	

Policy S/RRA/FID: Fulbourn and Ida Darwin Hospitals

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made by Historic England to highlight the and Settlement site by Caudle Corner Farm Scheduled Monument and welcome the HIA and points 1c and 1f of the policy.

Response to the main issues raised in representations

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

- The policy wording has been amended to directly address the comments made by Historic England.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
This site lies within Fulbourn Hospital Conservation Area. The eastern part of the site lies opposite the scheduled monument Settlement site by Caudle Corner Farm. The site lies close to the Fulbourn Conservation Area and its listed buildings, and the grade II listed windmill sits on elevated land to the south of the site. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA. We welcome criterion 1c although we recommend that the scheduled monument is also specifically referenced in this clause. We welcome criterion 1f.	210165 (Historic England)

Policy S/RRP: Policy Areas in the rest of the rural area

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made by Papworth Everard PC to set out that Policy H/4: Papworth West Central is still relevant to the Local Plan.

Comments were made in support of the sites in the Rest of Rural Area from Gamlingay Parish Council.

Response to the main issues raised in representations

Policy H/4: Papworth West Central of the 2018 Local Plan was first introduced in the South Cambridgeshire Site Specific Policies DPD adopted in 2010. At that time the village was undergoing considerable change. In addition to the news the hospital would be relocating, there were a range of redundant or soon to become redundant sites. A policy area was identified to ensure a coordinated approach to delivery of a mix of uses. Since then, the majority of those land parcels have been redeveloped or have gained planning permission. Whilst there are some small areas which may provide future development opportunities, and there may be other buildings that in future come forward for redevelopment, a standalone site specific policy is no longer required. Other policies in the local plan can ensure that they make proper contribution towards infrastructure to make development acceptable.

Support noted from Gamlingay PC.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Papworth Everard Parish Council cannot see that Policy H/4: Papworth West Central has been carried forward from the adopted Local Plan 2018. Policy H/4 of the adopted Local Plan 2018 remains 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 the maintenance of Policy H/4 for sites in the policy area.	205094 (Papworth Everard PC)
Support the proposals of development in the rest of the rural area- land associated with Papworth Hospital - reuse of brownfield land.	201378 (Gamlingay PC)

Policy S/AMC/IWM: Imperial War Museum, Duxford

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Broad support for the policy area from Twenty5 Planning Ltd on behalf of Henry Boot Developments Limited.

Concerns were raised around reflecting the AvTech proposals in the policy area.

Comments were made by Historic England to reflect the heritage assets nearby and a need for an HIA to be completed.

Comments were made by Cambridgeshire County Council to refer to the Duxford Water Recycling Centre and the Cambridgeshire and Peterborough Minerals and Waste Local Plan.

Gonville & Caius support the designation, and suggest that point 5 be added to reflect aviation development in NPPF, and that the masterplan requirement be amended.

Response to the main issues raised in representations

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

- In response to reflecting AvTech proposals within the policy area, the policy wording been amended to set out that - A masterplan for development focused on aviation and other complementary uses to support the future of the museum site, must align with the wider masterplan for IWM Duxford. This is also in response to Gonville & Caius College.
- In response to Gonville & Caius, support is noted, and NPPF requirements are not duplicated in the Local Plan, this is an approach taken across the Local Plan.
- In response to Historic England, the suggested amendments have been made.

– In response to Cambridgeshire County Council, the suggested amendments have been made.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
There are multiple designated assets on this site including Duxford Airfield Conservation Area, five grade II* listed buildings and over 20 grade II listed buildings. The Conservation Area is on the Heritage at Risk Register. Often the best use for an asset is its original use. However, this clearly has implications for development in the surrounding area. Development in this policy area has the potential to impact these designated heritage assets and their settings. We welcome the reference to the need for a site wide masterplan for the site as well as references to the historic nature of the airfield and heritage assets. Criterion 2 should specifically mention the Conservation Area and listed buildings.	210166 (Historic England)
The policy should state that the masterplan should be informed by a Heritage Impact Assessment. The potential uses for the land in the west end of the site should be set out in the policy and/or supporting text. Historic England is keen to support the ongoing use of the site as a museum which is an important visitor attraction, educational, commercial and aviation facility.	210166 (Historic England)
Support for the policy, which identifies the special case of the site. • It is requested that the policy be amended to allow for a specific masterplan for the IWM Lab and AvTech as part of an application at land promoted (HELAA Site Ref: 40095, Site ID 115178). • The wording on the masterplan-led approach should be amended to state that the existing Imperial War Museum masterplan is sufficient and a wholly new masterplan for the whole site is unnecessary.	205225, 206940, 206941, 206942, 206943, 211453, 211454, 211455 (Twenty5 Planning Ltd on behalf of

• Infrastructure requirements are already covered by other policies.	Henry Boot Developments Limited)
Proposals for the AvTech research and technology park represent a major employment-led development, with the potential to accommodate a substantial number of employees and generate significant traffic movements, breaching NPPF paragraphs 20, 22 and 31. The absence of AvTech from the Plan prevents a holistic assessment of cumulative impacts, particularly in relation to the A505 corridor and surrounding villages. This undermines the justification of the spatial strategy and risks leaving significant impacts to be addressed in a piecemeal manner through planning applications.	206691 (Cllr R Williams)
Support for the policy.	208279 (Imperial War Museum)
Site is partly located within the Consultation Area for the Duxford Water Recycling Centre. This should be identified as a constraint in the supporting text. The following supporting text is recommended for inclusion. "This site is near to the Duxford Water Recycling Centre. An odour assessment may be required. Please refer to Policy 16 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) for further information."	210605 (Cambridgeshire County Council)
SCDC have omitted comments regarding any impact on the A505 running through to Junction 10 and beyond. The additional encroachment from the expansion of operations at the site needs careful consideration.	209060 (Fowlmere PC)
It is requested that the draft policy be amended to: 2. ‘Development of the site will be masterplan that masterplan led which will enable…….’ This minor	210576 (Imperial War Museum)

alteration of the wording covers all future development proposals in the AMC and accommodates the existing IWM Duxford masterplan and the AvTech 1 / IWM Lab masterplan currently in preparation.	
Caius welcomes and supports the inclusion of Policy S/AMC/IWM and the extension of the “red line” designation at Figure 122. • Aviation uses should be recognised in part 1 of the policy/ • A new policy point 5 be added to recognise further aviation development opportunities in line with NPPF paragraph 111(f). • The wording on the masterplan-led approach should be amended to state that the existing Imperial War Museum masterplan is sufficient and a wholly new masterplan for the whole site is unnecessary. • Detailed amendments are suggested to policy and supporting text.	211421, 209028, 209029, 209030, 211450, 211451, 211452 (Gonville & Caius College)

Policy S/AMC/PH: Papworth Hospital, Papworth Everard

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Broad support for the policy from Papworth Everard Parish Council.

Comments were made to raise concerns about the marketing restrictions placed on replacement healthcare uses.

Concerns were raised by Historic England to change the name of the allocation and reflect the heritage assets onsite.

Response to the main issues raised in representations

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

- The title of the policy has been amended to say Papworth Hospital, Papworth Everard in response to comments from Historic England.
- The marketing requirement of two years to prioritise finding replacement healthcare uses is required to maintain healthcare related uses on the site, and there is general support for this from the local community.
- The requirement for a HIA and the reference to the Grade II* and Grade II Listed assets onsite has been amended in the policy wording in response to Historic England.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue

The statement "after the site has been marketed for healthcare for a period of no less than 2 years would other employment uses ... be permitted" makes no sense. The NHS has been trying to offload the site since the hospital moved to Cambridge around 6 years ago. At one point, they had a sale in principle agreed with a Chinese company, which eventually disappeared. Has the "marketing" period therefore already started or when will it begin? Also, there is a covenant on the site which prevents its use for non-healthcare purposes.	201409 (South Cambridgeshire DC Cllr P Sandford)
Support for the policy.	204223 (Papworth Everard PC), 205498 (Papworth Everard PC),
We recommend add the words Papworth Everard to the Policy title to avoid any confusion with the New Papworth Hospital at CBC. This site includes the part of the Papworth Everard Conservation Area and lies adjacent to and in the setting of the grade II* listed Papworth Hall, scheduled monument moated site and close to the grade II listed Lodge. Development in this policy area has the potential to impact these designated heritage assets and their settings. The policy should require the preparation of a Heritage Impact Assessment for the Site. The HIA should be used to inform a masterplan for the site. The policy should specifically reference the fact that the hall is Grade II*, the scheduled moated site and the grade II Listed Lodge.	210167 (Historic England)

Policy S/AMC/FD: Fen Drayton Former Land Settlement Association Estate

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made to extend the Fen Drayton Land Settlement Association Estate boundary to include Land West of Mill Road

Comments were made by RSPB to review the removal of the Wildlife Reserves from the allocation.

Concerns were raised by Historic England to reflect the heritage assets onsite.

Response to the main issues raised in representations

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

- The existing policy area is to enable development within the existing plots rather than to expand the settlement. This aligns with the Local Plan's strategy seeks to deliver housing in what it considers to be sustainable locations, as opposed to promoting the extension of development in locations with poorer public transport options.
- In response to RSPB, the site allocation boundary has been amended to remove the Fen Drayton Lakes RSPB Reserve and Fen Drayton Gravel Pits County Wildlife Site from the allocation.
- In response to Historic England, their suggested amendments have been made.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue

The RSPB objects to the current mapping of the allocation, as it includes part of the Fen Drayton Lakes RSPB Reserve and Fen Drayton Gravel Pits County Wildlife Site, which should not be designated for infill development. The RSPB emphasizes that the area around Springhill Lagoon is integral to the Reserve and will not be sold for development, requesting the council to amend the allocation accordingly. The respondent notes the adopted SPD requires control of surface runoff from developments, highlighting its importance for preventing surface water pollution to the lagoon, particularly for new developments along Springhill Road.	201507 (RSPB)
The respondent highlights the potential for sustainable rural development at Land West of Mill Road, Fen Drayton, which has been submitted for consideration in the call for sites. The surrounding land has been allocated under Policy S/AMC/FD for the 'rest of the rural area' and has a Supplementary Planning Document guiding sustainable living since 2011, but no changes have occurred. The proposal suggests allocating Land West of Mill Road as an extension to the Land Settlement Area, promoting a sustainable living agenda and enhancing the character of Mill Road.	205328 (Varsity Town Planning Ltd on behalf of O&H Land)
The Fen Drayton Conservation area and associated listed buildings lies to the east of the site. Any development of the site has the potential to impact these designated heritage assets and their settings. There is currently no reference to these heritage assets in the policy. Reference should be made in the policy and supporting text to nearby heritage assets and the need to conserve/sustain or where appropriate enhance the significance of heritage assets (noting that significance may be harmed by development within the setting of an asset). The policy should include some reference to the need to consider views into and out of the Conservation Area. Any required mitigation should be included within the policy wording.	210168 (Historic England)

Policy S/AMC/HIS: Mixed Use Development in Histon & Impington Station Area

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made to raise concerns about the marketing restrictions placed on replacement healthcare uses.

Concerns were raised by local residents about loss of amenities and parking provision.

Comments were raised that the proposals should comply with the Histon and Impington Neighbourhood Plan 2021.

Concerns were raised about alignment with nearby sites and the use classes being overly restrictive.

Historic England made comments on the need to make reference to heritage assets in the policy wording.

Response to the main issues raised in representations

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

- Parking standards for development are set out in Policy I/EV: Parking and electric vehicles. this is a location in close proximity to public transport and close to residential areas, and therefore a low car parking plan is suitable in this location.
- The Histon and Impington Neighbourhood Plan 2021 forms part of the development plan alongside the Local Plan and therefore development will need to be in compliance with it.
- The loss of local amenities is mitigated by the policy area specifying that community uses are suitable in this location.
- The suggested changes from The Land Development Limited have been made.
- The suggested changes to the policy from Historic England have been made.
- In response to Quod, Eg i and ii have been added into the policy wording.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
I worry the development will remove the local shops and facilities (the general store, cafe and pub). Impington has very few truly local retail businesses; they are vital to our community. Being without them — even if only during the development would be a great loss.	201183 (J Dent)
The 'low car' parking plan is not reassuring. As new families grow, they will heap pressure on surrounding streets — a poor outcome for those new residents, their families, visitors, and those living nearby. Better for all would be to invest, to provide sufficient parking for the development in its own right.	205549 (J Dent)
Proposals should comply with the Histon and Impington Neighbourhood Plan 2021 or any successor documents. All schemes must integrate with surrounding uses, respect local character, and maintain the vitality of the village centre while preserving 'The Copse'. The Histon & Impington Station Area is over 1 mile from the Cambridge City boundary and should not support development intended for Cambridge City, as it is classified as a Rural area. Any loss of employment or business premises must adhere to the justification outlined in Policy J/PB, particularly point 1.a.ii. The Kendal Court site, currently at 1,100sqm, will be lost if application 25/04793/FUL is approved, and there has been no effort to advertise or develop it for commercial use, thus supporting Policy J/PB point 1.a.ii.	201435 (Histon and Impington PC)
There are no designated heritage assets within the site boundary but the Histon and Impington Conservation Area and associated listed buildings lies to the north of the site as well as other listed	210169 (Historic England)

buildings to the south (Impington Windmill grade II* and Mill House grade II). Any development of the site has the potential to impact these designated heritage assets and their settings. There is currently no reference to these heritage assets in the policy. Reference should be made in the policy and supporting text to nearby heritage assets and the need to conserve/sustain or where appropriate enhance the significance of heritage assets (noting that significance may be harmed by development within the setting of an asset). The policy should include some reference to the need to consider views into and out of the Conservation Area. Any required mitigation should be included within the policy wording.	
Support the policy as it marks the area around the former Histon & Impington Railway Station and Guided Busway as an Area of Major Change through mixed use redevelopment and this will help create conditions for business investment, expansion and adaptation, as per paragraph 85 of the NPPF 2024. These uses are needed to support a modern economy as set out in paragraph 86c of the NPPF 2024 although, we highlight this site does not exist in isolation and is spatially linked to Compass House and Vision Park.	204488 (Stantec on behalf of The Royal London Mutual Insurance Society Ltd)
Consider the policy wording should be amended to include ensuring the development aligns, in collaboration with Land at Compass House, Chivers Way (policy S/RRA/CH) and with Vision Park (owned by our client). This will help to deliver coherent masterplanning, high-quality design outcomes and long-term deliverability with a comprehensive approach to placemaking across Vision Park, Compass House and Histon & Impington Station Area holistically. It is considered this amendment to the policy is required to ensure it is effective as set out in paragraph 36 of the NPPF 2024.	204488 (Stantec on behalf of The Royal London Mutual Insurance Society Ltd)

This Land Development Ltd supports the principle of mixed use development within the Histon & Impington Station Area and welcomes the continued recognition of this location as an opportunity for redevelopment. However, as currently drafted, Policy S/AMC/HIS introduces unnecessary constraints that risk reducing the flexibility and deliverability of future development when compared with the adopted Local Plan framework. The amendments proposed in this representation would strengthen Draft Policy S/AMC/HIS by ensuring it remains justified, and consistent with both the adopted policy framework and the intent of the updated Use Class Order.	201885 (Bidwells on behalf of This Land Development Ltd)
The draft policy's replacement of B1 with only E(g)(iii) is overly narrow, excluding offices (E(g)(i)) and research & development (E(g)(ii)) and therefore limits commercial flexibility. It is also contrary to the Government's intention behind the consolidated Use Class E, which was introduced to support adaptability, economic resilience and mixed-use regeneration. Given that the policy area is explicitly intended to support mixed-use development, it is important that the full range of compatible employment uses is retained.	206003 (Bidwells on behalf of This Land Development Limited)
Replace the term "align" with "complement" in Draft Policies S/AMC/HIS and S/RRA/CH to remove ambiguity and avoid overly prescriptive requirements.	206005 (Bidwells on behalf of This Land Development Limited)
S/AMC/HIS: Mixed Use Development in Histon & Impington Station Area This draft policy encompasses the southern part of the Site and has aspirations to rejuvenate the area around the former railway station in Histon and Impington to create a vibrant gateway into this community, which features a mix of commercial, community and residential uses. Adding this additional	211110 (Quod)

point as 1d. d. Employment uses including office and research and development (Use Classes E(g)(i) and E(g)(ii)).	

Policy S/AMC/GT: Optimisation of Gypsy and Traveller Sites

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Comments were made to raise concerns about safety on sites, and the potential for expansion of the sites and what this means for local communities.

Concerns were raised by local residents about the need for better enforcement to ensure that G&T sites are safe and are occupied by Gypsy and Travellers.

Comments were raised that the proposals should comply with the Histon and Impington Neighbourhood Plan 2021.

Concerns were raised by Cambridgeshire County Council about reference to the Waste Plan.

Historic England made comments on the need to make reference to heritage assets in the policy wording.

EWR request a minor amend to the policy area.

Response to the main issues raised in representations

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

- The purpose of optimising Gypsy and Traveller sites is to safeguard Gypsy and Traveller sites for use by Gypsy and Travellers. The policy's purpose is predominately to reconfigure sites to provide an improvement in health, safety and living conditions for Gypsy and Travellers and to make pitches available for those meeting the definition of Gypsy and Traveller. This process may result in the creation of new pitches, however new pitches are also allocated on strategic sites to address the accommodation needs of Gypsies and Travellers.
- At the time of the Draft Local Plan publication in Autumn 2026 we reported that officers were investigating the occupancy of

these pitches, and are gathering other necessary information, to enable the Council to consider whether it is appropriate to take enforcement action to make these pitches available for occupancy by Gypsies and Travellers. Officers had also developed a protocol for dealing with any issues of homelessness that may result from any enforcement action taken. The Council have since continued with enforcement action and this is set out in the Strategy Topic Paper in Appendix 12.

- The policy has been amended to clarify what a suitable density is for pitches per hectare to ensure that it is clear what the aim of the policy is, to ensure safety of pitches and ensure that all pitches have sufficient amenity space.
- Amendments have been made to the policy to widen it more generally to optimisation of all sites, instead of just focusing on Chesterton Fen, Smithy Fen and Cottenham. Point 1 has been revised to include all sites of half a hectare and above.
- Amendments to policy wording have also the reflected the need to ensure there is sufficient capacity to utilities, including waste, electricity and water.
- In response to concerns about expanding these sites, especially where Northstowe and Waterbeach have new allocations, the policy is about optimising these sites for the intended occupants in a safe way, with sufficient utilities, infrastructure and amenity. New sites are needed as well as optimisation to meet the identified need for Gypsy and Traveller pitches.
- Suggested amendments have been made to address Historic England's comments.
- Suggested amendments have been made to address Cambridgeshire County Council's comments.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
In January 2026, it has been suggested, by members of the Gypsy & Traveller communities living on Smithy Fen, that development of land, covered by injunction, on Water Lane has been affected with	201521 (S Bristow)

South Cambridgeshire District Council (SCDC) officer(s) approval. While the claim is now under investigation and whether or not officers involved are complicit remains to be seen. Irrespective of the allegation the 'reality' of the development has relevance in that it demonstrates, SCDC's lack of awareness of what is going on. My husband has in his objection to the expansion of the sites has already set out to SCDC that they are already failing to enforce breaches of other injunctions. The aim of the policy, in order that it might be supported has to be capable of being delivered in that 'Intensification, expansion or reconfiguration of authorised pitches creates a positive, balanced and attractive environment with a material improvement in health, safety, living conditions and amenities for the existing residents and neighbouring occupiers' I do not believe that this aim is deliverable as SCDC has neither the power, the money or resource to sustain these conditions of expansion.	
Question as to whether the statutory duty under the terms of the Equality Act 2010 has been fulfilled. In discharging this Public Sector Equality Duty (PSED) the PSED shall have 'due regard' for the 'Equality Impacts' of its decisions, taking into account both the positive and negative impacts. Does the policy fully account for these impacts?	201522 (S Bristow)
The LPA has carried out an Accommodation Needs Assessment and identified the G&T communities require more pitches through the period to 2040/41. A minimum of 130 pitches may indeed turn out to be more, especially if birth trends in the communities improves the general performance of the British public, but this acknowledgement of accommodation need', takes no account of social or dependence requirements including the general problem of successful community integration.	201523 (S Bristow)

The 130 + pitches are required for persons from across the Greater Cambridge Region not just areas around Chesterton and Smithy Fens and so umpteen person will be displaced from, from their preferred residential area without regard to social need. By not seriously considering or proposing that first each and every existing Gypsy, Traveller, or Showman, site should be prioritised for proportionate expansion, in an effort to seek to satisfy needs and opportunities whilst ensuring equality, before expansion of already large and existing sites (which may not be suitable for many), is a failure of the PSED. At Smithy Fen there has been no attempt to discuss proposals or opinions with the Parish Council, any local settled community members, nor even travellers themselves. This is a second failure of the PSED.	
In the short to medium term, at least, the Smithy Fen sites are neither suitable for, nor in need of, expansion. Until SCDC can re-house/rehome the plethora of those renting chalets and re-establish the boundaries of lawful pitches, demonstrate it can control existing pitches and licenses and uphold terms of injunctions. Until then there should be thought of, nor consideration for, any expansion at Smithy Fen.	201527 (S Bristow)
I think that the village has been overwhelmed with new homes in recent years and the supporting infrastructure has not been improved to support this growth. There should therefore be no additional development on any village site until there are sufficient services that are able to cope with increased demand	200998 (D Smith)
We do not support any expansion of the site in Smithy Fen. The site appears to have plots that are not currently occupied by those who identify as Gypsy and Travellers. The one entrance into the Fen and road infrastructure is not sufficient for additional plots. Given previous history and intimidation of local	201327 (J Dixon)

residents this is of major concern and may impact police resources. Additional sites in Cambridgeshire should be identified in line with planning policy	
Re. expansion of gypsy site on Smithy Fen. It's an appalling idea! We already have enough anti-social behaviour. This will cause more!!! The site is too big already. You will just cause more misery!!!! JUST STOP!	201462 (I Johnson)
Commenting on Smithy Fen (Cottenham). Site has a history of over use and adverse impact on surrounding countryside/environment (e.g. fly tipping, crop damage, fires) and settled communities (e.g. anti-social behaviour, over loading local services, frequent police intervention). Current lower and more sustainable occupancy has created harmony and co-existence of travellers and settled community. The consultation lacks detail on whether it will (i) intensify and increase occupancy or (2) enforce use by genuine travellers so site meets traveller needs. If point 1, I wish to object (intensification risks a return to past negative impacts). If point 2 I support the plans.	201532 (M Davis)
In 2003, Cottenham Residents Association (CRA) was formed specifically to press South Cambridgeshire District Council to take seriously its responsibilities in managing the relationship between settled communities and the Smithy Fen Traveller Site. At that time, residents experienced several problems including anti-social behaviour, theft. These issues have had a significant lasting impact on residents. Twenty-three years on, it is deeply disappointing that concerns remain. Currently there is a lack of visible and effective enforcement at Smithy Fen, that does not inspire confidence that the Council has learned from the past experience. I am particularly concerned to the potential intensification at existing sites. At Smithy Fen, many pitches are now occupied by individuals who don't meet the definition of Gypsies and Travellers. This raises the question If existing pitches are not being	201625 (Fen End farm)

occupied by the intended community, what evidence is there that additional pitches are required at this location. It also suggests that Gypsies and Travellers themselves may not be choosing to live at Smithy Fen, which in turn raises questions about the site's suitability.	
Cottenham has suffered greatly in the past years of bad decision and ineffective management/enforcement by SCDC and its officers regarding Smithy Fen. The policy talks about the Intensification, expansion or reconfiguration of authorized pitches creates a positive, balanced and attractive environment with a material improvement in health, safety, living conditions and amenities for the existing residents and neighbouring occupiers," I am impressed with the wording give past events, I have little faith that should the expansion be authorised that the necessary steps would be put in place to manage an increase or reconfigure pitches. Given the amount of non-gypsy traveller occupation at Smithy Fen, this highlights the lack of control and enforcement. If enforcement was to be properly implemented there would be plenty of unoccupied pitches available, without the need for further expansion. Injunctive action was taken against a part of the site and further land on the Fen to stop further illegal expansion as it was out of control and illegal pitches had been created. This land should never be free from injunction, for the same reasons it was enforced at the time. Currently breaches of these injunctions are taking place. You state vehicular access is to be considered. Smithy Fen site access is over a single track bridge, it cannot contend with the traffic movement now let alone a significant increase.	201582 (C Simms)
The Plan further states " The proposed development meets the requirements of Policy H/GT: Gypsy and Traveller pitches and Travelling Showpeople plots." Do I take from this that the proposed developments are the only ones which are under consideration throughout Greater Cambridge Local	201583 (C Simms)

Plan areas? I find it hard to believe that no other current or new sites are suitable to meet the expected future need. I request that you provide a full disclosure of what other sites were investigated prior to publication and deemed not suitable.	
Concerns around the physical characteristics of the site, as Smithy Fen is low-lying and immediately adjacent to a watercourse that is regularly subject to flood alerts. Intensification or expansion at the site would place more residents at increased risk of flooding.	201626 (Fen End Farm)
The consultation document implies that site optimisation has been considered across the district. If this is the case, I would ask SCDC to make public the details of any studies undertaken into alternative Gypsy and Traveller sites	201627 (Fen End Farm)
It is my understanding that new major developments are expected to make provision for Gypsy and Traveller Communities. I have seen no evidence that such provision has been made, or meaningfully planned, within developments such as Northstowe or Waterbeach. If this understanding Is incorrect, I would welcome clarification; If it is correct, that the apparent failure to deliver such provision undermines the rationale for further intensification at existing, problematic sites such as Smithy Fen.	201628 (Fen End Farm)
Concern regarding the potential implications to the increase the size of the site located at Smithy Fen, Cottenham. Since 2003, we have burnt out cars dumped in hedgerows and we constantly have fly tipping which could be attributed to anyone, but the lack of security down the Fen does not enable this behaviour to be monitored. It is disappointing to see that despite all the enquiries, local injunctions and various representations from those in settled community on Fen that we are now again facing the expansion of this site.	201852 (S Dixon)

Concern that yet again there appears to be a lack of visible and effective enforcement at Smithy Fen and does nothing to give us confidence that the Council has not learned from past experience. Any intensification or expansion of this site must be viewed in the context of a long history of inadequate management and enforcement. There is also a local of oversight to ensure current plots are being used by those who meet the definition of Gypsies and Travellers as many appear to be sub-let to various ethnic groups. I question the suitability of the site, given that Gypsies and Travellers are choosing not to live on Smithy Fen. Smithy Fen does not have the infrastructure to make it a suitable site for expansion or intensification. Access to the Fen is by a single track, the site does not have street lamps. The site is also in an area of a local flood plain and therefore this also needs to be carefully considered.	201858 (S Dixon)
Fen Road is facing a high volume of speeding traffic and heavy goods vehicles, posing risks to residents, cyclists, and pedestrians, as well as causing damage to homes. Current traffic calming measures are inadequate; speed bumps exacerbate vibration and noise, and effective solutions like chicanes have not been implemented. The railway level crossing is no longer suitable for industrial traffic and closing it while providing a new traffic bridge would enhance safety for businesses and reduce HGV traffic through residential areas. There is an urgent need for action to prevent further harm to the community.	202159 (B McCann)
When in the consultation have you considered looking at other areas in Cambridgeshire for additional sites for Gypsies and Travellers? We cannot find any public documents that show assessments have been undertaken in line with local planning policy to consider additional sites in other villages. It was my understanding that major new developments such as Northstowe and Waterbeach should have made such a provision. Please confirm if that is the case.	201861 (S Dixon)

The cadence and pace of enforcement at Smithy Fen has not been able to constrain unauthorised development, development on injuncted land or to ensure that occupation is in-line with policy. The ability to meet and sustain the optimisation objective is extremely limited, thus intensification would remain the only option. The red lines shown in Figure 126 include land with existing injunctions precluding general occupation of redevelopment. Existing injunctions and site constraints are not recognised within the proposed policy. There have been increasing incidents of flooding on neighbouring properties and farmland coinciding with unplanned development within the boundary of the site	204478 (Cottenham PC), 208509 (Cottenham PC), 208510 (Cottenham PC), 208511 (Cottenham PC), 208512 (Cottenham PC),
There are circa 45-50 legal pitches if you include Setchell Drove and Water Lane. If these were to be filled, it would help the council fulfil their need, but what about the 14 Settled families that live in Smithy Fen. We would dread the situation the local residents found ourselves back in 2003. There is a concentration of travellers sites within a five mile radius of Smithy Fen, at Cottenham, Rampton, Willingham, Histon, Landbeach and Chesterton Fen. This should be quite enough for local services to have to absorb. You have two large new developments at Northstowe and Waterbeach that would be land set aside at each development (24 plots) for travellers provision. Is this not the case?	207686 (R Jones), 208474 (R Jones), 208476 (R Jones)
Concerns raised that there is a history of under-enforcement of the existing plots and I know of at least one family of non travellers living there. So the current plots and their use are not being adequately enforced to prevent their being used by non-travellers.	202105 (C Ward)
Concerns about safety, traffic and amenity raised, and a need for long-term infrastructure.	202157 (B McCann)

Concerns raised about SCDC to focus on enforcing injunctions and addressing the illegal allocation of existing sites to non-travellers and that the burden on rural communities, feeling neglected as SCDC and the police fail to provide assistance.	202810 (I Koutoudis)
Concerns raised about the absence of mains sewage at the Fen Road site is concerning, especially given its proximity to the wastewater treatment plant. The local authority and Anglian Water should collaborate to address this issue promptly, as the current situation is unsanitary and poses health risks.	202929 (Fen House Property Ltd)
The ANA concludes a need for a minimum for 130 additional Gypsy & Traveller 2040/4- the Planning Authority are minded to adhere to the findings of the ANA. While the ANA is available to public scrutiny under Appendix A(i) and Appendix A(ii) is withheld as confidential and sensitive containing the details of site locations. This decision alone confirms a lack of transparency in the plan.	201572 (Turks Head Farm)
The levels of proposed increased pitches would be totally unacceptable given the Fen has just 20 homes. The Smithy Fen should not be considered in the same light as Moor Drive, Chesterton or even Primrose Meadow, Rampton, where the extended family is cultural and controlled size increase is justifiable.	201572 (Turks Head Farm)
The ANA authenticity is not in question, but in compilation it did not, seek the views of the Cottenham Parish Council (CPC), seek the views of the traveller's living on the Smithy Fen sites and has not sought to upgrade statement on pitch 'under-utilisation'. The sites at Smithy Fen are within the Parish boundary and as such CPC should have been consulted.	201573 (Turks Head Farm)
Concerns raised about the ANA and how many pitches are considered on each site.	201573 (Turks Head Farm)

Smithy Fen has privately owned G&T pitches, and whereas full-time occupancy may exist at other sites in Cambridgeshire, this has not been the case for Smithy Fen. Travellers on Smithy Fen move places to place and the ANA should reflect this reality and the conclusions on vacancy and under-utilisation are no longer accurate.	201574 (Turks Head Farm)
Concerns raised about officers are withholding information that the plan for Smithy Fen is a large expansion.	201575 (Turks Head Farm)
Concerns raised about conditions not being enforced and not having adequate amenity and utilities arrangements.	201575 (Turks Head Farm)
SCDC need to ensure that licensing is correct at all times and regulate unit numbers, and spacing of such on all pitches meet standards for fire prevention. Lastly there needs to be a full liaison with the police/appropriate authorities before decisions are finalised.	201576 (Turks Head Farm)
Cottenham has enough traveller/gypsy sites and if more are required then look for alternative areas, spreading the load to other communities, our facilities are already bursting at the seams.	203867 (J Welford)
Support for the approach. The plan is completely inadequate in addressing the heavy industrial usage in the area, especially waste.	204491 (T Woodcock)
Concerns raised about enforcement.	205139 (E Wilson)
Concerns raised about needing this approach when sites are allocated on Northstowe and Waterbeach.	208475 (R Jones)
The Chesterton Fen Road site is located across the river from the Fen Ditton and Riverside and Stourbridge Common Conservation Areas. Any development of this site has the potential to affect these heritage assets and their settings. This policy should therefore reference the nearby Conservation Area and the need to conserve and where appropriate enhance the Conservation Area and its setting.	210170 (Historic England)

Site is partly located within the Consultation Area for the Cambridge Northern Fringe Aggregates Railheads and the Cambridge North Water Recycling Centre. Any proposals must demonstrate that they are compatible with the existing railhead and waste management uses and will not be adversely affected by their proximity. An additional criterion to policy S/SMC/GT should be added, suggested text: "The Chesterton Fen Site located near to the Cambridge Northern Fringe Aggregates Railheads and the Cambridge North Water Recycling Centre, any proposals must demonstrate compliance with Policy 16 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) (or any successor policies)."	210606 (Cambridgeshire County Council)
EWR Co has identified that a small area of land within the Chesterton Fen Road site is required for railway infrastructure works for EWR. This land is included in the safeguarded area. To avoid a conflict between the Chesterton Fen Road AMC and the EWR Safeguarding Directions, EWR Co requests that draft S/AMC/GT is amended.	211905 (East West Rail)

Consultation Statement

Appendix 8: Response to Representations - Climate change



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

Climate Change

Climate Change Introduction

Abbreviations

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

Summary of Main Issues:

There was broad support for the ambition in the planning policy relating to climate change. The ambition of both Cambridge City and South Cambridgeshire District Councils relating to climate change targets and wanting to deliver sustainable development was noted.

Concerns were raised about rise in urban heat island effect and need for mitigation in policy. Comments were made about concerns about transport emissions not being considered in policy and that development more generally was generating a lot of carbon emissions, including the carbon emissions from concrete. Comments also queried why the Councils had identified net zero by 2050 and had not set an earlier target such as 2030.

Whilst there was support for the policy standards some said they should go further. It was also proposed that they should be clear that if national or other standards improve beyond the standards referenced in the plan, they should be applied. The need for standards not only to be set but also development to be certified was referenced. Others questioned whether polices would make development unviable, particularly in rural areas.

Concerns were raised about flood risk, management of water and water efficiency, noting the issues of low-lying land and water pressure in this area of the country. There was concern that development would put pressure on chalk streams. Loss of trees, hedges and grass lands should also be considered.

Some supported the circular economy approach, while others questioned whether it could be applied in all circumstances. It was questioned whether the cooling hierarchy could be applied effectively to minor developments, and that cross ventilation was not always possible. The practicality and viability of the water efficiency standards were challenged. Requiring sustainability statements was also considered by some to be unnecessary as information was already provided in other documents.

There was reference to cultural venues, which has been raised on a number of themes, highlighting opportunities for venues to reflect climate change policies. It was also questioned why the Councils send recycling to Northern Ireland rather than processing it locally. There were calls for the creation of an inclusive transport network, including for horse riders. One comment expressed support for the development of a low-carbon heat network in Cambridge City Centre.

Response to the main issues raised in representations:

Comments supporting the broad approach to climate change policies in the draft plan are noted.

Both Cambridge City Council and Cambridgeshire District Council have set out their net zero targets and a climate strategy to set out how they will reduce carbon emissions to meet their respective targets. Planning policy have done further work in the Carbon Budget Assessment (2025) to set out what this means for the Local Plan and how carbon emissions will be reduced.

There is a need for development in Greater Cambridge that the Councils are required to respond to, and the Councils intend to deliver this as sustainably as possible. This includes ensuring that homes are mitigated against heat risk, have high energy efficiency, renewables, and re-use materials and consider whole life carbon emissions in development. Emissions from development are inevitable but the Councils are doing all they can to reduce carbon emissions from growth, by prioritising energy demand reduction, sustainable construction and active travel and public transport to reduce carbon emissions. The plan addresses emissions from transport through identification of a development strategy which focuses development where there are opportunities for active travel and public transport and reducing the reliance on the car.

The climate chapter proposes an ambitious but proportionate approach to reducing carbon emissions and delivering sustainable development. Additional evidence has been set out in the Net Zero Topic Paper Addendum to set out the considerations for the application of policy and how it is implemented considering what could be some alternatives that could be negotiated as part of the planning balance. The policies in the climate chapter have been tested in the Whole Plan Viability Assessment and this has set out that these policies are viable to deliver. Additional technical notes and the Sustainability Checklist will support the consistent implementation of these policies and provide guidance for unique typologies and circumstances where climate mitigation may be more challenging.

Water Supply issues have been carefully considered during the preparation of the Local Plan. Working with the Water Scarcity Group which was established by the government, the Local Plan is supported by a Water Supply evidence base exploring the availability of sustainable water supply alongside the anticipated development trajectory. Infrastructure is planned which will bring new supplies to Greater Cambridge in order to reduce the reliance on water from the chalk aquifer. However, it also remains vital that water is used efficiently in this area therefore water efficiency policies are proposed which set more stringent levels than are applied nationally.

With regard to flood risk, further evidence has been prepared to understand the implications of flood risk in future climate scenarios, and this flood risk data has also informed the site selection through the HELAA process as well.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for climate policies including water reduction, reuse of materials and reducing carbon emissions.	204737 (Optimis Consulting Ltd on behalf of Croudace Homes), 205702 (Newnham Labour), 202645 (C McQuitty), 202957 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 208286 (Turley on behalf of the Imperial War Museum), 210549 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
Cultural venues support low-carbon placemaking and should be reflected in climate policy. Cultural infrastructure contributes to climate outcomes and this should be recognised and embedded in the chapter.	202052 (H Chamberlain) 202137 (Cambridge Junction) 202195 (H Tam) 202397 (T Shaw) 202399 (Kettle's Yard) 202682 (T Altmann) 202712 (W Townsend) 202777 (S Lee) 202864 (Cambridge Junction) 202924 (R Terry) 202978 (T Flinders) 203014 (The Arts Theatre Cambridge) 203323 (N Ellis) 203429 (S Ashworth) 203490 (L Heap) 203506 (D Lever) 203623 (University of Cambridge) 203847 (N Yeni) 203865 (University of Cambridge) 204385 (New International Encounter)

Summary of issues raised in comments	Comments highlighting this issue
	204934 (Wysing Arts Centre) 205025 (H Paterson) 205026 (University of Cambridge, L. Sheerman) 205115 (J Walsh) 205312 (L Howse) 205349 (A Seiglow) 204674 (NEBAU Architecture Ltd) 204692 (A Giarlis) 204819 (L Matthews) 204934 (Wysing Arts Centre) 205278 (A C de Azevedo Lamha) 205290 (N Oakley) 205381 (Cambridge Junction / Create Cambridge), 202012 (H Chamberlain)
I support Cambridge Junction and Create Cambridge in asking that: • cultural infrastructure's contribution to climate outcomes (adaptive reuse, shared spaces, walkable places) is explicitly recognised • culture is embedded within this chapter, not treated solely as a social outcome Cultural venues support low-carbon placemaking and should be reflected in climate policy.	202382 (J Webber), 202300 (Cambridge Junction), 202807 (Cambridge Junction), 204692 (A Giarlis), 202307 (Cambridge Junction / Create Cambridge), 205278 (A de Azevedo),

Summary of issues raised in comments	Comments highlighting this issue
The Councils have declared a climate crisis but still send recycling 400miles to Northern Ireland which emits tonnes of CO2.	201221 (S Williams) 201240 (S Williams)
Concrete generates lots of carbon emissions and the strategy for development is not correctly located for where people needs jobs and where there is space for development, Cambridge does not have capacity for more development.	201240 (S Williams)
Flood projections at 2050 must have a massive impact on any growth projections for Greater Cambridge. While there are clearly opportunities in the immediate future, beyond this timeframe any significant growth is very questionable.	201806 (K Rhodes)
While building at relatively high densities is recognised as generally being 'environmentally friendly', the health impacts for individuals of urban living with temperature rise are considerable. Action to mitigate the effects of the existing climate crisis on residents to prevent health disasters and the surrounding biosphere to prevent negative impacts on biodiversity	201806 (K Rhodes) 202448 (Dr J. Neal)
The Climate Change emphasis of the plan is all about future carbon control. This is very important but there is no acknowledgment of the impacts of 'baked in' climate change that takes effect as the plan develops to 2045. While the plan hopes to build with the lowest level carbon impact possible, development of this scale is necessarily carbon intensive. Essentially the less we build, the better for the environment.	201806 (K Rhodes)
Support for development of low carbon heat network in Cambridge City Centre.	202172 (R Lambert)

Summary of issues raised in comments	Comments highlighting this issue
The carbon intensity associated with new development needs to be better reflected in policy as well as acknowledging impacts of extreme water stress and additional pressure caused by new development.	202172 (R Lambert)
The plan's climate change strategy is for 'Greater Cambridge to transition to net zero by 2050', however the City of Cambridge's Climate Change Strategy is for Cambridge to be net zero carbon by 2030. There is no apparent discussion on why the 2050 ambition has been chosen, despite the 2030 target. Given the impact of the local plan on the city's climate strategy, a 2030 target is required.	202345 (H Brown)
I strongly support the new Net Zero Carbon buildings policy. This is necessary to facilitate a net zero city. I strongly support the policy to protect peatland from development. Wind development on peatland should be included	202476 (I Morris)
The policy on design for a changing climate should provide a stronger steer to developers to deploy the full range of potential design solutions in planning.	202476 (I Morris)
Support the high standards of these policies. It is important that all the climate policies allow for changes in national regulations so when a policy is mentioned (e.g. "Good Homes Overheating Toolkit") this is caveated with something like "and appropriate future updated standards" or "successor documents". This will ensure that our policies keep up with the fast changing climate agenda which will have moved on before future local plans are published.	202882 (Cambridge City Council Liberal Democrat Group)

Summary of issues raised in comments	Comments highlighting this issue
The climate change policies are ambitious and welcome, particularly on energy efficiency and water use. However, rural implications are not fully explored. Tighter building standards may affect viability of small rural schemes and conversions. Water neutrality measures could constrain development in villages without clear mitigation pathways.	203165 (Cambridgeshire ACRE)
Whilst I support what is proposed for new houses as a sound and good idea I am concerned that South Cambridgeshire's District Carbon Zero plan is only based on reducing 'new omissions'. Carbon net zero measures makes no account of the Carbon Dioxide absorbed by existing Trees, Hedges or Grasslands and as such it is inaccurately reporting/measuring progress that is or isn't being made.	204995 (M Jordan)
There is not enough of a focus on emissions from transport. Electric vehicles are not a type of sustainable travel. Net zero assessments should include lifetime transport emissions, not just building emissions. Major development should be required to meet measurable mode share targets.	204496 (D Potts), 204988 (S Webster), 204356 (F Sanchez Garcia), 204654 (P Colledge)
Construction is a very high emissions activity. The policies above don't require embodied, whole life and whole life cycle emissions from developments are predicted before construction and calculated afterwards, so decisions are made in ignorance. There's no requirement ghg emissions should be minimised at the construction stage. The govt's target of 1.5m houses is breaching interim carbon	203692 (A Copping)

Summary of issues raised in comments	Comments highlighting this issue
targets, and building-in high future emissions which will breach the 2050 target, The Cambridge plan is part of this.	
The net zero by 2050 target is welcome but insufficient to limit warming to 1.5°C. The Plan should aim for net zero before 2050. Developments should minimise carbon through location, high energy and water efficiency, low-carbon materials, retrofit, climate resilience and avoidance of high-emission activities, while pursuing net negative carbon. The Local Plan focuses too much on end-state emissions at the expense of cumulative impacts.	203659 (Cambridge Green Party)
The Climate Change emphasis of the plan is all about future carbon control. This is very important but there is no acknowledgment of the impacts of 'baked in' climate change that takes effect as the plan develops to 2045. While the plan hopes to build with the lowest level carbon impact possible, development of this scale is necessarily carbon intensive. Essentially the less we build, the better for the environment. Managing flood risk is important to.	201806 (K Rhodes)
The policies above are required for mitigating Climate Chaos for EXISTING settlements, not taking responsibility for NEW, unnecessarily attracted to this ultra-fragile Riverlands/prime agricultural region suffering extreme Water Stress. I support the development of a low-carbon heat network in Cambridge City Centre.	202173 (R Lambert)

Summary of issues raised in comments	Comments highlighting this issue
The Draft Local Plan addresses climate change but lacks a strong focus on transport, which is the largest source of carbon emissions in Greater Cambridge. There are no binding targets to increase walking, cycling, and public transport use, risking continued car-dependent development. To meet climate commitments, the Plan should include transport emissions in net zero assessments and set clear mode-share targets for major developments.	203191 (G Orwell), 209066 (Camcycle), 203554 (P Tribble), 201707 (L Passmore), 201708 (J Anderson), 202166 (M MacGinley),
Policy CC/SD lacks specific penalties for noncompliance, making it likely to be ineffective.	203270 (Horseheath PC)
Policy CC/WE requires dramatic reductions in water usage; we are concerned about how this will be policed and how developers will be encouraged to fund greywater recycling.	203272 (Horseheath PC)
Development should be promoted for higher environmental standards, not just proximity to public transport. Principles of climate change mitigation need to be embedded into all new development.	204737 (Optimis Consulting Ltd on behalf of Croudace Homes) 202759 (A. Bragg)
Concerns that the proposed level of growth is unsustainable in terms of the sub-region's water resources. Concerns raised about impacts of development on chalk streams and water scarcity.	205726 (F Goad), 205777 (Rustat Neighbourhood Association C Cameron), 205815 (R Perucchini), 207964 (S Trueman),

Summary of issues raised in comments	Comments highlighting this issue
	202698 (S Berridge), 202597 (Bedfordshire, Cambridgeshire and Northamptonshire Wildlife Trust),
We support the plans for moving to net zero but calls for more focus on transport in the discussions about sustainable new housing. Evidence from other new developments suggests that even if vehicle spaces are radically reduced people buy cars and park all over the sites. Investment in public transport and 'active travel' modes counters this. This involves more penetration of housing developments by buses that offer commuters a real alternative; safe walking routes to bus stops; and safe cycling routes. Cars are the biggest source of air pollution, and we need to highlight how they damage air quality.	201629 (Cambridge living streets)
Non-motorised infrastructure in rural areas should consistently include equestrian provision, not just cycling and walking. Current Active Travel projects often exclude horse riders, despite rural roads being high-risk for them due to 40–60 mph traffic and the lack of safe alternatives. Bridleways make up less than 15% of the county’s Rights of Way network and are highly fragmented, so new rural schemes are crucial opportunities to improve safety and connectivity. Since most equestrians are women, providing safe, joined up access to the countryside also supports equality and health benefits, much like cycling infrastructure has done for cyclists—who in rural settings are predominantly men.	203937 (S Rogers)

Summary of issues raised in comments	Comments highlighting this issue
Ensuring equestrians are fully included would create a more balanced, inclusive and effective rural Active Travel network.	
CC/CE Support for policy and use of circular economy principles to reduce embodied carbon.	203524 (Cambridge Ahead)
CC/CE Pleased to note that LAs broadly acknowledge and grasp this concept therefore the aim should be to increase the net number of carbon-rich Old Builds long-term through support packages that will combat the Climate Crisis, provide economic benefit and improve Conservation in a pioneering fashion that may draw wider funding opportunities for the area.	210349 (Community Campaigner D Barton)
CC/CE The policy does not appear to consider a scenario where a dwelling is proposed to be demolished to enable access through to land which is being developed.	204735 (Abbey Properties Limited)
The scale of new development will make it impossible to meet the NetZero carbon target by 2050 and will worsen climate change.	209168 (R Smith)
The plan's climate change strategy is for 'Greater Cambridge to transition to net zero by 2050', however the City of Cambridge's Climate Change Strategy is for Cambridge to be net zero carbon by 2030. There is no apparent discussion on	202345 (H Brown)

Summary of issues raised in comments	Comments highlighting this issue
why the 2050 ambition has been chosen, despite the 2030 target. Given the impact of the local plan on the city's climate strategy, a 2030 target is required.	
ECC notes and supports that a climate emergency has been declared by the Greater Cambridge authorities, and that climate change is a strategic priority for the Local Plan. ECC strongly support developments which seek higher energy performance standards for new homes than the requirement to be in accordance with Building Regulations and go beyond Future Homes Standard (FHS). Similarly to Essex, it is recognised and welcomed that the Local Plan is seeking to address the challenge of the availability of water supplies. Attention is drawn to Uttlesford District Council's Local Plan (examination hearings held June 2025 and found sound in January 2026 – adoption scheduled soon).	210461 (Essex County Council)
As an energy specialist, I also strongly support the Plan's policies on climate change and energy efficiency. Applying Passivhaus standards to all new housing is excellent, although I would note that insisting on the standard is not sufficient, and Passivhaus homes must be certified to ensure that they truly meet the standard. (Building Control Officers alone do not have the time or the experience to assess whether a dwelling complies with Passivhaus standards.)	203283 (J Palmer)
CC/DC Support for Policy CC/DC. Clarification is sought on the application of the cooling hierarchy, requesting that it be limited to major developments only to avoid	204210 (Brookgate Land Ltd and Network Rail Infrastructure)

Summary of issues raised in comments	Comments highlighting this issue
disproportionate burdens on minor developments. Concerns are raised regarding the supporting text on cross ventilation, which is seen as overly restrictive; a case-by-case assessment is recommended for the appropriateness of single-aspect dwellings based on site-specific constraints. Specific site constraints that may necessitate single-aspect dwellings include proximity to railway lines or major roads, heritage assets or conservation areas, and constrained urban sites.	
CC/DC Point 3 of the policy states that “All new dwellings shall be designed to benefit from cross ventilation where possible.” While the inclusion of the phrase “where possible” is welcomed and introduces an appropriate degree of flexibility, the supporting text goes on to state that “single aspect dwellings should be avoided for all schemes as effective passive ventilation can be difficult or impossible to achieve.” This supporting text is overly restrictive, and the rigid application of dual-aspect requirements can reduce significantly the number of homes capable of being built within developments, limit density or lead to an undesirable trade-off with habitable space. The policy also does not sufficiently recognise site-specific constraints that may make cross-ventilation or dual-aspect layouts inappropriate or unachievable. Matters are also already addressed by building regulations.	204251 (Bellway Strategic Land) 204723 (Vistry)
CC/WE	204556 (Redrow South Midlands)

Summary of issues raised in comments	Comments highlighting this issue
The respondent objects to Policy CC/WE, stating it is unsound due to lack of justification, proportionality, and deliverability based on the Integrated Water Management Study (2025) and Climate Change Topic Paper (2025). The 100 unit threshold for water efficiency requirements is not supported by technical rationale, leading to confusion about differing standards for schemes of varying sizes. The requirement for 80 litres/person/day is more stringent than national Building Regulations, potentially increasing build costs significantly due to the need for complex systems like dual pipe installations and greywater recycling. The policy's reliance on future legislative changes makes it premature and potentially unenforceable, as it cannot impose requirements dependent on uncertain amendments. The application of stringent BREEAM water credits for non-residential developments lacks flexibility and does not consider the viability impacts or operational requirements of various sectors. The cumulative requirements of the policy have not undergone whole plan viability testing, risking constraints on development and the delivery of homes and employment premises.	
CC/WE Objects to the wording of draft Policy CC/WE regarding potable water, questioning the rationale for applying stricter internal water-use requirements solely based on development size. The respondent supports the aim of reducing water consumption but argues that internal water use is influenced more by occupant	204259 (Bellway Strategic Land)

Summary of issues raised in comments	Comments highlighting this issue
behaviour and dwelling specifications than by the scale of development. The policy is seen as potentially arbitrary and not meeting the water efficiency targets set by the Planning Practice Guidance, specifically the optional requirement of 110 litres/person/day. The policy should either apply a consistent, evidence-based standard across all residential developments or provide clear justification for higher requirements for larger schemes.	
Cambridge Water say they currently abstract 60 million litres a day more than the 'sustainable' abstraction limit, which is depleting chalk streams and underground aquifers. Any additional homes will increase the abstraction. Cambridge Water's optimistic modelling says they will reduce this to zero – i.e. sustainable abstraction. Climate change is already making summer droughts more likely, and this will continue until 2050 at least under all emissions scenarios. The planned new reservoirs around Cambridge and the link to Grafham Water will help to meet the current water deficit, but they are not sufficient to meet additional demand from new homes and businesses in Cambridge and South Cambs (or the growth in neighbouring areas).	203289 (J Palmer)
CC/SD Objects to Policy CC/SD, stating it is overly prescriptive, insufficiently justified, and risks undermining deliverability. The requirement for a Sustainability Statement for all non-householder applications is deemed excessive and unnecessary,	204543 (Redrow South Midlands)

Summary of issues raised in comments	Comments highlighting this issue
particularly for minor developments. Remove the standalone Sustainability Statement requirement and to allow major developments to include sustainability information within existing documents.	
The Plan's emphasis on active travel to combat climate change is more challenging in rural South Cambs compared to Cambridge, raising concerns about its practical application.	210448 (P Deer)
ECC is also mindful that a climate emergency has been declared by the Greater Cambridge authorities, and that climate change is a strategic Priority for the Local Plan. ECC strongly support developments which seek higher energy performance standards for new homes than the requirement to be in accordance with Building Regulations and go beyond Future Homes Standard (FHS). We provide the following information which shows what Essex authorities are doing in this area and see this as an approach the Greater Cambridge authorities could also adopt. Please refer to the Open Legal Advice B briefing note which can be viewed here. This advises that Local Planning Authorities can require higher building fabric and energy efficiency standards than those set in Building Regulations for new development coming forward now and crucially in advance of adopted local plan 'net zero' policy. The advice highlights that the model policies and evidence base can also be used by those drafting and bringing forward neighbourhood plans in advance of up to date Local Plans.	210469 (Essex County Council)

Summary of issues raised in comments	Comments highlighting this issue
Embedding micro rain-gardens and small green spaces within new developments is endorsed to manage surface water and reduce flood risk.	208006 (Cambridgeshire County Council)
Climate policies omit household extensions from Sustainability Statements, lack albedo considerations, do not apply water-efficiency standards to refurbishments, and assume integrated water management without funding for the wastewater-treatment plant relocation.	208099 (Great Shelford PC)
Consideration should be made for Rainwater harvesting, Grey Water Recycling and Battery Storage and Local Energy Grids for new developments, and clarification is needed on whether funding for sustainability initiatives will be spread across Greater Cambridge or concentrated only in new development. Local heat grids with Ground Heat Pump Energy Storage should be considered.	208007 (Cambridgeshire County Council). 208735 (Cambridgeshire County Council)
Concerns that conflicts between heritage and sustainable adaptation creates barriers to real progress in climate change action.	202631 (T Pfaff)

Policy CC/SD: Sustainable development and the climate emergency

Abbreviations

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

Summary of Main Issues:

There was broad support for the policy and the need to address climate change in development.

Concerns were raised about needing flexibility in the policy to relate to different types of development, but on the other hand some respondents were wanting householder development to do more. One representor considered it was overly prescriptive, insufficiently justified, and risks undermining deliverability. Sustainability Statement for all non-householder applications was excessive and unnecessary, particularly for minor developments

Many of the comments focused on the impact of transport, and the absence of measuring, monitoring and reducing emissions from transport, and the need for this to be included in these documents. There was concern that focusing on a move to electric vehicles would not address climate issues. The plan should support active travel and include measurable mode share targets.

On water efficiency there was some concerns targets being too low, or not being clear how they related to different types of development and occupancy of buildings. The water management elements of the policy were welcomed by the Environment Agency, Anglian Water, and Cambridgeshire County Council as Lead Flood Authority. Cambridgeshire County Council noted that all sources of flood risk should be listed out in policy.

Concerns from local residents and local cultural institutions have raised that culture must be integrated in all chapters and not just confined to the Wellbeing chapter. There was also support for inclusion of the project around the Elizabeth Way

underpass, also raised in a number of policy themes.

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approaches, are noted.

The policy sets out an ambitious but proportionate approach to tackling the climate crisis through managing heat risk and ensuring that long term adaptation to the climate crisis is achieved in buildings with regard to managing heat risk. This is reflected in Policy CC/SD which sets out the requirements for Sustainability Statements to ensure that all climate related issues are demonstrated as assessed and mitigated against in the planning application submission.

Some comments sought greater detail and specificity on the requirements. The Councils have previously published a sustainability checklist to accompany the adopted local plans. An updated Sustainability Checklist has been prepared, and is provided as an appendix to the Climate Change Topic Paper. Some comments challenged the requirement to provide a Sustainability Statement. It is considered vital that developments demonstrate they have responded effectively to climate change and the polices in the Local Plan. The requirement to provide a statement provides a consistent and clear mechanism for achieving this, and detail can be proportionate to the scale and nature of the proposal.

In response comments on the need to include Transport Carbon Emissions in the sustainability and / or energy assessment, the purpose of the energy statement and sustainability statement is to cover operational carbon emissions and whole life carbon emissions which predominately focus on Scope 1 and 2 emissions using the standard RICS methodology that is used for assessing whole life carbon. The inclusion of Scope 3 emissions from transport in these documents is not common practice. There is a separate policy on transport in the infrastructure chapter which prioritises active travel and has low car

usage which contributes to the wider climate objectives of this local plan. The strategy for the allocation of sites is also led by how much carbon is generated by journeys to key employment sites and amenities from across Greater Cambridge. It is acknowledged that the shift to electric vehicles is only part of the answer, and support for active travel must be central to the aspirations of the plan.

The approach to water standards, the use of litres per person per day design standards is an appropriate and recognised way of delivering water efficacy. The standards respond to local issues by going beyond national standards. It is not necessary to list out all of the sources of flood risk in this policy, but reference to the sequential approach to flood risk has been included.

Other polices in the plan address the issue of cultural infrastructure provision. The opportunities for the Elizabeth Way project have also been recognised on S/PRIA/EG Eastern Gateway.

Table of representations:

General policy comments

Summary of issues raised in comments	Comments highlighting this issue
Support for the policy.	202177 (R Lambert), 202896 (Cambridge City Council Liberal Democrat Group (Cllr Katie Porrer)), 204231 (Cambridge Investment Partnership), 208287 (Imperial War Museum),

Summary of issues raised in comments	Comments highlighting this issue
	202955 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)
We support the intent of policy. Support CC/SD(2) which applies a proportionate approach to sustainability statements. However, we request the addition of the words “where appropriate” when listing the range of issues to address in sustainability statements, to provide the flexibility intended here. The list of content described in paragraph 2 will need to be amended to reflect the final approved policies post examination which may include the need to remove the requirement for ‘net zero carbon’ should the proposed NPPF changes be implemented.	204714 (Vistry)
Policy is supported insofar as it reflects the aspirations of Paragraph 162 of the Framework which establishes that Local Plans should take a proactive approach to mitigating and adapting to climate change. However, the draft Policy text is considered to be ambiguous in its current format, whereby the measures that the Councils are expecting developments to implement are not identified. Further guidance should be published.	211280 (Woolsington One Ltd)
Replace changing climate with climate crisis, remove proportionately from point 1, in point 2 address the impact of development on surrounding townscape and biosphere and reflect urban heat island effect and in point 3 delete the words where possible.	201870 (J Brightman), 201505 (B Greig)

Summary of issues raised in comments	Comments highlighting this issue
I fully support these measures. Any attempts by developers to cut corners because of cost should be resisted. The inclusion of solar EV and/or solar hot water on all new build roofs is long overdue.	201899 (R Pargeter)
The respondent expresses broad support for Policy CC/SD but raises concerns about clause 1's exclusion of individual household applications from Sustainability Statement requirements, particularly for sizeable extensions or knock-down-rebuild projects. They highlight this exclusion as a missed opportunity to enhance the sustainability of existing properties and suggest that many households would benefit from guidance on prioritising resources for sustainability during renovation or building work.	201561 (Stapleford Parish Council)

Comments highlighting impacts of transport

Summary of issues raised in comments	Comments highlighting this issue
Transport is the major source of emission in Cambridge but is not well included or sufficiently addressed. Transport is the largest part of Cambridgeshire's carbon burn – net zero has to include the transport contributions (not just building emissions) so that it is systematically addressed. Big developments should be enforced to meet targets for share of different transport modes.	201810 (J Baumberg); 201698 (R. MacDonald), 203361 (Great Wilbraham Parish Council), 201819 (T McKeown) 203661 (Cambridge Green Party), 203714 (D. Peters),

Summary of issues raised in comments	Comments highlighting this issue
Policies to help satellite villages improve walking and cycling connections. Without these to increase walking, cycling and public transport use, car-dependent development risks undermining the sustainability goals.	204653 (R. Humphrey), 205143 (D. Stoughton), 205258 (S. Nuttall), 205599 (A. Kirchgaessner),
Transport is a major source of emissions and needs binding outcomes, not general support. Net zero assessments should include lifetime transport emissions, not just building emissions. Major development should be required to meet measurable mode share targets. Assessment of proposed developments should include the whole-life emissions produced by residents driving to distant locations for work, shopping and all other purposes Private electric vehicles are not a type of sustainable travel and should be seen as a last resort - they contribute to Cambridge's terrible congestion problem, damage roads, and can be a danger to vulnerable road users.	204779 (K Brightwell), 203657 (T Preud'homme), 205112 (J Grantham), 203308 (L Dassy) , 201801 (C Barker), 201705 (M. Hickford), 202504 (H. Brown), 201241 (S. Williams), 203184 (A. Hoare) 203195 (G. Orwell) 203657 (T Preud'homme), 203031 (S. Hughes), 201737 (T Burford), 202533 (A Brown), 202853 (J Williams),

Summary of issues raised in comments	Comments highlighting this issue
	203710 (A Hofer), 203105 (K. ap Garth) 204742 (Mothers CAN Cambridge), 204756 (R de Beaux), 203883 (J Prince), 205603, 205604 (L Dassy) 203660 (Dr V. Ashton) 204554 (Dr R. Hoadley), 205251 (A. Williams), 205408 (A. Kirchgaessner),
We need binding commitments on emissions from transport and net zero assessments should include emissions from transport to/from the building rather than just the building itself. Major developments need to be required to meet specific mode share targets. Therefore, this policy should have explicit, strong, measurable requirements, e.g. build only homes that are net-zero, and development must meet mode share targets. Electric vehicles, though preferable to fossil fuel cars, have a variety of issues including imbedded carbon, tyres and brakes, and so should not be considered be	201987 (D Langley), 203883 (J Prince), 205495 (R. Humphrey)

Summary of issues raised in comments	Comments highlighting this issue
considered a primary form of “sustainable transport”, However, reference to EV charging is welcomed.	
The Sustainability Statement requirements omit consideration of public rights of way and equestrian users, despite their relevance to low-carbon travel, health and wellbeing, and green infrastructure delivery. Rights of way, including bridleways, enable sustainable, non-motorised movement and access to green spaces, reducing reliance on motor vehicles.	203566 (British Horse Society)
I support the overall climate goals and the sustainable development policies for building fabric. However, I do not feel emissions around transportation are. . The distribution of development into satellite villages and towns requires commuting to and from the major employment centres. I would like to see binding targets for improved active and public transport.	201819 (T McKeown)

Comments relating to water and flooding

Summary of issues raised in comments	Comments highlighting this issue
Anglian Water fully supports the policy requirements to ensure sustainable and resilient development embeds the principles of climate change mitigation and adaptation. We agree that a proportionate Sustainability Statement should be submitted to demonstrate how these policy requirements have been met, and these may be supported by separate assessments or strategies including flood	210198 (Anglian Water Services)

Summary of issues raised in comments	Comments highlighting this issue
risk assessments and surface water drainage strategies. The inclusion of integrated water management, nature-based solutions and circular economy fully align with the sustainable use of water resources, that contribute towards "Enabling Water Smart Communities" www.ewsc.org.uk .	
We welcome this policy and the requirement for Sustainability Statements to be submitted for major development proposals. In particular, we support the requirement for statements to include how water management has been considered in an integrated way which protects and enhances water quality and the reference to the use of ‘nature based design solutions’ in point 2. We recommend adding the following wording to bullet 8 on what a Sustainability Statement should include: ‘Demonstrate that flood risk from all sources has been avoided or managed if it is not possible to sequentially locate all development outside areas of flood risk.’	211132 (Environment Agency)
Policy places emphasis on how new developments should demonstrated flood risk from all sources has been avoided or managed. It would be beneficial to list all sources of flood risk. Sources include rivers and the sea, direct rainfall on the ground surface, rising groundwater, overwhelmed sewers and drainage systems, reservoirs, canals and lakes and other artificial sources (Paragraph 001 PPG).	210575 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
As with energy usage targets, the assumptions regarding usage of the properties are not clear, which make it difficult to judge the targets objectively. Not clear how they reflect different occupancy patterns or use in gardens.	201927 (R Pargeter)

Comments on Policy Requirements and Implementation

Summary of issues raised in comments	Comments highlighting this issue
Comments requesting the requirements of the policy are strengthened, noting that the supporting information should clarify that statements must, at minimum, show how developments meet the standards set out in relevant policies, rather than addressing issues only “where relevant.”	203661 (Cambridge Green Party)
Concerns raised whether it is proportionate and appropriate that all applications will be required to submit a sustainability statement without any consideration of the type of development or the context such as where large-scale development is delivered in phases and sustainability is addressed strategically, further suggesting that the policy is amended to acknowledge that where site-wide or phased sustainability strategies are in place already a conformity statement should be submitted rather than a standalone sustainability	209205 (Urban & Civic), 208332 (Gladman Developments), 208351 (T. Elbourn), 208960, 208961 (Persimmon Homes East Midlands)
Suggestions that the draft Policy is amended so that the flexibility applied to minor applications is extended to major applications to ensure details are commensurate	209206, 209207 (Urban & Civic), 203153 (ESCO Prospect), 208962 (Persimmon Homes East Midlands),

Summary of issues raised in comments	Comments highlighting this issue
with the proposed development, and the requirements set out are clarified for the different scales of development.	208986 (Barratt Homes Northampton), 210913 (Great Shelford Parish Council),
Comments emphasising the need for flexibility to adapt to changes in national climate change policy and good practice throughout the Plan's lifetime.	203041 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners), 204289 (Tritax Big Box Developments) 204093 (E. W. Pepper Ltd.), 208287 (Imperial War Museum) 208351 (T. Elbourn), 210279 (Vistry Group),
Concerns that requirements exceed national standards, creating inconsistency with the sector agreed pathway set out in the Future Homes Hub One Plan and the Net Zero Transition Plan.	204755 (Hill), 208986 (Barratt Homes Northampton), 210280 (Vistry Group),
Comments noting that the policy should be strengthened with a suggested length for the sustainability statement, and we would like to see householders also be required to demonstrate some level of engagement with the range of sustainability issues, particularly water management, climate change adaptation and zero carbon.	204742 (Mothers CAN Cambridge), 204756 (R de Beaux), 203883 (J Prince), 205603, 205604 (L Dassy), 203129 (Cambridge Past, Present and Future), 204048 (B. Young),

Summary of issues raised in comments	Comments highlighting this issue
	204444 (Max Fordham, Ms H. Bennett),
Comments highlighting that the strategy requires 'ensuring that development is sited in places that help to limit carbon emissions'. This policy needs to follow that strategy requirement, requiring planning permission to only be granted if development is sited in places that help to limit carbon emissions, as even if the development itself is sustainable, that sustainability is lost if high emissions are required in order to meet transport needs. In addition to the items listed in 4.11, the Sustainability Statement should outline how the proposed location of the development enables the use of sustainable transport.	203546 (P. Tribble)
The policy must ensure compliance with the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981, as required by NPPF paragraph 174.	208951 (CPRE Cambridgeshire and Peterborough)

Comments on specific types of development

Summary of issues raised in comments	Comments highlighting this issue
Cultural venues support low-carbon placemaking and should be reflected in climate policy. Cultural infrastructure contributes to climate outcomes and this should be recognised and embedded in the chapter. I support Cambridge Junction and Create Cambridge in asking that: • cultural infrastructure is embedded across strategic chapters, not confined to Wellbeing • culture is treated with parity alongside housing, transport and utilities as core civic infrastructure • Create Cambridge is engaged as advisor/consultee on the further development of the Cultural Infrastructure Strategy and the Local Plan where this relates to cultural infrastructure and embedding Culture across the city's plans.	202064 (H Chamberlain), 202750 (Cambridge Junction/Create Cambridge), 204155 (Cambridge Junction/Create Cambridge), 202765 (Cambridge Junction/Create Cambridge), 202946 (R Terry), 202965 (T Flinders), 202469 (K Jones), 202893 (Cambridge Junction), 202151 (Cambridge Junction) 202206 (H Tam), 202318 (Cambridge Junction) 202400 (J Webber), 202419 (T Shaw), 202692 (T Altmann) 202722 (W. Townsend), 202895 (Cambridge Junction, R. Tinkler), 202064 (H Chamberlain), 203368 (N. Ellis) 203450 (S. Ashworth) 203500 (L. Heap)

Summary of issues raised in comments	Comments highlighting this issue
	203551 (D. Lever) 203646 (University of Cambridge, Dr Svendsen) 203857 (N. Yeni), 203878 (University of Cambridge, Dr J. Fritsch), 204193 (Cambridge Junction / Create Cambridge, M. Burman) 204417 (New International Encounter, Ms L. Elmer), 204859 (L. Matthews), 205074 (University of Cambridge, L. Sheerman), 205138 (H. Paterson), 205219 (J. Walsh), 205373 (L. Howse), 205424 (Cambridge Junction / Create Cambridge (E. Hine), 205439 (A. Seiglow),
support: principles of sustainable development / retention of concrete infrastructures in a climate emergency: with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project, I object to proposals	204282 (L. Cooke), 204516 (T. Woodcock), 205113 (M. Cleminson),

Summary of issues raised in comments	Comments highlighting this issue
to demolish the Underpass, proposals were rejected during the 2023 consultation. It would cause unnecessary disturbance and high-carbon emissions to backfill and level the underpass drum 70's transport infrastructure which contains existing biodiversity and has proven potential as an inviting public square. I support minimal environmental footprint / maximum impact redevelopment of the as-found underpasses and under crofts, greening of the public realm in and around the transport infrastructure.	205197 (T. Ziromskas), 205228 (Cambridge Junction / Create Cambridge (M. Burman),

Policy CC/DC Designing for Climate Change

Abbreviations

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

Summary of Main Issues:

There was broad support for a climate change adaptation policy with inclusion of the cooling hierarchy from a range of comments.

Comments were made that while the policy was supported, it needed to be strengthened in relation to the role of green infrastructure in reducing the impacts of the Urban Heat Island effect, consideration of the albedo of materials and ensuring that external shading was prioritised to reduce overheating risk in new homes. Those responding suggested that reference to specific measures could usefully be added to the policy.

Concerns from local groups and residents were raised in relation to the wording around cross ventilation, with a concern that this could allow for too many single aspect units to be brought forward. Some developers raised concerns that the wording in relation to requiring cross ventilation where practicable was too prescriptive and felt that consideration of overheating should be left to Part O of Building Regulations.

Some developers also raised concerns about the importance that the policy enables sufficient flexibility to accommodate changes in climate change policy and good practice over the plan period given the Climate change scenarios predict extensive changes by 2050, much of which is dependent on government and human action so there is substantial uncertainty over outcomes. Reference was also made to the need for all policies to be subject to viability testing. Another comment said it

should include an exception for buildings of unique type and nature.

Further responses raised the need for policy CC/NZ and policy CC/DC to be combined as both dealt with climate change mitigation.

Response to the main issues raised in representations:

In response to comments relating to the Urban Heat Island Effect and the role of nature based solutions and greening for cooling, the policy wording has now been amended to include specific reference to the role of both green and blue infrastructure, the definition of green infrastructure in the glossary includes blue and green infrastructure, to provide evaporative cooling, enhancement of tree canopy cover to provide shade and the use of cool materials. Further detail is provided in the supporting text and a new policy with requirements related to the urban greening factor has been included in the local plan (policy BG/UGF). Further guidance on mitigating the urban heat island effect will also be provided in a future technical guidance note building on guidance already included in the adopted Greater Cambridge Sustainable Design and Construction SPD (2020).
In response to the various comments suggesting amendments and strengthening of the cooling hierarchy and prioritisation of passive design measures to help mitigate overheating risk, the cooling hierarchy has now been embedded within the policy wording as opposed to being within the supporting text. Additional requirements in relation to the need for glazing ratios needing to respond to orientation and the avoidance of floor to ceiling glazing on exposed elevations unless accompanied by external shading and a secure means of providing natural ventilation has also been added to the policy. Further guidance on issues such as external shading will be provided in a future technical note.

In response to calls to strengthen the policy in relation to avoiding single aspect units, while we recognise the concerns regarding single aspect dwellings, it is not always possible to design out all single aspect dwellings, and there is a need for policy to provide some flexibility to developers especially where it can be demonstrated that schemes are compliant with Building Regulations Parts F and O. The policy requires evidence in the form of detailed thermal modelling that schemes can be delivered that meet Part O requirements with consideration also given to future climate scenarios. The policy wording has been strengthened so that where single aspect units remain, applicants must clearly demonstrate that their design has followed the cooling hierarchy and prioritised the use of passive design measures and the use of external shading to reduce internal solar gains.

In response to comments relating to leaving the consideration of overheating to Building Regulations and concerns about viability and the flexibility of the policy, paragraph 162 of the NPPF is clear that plans should take a proactive approach to mitigating and adapting to climate change, including consideration of the risk of overheating. The draft Placemaking and Design PPG also sees a clear role for the planning process in considering the risk of overheating in new homes and buildings and noting the vital role that local design policies can play in addressing the challenge posed by our changing climate. The guidance set out in the PPG for addressing overheating and thermal comfort follows that set out in policy CC/DC. The policy does not seek to require additional modelling beyond that required for Part O compliance. It does, however, seek to ensure that measures to reduce overheating are considered early in the design of development, in order to ensure that priority is given to passive design measures, reduce costs and to ensure that schemes can be delivered post approval without the need for changes to facade design after Part O assessment has been undertaken, which usually takes place after planning permission has been granted. This is a continuation of the approach already set out in the current Cambridge and South Cambridgeshire Local Plans and the Greater Cambridge Sustainable Design and Construction SPD, which provides sufficient flexibility to applicants in relation to the measures implemented as part of the design of proposals and is already being successfully applied to developments across Greater Cambridge for both residential and non-residential development with no impact on the viability of development.

With regards to the calls to combine policies CC/NZ and CC/DC, this is not considered appropriate as policy CC/NZ specifically deals with climate mitigation and metrics to deliver net zero carbon development, while policy CC/DC relates to climate change adaptation. Buildings of a unique nature are capable of being considered as a material consideration.

Tables of representations:

Support for the Policy Approach

Summary of issues raised in comments	Comments highlighting this issue
Support for the designing for a climate change policy, including use of the cooling hierarchy. Comments highlighting that the principles are both appropriate and capable of guiding development that meets local and regional needs.	205514 (BCN Wildlife Trust), 201562 (Stapleford PC), 202841 (Dr Cook), 202771 (A Bragg), 202839 (Carbon Neutral Cambridge), 203158 (ESCO Prospect), 203664 (Cambridge Green Party), 204449 (Max Fordham), 204746 (Mothers CAN Cambridge) 210578 (Cambridgeshire County Council), 204299 (Tritax Big Box Developments) 202405 (University of Cambridge, Mark Parsons),

Summary of issues raised in comments	Comments highlighting this issue
	204235 (Cambridge Investment Partnership), 211536 (Martin Grant Land Limited)
Very supportive of the need for cross ventilation and avoidance of single aspect homes	202903 (Cambridge City Council Liberal Democrat Group)

General Policy Comments

Summary of issues raised in comments	Comments highlighting this issue
The policy needs to be made significantly more detailed, with stronger requirements. It must learn from countries that already have the sort of climate we are likely to have here in future. Designing for a changing climate states that “development proposals should reflect the cooling hierarchy priority order”. In our view this is inadequate, because overheating is already a serious problem and climate change is going to significantly increase the risk. Solar Shading (for summer months) should be a top priority. The report by the Committee on Climate change “Risks to health, wellbeing and productivity from overheating in buildings July 2022” points out that “around a fifth of homes in the UK are already overheating in summers today”, while the	203098 (Carbon Neutral Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
Environment Agency warns that we need to prepare for heatwaves temperatures to be 6.6C higher by 2100	
Residents and the Cambridge Green Party have raised concerns about development of sites worsening the urban heat island and to leave vegetation on waste ground to enable transpiration. All applications to evaluate and then actively and effectively reduce existing and/or future UHI effect (including impacts on surrounding townscape and biosphere) and integrate blue and green infrastructure as connected cooling corridors to reduce UHI and ensure equitable access to cooler environments.	201242 (S Williams), 201878 (J Hurst), 202180 (R Lambert), 203664 (Cambridge Green Party), 205652 (S Buckingham), 205665 (D Storey), 207651 (Duxford PC)
Consider that the policy is essential but needs strengthening. Remove reference to cross ventilation where possible as this may allow projects to implementing it on viability grounds. Demonstration of compliance with future weather files should be required and clarification of what passive design solutions mean to ensure implementation of external measures.	204449 (Max Fordham), 204746 (Mothers CAN Cambridge)
The scale of development must be drastically reduced – the region has already exceeded its carbon emissions budget for 2030.	205657 (S Buckingham)
The longer the heatwave, the hotter houses become, even when taking exemplary passive measures to reduce overheating. As heatwaves will become hotter and longer in duration, it's important that planning policy requires developers to design for this. Representation includes evidence for the results of	203127 (Carbon Neutral Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
research into the effectiveness of taking all reasonable passive measures to reduce overheating in an Edwardian terraced house in Cambridge, but also the steady rise in temperature day-by-day.	
Sustainability Statements must account for all GHG emissions (embodied or otherwise, directly and indirectly)	205657 (S Buckingham)
The policy should be strengthened to explicitly address the impact of any development not only on future edifices but (more importantly) on surrounding townscape and biosphere	201878 (J Hurst), 202180 (R Lambert), 205652 (S. Buckingham), 205665 (D Storey), 207651 (Duxford PC, Cllr Ian Walters) 201548 (T. Neal) 201341 (J Neal), 205440 (C Aman), 202976 (Cambridge G Self), 203522 (Federation of Cambridge Resident's Associations), 201548 (T. Neal) 201735 (Dr J. Neal), 201742 (J. Johnson) 201868 (J. Brightman)

Comments about Specific Design Measures to Address Urban Heating

Summary of issues raised in comments	Comments highlighting this issue
Design should include outdoor spaces as well. Should be more directive about outdoor space design and ensuring spaces have ample shading etc., rather than just requiring standards for individual dwellings.	202841 (Dr Cook), 203008 (M Cleminson), 202618 (C. Pointon), 203201 (P. Tribble),
The Wildlife Trust supports the use of Natural England's Urban Greening Factor in urban areas but concerns about how this will be used for standalone new settlements and rural development locations (raised in relation to policy BG/GI but some crossover).	205514 (BCN Wildlife Trust)
Policy needs strengthening – solar shading must be a top priority and external shading on all south and west facing glazing, with a means to maintain it should be required. White surfaces should be encouraged to reduce heat buildup. Attempt to plan for a global temperature rise of 4 degrees.	202771 (A Bragg), 203109 (Carbon Neutral Cambridge)
Policy should explicitly encourage and support the use of low carbon materials in construction (e.g. timber)	202839 (Carbon Neutral Cambridge)
Reference to value of low-emissivity glass to reduce solar gain in summer and heat loss in winter and vacuum glazing	203133 (CPPF)
The policy should explicitly apply to all forms of development, including buildings, streets, spaces, places, redevelopment and refurbishment.	203664 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
Incorporate specific measures to mitigate the urban heat island including shading and cool materials.	204449 (Max Fordham), 204746 (Mothers CAN Cambridge), 201548 (T. Neal)
White walls help reduce overheating in summer heatwaves and will also help reduce urban heat island effects, so should be encouraged. The south facing external surface of houses with a brick facing averaged 50.1C, 14.3C hotter than the white painted ones	202816 (A Bragg)
Retrofit Ventilation is a key point that should warrant future new construction utilising higher ceilings through the reconstruction of Old Builds outfitted for the modern day with retrofitted energy supplies, etc that will also serve to break down societal dives regarding perceived good and bad areas where streetscapes are harmonious yet distinctly unique in beauty like any one Conservation Area. Embodied energy and embodied carbon- must remain a central priority and so influence new construction to readopt TVA principles as this will be pivotal towards the area's future green credentials as outlined in many existing auxiliary planning documents approved presently with Carbon Studies taken of existing architecture, notably buildings saved from demolition.	210350 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
Support for the policy but should refer to green roofs and how surface water systems should be designed with an allowance for climate change (Climate change allowances for peak rainfall).	210578 (Cambridgeshire County Council)
Rural active travel routes should be bridleway to include equestrians	203938, 203942 (S Rogers)
Please ban wood burners which the press in particular have stated create more pollution than cars. Please preserve as many trees in private ownership as possible to shade properties and absorb carbon.	202376 (S Hegarty),
Comment regarding possible conflicts between “cool roofs” and using roof spaces for other development purposes, such as generating electricity and solar hot water.	201900 (R. Pargeter)
We note that the Net Zero Carbon Building Standard results are not yet published, so our comments on the Designing for a Changing Climate policy may be revised at the Regulation 19 stage.	208294 (Trinity College)

Comments Suggesting Changes to Policy Wording

Summary of issues raised in comments	Comments highlighting this issue
Delete the words "where possible" from the policy.	201878 (J Hurst), 202180 (R Lambert), 203664 (Cambridge Green Party), 205652 (S Buckingham),

Summary of issues raised in comments	Comments highlighting this issue
	205665 (D Storey), 207651 (Duxford PC, Cllr Ian Walters) 201548 (T. Neal) 201341 (J Neal), 205440 (C Aman), 202976 (Cambridge G Self), 203522 (Federation of Cambridge Resident's Associations), 201548 (T. Neal) 201735 (Dr J. Neal), 201742 (J. Johnson) 201868 (J. Brightman)
Replace changing climate with climate crisis throughout and change the wording to "respond proportionately and actively to the emerging climate crisis" (not "positively respond to our changing climate").	201878 (J Hurst), 202180 (R Lambert), 203664 (Cambridge Green Party), 205652 (S. Buckingham), 205665 (D Storey), 207651 (Duxford PC, Cllr Ian Walters) 201548 (T. Neal) 201341 (J Neal),

Summary of issues raised in comments	Comments highlighting this issue
	205440 (C Aman), 202976 (Cambridge G Self), 203522 (Federation of Cambridge Resident's Associations), 201548 (T. Neal) 201735 (Dr J. Neal), 201742 (J. Johnson) 201868 (J. Brightman)
Include consideration of albedo effect of new development at paragraph 4.17, which can be mitigated through building design.	201562 (Stapleford PC), 210914 (Great Shelford Parish Council)
The policy should be amended to include the following text: 'Buildings which have heritage and/ or specific functional constraints will be provided additional commercial or technical flexibility with these requirements subject to the provision of evidence'.	208250 (Kings College)
The policy should be amended to include the following text: "Buildings of a unique nature and type (e.g. visitor attractions) may be provided additional commercial or technical flexibility."	208288 (Imperial War Museum), 208303 (Girton College)
We suggest replace the hierarchy with: "Developments must demonstrate that they have appropriately assessed and mitigated the risk of overheating using a	208963 (Persimmon Homes East Midlands)

Summary of issues raised in comments	Comments highlighting this issue
performance based approach (e.g., CIBSE TM59), applying passive, active and hybrid cooling measures as appropriate to site context".	

Comments raising Concerns about the Policy and Implementation

Summary of issues raised in comments	Comments highlighting this issue
Vistry have concerns regarding the prescriptive nature of part 3 of the policy, which states that "all new dwellings shall be designed to benefit from cross ventilation where possible, and take passive, design-led approaches to reducing excess solar gain." While the intent of this requirement is understood, matters relating to overheating risk, ventilation and internal environmental performance are already comprehensively addressed through the Building Regulations (part O) and associated guidance. Vistry consider that this Policy should be deleted to reduce reporting and administration associated with the Draft Plan.	204844 (Vistry Group)
While the intent of this requirement is understood, matters relating to overheating risk, ventilation and internal environmental performance are already comprehensively addressed through the Building Regulations (part O) and associated guidance. Some of our buildings may require large open spaces such as lecture theatres which present unique challenges to issues such as ventilation and overheating.	208250 (Kings College), 208288 (Imperial War Museum), 208303 (Girton College), 210281 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
It is important to ensure the policy enables sufficient flexibility to accommodate changes in climate change policy and good practice over the plan period. Climate change scenarios predict extensive changes by 2050, much of which is dependent on government and human action so there is substantial uncertainty over outcomes. The Local Plan will therefore need to build in suitable flexibility to accommodate these changes over the plan period. The Plan will also need to be informed by a viability assessment to ensure policies are achievable, and the cumulative cost of policies will not undermine deliverability of the Plan – Policy CC/DC should be revised to provide a more flexible, evidence-based and proportionate approach to climate-resilient design.	203353 (Babraham Research Campus), 203043 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners), 208963 (Persimmon Homes East Midlands), 208988 (Barratt Homes Northampton),
Policy CC/DC sets out how developments in terms of design and placemaking should mitigate against the challenge of climate change, including overheating. Hill acknowledges the importance of new developments to be climate efficient as possible. However, the principles set out under Policy CC/DC largely replicate the principles listed under draft Policy CC/NZ. It is suggested that the two policies are combined to avoid unnecessary repetition.	204757 (Hill)
Object to use of must at CC/DC (1) as leaves little to no discretion for decision makers – should would be more appropriate in reaching a balanced judgement	204097 (EW Pepper Ltd)

Policy CC/NZ: Net zero carbon new buildings

Abbreviations

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

Summary of Main Issues:

There was strong support for the policy from residents and parish councils, political groups, organisations such as the Cambridgeshire and Peterborough Integrated Care Board, the Passivhaus Trust and Carbon Neutral Cambridge and some developers and consultants. Notably East of England Ambulance service commented that EEAST recommend building all homes and commercial buildings to BREEAM standard or PASSIVHAUS, as this would provide significantly long-term environmental savings for residents who are more likely to be from the most deprived backgrounds or have limited disposable income.

Comments were made to suggest areas for clarification to the policy including in relation to the area metrics used to calculate space heating demand. There were also suggestions that schemes targeting compliance with certain construction methodologies such as Passivhaus should be seemed to be in compliance with the policy without the need for additional modelling.

Cambridge Past Present and Future called for the supporting information should reflect national targets and local authorities should estimate their carbon budget share. They also suggested the addition of battery storage to Part C of the policy and the need to clarify the practical implementation of energy offsetting including updates to the Planning Obligations SPD.

Concerns from some developers were raised as to the implementation of the policy with calls for further guidance and a need

for flexibility in application, particularly in relation to energy use intensity figures for some types of non residential development with high energy demands, such as research and development and biotechnology uses. There were calls for a phased transition for policy implementation to ensure a steady build-up of skills for delivering higher standards as well as a consistent technical framework approach to maintain consistency in building performance assessment.

Concerns are raised about the requirement for whole life carbon assessment, for which there is no support in the NPPF, noting that these are onerous assessments and there can be significant inconsistencies in approach across assessments

Some in the house building industry objected to the policy on the grounds that it is not needed on the basis of the Future Homes Standard, would not be viable and was not technically feasible and questioned whether the policy was supported by appropriate evidence. Some argued that proposals in the draft NPPF (PM13) meant that such policies could not be implemented by local planning authorities.

There was a suggestion that escalating targets over the plan period could accommodate technological advancements, providing clarity on development costs over time.

Other concerns included that requiring net zero operational emissions at the shell and core stage is impractical without knowledge of future end users and operational profiles, and that requirements of the policy would lead to overly simple building designs in order to achieve the operational energy metrics required by the policy.

With regards to embodied carbon there were calls for the policy to explicitly require the demonstration of lean design and require demonstration of optioneering having taken place during design. Another comment challenged the approach, and said the plan should follow national regulatory requirements.

A number of respondents called for the calculation of transport related emissions both before and after development as well as

the calculation of carbon emissions from infrastructure proposals.

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach, are noted.

Regarding calls for clarification on some elements of the policy and guidance on implementation, a number of changes have been made to the policy have been made including clarification of the area metric used for the space heating demand and energy use intensity calculation, which is Gross Internal Area. Support for the inclusion of battery storage to help maximise the use of onsite energy generation has also been added to Part C of the policy. To provide further clarification on the implementation of the policy, an addendum to the Climate Change topic paper has been prepared to provide additional guidance on how the energy metrics should be calculated, guidance on how the policy will be applied in situations where full compliance with the policy targets cannot be met, for example for building types with very large energy demands, and guidance on elements including the implementation of the energy offset mechanism in cases where this requirement is triggered. Further technical guidance notes will be prepared to aid the implementation of the policy and consideration is also being given to developing a route for compliance using SAP (or the Home Energy Model once adopted for those schemes not able to utilise PHPP, CIBSE TM54 or NABERS modelling. This approach is similar to that already being implemented to support the Central Lincolnshire Local Plan.

In some cases, schemes being delivered to specific construction standards will be deemed to comply with the requirements of policy CC/NZ. Clarification on this point has been added to the supporting text of the policy alongside details of the evidence that would need to be submitted for this approach to be taken.

Regarding the concerns raised by the Home Builders Federation regarding the requirement for Whole Life Carbon

Assessment, it is recognised that such assessments do require the use of specialist software and consultants, access to which is not always available to smaller scale development. As such the policy has been amended, introducing a threshold at which a Whole Life Carbon Assessment should be undertaken, which for homes is set at 100 units and 10,000 square metres of non-residential floorspace. Below this, it will still be important for schemes to look to reduce embodied carbon through lean design, choice of materials and material efficiency, reference to which has been added to the policy in response to representations, and measures to address this should be demonstrated through the Sustainability Statement. Further guidance on reducing embodied carbon and Whole Life Carbon Assessment will be provided within a future technical note that will site alongside the Local Plan on adoption and support implementation of the policy.

With regards to the objections raised by developers that the policy is not justified in light of the Future Homes Standard, and not supported by evidence of viability and technical feasibility, policy CC/NZ is supported by a full suite of evidence prepared by Bioregional, Etude and Currie and Brown. This includes technical feasibility and modelling and a range of development types and an assessment of viability, assessing the costs of achieving the requirements of the policy as an extra over cost on top of Part L Compliance (updated in 2025 to account for the changes made by Part L 2021), which has been fed into the wider Local Plan evidence base. The requirements of the policy are both technically feasible and viable.

A number of respondents suggested that setting metrics for net zero carbon is not a role for local planning authorities and should be left to the Future Homes Standard (FHS). While representing a significant step forward in energy performance standards for new homes, it is important to note that the FHS does not set a requirement for net zero carbon operational emissions, unlike Greater Cambridge's proposed Policy CC/NZ. Instead, the FHS seeks to ensure that new homes (and non-residential buildings) have low carbon, gas-free heating and slightly improved levels of energy efficiency, becoming net zero carbon in use once the electricity grid is fully decarbonised. Carbon budgets analysis carried out to support the emerging local plan has concluded that if Greater Cambridge was to reply on the Future Homes Standard alone, the areas carbon budget

available for all housing, derived from the national UK carbon budgets, would be exceeded meaning that we would not be able to contribute our share towards the national carbon budgets needed to meet the legally binding target of net zero by 2050. It is only via the application of the energy based metrics and onsite renewable energy generation requirements set out in policy CC/NZ that true net zero carbon housing can be delivered in Greater Cambridge.

Regarding the draft NPPF and the proposals set out in PM13 regarding stopping local planning authorities from setting standards for new homes, it must be noted that at the time of writing, the proposals in the draft NPPF were only draft proposals. It is also noted that the most recent draft NPPF, published for consultation in December 2025, sought views on ending the ability of local planning authorities to set standards for energy efficiency in new homes that go beyond Building Regulations requirements (and on dissuading the setting of any other numerical targets that cover any matters that are addressed by regulation). While the outcome of this consultation is awaited, the Councils' position aligns with the open legal advice published by Essex County Council, which notes that while the NPPF is policy guidance to which regard must be had during plan-making, deviation from it can be justified so long as there is clear evidence that demonstrates the reason for doing so and the viability of the proposed policies. As set out in the 2025 Climate Change Topic Paper, the significant evidence base for Policy CC/NZ, which includes viability assessment, technical feasibility and carbon budget analysis, provides the justification for this departure from the NPPF.

With regards to the calls for a phased approach to targets, this approach would still hamper Greater Cambridge's ability to contribute its fair share towards meeting national carbon budgets. The approach set out in policy CC/NZ has been subject to technical feasibility work and viability assessment all of which demonstrates that these requirements are achievable now. It should also be noted that these requirements are in line with requirements set out in other adopted Local Plans which are already being successfully implemented including in Central Lincolnshire, Cornwall and Bath and North East Somerset.

Concerns were raised that it would be difficult to apply the requirements of the policy to shell and core schemes where the precise end user is not known. However, the general use class of schemes will be known, so the recommended approach would be for modelling to be undertaken using the closest possible use class allowed for in the energy modelling software e.g. TM54. Where considered necessary, a planning condition could then be applied to require the submission of more accurate modelling once the final end user is known.

With regards to concerns that the application of the policy would lead to an over simplification of building design due to stringent performance criteria affecting design elements like elevational design and fenestration, the technical feasibility work undertaken to support the development of the policy used existing permitted housing schemes to model the achievement of the policy requirements, schemes that included elements such as former windows. While it is recognised that simpler building forms will make compliance with the policy simpler to achieve, it is not necessary and as such we would dispute claims that the policy will lead to homogenised architectural forms.

Tables of representations:

Support for the Policy Approach and Requirements

Summary of issues raised in comments	Comments highlighting this issue
Comments expressing support for the policy approach.	201395 (Gamlingay PC), 204054 (B Young), 205515 (BCN Wildlife Trust), 201166 (M Clarke), 202905 (Carbon Neutral Cambridge), 203214 (P Tribble),

Summary of issues raised in comments	Comments highlighting this issue
	203644 (Passivhaus Trust), 203665 (Cambridge Green Party), 204240 (CIP), 204753 (Mothers CAN Cambridge), 205118 (NHS Cambridgeshire and Peterborough Integrated Care Board), 201379 (Gamlingay PC), 201405 (M Rokoszak), 202742 (A Bragg), 201563 (Stapleford PC), 204240 (Carter Jonas on behalf of CIP), 204458 (Max Fordham), 205127(D Stoughton), 203323 (N Ellis), 203429 (S Ashworth), 201406 (M. Rokoszak), 210915 (Great Shelford Parish Council)
Welcome extra to Building Regs. Lean Design and the Circular Economy.	202184 (R Lambert)
Fully support policies that promote carbon neutral development and the securing of financial contributions where on-site carbon mitigation requirements cannot be met. We would highlight that NHS property could benefit from carbon/energy	205118 (NHS Cambridgeshire and Peterborough Integrated Care Board)

Summary of issues raised in comments	Comments highlighting this issue
offset funds supporting the NHS to reach the goal of becoming the world's first net zero healthcare provider.	
Support the requirement of draft Policy CC/NZ Part 2.	210285 (Vistry Group)
The policies for embodied carbon are supported as they are not unduly prescriptive.	211540 (Martin Grant Land Limited)

Comments on the Policy Approach and Requirements

Summary of issues raised in comments	Comments highlighting this issue
Monitoring and enforcement of the policy is essential. The issue of quality control needs to be raised to ensure figures are from a reputable source.	202844 (H Cook), 203013 (M Cleminson), 203271 (Horseheath PC), 207420 (A Copping)
The policy should explicitly require the demonstration of lean design and require demonstration of optioneering having taken place during design.	204753 (Mothers CAN Cambridge)
Transport carbon (lifetime transport emissions) should be included within net zero assessments not just building emissions. Operational carbon emissions must consider vehicle movement emissions generated by developments.	203144 (CPPF), 205216 (Dr Thomas), 207524 (Dr Lawrence), 205127 (D Stoughton), 207420 (A Copping)

Summary of issues raised in comments	Comments highlighting this issue
Need to recognise biodiversity and climate crisis and need to adapt to climate change and address urban heat island and mitigate effects of new structures.	202454 (J Neal)
Home working has impacted on energy demand and EV charging has also changed energy demand in residential and non-residential properties, energy generation should be local.	201926 (R Parteger)
Policy should explicitly encourage and support the use of low carbon materials such as timber and rendered surfaces.	202905 (Carbon Neutral Cambridge)
Policy should take account of the evolution of sustainable housing and energy technology in a way that enables the standards to rise in the future.	203214 (P Tribble)
With regards to assessing building performance must be within a consistent technical framework approach to maintain consistency in building performance assessment.	205174 (Home Builders Federation)
Rural Active travel routes should be bridleway to include equestrians.	203944 (S Rogers)
If policy is deliverable, consistency will be required across other policies in the plan notably design as the approach will inevitably lead to less variety in built form in order to reduce the surface area of the building.	205174 (Home Builders Federation)
The Passivhaus Trust advocate for the use of the Passivhaus standard as a reliable method to ensure projects meet the performance outcomes set out in the Local Plan, noting the risk of performance gaps without such quality assurance.	203644 (Passivhaus Trust), 204753 (Mothers CAN Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
Projects targeting Passivhaus certification should be considered as 'deemed to comply' with Local Plan requirements, similar to proposed practices in Scotland.	
EEAST recommend building all homes and commercial buildings to BREEAM standard or PASSIVHAUS. As a minimum EEAST recommends the proposed 40% affordable/social housing are built to Passivhaus or BREEAM Excellent standards, as this would provide significantly long-term environmental savings for residents who are more likely to be from the most deprived backgrounds or have limited disposable income.	210327 (East England Ambulance Service NHS Trust)
Calls for a phased transition for policy implementation to ensure a steady build-up of skills for delivering higher standards.	205174 (Home Builders Federation), 208964 (Persimmon Homes East Midlands)
Encouraging alignment with the UK Zero Carbon Buildings Standard is meaningless.	202614 (C Pointon)
A policy is needed for transport infrastructure to achieve net negative cumulative carbon emissions by 2050. The plan should have binding targets for the proportion of journeys walked/cycled and by public transport. Major developments should have targets for mode share and permeability.	203144 (CPPF), 207524 (Dr Lawrence)

Summary of issues raised in comments	Comments highlighting this issue
Comments question whether the policy is not needed as the Future Homes Standard is being progressed by Government and they will change legislation to prevent local authorities from setting standards above Building Regulations. Need for careful consideration of the outcomes of the draft NPPF consultation and in particular PM13.	205174 (Home Builders Federation), 204845 (Vistry Group), 207442 (Bidwells on behalf of Pioneer Group Ltd), 208272, 211541 (Martin Grant Land Limited), 208289 (Imperial War Museum), 208314 (Churchill Retirement Living with McCarthy and Stone) 210282 (Vistry Group),
The council should consider deleting the policy and aligning the Council's requirement for carbon neutral development with those of Government, including embodied carbon, as new development will often be far more sustainable in many circumstances including building fabric by use of modern methods of construction but also extending beyond that, such as sustainability through optimisation of use of a site.	208314 (Churchill Retirement Living with McCarthy and Stone)
Strongly object. Whilst the UK's legally binding requirement to achieve net zero carbon by 2050 is recognised; it is considered that the proposed requirement for new development to achieve net zero operational carbon emissions far exceeds current building regulations requirements.	211281 (Woolsington One Ltd)

Summary of issues raised in comments	Comments highlighting this issue
It should be recognised that the UK is currently in the process of transitioning towards net zero carbon, through the implementation of the Future Homes Standard. Written Ministerial Statement made in December 2023 established that any planning policies which propose local energy efficiency standards for buildings that go beyond current or planned building regulations should be rejected at examination if they do not provide a well-reasoned and robustly costed rationale which ensures that development remains viable	

Comments Regarding Space Heating and EUI Targets

Summary of issues raised in comments	Comments highlighting this issue
Need clarity on the target (explicitly state the area metric required) as different reporting methods (PHPP, SAP, IES) yield varying Energy Use Intensity results, largely dependent on area metrics and thermal bridging.	204054 (B Young), 204753 (Mothers CAN Cambridge)
Suggestion that escalating targets over the plan period could accommodate technological advancements, providing clarity on development costs over time.	203048 (Bidwells on behalf of Barrat Homes)
Energy consumption targets much include a standard reference to room temperature for reliable measurability.	203144 (CPPF)
Carbon budgets for construction should align with national targets, include battery storage and account for embodied carbon including setting of targets.	203144 (CPPF)
Emissions associated with heating and cooling should be included.	207524 (Dr Lawrence)

Summary of issues raised in comments	Comments highlighting this issue
It should be noted that it is not clear what the targets are exactly unless the modelling methodology is more clearly defined. For example – PHPP reports EUI differently than SAP or IES does unless a conversion is added. Please explicitly state the area metric required. Passivhaus certification should be accepted as compliance with the policy without additional modelling to limit conflict and cost to developers	204458 (Max Fordham)
The energy metrics are inconsistent with the Written Ministerial Statement and the Planning and Energy Act. Any local standard should be expressed as a percentage uplift on the Target Emission Rate.	205174 (Home Builders Federation)
Comments highlighting that net zero operational emissions at the shell and core stage is impractical without knowledge of future end users and operational profiles. Requirements could deter occupier delivery or investment due to the impractical obligations imposed. Concerns are raised regarding the reliance on CIBSE TM54 modelling, which overlaps with existing energy performance assessments in BREEAM requirements, potentially reducing certainty without providing significant environmental benefits. The respondent advocates for a proportionate, evidence-based approach that considers realistic delivery stages and aligns with existing standards.	204314 (Tritax Big Box Development)

Summary of issues raised in comments	Comments highlighting this issue
Comments highlighting the approach is unsupported by sufficient evidence, failing to demonstrate that proposed performance thresholds are achievable across various building types and site contexts	204548 (Redrow South Midlands), 203352 (BMR Granta Park PropCo Limited),

Comments Raising Suggestions about the Policy Wording

Summary of issues raised in comments	Comments highlighting this issue
Some points of the policy require strengthening particularly point 8 which merely requires 'demonstrating action'. The policy should set clear expectations for prioritising recycled and low carbon materials, apply to retrofit as well as new buildings and include standards for buildings lifetime. Amendments to the wording are suggested. Critical of use of language like where appropriate and encourage.	203665 (Cambridge Green Party), 201744 (J Johnson), 203013 (M Cleminson)
Supporting information should reflect national targets and local authorities should estimate their carbon budget share.	203144 (CPPF)
Amendments required to ensure greater flexibility of application of policy. The space heating targets may be challenging in certain circumstances, and flexibility is therefore needed to reflect built form, design, urban design, placemaking and viability principles. Similarly, the EUI targets need to be	203164 (ESCO Prospect), 205085 (Lichfields on behalf of Lolworth Developments Limited), 204104 (EW Pepper Ltd), 208267 (Martin Grant Land Limited),

Summary of issues raised in comments	Comments highlighting this issue
adaptable to ensure they can respond appropriately to differing site contexts and design constraints. Policy should be amended to be proportionate to the size of scheme to which it is being applied.	208304 (Girton College), 210286 (Vistry Group)
Comments seeking clarification on the use of ‘maximise’ for the draft Policy wording which relates to generating on-site renewable energy (Part C, bullet no.5). This should be quantified.	211755 (Urban & Civic)
Question whether the policy should read that 'new buildings should be limited in design to use 'less than' 20kWh per m2 per year.	201379 (Gamlingay PC)
Part 2 and onsite renewable energy may not be achievable for buildings of more than 2 floors and should be updated to read “Proposals must seek to maximise opportunities to generate on-site renewable energy to serve the development”.	204012 (ARU)
Part C: the renewable-energy provision wording “where possible” should be interpreted flexibly, and the policy should be amended to read: "Proposals should maximise the deployment of renewable energy where appropriate / feasible and viable".	208252 (Kings College), 209748 (Endurance Estates), 208291 (Imperial War Museum), 210286 (Vistry Group)
Part C should mandate battery storage alongside onsite energy generation to manage electricity demand effectively.	203144 (CPPF)

Summary of issues raised in comments	Comments highlighting this issue
Part D also requires new development to calculate whole life carbon emissions through a nationally recognised whole life carbon assessment tool and demonstrate actions to reduce embodied carbon where possible. The College therefore requests that the following text be inserted into this draft Policy: "The Whole Life Carbon Assessment undertaken should be proportionate to the nature and scale of the application".	208252 (Kings College)
There is no mention in the draft Policy of the need for flexibility where sites are impacted by heritage designations, which of course significantly impact the College. We therefore suggest that the following wording should be inserted into the draft Policy: “It is recognised that buildings impacted by heritage designations may have specific constraints and this will be considered in the context of the targets within this Policy.”	208251 (Kings College)
Objection raised to the word “must” at CC/DC(1) as this creates a requirement leaving little to no discretion for decision makers. The word “should” would be more appropriate, setting out an expectation unless justified otherwise, which aids decision makers in reaching a balanced judgement. The requirements regarding these matters are addressed through the Building Regulations and planning policies should not duplicate this legislation.	204469 (Bellway Strategic)
The requirement to follow a hierarchical approach of reduction heat and power demand, however, raises concern with flexibility on the subsequent requirement	205085 (Lichfields on behalf of Lolworth Developments Limited)

Summary of issues raised in comments	Comments highlighting this issue
to supply all energy demand through on site energy generation, as there may be some instances where this is not possible and/or an alternative off-site solution may be preferable. Amendments to the wording should be introduced to allow flexibility, where it can be justified: “Where appropriate new development must achieve net zero operational emissions by following a hierarchical approach of reducing heat and power demand then supplying all energy demand through onsite energy generation, unless, satisfactorily justified otherwise”	
Overall the policy aligns with the ARU Design Principles document, but some parts of the policy require clarification. Part B and requirements for Higher Education Teaching Facilities requires clarification within the supporting text so that is based on the sub-typology that best applies to different extents of the proposed floorspace.	204012 (ARU)
Concerns are raised about the requirement for whole life carbon assessment, for which there is no support in the NPPF. These are onerous assessments and there can be significant inconsistencies in approach across assessments (noting that not all products will have an Environmental Product Declaration). This requirement should be deleted.	205174 (Home Builders Federation), 211757 (Urban & Civic)
Amend policy as follows: 1. Introduce flexibility by replacing fixed space heating and EUI thresholds with performance targets “where technically feasible and demonstrated to be viable”,	204548 (Redrow South Midlands)

Summary of issues raised in comments	Comments highlighting this issue
supported by site specific evidence. 2. Align targets with national policy, including the Future Homes Standard, and avoid imposing Passivhaus equivalent requirements unless justified by robust local evidence. 3. Allow compliance through multiple routes, not solely Passivhaus style modelling tools (e.g. TM54, PHPP), to accommodate a wider range of building types and construction approaches. 4. Remove the requirement for onsite renewable generation to meet all energy demand; instead require developments to maximise feasible onsite generation and supplement through local low carbon energy sources. 5. The proposed offsetting fund should be removed as it is beyond the remit of planning policy and should be left to the Building Regulations regime. 6. Ensure whole plan viability testing is carried out, and the results shared and consulted upon to enable full review of the policies in that context. This would confirm that CC/NZ can be implemented without compromising housing delivery or affordable housing provision. 7. Avoid duplication by clarifying how CC/NZ interacts with CC/SD, CC/IW, CC/DC and CC/CE, ensuring applicants only submit one coordinated set of climate related evidence.	

Summary of issues raised in comments	Comments highlighting this issue
Comments highlighting the challenges for new dwellings to deploy sufficient renewable energy to meet all its energy demands on site, particularly given the substantial power requirement from Electric Vehicles (EV'). Recommendation for the draft policy to be amended to: "Proposals should maximise the deployment of renewable energy where feasible and viable."	210287 (Vistry Group)
The current proposed policy ignores the fact that solar energy generation rarely matches energy demand at the time it is produced, therefore leading to excess energy generated that is not consumed on-site. The policy wording should suggest that this should be balanced over the course of a year for a net zero carbon development. It would not be reasonable to expect all schemes to provide at least all of their energy requirements on site and through renewable resources, especially for speculative developments where the end user is not known. Different tenants will use energy in different ways.	211537 (Martin Grant Land Limited)

Comments Raising Concerns about the Policy and its Implementation

Summary of issues raised in comments	Comments highlighting this issue
Need to clarify the practical implementation of energy offsetting including updates to the Planning Obligations SPD.	203144 (CPPF)
Parts A and B of the policy include requirements that may not be enforceable, and the policy should clarify that these are hypothetical. Building Regulations requirements should suffice.	204509 (Abbey Properties)
Part D is inconsistent with national policy by proposing a tariff on all developments and would complicate the process due to the need for a Section 106 Agreement.	204509 (Abbey Properties)
The policy's approach to net zero is not aligned with national planning policy as net zero can be achieved by various means and properties will require backup power when renewable energy source are insufficient.	204509 (Abbey Properties)
Part D and local energy offsetting would seem to duplicate energy users funding the installation of renewable energy generation through their bills. Renewable energy procurement should be included within this policy as a route to achieve net zero carbon buildings, as it is within the UK Net Zero Carbon Buildings Standard used for Part C of this policy.	204012 (ARU)
In relation to the "Energy Offset Fund" raise in Part D, concerns were raised that the policy does not give any detail with respect to the cost of the fund and therefore this part of the policy is unsound and not in accordance with Paragraph	208304 (Girton College), 208964 (Persimmon Homes East Midlands), 208987 (Barratt Homes Northampton), 210059 (Endurance Estates),

Summary of issues raised in comments	Comments highlighting this issue
59 of the NPPF, which requires local plan policies to be accompanied by up-to-date viability assessments. Contributions must also meet CIL/S106 legal tests.	210288 (Vistry Group), 210594 (Imperial War Museum), 211538 (Martin Grant Land Limited), 211756 (Urban & Civic)
Policy imposes space-heating (15-20 kWh m^{-2}) and EUI (35 kWh m^{-2} yr^{-1}) targets equivalent to Passivhaus standards, which are financially and technically onerous; the draft should be amended or withdrawn, with a heritage-flexibility clause and targets aligned to construction year rather than a fixed 2030 benchmark.	208251 (Kings College), 208289 (Imperial War Museum), 210282 (Vistry Group), 211754 (Urban & Civic)
Part B is unenforceable as it is beyond the control of developers, with space heating being the only standardisable element. While a methodology can be required, the council cannot enforce actual in use performance outcomes as these will never fully align with design intent	203144 (CPPF), 211539 (Martin Grant Land Limited)
Concerns about the viability implications of policy requirements as it goes beyond national Building Regulations and Future Homes Standard for operational carbon and whole life carbon. The requirements would also conflict with NPPF PM13.1. The cumulative impacts of the policy have not been accounted for, posing risks to housing viability, affordable housing delivery, and overall development rates.	203048 (Bidwells on behalf of Barrat Homes), 203381 (Bidwells on behalf of Babraham Research Campus) 204227 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure) 204248 (Bidwells on behalf of Bellway Strategic Land)

Summary of issues raised in comments	Comments highlighting this issue
Onerous requirements have the potential to impact on housing affordability and delivery rates for new homes.	204473 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure) 204548 (Carter Jonas on behalf of Redrow South Midlands) 204738 (Bidwells on behalf of Vistry) 204770 (Carter Jones on behalf of Hill) 205041 (Savills UK on behalf of Endurance Estates), 205174 (Home Builders Federation), 204548 (Redrow South Midlands), 204104 (EW Pepper Ltd), 208267 (Martin Grant Land Limited), 208987 (Barratt Homes Northampton), 210059 (Endurance Estates), 210283 (Vistry Group), 211753, 211754, 211757 (Urban & Civic)
Concerns that the proposed energy targets are not technically feasible for certain types of uses (e.g. life sciences laboratories) and that greater flexibility is needed.	203352 (BMR Granta Park PropCo Limited), 208290 (Imperial War Museum),

Summary of issues raised in comments	Comments highlighting this issue
Concerns that the policy does not provide sufficient consideration for the unique nature of some historic buildings or heritage designations or other unique cases where gas supply may be necessary.	208290 (Imperial War Museum), 208304 (Girton College) 210284 (Vistry Group) 208251 (Kings College)
As the measures are not monitored, it will be unlikely to be followed.	202614 (C Pointon), 202844 (Dr Cook)
Support the principles of Policy CC/NZ but concerned that the proposed energy standards exceed the Future Homes Standard, effectively mandating Passivhaus performance. Risk of homogenised architectural forms due to stringent performance criteria affecting design elements like elevational design and fenestration. Practical issues related to procurement, buildability, and the construction supply chain are highlighted, including potential shortages of materials and skilled labour. Cost uplifts of 10-20% identified by the Future Homes Hub may not align with the Council's evidence base, necessitating further viability testing. Inflated costs could lead to delayed housing delivery or reduced affordable housing output, impacting overall housing viability. Emerging policy PM13 from the NPPF draft may render Policy CC/NZ inconsistent with national policy once adopted, limiting its weight in decision-making. While acknowledging that local planning authorities can set higher standards, the respondent argues that such policies must be justified and demonstrate maintained development viability. Policy does not align with the requirements of	204770 (Hill)

Summary of issues raised in comments	Comments highlighting this issue
the 2023 Written Ministerial Statement, Planning – Local Energy Efficiency Standards Update and that the consequences have not been adequately tested.	

Policy CC/WE: Water efficiency in new developments

Abbreviations

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

Summary of Main Issues:

There was broad support for a robust water efficiency policy that goes beyond Building Regulations from a range of bodies including the Environment Agency and individuals. Cambridge Water and Anglian Water supported the Plan's strategy to phase growth at new strategic sites to align with the delivery of new strategic water supply options. However, there were also objections from developers and landowners saying that the policy goes beyond national and industry guidance, can't be realistically delivered in the short term and needs more flexibility in the policy wording. There were comments that the requirements of the Shared Standards document produced by water stakeholders should be followed.

Concerns were raised about part 1 of the policy, which several respondents said puts responsibility on the developer to demonstrate that there will be adequate water supply rather than water companies who have legal obligations under the Water Industry Act 1991.

There were a number of comments that the 90-100 l/p/d level for smaller residential schemes should not be a range but should be 90l/p/d as an achievable level and to prevent schemes actually building to 100 l/p/d. There was some concern that the five BREEAM credits is challenging and often unfeasible and would necessitate commercial developments to engage a qualified BREEAM assessor.

The Environment Agency recommended a section dealing specifically with data centres as an emerging sector with high water consumption. They also made detailed comments on the Water Supply evidence that was published to accompany the Draft Local Plan.

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach and phasing of growth in the plan to align with new strategic water supply are noted.

Concerns that the policy is setting unreasonable requirements on developers to produce evidence have been addressed by removing paragraph 1 of the policy so that the policy is focused on achieving high water efficiency design levels in new development.

Evidence in the Shared Standards in Water Efficiency for Local Plans (2025), Future Homes Hub Water Ready report (2024), Water Reuse in New Housing report (2024), and the Greater Cambridge Local Plan Viability Assessment (2026) has shown that the standards proposed are achievable and viable. They are supported by water stakeholders. Given the water scarcity position in Greater Cambridge, and the development aspirations for the area, it is vital that water is used efficiently.

In relation to comments saying that the Shared Standards should be followed, the Councils considered the 85 l/p/d water efficiency level recommended in the Shared Standards for all housing but considered that it may be hard to achieve this level purely with fixtures and fittings and that further work is needed to test the specifications suggested. As a result the policy

requires a lower level of 80 l/p/d for large developments over 100 houses where evidence has shown that community scale stormwater reuse is more cost effective and could be implemented in addition to water efficient fixtures and fittings. A level of 90 l/p/d is required for developments below 100 houses which can be achieved through water efficient fixtures and fittings. The previous range given for developments below 100 houses of 90-100 l/p/d has been replaced with the more water efficient 90 l/p/d in order that development is designed to be as water efficient as possible.

In relation to objections to the levels of water efficiency proposed for non-household development, BREEAM is an industry standard certification scheme to assess the environmental performance of buildings. This standard is in the current adopted Local Plan policies and has been practical to use and it is also used in the Shared Standards. As such it seems an appropriate tool. Additional wording has been added to show that the equivalent reduction in water use in non-household developments would also be acceptable as an alternative to BREEAM. The wording 'unless demonstrated impracticable' allows for some flexibility depending upon the exact circumstances, but the onus is on the developer to demonstrate within the Sustainability Statement the reasons why the full BREEAM credits required in the policy would not be achievable.

It is recognised that data centres have a high water consumption and an additional section has been added to the policy to ensure they are designed to be as water efficient as possible.

Prioritising reuse of rainwater for outdoor space irrigation is an appropriate and achievable response to water scarcity issues facing the area.

Environment Agency comments on the Water Supply Evidence Report have been reviewed by the consultants who produced the study. An Addendum Report has been published, responding to the comments, and updating the assessment to take account of

updated development trajectories, including updating growth anticipated in the Huntingdonshire part of the water resource zone. A Statement of Common Ground has also been agreed with the Environment Agency and Cambridge Water on this issue.

Table of representations:

General policy comments

Summary of issues raised in comments	**Comments highlighting this issue**
Support for a robust water efficiency policy.	202619 (C Pointon), Cambridge City Council Liberal Democrat Group (202908), 204475 (Max Fordham), 204764 (Mothers CAN Cambridge), 203018 (M Cleminson), 209160 (Anglian Water Services), 202468 (Dr J Neal), 211133, 211141 (Environment Agency), 208305 (Girton College),

Summary of issues raised in comments	Comments highlighting this issue
The policy is generally supported, but the requirements sought should be proportionate to the development.	203168 (ESCO Prospect)
Strongly support parts 1, 4 and 5 of the policy	203667 (Cambridge Green Party), 205210 (Cam Valley Forum)
It is noted that Greater Cambridge faces significant challenges in respect of water scarcity and provision of wastewater recycling facilities. We share your concerns about this matter and consider it to be another area where there is scope for joint action and collaboration across the Ox Cam corridor geography.	208229 (Bedford Borough Council)
As identified by this section of the draft Local Plan, Anglian Water is already working with Cambridge Water to deliver strategic water supply options to address the water resource needs of the area, and enable more water to remain in the environment, to protect internationally important chalk stream habitats. We support the Plan's strategy to phase growth at new strategic sites to align with the delivery of strategic water supply options. It is important that these water supply options are also underpinned by demand management solutions, and tighter water efficiency standards for new development. Opportunities for integrated water management, including reuse, are significant factors for consideration in new development proposals coming forward, and align with the measures the Cambridge Water Scarcity Group has been developing	209160 (Anglian Water Services)

Summary of issues raised in comments	Comments highlighting this issue
Encourage GCSP to commit to monitoring reports that give periodic updates on the policy's effective implementation.	211133 (Environment Agency)
The final Water Resources Management Plan (WRMP) for 2025-2050 has been published, with reviews every 5 years to adapt to changes. Demand forecasts for water are based on current local plans and strategic developments, with significant reductions in abstractions planned for 2033 and 2037. Increased growth beyond adopted plans may raise demand above forecasts, necessitating additional supply and demand options to maintain water supplies. Non-household connections are restricted to below 20m3/day, and there is advocacy for domestic water consumption standards of 110 litres per person minimum. The growth forecast to 2032 aligns with previous plans, providing stability, while growth from 2032-2045 is elevated, with strategic sites beyond 2045 being considered. The Grafham transfer will help with supply concerns, but additional growth is challenging until the Fens Reservoir is operational. Certainty on growth proposals is needed for the revised draft WRMP due in 2028, with potential new water supply options to be developed if cumulative growth requires it. Significant water resources infrastructure has long lead times and must be considered in a regional context.	201578 (Cambridge Water)
All of the potable water supplying Greater Cambridge is currently obtained from nearly 100% abstraction of chalk aquifers, any increase in development has the potential to result in an adverse	208453 (The National Trust (MEE Planning Team))

Summary of issues raised in comments	Comments highlighting this issue
effect on Habitats sites susceptible to impacts from changes in water quantity in-combination with development in areas outside of the GCLP area. It will be vital for new developments to comply with the water efficiency measures, both until the new supply side measures come online, and continuing into the future to make efficient use of this constrained resource. Policy CC/WE should be amended to require all new development to provide a project level assessment of water quantity to demonstrate that it would not result adversely affect water sensitive designated sites.	
Object to Policy CC/WE as it exceeds national and industry guidance by mandating rainwater or greywater harvesting on all major developments, which may not always be appropriate or deliverable.	204110 (EW Pepper Ltd), 204748 (Vistry), 204327 (Tritax Big Box Developments), 204484 (Bellway Strategic Land), 211759 (Urban & Civic)
Object to policy as it exceeds what can realistically be delivered in the near term, lacks a credible evidence base, is unduly onerous and imposes requirements beyond national policy without demonstrating feasibility or viability.	130695 (Redrow South Midlands), 205044 (Endurance Estates)
The scale of development is unrealistic in this drought area with water supply unconfirmed; particularly commercial labs/data & AI centres.	205649 (S Buckingham), 207498 (FECRA)

Summary of issues raised in comments	Comments highlighting this issue
Need for flexibility in the policy wording. The use of 'must' in the policy creates a mandatory requirement, limiting discretion for decision makers; 'should' would allow for a more balanced judgement.	204110 (EW Pepper Ltd), 204748 (Vistry), 204249 ((Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204327 (Tritax Big Box Developments), 204484 (Bellway Strategic Land), 205044 (Endurance Estates)
The policy goes beyond national and industry guidance. Recent case law confirms that, while local planning authorities may depart from national policy or guidance where this is justified by local circumstances, such departure is not expected as a matter of course and cannot be assumed to be appropriate in the absence of robust evidence.	204327 (Tritax Big Box Developments)
The policy duplicates matters addressed in other policies (CC/SD, CC/IW, CC/NZ), creating uncertainty and undermining clarity, which is essential for soundness.	130695 (Redrow South Midlands)
Councils will need to ensure that an appropriate balance is struck between the ambition of the policy and the deliverability of development, supported by robust viability evidence.	210291 (Vistry Group)

Comments on requirement to demonstrate water supply availability

Summary of issues raised in comments	Comments highlighting this issue
Part 1 of the policy puts responsibility on the developer to demonstrate that there will be adequate water supply rather than the water companies who have legal obligations under the Water Industry Act 1991. It is inappropriate to ask developers to evidence something that they are not legally responsible for and is out of their control. Request deletion. Suggested amendment by CIP 'All development proposals (with the exception of householder applications) are required to undertake pre-application engagement with the relevant water provider to confirm water supply availability to serve the development.'	204777 (Hill), 204271 (Cambridge Investment Partnership), 205195 (Home Builders Federation), 211758 (Urban & Civic)
Part 1 of the policy is in conflict with paragraph 20 of the NPPF as the supply of water is not normally a matter for individual planning applications and would normally be addressed through authorities' strategic policies. Part 1 should not therefore be a requirement for applicants and should be deleted.	202780 (Martin Grant Land Limited)
To show that there is an adequate water supply for development will the Cambridge Water Water Resources Management Plan be accepted in determinations?	202447 (University of Cambridge)
All development proposals (with the exception of householder applications) must demonstrate that there will be an adequate water supply available to serve the development AND that any increase in water demand will not damage any chalk streams or slow the improvement in chalk stream WFD status. Add 'without harm to existing chalk stream levels'.	202437 (R MacDonald), 202494 (H Brown)
Part 1: To date, Environment Agency's concern re insufficient water has been ignored, so this statement is unreliable.	2025649 (S Buckingham)
Part 1: Encourage wording is changed from 'adequate' to 'sufficient and sustainable'.	211133 (Environment Agency)

It will be vital for new developments to comply with the water efficiency measures, both until the new supply side measures come online, and continuing into the future to make efficient use of this constrained resource. Policy CC/WE should be amended to require all new development to provide a project level assessment of water quantity to demonstrate that it would not result adversely affect water sensitive designated sites.	208453 (National Trust)

Comments on Water efficiency levels - Residential

Summary of issues raised in comments	**Comments highlighting this issue**
Part 2a. Support for 80 l/p/d for residential schemes over 100 homes to address the issue of serious water stress.	201659 (Hunts DC), 204993 (Uttlesford DC), 211134 (Environment Agency), 207617 (Natural England)
The Climate Change Topic Paper (2025) covers the reasoning behind the policy decisions and along with paragraph 6.39 explains why the 85 litres/person/day recommended by the Shared Standards in Water Efficiency for Local Plans (2025) has not currently been included for developments of less than 100 homes.	207617 (Natural England)
Part 2a. Recommend that GCSP reviews 2021 evidence base in light of the Shared Standards for Water Efficiency, and to include this within the policy justification to improve soundness at examination.	211134 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
Part 2a, suggest ‘subject to amendments to relevant water legislation’ be amended to ‘subject to amendments to relevant water re-use policy’. Clarify what the implications would be on the policy’s effectiveness if this reform does not occur.	211135 (Environment Agency)
As a partner to the Shared Standards, we would encourage the policy to go further in respect of developments of less than 100 dwellings, to use a water efficiency standard within the range set by the Shared Standards i.e. 85-95 l/p/d. It is noted that other emerging local plans across the WRE region are bringing forward tighter water efficiency standards within this range, dependent on viability. We would direct the GCSPS to review the recent Inspector's Report on the Uttlesford District Council Local Plan, where the tighter standard of 90 l/p/d for all new residential development has been demonstrated to be sound.	210199 (Anglian Water Services)
Part 2a of the policy (80 l/p/d) should also apply to householder applications and the refurbishment or change of use of existing buildings.	201564 (Stapleford PC), 210916 (Great Shelford PC)
The 80 l/p/d standard should apply to all new residential development regardless of number of dwellings	203667 (Cambridge Green Party), 205649 (S Buckingham), 205210 (Cam Valley Forum), 201745 (J Johnson)

Summary of issues raised in comments	Comments highlighting this issue
Part 2a of the policy relating to water reuse or recycling is not justified as it is subject to amendments to relevant water legislation and can only be included if these changes are made. Delete part 2a or re-word. Paragraph 4.31 also needs amending to reflect this.	(A Brand), 130695 (Redrow South Midlands), 204621 (Abbey Properties Cambridgeshire Limited)
Water efficiency level of 80 l/p/d for developments of 100 or more dwellings is considered onerous and difficult to implement, not justified and not in line with Building Regulations. Higher costs may impact viability of developments.	204777 (Hill), 204271 (Cambridge Investment Partnership), 204259 (Bellway Strategic Land), 130695 (Redrow South Midlands), 205044 (Endurance Estates), 210289 (Vistry Group), 211234 (Living Space Housing) 208268 (Martin Grant Land) 211459 (Hayfields Homes Construction), 211759 (Urban & Civic)

Summary of issues raised in comments	Comments highlighting this issue
Mandatory 80 l/p/d standard for all new residential development is not justified. As there is an existing national standard for such areas then the only sound approach is to apply that standard, which remains 110 litres per person per day.	208965 (Persimmon Homes East Midlands)
The proposed restriction on water use to 80 litres per person per day (LPPPD) in developments of 100+ dwellings, and 90-100 litres per person per day in developments of less than 100 dwellings is unduly onerous and is not consistent with national policy requirements. By Building Regulation standards, the current restriction is 125 litres per person per day (LPPPD) with an optional uplift / reduction to 110 litres per person per day. The 'Water Ready' report published earlier this year by the Future Homes Hub outlines a framework for new homes to achieve 90 LPPPD by 2035.	211234 (Living Space Housing), 211220 (Terra Strategic), 211264 (Terra Strategic)
The Future Homes Hub – Water Ready report should be used as a framework for water-stressed areas with transitional periods, such as dual supply pipework, rather than mandating on-site water recycling systems, which could pose risks.	204777 (Hill)
Upgrading existing local housing stock water related fixtures & fittings, through the incumbent water utility companies, using water-offsetting funds, offers a more equitable and lower-risk route to achieving water efficiency gains.	204777 (Hill)
A balanced, phased approach that considers flexibility around targets exceeding building regulation requirements is requested to avoid undermining deliverability and affordability.	204777 (Hill)
The policy needs to be clear on the l/p/d domestic figure where non-potable sources are unavailable. 80 l/p/d is far tighter than the government target of 100 l/p/d for water stressed areas.	202447 (University of Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
It is unclear why the policy imposes stricter internal water-use requirements for developments over 100 dwellings. Internal water use is influenced more by occupant behaviour and dwelling specifications than by the scale of development. The policy should either apply a consistent, evidence-based standard across all residential developments or provide clear justification explaining why a higher requirement is appropriate only for larger schemes.	204110 (EW Pepper Ltd), 204748 (Vistry), 204249 (Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204259 (Bellway Strategic Land), 204484 (Bellway Strategic Land), 204556 (Redrow South Midlands), 204259 (Bellway Strategic Land)
100 litres/person/day for all dwellings where practical and viable is more achievable.	204748 (Vistry), 204484 (Bellway Strategic Land), 210292 (Vistry Group)
We question how it is justified to limit people's water use by reason that they reside on a larger development site, which, given the high percentage of large-scale sites proposed for allocation, will not	208352 (T Elbourn)

Summary of issues raised in comments	Comments highlighting this issue
be a choice for many people. We would suggest that the water usage limit of between 90 to 100 litres per day applies to all residential developments, regardless of the size of site.	
HBF does not support 80 lppd noting the potential legal implications and risks of cross-contamination associated with water recycling systems, suggesting the council should not mandate given that there are no national standards.	205195 (Home Builders Federation)
If a lower water standard is implemented, it should be averaged across the site to allow flexibility for homes with varying water usage.	205195 (Home Builders Federation)
Part 2b of the policy for smaller residential schemes should not be a range but should be 90 l/p/d as an achievable level. At the moment it is no different to saying less than 100 l/p/d.	201659 (Hunts DC), Cambridge City Council Liberal Democrat Group (202908), 204475 (Max Fordham), 204764 (Mothers CAN Cambridge)
100 l/p/d is not strict enough. Dual pipes must ensure that loo flushes do not use potable water. There needs to be a change in the law.	202188 (R Lambert)
Assumptions being used to achieve these targets are not clear, including home working and irrigation of gardens and vegetable growing areas.	201927 (R Pargeter)
The proposed water efficiency standards far exceed building regulations. The Government's proposed revisions to the Water Efficiency Standard are being undertaken in consultation with DEFRA and has	211282 (Woolsington One Ltd)

Summary of issues raised in comments	Comments highlighting this issue
been informed by independent research regarding the infrastructure that needs to be in place to enable the tighter water efficiency standards that the Government is consulting on to be achieved. It is notable that the Government's target is to achieve a reduction in water use to 110 litres/person/per day by 2050. In light of this national target, it is unclear how the Council considers that the achievement of a water efficiency target 30 litres below the proposed national 2050 target will be achievable. The evidence base accompanying the Draft Plan does not address the viability, of feasibility of achieving these enhanced standards.	
The per-capita water consumption calculation (80 L/person/day) does not accommodate Managed Aquifer Recharge and could divert rainwater from natural recharge.	209042 (Marshall Group Properties)

Comments on Water efficiency levels – Non-residential

Summary of issues raised in comments	Comments highlighting this issue
Part 2c should be strengthened to reflect the recommended policy wording in the Shared Standards.	203667 (Cambridge Green Party), 205210 (Cam Valley Forum)
Support for water reuse or recycling for non-residential major development sites, which must be provided in the Sustainability Statement.	201986 (Swavesey PC)

Summary of issues raised in comments	Comments highlighting this issue
Support for requiring a full 5 credits under the Wat01 heading in the BREEAM assessment for non-residential development, but the policy should include 'unless demonstrated not practicable' to allow for flexibility in cases of refurbishment on constrained urban sites.	202447 (University of Cambridge)
Support Part 2d and that the efficiency of process water use should be part of the sustainability statement. Recommend referencing corporate water efficiency standards from larger organisations to inform policy, particularly for laboratory buildings.	204475 (Max Fordham), 204764 (Mothers CAN Cambridge)
Encouraged to see a high standard being promoted for non-household development. Regarding the phrasing “unless demonstrated not practicable”; we strongly encourage GCSP to define how “non-practicable” will be assessed. We would also encourage a minimum of 3 credits for Wat 01 where 5 credits cannot be achieved, as per the Shared Standard.	211136 (Environment Agency)
Clearly state whether point d applies in addition to point c for non-household developments which use as part of a commercial process(es).	211137 (Environment Agency)
Recommend the inclusion of a section dealing specifically with Data Centre’s water efficiency as these are an emerging sector with high water consumption.	211139 (Environment Agency)
The policy goes beyond national and industry guidance by effectively mandating rainwater or greywater harvesting on all major developments, which will not always be appropriate or deliverable. The policy requirement for commercial units to achieve all five BREEAM water credits is considered challenging and often unfeasible, with flexibility only applied to WAT 01. The draft Plan is largely silent on BREEAM, and the policy's requirements would necessitate all commercial developments to engage a qualified	203394 (Babraham Research Campus Ltd), 204249 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)

Summary of issues raised in comments	Comments highlighting this issue
BREEAM assessor, leading to additional costs and concerns about proportionality for smaller or less complex schemes. Suggest, remove requirement for rainwater or greywater harvesting being mandated in all major developments, this should only be delivered where viable or feasible. Remove requirement to comply with all 5 BREEAM water credits.	
Goes beyond minimum compliance and typically demands specialist design and technology. Wat 04 is difficult to control because it focuses on unregulated water uses, which rely heavily on end users, operational practices and decisions made after construction. As a result, even with strong design intentions, it can be challenging to guarantee performance outcomes, and the measures required may not always be feasible within the physical or operational limitations of the site. We therefore recommend that these requirements are supported by clear viability guidance or phased implementation and that flexibility is allowed where site specific constraints limit the ability to achieve the highest water efficiency standards.	208269 (Martin Grant Land)
Stringent BREEAM requirements are inflexible and one size fits all approach and there is no evidence that they can be achieved for water intensive uses such as research facilities, laboratories, food production, leisure or hospitality sectors. The policy fails to consider viability impacts, scale, use type and operational requirements.	130695 (Redrow South Midlands)
Assume that the target of 5 credits for category Wat01 of BREEAM will be relevant for student accommodation. To achieve these targets will require extensive water management and recycling facilities including potentially rainwater harvesting and greywater recycling, which will have considerable	208305 (Girton College), 210979 (Kings College) 208295 (Trinity College),

Summary of issues raised in comments	Comments highlighting this issue
commercial and technical implications, particularly with respect to maintenance. The term 'unless demonstrated not practicable' should therefore be applied to decision making and all of the water efficiency targets presented.	211760 (Urban & Civic)
The practical and viability implications of the proposed standards should be carefully considered. In particular, the requirement for non-domestic building to obtain 5 credits for category Wat 01 (BREEAM) is a challenge given the consumption of water. Request the following is added to the policy: 'Buildings in the tourism or similar sectors may warrant flexibility with these water efficiency targets subject to the provision of commercial or viability evidence'.	210595 (Imperial War Museum)

Comments on Refurbishment of buildings

Summary of issues raised in comments	Comments highlighting this issue
Part 2e: The requirement for sustainability retrofitting of an existing building being developed is commendable, but may not be financially viable, so offsetting contribution instead should be allowed.	203152 (Cambridge Past, Present and Future)
Support part 2e but should be strengthened by giving a methodology or target efficiency. It is unlikely that in most cases water recycling could be easily retrofitted to achieve 5 BREEAM credits, however referencing the methodology and a minimum number of credits will strengthen this requirement. Water efficiency proposals should be set out in the Sustainability Statement.	204475 (Max Fordham), 204764 (Mothers CAN Cambridge), 205210 (Cam Valley Forum)

Summary of issues raised in comments	Comments highlighting this issue
Part 2e: ‘should’ should be changed to ‘must’ to further the policy’s application.	211138 (Environment Agency)
Clause 2e should apply water efficiency standards to refurbishment and change of use of existing buildings, rather than merely requiring retrofitting to “increase water efficiency”.	210916 (Great Shelford PC)

Comments on Water reuse

Summary of issues raised in comments	Comments highlighting this issue
Support for water reuse and recycling rather than water credits. Eddington is currently not operating as planned because the Drinking Water Inspectorate requires non-potable supplies to be treated to potable standards due to concerns about cross-contamination.	205651 (A Sykes)
Part 3b (concerning how water efficiency is demonstrated) should be reworded to reflect the Shared Standards. Wording provided.	203667 (Cambridge Green Party), 205210 (Cam Valley Forum)
All new builds should use grey water/ non potable water for washing machines and flushing toilets, as in Eddington but has not been turned on.	202846 (H Cook)
The Topic Paper references the Shared Standards in Water Efficiency for Local Plans (June 2025) which has been prepared by several water companies and the Environment Agency. The specification	210290 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
proposed to achieve 85 l/p/d is only achieved if a bath is not supplied, which is a basic necessity for the majority of homeowners, particularly those with children or the elderly. Vistry and The Quy Estate consider the 85 l/p/d to be extremely challenging with the solutions presented in the topic paper (without greywater recycling) still not sufficient to meet the draft Policy requirement of 80 l/p/d. Greywater recycling is therefore necessary to meet the draft target and the Topic Paper estimates the cost of such a unit to be £4,000 with the Viability assessment allocating a cost of c.£6,000 per unit for the purchase of water efficiency equipment only. The Viability study does not make allowance for on-going maintenance costs which are anticipated to be significant, especially for greywater recycling systems.	
In respect of criterion 5, which requires all new dwellings with private outdoor amenity space to provide a water butt and prioritises the use of rainwater for outdoor irrigation, Vistry and The Quy Estate support the principle of encouraging rainwater harvesting. However, consideration should be given to how this requirement would be secured and monitored in practice, particularly in relation to long-term management, maintenance and enforcement. Clarification on the intended implementation mechanisms, would assist in ensuring the policy is applied consistently and effectively.	210293 (Vistry Group)

Comments on General water efficiency

Summary of issues raised in comments	Comments highlighting this issue
A requirement of new development should be water retention and adequate purification infrastructure.	201038 (P Spowart)
The policy should reflect the 2025 Shared Standards, require Water Efficient Design Statements and completion certificates, and mandate smart meters and leak detection in all new buildings.	203667 (Cambridge Green Party), 205210 (Cam Valley Forum)
Whilst the sensitivity of water availability within the Greater Cambridge area is understood, the proposed water consumption targets in policy CC/WE are ambitious and should be tested further as these may require rain/greywater harvesting. Revise Policy CC/WE to ensure that is based on evidence and does not make development unviable.	210060 (Endurance Estates)

Other Comments

Summary of issues raised in comments	Comments highlighting this issue
Water meters should be compulsory.	201774 (H Jackson)
Water usage in construction should also be considered – encourage lean design in addition to efficient usage.	204069 (B Young)
Water company privatisation limits investment in repairing and improving facilities.	201038 (P Spowart)
Freshwater supply cannot sensibly be considered without simultaneously ensuring adequate balancing wastewater management.	202468 (J Neal)
Rural active travel routes should be bridleway to include equestrians	203945 (S Rogers)

Summary of issues raised in comments	Comments highlighting this issue
Rainwater for outdoor irrigation - While we support the intent to reduce potable water consumption, the requirement as drafted is technically unclear, operationally problematic and introduces significant long-term management liabilities, particularly for multi-phase or multi-ownership residential developments.	208966 (Persimmon Homes East Midlands)
We would encourage wording in the policy's justification ("Where Government policy or legislation relating to water efficiency is more stringent or at significant variance with this policy in the future, the more stringent standard will be adopted when determining planning applications.") to be transferred as an additional point to the policy.	211140 (Environment Agency)
Recommend the inclusion in relation to aquifers and source protection are added to the supporting text. These considerations can be useful to guide decisions regarding development and water availability: - Bedrock geology from the northwest to southeast; - Principal Chalk aquifer and Source Protection Zones; Superficial deposits classified as Secondary aquifers; Aquifers that underly the area that are of high value; We also recommend referencing Groundwater Protection, and other guidance and any superseded versions.	211142 (Environment Agency)
Water Supply Evidence Detailed comments provided on the evidence, including on 'water available for use', and approaches to non domestic use. Recommend that the GCSP consider what further measures it can put in place to ensure that the most ambitious water supply and efficiency targets are met.	211205, 211206, 211207 (Environment Agency)

Policy CC/IW Integrated water management, sustainable drainage and water quality

Abbreviations

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

Summary of Main Issues:

There was broad support for the policy from a range of stakeholders including statutory bodies, environmental groups and individuals.

There was some concern about the deliverability of the policy given issues with infrastructure at both Cambridge and Uttons Drove Water Recycling Centres and concern about overall levels of growth damaging rivers and chalk aquifers. There were representations from Cambridge Water and Anglian Water setting out their processes and plans and acknowledging that joint working has been carried out with the Councils.

There was considerable support for SuDS, but with comments that they are not suitable everywhere, such as where there is contaminated land, and that their adoption must be secured particularly as in the past unclear ownership has put maintenance at risk. There was support for the water quality part of the policy which sets out the requirements to ensure adequate wastewater treatment. A number of comments highlighted the importance of robust investigation and water quality control measures.

There was also some objection from developers that this part of the policy places responsibility on developers to demonstrate wastewater treatment capacity and that this responsibility lies with water and sewage companies.

The Environment Agency provided detailed feedback on the Water cycle Strategy with regard to waste water provision.

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach, are noted.

The policy seeks to ensure that development proposals would not cause detriment to water quality by ensuring that there is adequate wastewater treatment and conveyancing infrastructure to serve the development prior to occupation which would relate to each phase and as explained in the supporting text would be conditioned. Anglian Water's next Drainage and Wastewater Management Plan (DWMP28) will look at the growth proposed in the Local Plan and what infrastructure will be needed to protect water quality. The Councils will continue to work collaboratively with Anglian Water during the development of this plan which will look at requirements at Cambridge Water Recycling Centre (WRC), Uttons Drove WRC and the other WRCs in Greater Cambridge. The strategic sites are planned for later in the plan period which will give a longer lead in time for investment in wastewater treatment infrastructure.

The concerns about SuDS in areas of contaminated land and the adoption of SuDS has been considered in changes to the wording of the policy.

Water Supply issues have been carefully considered during the preparation of the Local Plan. Working with the Cambridge Water Scarcity Group which was established by the government, the Local Plan is supported by a Water Supply evidence base exploring the availability of sustainable water supply alongside the anticipated development trajectory. Infrastructure is planned which will

bring new supplies to Greater Cambridge in order to reduce the reliance on water from the chalk aquifer. However, it also remains vital that water is used efficiently in this area therefore water efficiency policies are proposed which set more stringent levels than are applied nationally.

Environment Agency comments on the Water Cycle Strategy have been reviewed by the consultants who produced the study. An Addendum Report has been published, responding to the comments. A Statement of Common Ground has also been agreed with the Environment Agency and Anglian Water on the approach to wastewater infrastructure.

Table of representations:

General comments

Summary of issues raised in comments	**Comments highlighting this issue**
Support policy	202706 (C Todd), 201928 (R Pargeter), 202848 (H Cook), 202911 (Cambridge City Council Liberal Democrat Group), 203668 (Cambridge Green Party), 203021 (M Cleminson), 202191 (R Lambert)

Summary of issues raised in comments	Comments highlighting this issue
Fully support bullet points 1 and 2 of the policy	202958 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)
Support the requirement to make use of nature-based solutions wherever practicable (Point 1d).	205261 (Cam Valley Forum), 203668 (Cambridge Green Party), 207618 (Natural England)
These issues must be explored during the preparation of the Plan and not left until the submission of applications. If such exploration is not evidenced, it could render allocations undeliverable.	203178 (ESCO Prospect)
Highlights major concerns about water abstraction impacting chalk streams; notes Cambridge Water already extracts above sustainable limits and warns that development should not proceed without water infrastructure. Importance of protecting chalk streams emphasised. Development should not proceed until adequate water supply and wastewater infrastructure is provided, to avoid further damage to rivers and chalk streams. New homes will increase water use and place further pressure on chalk streams which are already ecologically vulnerable.	203288 (J Palmer)
Regarding the wider groundwater crisis, and the impact of that on our chalk streams. The need to find effective ways to mitigate and reduce the additional burdens created by any new development is a matter that concerns the Trustees directly. There is NO MARGIN for further growth to allow for chalk	209016 (Hobsons Conduit Trust)

Summary of issues raised in comments	Comments highlighting this issue
stream and rivers to be restored to normal from around 2036. The Trustees therefore warmly welcome the way Policy CC/IW focuses on these issues. However, a number of the measures require progress including legislation and regulation to make targets achievable.	
Concerns about the deliverability of the policy which threatens the deliverability of the Local Plan. This is due to the lack of funding for the relocation of the Cambridge Waste Water Treatment Plant and a delay in the Fens Reservoir which could impact water supply. If Policy CC/IW and the wider strategic issues relating to water scarcity and management cannot be delivered in a timely manner, the Plan will not be able to supply even a fraction of the new jobs and new homes demanded of our region, and certainly not in the desired strategic locations. Instead, growth will occur piecemeal across the region – negatively impacting our existing communities,	201565 (Stapleford PC) 210917, 210918 (Great Shelford PC)
There are serious concerns regarding increased flood risk from developments within the Swavesey surface water catchment area, as the existing drainage system is already at capacity. Detail is provided about specific issues relating to Webb's Hole Sluice and Uttons Drove Treatment Works. Major developments should negotiate S106 contributions for onsite and offsite mitigation to address local flood risk concerns and improve existing infrastructure.	201989 (Swavesey PC)
A policy should be added to stipulate that any new development must not result in any increase in flood risk (fluvial or surface water) to any properties, buildings or infrastructure.	202439 (R MacDonald)
Support sections 1.a and 1.b. and 4.d for a whole development scale strategy for integrated water management from the earliest opportunity. This will help ensure the most efficient use of land and	211148 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
resources in a way that co-benefits biodiversity and amenity. Water re-use and infiltration aspects of the policy are crucial to protecting groundwater resources and taking pressure off the Fens where fluvial waters will, over the coming decades, be decreasingly able to discharge by gravity discharge into a rising sea level. We welcome the recognition of this challenge in the supporting information.	
New developments should not be considered unless there is sufficient water infrastructure in order to protect chalk streams and they are self-sufficient in processing their own sewage without damaging the rivers.	201295 (R King), 209676 (H Hale)
Water stress, flooding, sea level rise, over-abstraction of chalk aquifers precludes further growth in this ultra-fragile landscape.	202146 (R Lambert)
Concern about the level of growth in the Local Plan and the impact further water abstraction poses to chalk streams, which are rare and valuable wildlife habitats. The push for growth should be halted until this fundamental issue has been resolved.	203252 (Cambridge Friends of the Earth), 203288 (J Palmer), 203253 (Cambridge Friends of the Earth)
The policy places unduly prescriptive requirements on strategic employment sites, including expectations for rainwater and greywater harvesting that may not be appropriate or deliverable in all circumstances. For large-scale logistics and industrial developments, the feasibility of integrated water reuse technologies should be assessed on a site-specific basis, having regard to operational requirements, building use, viability, and infrastructure constraints.	204333 (Tritax Big Box Developments)

Comments on Sustainable Drainage Systems

Summary of issues raised in comments	Comments highlighting this issue
Support infiltration drainage as a way to promote aquifer recharge and reduce flooding, but there are risks associated with installing infiltration SuDS in areas of contaminated land. Recommend this is referred to in part 4 or 5 of the policy and in the supporting text to the policy.	211147 (Environment Agency)
The LLFA support that the policy requires SuDS to be incorporated as part of new developments. There should be reference made to the SuDS Management train. The management train is a sequence of drainage features that collect, convey, store and manage quality of surface water runoff as it drains through the development. Source control, in the management train, should prioritised.	210507 (Cambridgeshire County Council)
Support the integration of Sustainable Drainage Systems (SuDS) into developments as a way of managing surface water runoff.	211235 (Living Space housing Ltd) 211460 (Hayfield Homes construction Ltd)
New housing should minimise impermeable hard surfaces to avoid run off.	202848 (H Cook), 202621 (C Pointon), 203559 (P Tribble), 203021 (M Cleminson)
There should also be requirements that prevent residents turning soft surfaces areas into hardstanding, an action which reduces natural drainage.	203559 (P Tribble)

Summary of issues raised in comments	Comments highlighting this issue
Concerns about clause 4, which assumes SuDS are suitable for all locations. The Stapleford & Great Shelford Neighbourhood Plan had to be amended to require their use 'wherever practicable and subject to being suitable to the location'.	201565 (Stapleford PC) 210919 (Great Shelford PC)
Part 4 should be amended to read 'New development must FULLY incorporate Sustainable Drainage Systems (SuDS) as part of an Integrated Water Management approach to the design of the whole site' to ensure SuDS requirements are met in full.	203161 (Cambridge Past, Present and Future)
Section 4e, recommend changing "where reasonably practicable" to "wherever practicable" as permeable surfaces are essential for drainage.	203668 (Cambridge Green Party), 205261 (Cam Valley Forum)
Pavement verges can operate as rain gardens and help to alleviate flooding. Verges can be more than grass, add aesthetic beauty and relief, can attract pollinators and can be used strategically. Can we have greener water managing streetscapes.	203978 (Histon and Impington PC) 211008 (Cambridgeshire County Council)
Object to criterion 4(f) requesting its deletion due to a lack of evidence and viability testing regarding the requirement for green and brown roofs.	204558 (Redrow South Midlands)
Clause 4h regarding the adoption of SuDS must include specific wording to require responsibility for management and maintenance to be clearly assigned, given local experience where unclear ownership has put maintenance at risk e.g. Trinity Gate development. The word 'details' is not sufficiently specific.	201928 (R Pargeter), 203101 (K Wiemer), 203668 (Cambridge Green Party), 205261 (Cam Valley Forum),

Summary of issues raised in comments	Comments highlighting this issue
	208623 (Madingley Road Area Residents Association (MRARA)),
The policy is generally supported but there is concern that the interpretation of attenuation may obstruct innovative solutions for water harvesting.	202465 (University of Cambridge)
We would welcome reference to our Surface Water Risk Management Guidance in the supporting text. The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be conducted by the developer at their cost. Anglian Water will request a planning condition to ensure no additional flow will be connected to our surface water network until, any identified upgrades have been delivered and sufficient capacity in the network has been demonstrated.	210200 (Anglian Water Services)
fully supports the principles of integrated water management and sustainable drainage. However, we would like to raise the following points for consideration to ensure the policy is deliverable and proportionate: Mandating green or brown roofs on all flat roofs can present significant challenges, particularly for refurbishments. Structural capacity, cost implications, and heritage constraints may make this impractical in some cases. We suggest allowing flexibility where technical or viability issues arise,	208261 (Martin Grant Land)

Summary of issues raised in comments	Comments highlighting this issue
supported by alternative biodiversity measures. Designing for no runoff during small rainfall events is ambitious and may be difficult to achieve on constrained or high-density sites. We recommend considering a performance-based approach that allows equivalent mitigation measures where strict compliance is not feasible.	
Object to policy as it introduces a number of requirements that are not sufficiently justified, lack flexibility for site-specific delivery, and risk compromising the viability and timely implementation of strategic developments. The policy appears to assume that infiltration SuDS will be feasible across most development sites, yet this has not been robustly evidenced. Policy CC/IW should be revised to provide greater flexibility, clarity and proportionality. The policy should recognise that not all SuDS types are feasible on all sites and should allow developers to select the most appropriate drainage strategy based on site-specific assessments.	210504 (Barratt Homes Northampton)

Comments on Water Quality

Summary of issues raised in comments	Comments highlighting this issue
Generally support wording of wastewater part of policy. 6a should be tightened from ‘adequate’ to ensuring that there is sufficient capacity in any conveyancing infrastructure that the new network might connect to. Suggestions for the supporting text on different wastewater ‘capacity’ considerations for	211143, 211144, 211145, (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
development proposals, and if wastewater infrastructure capacity is unavailable mitigation could be delaying occupation of the development to protect water quality. If sufficient waste water infrastructure capacity is unavailable at the time of planning application submissions, risk to the environment from the development combined with wider planned growth could be mitigated by using a condition to delay occupation.	
This policy is welcomed, particularly the requirements around water quality, which will be necessary to avoid impacts to various protected sites including the Ouse Washes.	207618 (Natural England)
Object to criterion 6(a), which places the responsibility on developers to demonstrate wastewater treatment capacity. This responsibility lies with water and sewerage companies, as per the Water Industry Act 1991. Request to delete or revise the criterion. Alternative wording provided by CIP: 6. To protect and enhance water quality, all development proposals must demonstrate that: a..there is adequate wastewater conveyancing infrastructure to serve the whole development, or an agreement is in place with the relevant service provider to ensure the provision of the necessary infrastructure to support the capacity for wastewater treatment prior to the occupation of the development (where development is being phased, this must be demonstrated for each phase before first occupation).	204558 (Redrow South Midlands), 201285 and 204285 (Cambridge Investment Partnership), 204780 (Hill), 203054 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners), 205236 (Home Builders Federation), 210294, 210295 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
	210600 (Imperial War Museum)
Supports the need for integrated water management and strategic thinking and this has been considered within our site and new development activities. The College does have concerns respect to the application of paragraph 6 of the policy which risks placing an unreasonable and disproportionate evidential burden on applicants at the planning application stage. Policy CC/IW should be implemented flexibly, with appropriate reliance placed on the statutory duties of water companies and ongoing engagement through established mechanisms such as Water Resource Management Plans and Drainage and Wastewater Management Plans.	210980 (Kings College) 208306 (Girton College)
Support part 7 of the policy which outlines that foul drainage should connect to public sewers (Mains) wherever possible. It would helpful be to expand on this further within the supporting text section to clarify guidance on non-mains drainage.	211146 (Environment Agency)
Would like to see 'water quality' as a separate full policy which would need to address the many aspects of a development that contribute to poor water quality in the natural environment, with developers being required to demonstrate that any wastewater generated during construction and use of the development will not have a negative impact.	205261 (Cam Valley Forum)
As indicated in our response, Anglian Water is working proactively with stakeholders, to address current capacity constraints at some of our water recycling centres (WRC). This has been further exacerbated by the withdrawal for funding for CWWTPR, meaning that further investment will	209161 (Anglian Water Services)

Summary of issues raised in comments	Comments highlighting this issue
need to be brought forward to deliver enhancements at the existing Cambridge WRC in the short term, and in the long term if alternative funding cannot be secured for delivery of CWWTPR. Until such time as the opportunity to deliver CWWTPR expires, the Local Plan should recognise the CWWTPR project and ensure appropriate safeguarding of the consented relocation site (as requested under Policy I/SI). Anglian Water is currently preparing the DWMP28 and we will continue to engage with the Councils at various stages of the DWMP's development to ensure that this takes account of the quantum of growth proposed for Greater Cambridge.	
Chalk streams are internationally rare and highly sensitive ecosystems. Policies must provide explicit and robust protection for chalk streams.	211722 (CPRE Cambridgeshire and Peterborough)

Other Comments

Summary of issues raised in comments	Comments highlighting this issue
We are pleased to see that the detailed WCS scope covers a number of positive areas, including but not limited to summarising growth projections in relation to DWF uplift, and we welcome consideration of climate change impacts on waste water treatment. It is really important that evidence within the WCS is capable of informing growth allocations and the Plan can be positively prepared through robust	211188, 211189, 211190, 211191, 211192, 211193, 211194, 211195, 211196, 211197, 211199, 211202

Summary of issues raised in comments	Comments highlighting this issue
scrutiny of any environmental risks resulting from growth The WCS needs to be updated accordingly, and we recommend maintaining as a living document. Detailed comments on the WCS have been provided,	211203, 211204 (Environment Agency)
It has been confirmed by SCDC that there has been irreparable damage to the hydraulic ecosystem underneath our village, we must insist that no further development of any sort should be permitted within the Parish of Longstanton or the surrounding parishes without full and transparent public consultation to get ahead of any potential issues.	208467 (Longstanton Parish Council)
Rural active travel routes should be bridleway to include equestrians	203949 (S Rogers)
Water Quality must require rigorous site investigation and remediation of contaminated land, particularly where development could affect groundwater or surface water bodies. The Plan should explicitly recognise and protect private water supplies, including boreholes used by rural homes, farms, and businesses. Development proposals should be required to demonstrate that water quality and abstraction will not be compromised.	208952, 208953 (CPRE Cambridgeshire & Peterborough)
The dewatering at Northstowe demonstrates that buried rivers are capable of transporting large quantities of water away from a site but brings into question the usefulness of the BRE365 infiltration tests. Such deposits can also transport large quantities of water onto a site. To demonstrate the potential flow rates, please take a look at the size of the culverts on the Newmarket Watercourse and Saffron Walden Slades. In 2021, SCDC commissioned a Hydrogeological Assessment so I find it	208401. 208402 (R Mason)

Summary of issues raised in comments	Comments highlighting this issue
strange that there was no reference to the river terrace being a buried valley. It is an issue affecting the whole Anglian region and it is not being addressed. Part of the problem is that the watercourses map, an LLFA responsibility, has not been maintained.	
Conduit faces increasing pressure from the growing working and residential population around the Biomedical Campus, Clay Farm and the south-eastern axis. We therefore believe that the ambitions set out for the area on the northern slopes of White Hill need far greater definition and greater ambition. This would also be entirely consistent with the Trust's Vision for Nine Wells.	209015 Hobsons Conduit Trust)

Policy CC/FM: Managing flood risk

Abbreviations

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

Summary of Main Issues:

Some comments gave general support for the policy approach, and to some specific elements pf the proposed policy.

Anglian Water supported reference to the potential for sites to deliver betterment. East England Ambulance Service NHS Trust highlighted the negative impacts of flooding and emphasised the importance of measures to address it.

The Environment Agency made detailed comments. These included being clearer about the need to consider the impacts of climate change, the need to reapply tests if flood risk evidence had changed, that modelling may be required as part of site-specific flood risk assessments, considering off site impacts, residual risks, and when emergency plans need to be provided.

Cambridge Past, Present and Future sought clarity about what information should accompany planning applications, and that management arrangements for mitigation should also be identified up front. Cambridge Green Party considered the exception for allocated sites should be removed.

Some comments suggested the policy was not consistent with national policy, and that it set disproportionate requirements. Updates to the National Planning Practice were also sited which needed to be considered.

Others considered the policy was not strong enough in light of the challenges of climate change. Requirements should be widened to require flood risk assessments in allocations. Future monitoring was also needed. The cumulative impacts of development in catchments needed to be considered. Others sited that restored water courses could end up having more water in them, increasing flood risk.

There were some general concerns about the impacts of flooding and the risk form climate change. There was concern about new developments being built on flood plains. Some people also gave examples of local drainage problems

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach, are noted.

Flood risk has been carefully assessed when preparing the Local Plan. The Local Plan has been informed by a Strategic Flood Risk Assessment (SFRA), and the application of the sequential test to the site selection process. The SFRA (including a Level 1 and a Level 2 for some sites) was prepared in consultation with the Environment Agency and provides a robust basis for plan making. This includes consideration of the impacts of climate change.

The policy appropriately reflects national planning policy regarding the sequential and exception tests but does not seek to repeat it Some comments from developers questioned whether the policy reflected government planning practice guidance, particularly the approach to surface water in sequential testing. The Local Plan does not need to repeat that advice, and the draft policy remains sound.

A number of detailed policy amendments have been made in response to comments, including to more clearly reference the need to consider climate change, and the need for information regarding future management of mitigation measures. It also identifies requirements in relation to change of use.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for the policy.	201349 (RSPB), 201994 (Swavesey Parish Council), 204040 (Hertfordshire County Council), 204335 (Tritax Big Box Developments)
Welcome the policy's emphasis on demonstrating that flood risk can be safely managed throughout the lifetime of development.	204335 (Tritax Big Box Developments)
This policy must ensure that the cumulative collection of data is assessed. Where there are large scale developments in the same area, the Local Plan needs to ensure the impact of all sites is assessed as a whole, rather than just looking at individual ones. For example, with surface water and treated foul water flowing out to the River Gt Ouse through the Swavesey drainage system. Many large sites will outflow through this (Northstowe, Cambourne, Bourn, proposed new logistics sites), these need to be considered on a cumulative basis as well as individual.	202552 (L Miller)

Summary of issues raised in comments	Comments highlighting this issue
Also need a policy for adaption to climate change, and making sure drains are maintained. Many areas have standing water on the road as drains are not maintained.	202707 (C Todd), 202479 (J Neal)
We also support policy CC/FM but would note that there is potential for increased flows in our chalk streams and higher ground water tables from a restored aquifer towards the end of this Local Plan period. How do the policies and calculations of flood risk align with healthier river systems with more natural rather than low flows? Should the starting point for assessing flood risk be to use the future restored river system with more natural flows as the starting point for analysing flood risk management?	202960 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust (M Baker, Conservation Manager)
Supports Policy CC/FM and the approach for site-specific Flood Risk Assessments (FRAs) that are appropriate to the scale and nature of the development. The respondent endorses limb 1 (a) of the Policy, which states that a sequential test is not necessary for proposals on allocated sites consistent with the allocated use, suggesting this should be assessed during the Plan Making stage. The respondent references a High Court ruling confirming that failure to undertake a sequential test does not automatically constitute a strong reason for refusal ([2026] EWHC 51 (Admin)).	203058 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
Support the policy but propose amendment to ensure full information is provided in planning applications as to what has been agreed with which relevant bodies. Amend part f by adding 'and are included as part of the planning application' at the end	203167 (Cambridge Past, Present and Future (S Nicholas)

Summary of issues raised in comments	Comments highlighting this issue
f. The ongoing maintenance and management of any necessary flood defences or flood mitigation measures have been agreed with the relevant bodies and the necessary agreements are in place and are included as part of the planning application.	
We welcome the strong precautionary approach of this policy and fully support making flooding a separate policy issue, rather than including it with the previous policy as was the case in the first draft of the Local Plan. In point 1.a, we recommend deleting the exception stating “(this is not necessary if the proposal is on an allocated site and consistent with the allocated use).” Removing this exception would ensure that flood risk is assessed consistently for all developments, recognising that allocation does not remove or reduce real and increasing flood risks under climate change.	203670 (Cambridge Green Party)
I am writing as a resident of Oakington and Westwick and Lead of the Flood Mitigation Group in the village. I am increasingly concerned about the cumulative impact that current and emerging proposals within South Cambridgeshire Local Plan will have on flood resilience in the area, particularly in our village that has, to date, received no investment for attenuation ponds, surface water storage, or related mitigation infrastructure despite repeated and significant surface water flooding events. I would welcome the opportunity to discuss this matter further or provide more input if helpful.	204991 (A Dennis)
We do not think this policy is sufficiently strong to provide adequate management of flood risk. We have provided some suggestions for improvement but would like this policy to be rethought more carefully, given the scale of development that is anticipated within the life of this plan.	205357 (Cam Valley Forum)

Summary of issues raised in comments	Comments highlighting this issue
This policy needs to make it very, very clear that the risk of flooding has greatly increased with the rapid acceleration of climate change and the unpredictable nature of rainfall as evidenced by recent events. Development must be shown to conserve Cambridge's distinctive "Rus in Urbe" character. Point 1a: we recommend deleting the exception to ensure that flood risk is assessed consistently for all developments. Points 1g. and 1h. the policy needs to require future monitoring by responsible authorities. Point 2. a site-specific Flood Risk Assessment should be a requirement for all developments in Flood Zone 1.	
Should be expanded to include reference to the need to consider the impacts of climate change and all sources of flood risk when applying the sequential and exception tests. We recommend rewording this to: '…having regard to actual and residual flood risks from all sources and taking into account the impacts of climate change'. This would be in line with the recommendations of the Level 1 SFRA. Paragraph 174 of the NPPF states that the sequential test should be used in areas known to be at risk of flooding now or in the future from any form of flooding	211149 (Environment Agency)
The wording in brackets should be caveated as the exception test may need to be reapplied at the planning application stage – e.g. if evidence on flood risk has changed significantly or the nature of the development differs significantly from the nature of the allocation (see paragraph 180 of the NPPF)	211150 (Environment Agency)
We recommend that reference is made to the need for development proposals in flood risk areas to demonstrate that all reasonable opportunities to use natural flood management techniques or nature-	211154 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
based solutions to reduce flood risk overall have been considered and taken, in line with paragraph 172 of the NPPF	
Recommend that the policy makes it clear that where hydraulic modelling of a watercourse within or adjacent to a site is not available or is out-of-date, modelling may be required as part of a site-specific FRA to define the extents and depths of fluvial flood risk at the site. This will help ensure FRAs include sufficient evidence to ensure a sequential approach is taken and to inform any proposed mitigation measures to ensure the development will be safe for its lifetime.	211155 (Environment Agency)
Recommend the policy clarifies that any development in the floodplain (i.e. within the 1% annual probability flood extent, including an allowance for climate change) that is considered acceptable must not decrease flood storage capacity or impede flood water flows. See draft policy LP13 of the draft Hunts Local Plan for suggested wording.	211156 (Environment Agency)
Recommend clarifying that if development is proposed within areas benefitting from flood defences, the FRA should assess the residual risk of a flood defence breach or overtopping and breach analysis or modelling may be required where ‘more vulnerable’ development is proposed	211157 (Environment Agency)
Recommend that the policy clarifies the Council’s position on change of use applications in flood risk areas. The PPG recommends that Local Plans outline where change of use applications will be acceptable. These applications are excluded from the sequential and exception test but may still involve	211158 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
an increase in flood risk, either due to an increase in the number of properties in flood risk areas or an increase in the flood risk vulnerability classification. We recommend that appropriate restrictions are placed on change of use applications for sites within Flood Zones 3b and 3a, and within areas of high surface water flood risk, where ‘more vulnerable’ basement or ground floor uses may not be appropriate.	
In respect of 1d, the safety of access / egress routes should be defined – i.e. Is a dry route of escape required or is some depth of flood water along the route acceptable? This point should also clarify when emergency plans need to be provided.	211153 (Environment Agency)
Support the inclusion of the policy as it covers the importance of managing flood risk in new developments. Please note we would encourage reference to the NPPF and PPG in this policy. It is appreciated the policy has a proactive approach to mitigating and adapting to climate change, with reference to surface water flooding within the local plan. Please note, in section 4.44, there is a reference to 'safe access and egress route'; however, this should be revised to read as 'safe access and escape route' in line with PPG. Level 2 Strategic Flood Risk Assessment: The term 'safe access and egress' should not be used. It should read 'safe access and escape'. This is in line with PPG updates. We appreciate the level detail presented with reference to surface water flood risk in the report. In particular, the suite of maps provided for allocated plots. However, it is unclear whether the most up to date data is used for surface water flood risk mapping.	210574, 210508 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
We particularly welcome clauses 1.c and 1.e that positively influence the potential for betterment and ensuring existing assets are not adversely impacted by proposals. As indicated in our response to Policy CC/W, our Flooding Incident Reduction Plan is available on our website and sets out how we aim to mitigation flooding risks across our region. It is essential for the effective management of our operational risk that we ensure the risk posed from surface water drainage	210201 (Anglian Water Services)
Policy does not reflect the updated Planning Practice Guidance ("PPG") (updated 17 09 2025) relating to sequential testing. Policy CC/FM states that development proposals will be supported where the sequential test has been passed. However, this is not in line with the updated PPG, which states that a proportionate approach should be taken, applying NPPF Paragraph 175. The PPG makes clear that where a site-specific flood risk assessment demonstrates clearly that the proposal would ensure that occupiers and users would remain safe from surface water flood risk for the lifetime of the development (without increasing flood risk elsewhere) a sequential test is not required. Terra therefore request that this Policy be amended to reflect the updated PPG.	211221, 211265 (Terra Strategic) 211236 (Living Space Housing) 208908 (Nightingale Land and Hill Residential Ltd) 204524 (NP Architects) 211461 (Hayfield Homes Construction Ltd)
Flooding Defences- existing and prospective hotspot areas should be clearly identified for emergency grant funding whereby Local Authorities, especially across a region may agree with the respective Government Department to distribute emergency flooding to prevent costly consequential recurrent repairs.	210352 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
Flooding significantly affects residents physical and mental health in both the short and long term. Systematic reviews show consistent increases in PTSD, depression and anxiety after flooding events. Evidence that flooding disrupts healthcare systems and emergency access, damaging infrastructure and increasing demand. EEAST therefore requests: • Sustainable Urban Drainage Systems (SUDS) • Permeable paving accessible to mobility aids • Greywater harvesting via water butts or underground attenuation • Swales and flood-protection features in Zones 2 and 3 • Care homes should NOT be located in Flood Zones 2 or 3 unless they include a fully independent evacuation plan that does not require emergency service intervention • Community centres should not be built in Flood Zones 2 or 3 as they are often used as places of refuge • Health and emergency services buildings should not be built in Flood Zone areas 2 and 3. Emergency ambulance services have to use specialised vehicles (including onboard equipment such as life jackets) and trained staff to support flood/water related incidents and these sites are strategically located around the region and my not be local to Greater Cambridge area.	210321, 210322 (East England Ambulance Service NHS Trust)
Concerns about building in the flood plain, and the impacts of climate change. Also concern about whether insurance will be available of properties within flood areas.	208760 (E. Diaz) 202201 (R. Lambert) 205235 (Federation of Cambridge Residents' Associations)

Summary of issues raised in comments	Comments highlighting this issue
For the Swavesey catchment area, onsite attenuation for new development should be capable of holding water for up to 4 weeks when the Webb's Hole sluice closes to prevent inundation of the drainage system and flood fens. Site attenuation basins must reopen in a managed manner when the water level in the River Gt Ouse drops and the Webb's Hole sluice opens to avoid overwhelming the drainage system. The unique drainage system of Swavesey requires careful management. SCDC Awarded Watercourses should be considered in the overall drainage strategy for Swavesey.	201994 (Swavesey PC)
Swavesey's drainage system is already at capacity; the plan lacks cumulative attenuation data and basins capable of holding water for up to four weeks, and does not assure that Uttons Drove Treatment Works can handle the additional demands and that the drainage system will cope.	206381 (Boxworth Parish Meeting on behalf of A14 Logistics Forum), 211434 (Boxworth Parish Meeting)
The plan fails to present a cumulative flood-risk assessment for the four logistics sites, despite the clear need for such analysis.	206371 (Boxworth Parish Meeting on behalf of A14 Logistic Forum), 207713 (Boxworth Parish Meeting)
Support, the policy reiterates the approach set out in the National Planning Policy Framework, taking into account the impacts of climate change.	208262 (Savills on behalf of Martin Grant Land Limited)
The Strategic Flood Risk Assessment omits buried valleys, failing to meet NPPF sequential-test requirements set out in paragraphs 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182.	208400 (R Mason)

Summary of issues raised in comments	Comments highlighting this issue
The concealed occurrence of buried valleys can have significant and often unexpected implications for groundwater and hydrocarbon or geothermal resources.	
What concerns me is that in August 2014 ex Hurricane Bertha resulted in flooding to the west and north of Cambridge. The villages of Caldecote, Bar Hill, Longstanton and Oakington and the local A428 all experienced flooding. Cambridgeshire LLFA's flood reports on this event went no farther than excessive surface flooding and poorly maintained drains.	208403 (R Mason)
I hope and expect that in future, any LLFA flooding reports will be both timely and meet the standards given in this document. However, the EA have completely failed to engage with these investigations or with the LLFA on these matters	208404 (R Mason)
While we support the principle of minimising flood risk and ensuring robust SuDS design, this requirement is overly prescriptive, technically unjustified, and undeliverable in many site contexts.	208967 (Persimmon Homes East Midlands)
Missing borehole data – including Busway, Northstowe, Cambourne or Bourn Airfield.	211111 (R Mason)
We support part 1b as it requires a sequential approach to be taken to the site layout, avoiding any areas of flood risk.	211151 (Environment Agency)
We support the reference to reducing flood risk overall where possible in 1c. However, we would like this to be expanded to include reference to the use of natural flood management techniques.	211152 (Environment Agency)
Explicit guidance is needed on the flood-alleviation role of micro rain-gardens and on how funding for them will be allocated.	208008 (Cambridgeshire County Council)
Rural active travel routes should be bridleway to include equestrians	203951 (S Rogers)

Summary of issues raised in comments	Comments highlighting this issue
The supporting information mentions a Strategic Flood Risk Assessment (SFRA). The 2021 modelling used to map the River Granta is not based on the River Granta, nor on its porosity and ground conditions. As a result, there are notable discrepancies with actual flood events and historic flood events. The evidence should be reviewed and properly assessed so the Plan for this and any other similar areas are based on robust evidence.	211928 (C. Newell)

Policy CC/RE: Renewable energy projects and infrastructure

Abbreviations

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

Summary of Main Issues:

There was broad support for the policy and the specific references to biodiversity and the retention of biodiversity net gain at the end of a projects life.

Historic England broadly welcomed the policy but made some suggestions to strengthen the policy in relation to heritage assets. They also queried the approach taken to the Landscape Sensitivity Assessment and consideration given within this to heritage assets.

The Wildlife Trust welcomed the text on the loss of agricultural land loss of agricultural land and balances that must be struck between different competing land uses noting that too many solar farms could compromise nature recovery to address the biodiversity crisis by reducing land available for nature restoration and pitting nature restoration and food production against one another.

Stapleford Parish Council requested that reference to their neighbourhood plan be included in the criteria related to community energy proposals to ensure that such schemes protect or enhance landscape character.

Proposals for heat network zoning were welcomed although some raised concerns about the lack of case studies on successful projects. Max Fordhams called for a requirement for all heat networks to be low or zero carbon and have a decarbonisation strategy. Carbon intensity and efficiency of the heat network should be part of the feasibility study.

Some residents suggested that more enforcement of renewable energy projects was needed, especially in riverlands basins. There also needed to be ongoing monitoring of schemes as well as wider mitigation measures such as ecological enhancements.

The University of Cambridge requested clarification be added to the section on connection to district heating to make clear that this also applied to major refurbishment as well as new build. They also requested clarification as to what was meant by "unacceptable impacts" to avoid delays in determining applications. Of particular significance is the assessment of the impact of renewables on heritage buildings where there is significant opposition to rooftop solar on older buildings. They also called for better connection to the infrastructure chapter which referenced connections to the gas network but not district heating connections.

There was strong support for provision of photovoltaic panels to existing buildings and car parks.

Addition of a reference to energy storage was requested to enable developments to make best use of the energy generated.

CPPF suggested an amendment to the wording around the continuation of agricultural uses so that takes place both within and adjacent to projects.

Abbey Properties considered that the policy should be amended to mandate that unacceptable impacts are appropriately addressed rather than suggesting automatic refusal of planning permission. They also considered that if applied literally, part 1 of the policy if applied literally could prevent any development on agricultural land and considered part 5 of the policy unenforceable. They also suggested additional wording be added to part 7 of the policy in relation to community support for community led proposals.

Some residents raised concerns about the loss of agricultural land and Natural England raised concerns about renewable

energy projects on peat soils.

The East of England Ambulance service requested that should any data centres be built in or adjacent to the Greater Cambridge to utilise capture of heat generated to support industry or domestic heating.

While supportive of the general principle of the policy, Kingsway Solar considered that the policy was lacking in detail to enable the safeguarding of landscapes, biodiversity and community wellbeing from large-scale developments.

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach, are noted.

Changes to the supporting text have been made in response to the representations received from Historic England, to help clarify the approach that should be taken to consider the impacts of projects on heritage assets. Notably, this includes detail on the submission of detailed Heritage Impact Assessments to consider all designated and non-designated heritage assets and their settings added to paragraph 4.49 of the supporting text. Regarding the Landscape Sensitivity Assessment, this was prepared following the guidance prepared by Natural England. It is not intended to be interpreted as defining the suitability of individual sites for development and does not replace the requirement for more detailed studies, including Heritage Impact Assessment. An additional reference to Heritage Impact Assessment has been added to paragraph 4.44 of the supporting text.

Concerns about ongoing monitoring and enforcement of projects are noted, but enforcement sits outside the remit of the local plan. Where there are concerns about existing schemes not complying with their planning permissions, this should be reported to the Shared Planning Services enforcement team. Regarding the ongoing monitoring of elements such as

proposals for Biodiversity Net Gain (BNG), this forms a key part of our BNG policy and will be prescribed and secured through conservation covenants, planning conditions and / or obligations.

Regarding requests to add specific reference to Neighbourhood Plans to the policy in relation to community energy schemes, the inclusion of such a reference is not considered necessary. On adoption, Neighbourhood Plans form part of the statutory development plan for the area and as such any developments falling within the area covered by the Neighbourhood Plan would have to have consideration to both the Local Plan and the Neighbourhood Plan. As such it is not considered necessary to make specific reference to individual Neighbourhood Plans within this policy. Community led renewable energy projects would also still need to meet the requirements set out in part 1 of the policy which includes consideration of landscape impacts.

Support for heat networks is noted. In response to representations from the University of Cambridge and Max Fordhams, additional wording has been added to part 10 of the policy to clarify that connection applies to major refurbishment and that heat networks should be low or net zero carbon.

Regarding the clarification sought as to what is meant by ‘unacceptable impacts’ on heritage assets, some additional guidance has been added to paragraph 4.49 of the supporting text. Further, more detailed guidance on works to heritage assets can also be found in policy GP/HA (Designated Heritage Assets).

With regards to recommendations from Abbey Developments that the policy should be amended to mandate that unacceptable impacts are appropriately addressed rather than suggesting automatic refusal of planning permission, additional wording has now been added to paragraph 1 of the policy to clarify that proposals will be supported provided that they do not cause unacceptable impacts that cannot be mitigated and are reversible. We have also amended part 7 of the policy as suggested. We do not agree that part 1 of the policy effectively rules out all agricultural land for renewable energy as the

criteria specifically relates to the need to steer development towards lower quality agricultural land and support is also given in the supporting text to proposals that retain agricultural use both within and around the proposals. With regards to criteria 5 and the retention of biodiversity net gain works where renewable energy projects are decommissioned, this can be worked into the long term management and maintenance plans for biodiversity net gain proposals.

In response to representations from Natural England, reference to peat soils has been added to part 1b of the policy.

With regards to data centres, consideration of data centres falls outside the scope of policy CC/RE. Reference to data centres has been added to policy I/EI (energy infrastructure masterplanning) and the co-location of data centres as part of energy networks will be encouraged.

Regarding concerns about the loss of agricultural land, policy CC/RE seeks to balance the need for renewable energy generation with the need for agricultural land in food production and food security. Proposals should avoid the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a) and seeks to promote approaches that retains an element of agricultural use in and around the proposed renewable energy development.

A new addition to the policy in relation to community energy are criteria 8 and 9 which seek to encourage community benefit in the form of profit sharing or a proportion of community ownership. This responds to a government consultation on community benefits and shared ownership for low carbon energy infrastructure published in May 2025.

With regards to the policy lacking in detail as to enable the safeguarding of landscapes, biodiversity and community wellbeing, significant national policy guidance in the form of the PPG is available to assist in the determination of proposals, alongside other guidance from statutory consultees such as Natural England and Historic England. It is not necessary for the local plan to repeat this guidance.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for the policy and for renewables.	202622 (C Pointon), 202961 (BCN Wildlife Trust), 202211 (R. Lambert), 203175 (CPPF), 202624 (C Pointon), 202171 (M MacGinley), 202852 (H Cook), 211874 (Defence Infrastructure Organisation)
Support for clause 1b in relation to protection of biodiversity and bullet point 5 requiring retention of BNG at the end of a projects operational life.	202961 (BCN Wildlife Trust), 203671 (Cambridge Green Party)
Historic England is supportive of renewable energy development and supports the inclusion of a policy for renewable energy. Our advice note Commercial Renewable Energy Development Historic Environment Advice Note 15 provides further advice on Local Plans and renewable energy including site selection and development of policies and maps in plans. This needs to be set out in robust policy criteria and in supporting text which is also reflected in the key of the policies map. We welcome	208923 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
references to heritage in the policy. However, we suggest a number of changes to wording to ensure that the policy and supporting text and policies map key is clearer and more robust.	
Historic England is supportive of renewable energy development and supports the inclusion of a policy for renewable energy. Our advice note Commercial Renewable Energy Development Historic Environment Advice Note 15 provides further advice on Local Plans and renewable energy including site selection and development of policies and maps in plans. We note that you have commissioned a Landscape Assessment – Part 2 Renewable Energy Development Assessment as part of the evidence base for the Local Plan. We note that this evidence has been used for the development of maps for solar and wind turbines which have then been used on the policies map. The assessment is mainly landscape focussed and does not appear to give detailed consideration to the historic environment (though there are some mentions of heritage e.g. church spires but more in relation to the wider landscape). Recognising the challenges in preparing a detailed and thorough assessment of heritage at a strategic scale, we consider that the mapping represents a helpful starting point, although there are some limitations. However, given the limitations of the mapping it is very important that the plan includes suitable strong caveats to help explain these limitations and also to set out what further heritage assessment will be needed at planning application stage.	210171 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
This needs to be set out in robust policy criteria and in supporting text which is also reflected in the key to the policies map. We welcome references to heritage in the policy. However, we suggest a number of changes to wording to ensure that the policy and supporting text and policies map key is clearer and more robust. 1e we welcome the reference to the historic environment and the setting of heritage assets. The Policy should also include reference to the need for detailed heritage impact assessment. Parts of the policy refer to a zooming study – whilst others refer to zoning – we assume the latter? Paragraph 4.51 After (LVIA) add '…and Heritage Impact Assessment (HIA)'	
Welcome the supporting text in relation to the loss of agricultural land and balances that must be struck between different competing land uses – too many solar farms could compromise nature recovery to address the biodiversity crisis by reducing land available for nature restoration and pitting nature restoration and food production against one another.	202961 (BCN Wildlife Trust)
Suggest that criteria 7 be clarified such that community led schemes will be supported as long as they protect or enhance landscape character with reference to policy S&GS 8 of the Stapleford and Great Shelford Neighbourhood Plan	201566 (Stapleford PC)
Welcomes proposals for Heat Network Zoning	202211 (R Lambert), 203671 (Cambridge Green Party)
Enforcement of some control areas needed especially in riverlands basins where it is especially concentrated	202211 (R Lambert)

Summary of issues raised in comments	Comments highlighting this issue
There is a need for further guidance on what qualifies as “unacceptable impacts” to avoid delays in determining applications. Of particular significance is the assessment of the impact of renewables on heritage buildings where there is significant opposition to rooftop solar on older buildings.	University of Cambridge (202471)
Principles of heat network are valid but seem to relate to new build only – should this also apply to major refurbishment?	University of Cambridge (202471)
Needs better alignment with the infrastructure chapter which refers to connections to gas networks and doesn’t seem to require any statement on connecting to heat networks	University of Cambridge (202471)
Amend wording on continuation of agricultural uses to make clear that uses such as grazing can take place onsite around the equipment and is not referring to adjacent land	203175 (CPPF)
Strong support for encouragement of PV on existing buildings and above car parks	203671 (Cambridge Green Party)
Include explicit reference to energy storage and include specific reference to encouraging schemes to use energy onsite	203893 (Carbon Neutral Cambridge)
Policy should mandate that unacceptable impacts are appropriately addressed rather than suggesting automatic refusal of planning permission. The policy would also benefit from a balancing mechanism to allow for benefits to be weighed against any harm.	204724 (Abbey Properties Cambridgeshire Ltd)
Part 1 of the policy if applied literally could be seen as restricting proposals on agricultural land.	204724 (Abbey Properties Cambridgeshire Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Part 5 of the policy is unenforceable as decommissioning would take place at the end of life of the planning permission.	204724 (Abbey Properties Cambridgeshire Ltd)
Part 7 of the policy would benefit from the words ‘for such proposals’ being inserted after ‘demonstrated’.	204724 (Abbey Properties Cambridgeshire Ltd)
Concerns raised about monitoring and compliance with the policy.	202624 (C Pointon)
Policy CC/RE supports renewable energy in principle and aligns with net-zero objectives, making it relevant to proposals such as Kingsway Solar. However, KSCA considers the policy insufficiently detailed to safeguard landscapes, biodiversity and community wellbeing from large-scale developments.	201791 (Kingsway Solar Community Action)
Transformers impact affects countryside tranquillity.	201930 (R Pargeter)
Concern about impact and loss of agricultural land to renewables.	201930 (R Pargeter)
Ecological enhancements and biodiversity around solar farms needs to be properly secured.	201930 (R Pargeter)
Concerns about lack of successful case studies of district heat networks in practice.	202171 (M MacGinley)
Support for low carbon initiatives and community led renewables.	203024 (M Cleminson)
Support for renewables part of the policy. But district heating must be low or zero carbon and have a decarbonisation strategy. Carbon intensity and efficiency of the heat network should be part of the feasibility study.	204480 (Max Fordham)
Concerns about renewables on peat soils.	207619 (Natural England)
Anglian Water supports the policy to facilitate the delivery of renewable energy schemes. We use land at or close to our operational sites to create solar arrays and generate renewable energy. It is an	210202 (Anglian Water Services)

Summary of issues raised in comments	Comments highlighting this issue
efficient way of maximising the space we have. We are also trialling an energy storage solution that will allow us to store excess solar energy generated during the day in batteries and use it at other times, helping us to reduce our reliance on energy from the grid.	
Should any data centres be built in or adjacent to the Greater Cambridge to utilise capture of heat generated to support industry or domestic heating.	210324 (East England Ambulance Service NHS Trust)
The National Trust is supportive of renewable energy in principle. However, the landscape character, tranquillity, sensitive views, and future Wicken Vision ambition are all being adversely affected by the amount of solar and associated infrastructure being developed in the Vision area. We note that the policy states that these developments should not cause unacceptable impacts, including cumulative and cross-boundary impacts, but consider that this policy could be strengthened to put the onus on the developer to undertake an assessment of cumulative and cross-boundary impacts. Furthermore, any proposed renewable energy/infrastructure that is within the Greater Cambridge area and is functionally linked to designated sites should be avoided.	208454 (The National Trust)
Support for policy but note that NSIPs are decided by SoS.	210479 (Kingsway Solar Community Action)
To avoid ambiguity, the policy could include wording such as: “Support for renewable energy development will not be afforded where proposals result in significant harm to landscape character,	210480 (Kingsway Solar Community Action)

Summary of issues raised in comments	Comments highlighting this issue
biodiversity, residential amenity or heritage assets that cannot be demonstrably avoided and acceptably mitigated. The climate benefits of renewable energy generation must be balanced against, and not automatically outweigh, these considerations.”	
Policy CC/RE clause 7 – we suggest that clause 7 (community-led renewable and low-carbon initiatives) is clarified such that initiatives will be supported as long as they protect or enhance landscape character in line with other policies in the Development Plan. See Policy S&GS 8: Renewable energy schemes in Stapleford and Great Shelford for guidance.	210920 (Great Shelford PC)
Any emerging policy makes clear that, where an MOD assessment indicates that a development would have a detrimental impact on the operation and capability of defence assets or sites, that such an application would be refused or that conditions may be attached to any consent that might be issued which may include the removal of permitted development rights.	211875 (Defence Infrastructure Organisation)
Rural active travel routes should be bridleway to include horse riders.	203955 (S Rogers)

Policy CC/CE: Supporting a circular economy and sustainable resource use

Abbreviations

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

Summary of Main Issues:

There was broad support for the policy from FECRA, Wildlife Trust, Cambridge City Council Democrat Group, ESCO Propsect, Cambridge Green Party, Mothers CAN Cambridge, Granta Park, Cambridge Green Party, Anglian Water, some developers and local residents.

Comments were made about concerns about prohibiting development coming forward and being obstructive to the development process. Concerns were raised about feasibility of the policy requirements and the consistency of their application, including about impacts on some individual developments. Concerns were also raised about Circular Economy Principles and conflation with WLC assessments, about references to nationally consistent methodologies including Part Z, and approaches to uses like life sciences which are much more unique. There were requests for practical and viable wording to show a pragmatic approach to applying and considering circular economy principles.

The County Council requested reference to the Cambridgeshire and Peterborough Minerals and Waste Local Plan and alterations to Paragraph 4.68. The Environment Agency asked for the policy to reflect more detailed consideration for post-development household waste, CL:AIRE Definition of Waste Development Industry Code of Practice (DoWCoP), water scarcity and the requirement for waste permits.

Comments were also made about food waste storage and composting.

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach, are noted.

The proposed approach to this policy draws on existing evidence and a wider need to both reduce use of materials and reduce carbon by re-using materials, building elements and where possible new buildings. The considerations of Circular Economy principles as set out in this policy are designed to be a consideration to inform good quality design decisions and contributing to reducing whole life carbon. It is not prohibiting development but ensuring relevant development goes through a consideration and assessment of what can be retained and re-used on or off site and how can the building be designed to extend the life of the building. The requirements for circular economy policies have been removed from site allocations to set out a clear position in CC/CE.

In response to the demolition of the Cambridge Leisure Park, this policy will apply to this development depending on when the planning application comes in. If the future use of the site is impeded by the current building and there is not scope for refurbishment, demolition will be accepted. The re-use of materials and building elements will be encouraged.

In response to concerns raised about monitoring and enforcement, a Sustainability Checklist is being developed to support the policies to provide both case officers and applicants details on what needs to be provided and how it will be considered and weighed up in the planning application.

In response to concerns about point 5 of the policy and the timing of the Circular Economy Statement requirement, similarly to the GLA approach to Circular Economy used successfully in London, a circular economy statement is required at submission

stage to demonstrate how the development has utilised the principles to consider the approach to the site and the re-use of buildings, building elements and details. It is asked for at this stage as these considerations will feed into the operational energy and whole life carbon calculations completed at this stage. An Outline scheme will require less detail than a Reserved Matters application and this will be set out in the supporting technical notes and sustainability checklist.

In response to Cambridgeshire County Council, suggested amendments have been made.

Definition of significant part has been added in part 4.62of the policy in response to concerns.

There is no conflation with WLC. Circular Economy principles and assessments are about the re-use of materials and buildings and these considerations will reduce WLC as monitored and assessed in the WLC assessment. The two documents should speak to each other but have different purposes.

Nationally consistent methodologies including Part Z – this will be added in supporting technical notes and sustainability checklist. This will draw on national Carbon studies.

Approaches to uses like life sciences will be addressed on a case by case basis and further detail will be set out in supporting technical notes and sustainability checklist.

In response to the Environment Agency, the supporting technical note will reflect more detailed consideration for post-development household waste, water scarcity and the requirement for waste permits. The policy wording has been revised to include CL:AIRE Definition of Waste Development Industry Code of Practice (DoWCoP).

Food waste storage and composting is encouraged and supported by the wider approach to waste management by Cambridgeshire and Peterborough Combined Authority who is the responsible body for waste.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for the policy.	205192 (FECRA), 205516 (BCN Wildlife Trust), 202917 (Cambridge City Council Liberal Democrat Group), 203185 (ESCO Prospect), 203672 (Cambridge Green Party), 204905 (Mothers CAN Cambridge), 201820 (T McKeown), 203366 (Carter Jonas on behalf of BMR Granta Park Propco Limited), 210203 (Anglian Water Services), 210296 (Vistry Group), 210603 (Turley on behalf of Imperial War Museum), 210921 (Great Shelford PC), 210891

Summary of issues raised in comments	Comments highlighting this issue
	(Turley on behalf of Kings College)
Concerns raised about proposals to demolish the Cambridge Leisure Park complex.	201243 (S Williams)
Need to be clear on who 'performance will be monitored and reported' relates to (to whom will it be reported).	202917 (Cambridge City Council Liberal Democrat Group)
Supportive of circular economy principles but object to clause 2 as it does not reflect the specialist needs of life sciences facilities which need a specialist approach as well as other development types where there is a need to consider site-specific factors and viability. A more balanced approach is needed, and it is requested that "on an exceptional basis" is removed from the policy.	203366 (BMR Granta Park PropCo Limited), 204315 (CIP)
Concerns that opportunities for reuse and retrofit are not being proactively assessed, e.g. by bringing empty or under-used buildings back into use.	203672 (Cambridge Green Party)
Include a clearer and stronger requirement on reducing embodied carbon providing more guidance on retrofit best practice and the use of low carbon and carbon storing materials to future-proof delivery.	203672 (Cambridge Green Party)
Call for clear, nationally consistent methodologies for circularity requirements, potentially through a future Part Z of the Building Regulations.	204315 (CIP)
Recommendation to strengthen the policy with reference to lean design at point 1 to reduce embodied carbon through efficient structures and avoiding basements and cantilevers.	204905 (Mothers CAN Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
Emphasise intensity of land use as a consideration for demolition where it is likely to provide buildings that might otherwise be built on virgin soil (or peat outside of the city) with reference to policy CC/CS.	204905 (Mothers CAN Cambridge)
Recommend a pre-demolition audit as part of Circular Economy Statement for major projects and for projects of any size where the materials have significant heritage value or unusual reuse potential.	204905 Mothers CAN Cambridge)
Part 1 of the policy is deemed unnecessary as this issue is addressed in part 8 of policy CC/NZ.	205200 (Home Builders Federation)
No support in the NPPF for a presumption in favour of repairing or refurbishing existing buildings over their demolition or reuse. Approach could hinder development on previously developed land, lead to lower densities and hinder ability to meet standards for outdoor space, BNG and accessible units.	205200 (Home Builders Federation)
Provision of Circular Economy Statements for developments of 150 or more dwellings is considered unnecessary and could be incorporated into Sustainability Statements instead.	205200 (Home Builders Federation)
RECAP waste Management Design Guide is not part of the development plan and as such requirement for compliance with this is problematic	205200 (Home Builders Federation)
All assessments of claimed “New Zero Carbon” buildings should include embodied carbon of demolitions (with ref to Westminster Retrofit First policy)	205395 (J Preston)
Concerns raised about circular economy and re-use of food citing Cambridge Central Market as a good example.	202485 (J Neal)
Review wording criteria 2d as it may hinder a balanced assessment of the merits of retention versus demolition.	202794 (Carter Jonas on behalf of Trinity Hall)

Summary of issues raised in comments	Comments highlighting this issue
Concerns raised about monitoring and enforcing the policy.	202855 (H Cook) 203029 (M Cleminson)
Clarity is needed relating to what constitutes a significant part of the building. Concerns are about circumstances where development may be justified being restricted.	203400 (Bidwells on behalf of Babraham Research Campus Ltd) 204301 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure Ltd)
Rural active travel routes should be bridleway to include equestrians.	203957 (S Rogers)
Concern raised that there are not enough repair shops, especially in rural areas.	203987 (Histon and Impington PC)
Objections to the proposed wording of Policy CC/CE. Supportive of objectives but the requirement for a Circular Economy Statement goes beyond best practice and risks conflation with whole life cycle carbon requirements.	204344 (Bidwells on behalf of Tritax Big Box Developments)
Support the policy but it should be strengthened by referencing lean design and the intensity of land use should be a consideration for demolition where it could be built on virgin soils.	204485 (Max Fordham) 205478 (Max Fordham)

Summary of issues raised in comments	Comments highlighting this issue
Concerns about policies impact on site viability and other factors such as affordable housing delivery. A more balanced approach is needed that allows for demolition and redevelopment to meet NPPF objectives for sustainable growth and quality housing.	204796 (Carter Jonas on behalf of Hill)
Further clarity is needed on the scope and methodology for circularity assessments and their integration with whole life carbon assessments.	204796 (Carter Jonas on behalf of Hill)
Circularity requirements should align with existing policy thresholds and be supported by clear methodologies, potentially through a new Part Z of the Building Regulations.	204796 (Carter Jonas on behalf of Hill)
Object to the proposed wording of policy CC/CE, despite supporting its objectives and circular economy principles. Request clarity on the term 'significant part' in relation to the demolition of buildings to avoid ambiguity in policy interpretation. While supporting the emphasis on retrofit, it is suggested that the policy should allow for other material benefits that may justify demolition. Recommend adding flexibility to the policy to permit demolition and redevelopment if refurbishment or reuse is not viable. Changes to plan: Confirmation on the definition of a 'significant part' Recognition in the policy that there may be other planning benefits that outweigh presumption in favour of retrofit.	204301 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
We commend the inclusion of circular-economy principles that enable operational waste management and composting for new developments.	208188 (Cambridgeshire Sustainable Food)
The circular economy policy already supports operational waste management and composting. We recommend making food waste and surplus redistribution more explicit, by requiring (particularly in major schemes and mixed-use centres):	208193 (Cambridgeshire Sustainable Food)

Summary of issues raised in comments	Comments highlighting this issue
● separate, convenient food waste storage for homes and food businesses (designed for easy collection) ● design that enables community composting where appropriate ● practical space that can support surplus food redistribution in neighbourhood hubs (small “last mile” storage/handling space can be transformational).	
We back the circular-economy principles that enable operational waste management and composting.	206958 (Cambridgeshire Sustainable Food)
Make food-waste storage, community composting and surplus-food redistribution facilities mandatory in major schemes and mixed-use centres.	206963 (Y Dignon)
A brick by brick case study of as many buildings as possible may warrant invitation of national and international academic institutions to undertake a regional or national Carbon Study further justifying the retention of prized Old Builds elsewhere across the area, region and the UK. Sustainable Materials- an approved contractor directory that could readily advise and source the necessary raw materials with realistically reduced costs substantially again deterring potential demolition-driven applicants from consuming workload time of the Planning Department. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of sustainable materials must be provided by the Local Council. Enhancement of Setting with funding grants and financial incentives from all tiers of Government for	210351 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
Private Investors especially those contributing actively towards achieving Net Zero through Embodied Energy/ Carbon Capacity rich measures, i.e. Retention of Old Builds.	
Girton College broadly supports the intent of Policy CC/CE and welcome the flexibility built into paragraph 1 of the policy, which allows proposals to demonstrate compliance with the circular economy principles where “practical and viable” to meet all requirements in full.	208307 (Turley on behalf of Girton College)
Concerns raised about point 5 – requiring a CE statement as it requires it at submission stage not detailed design stage.	210297 (Vistry Group), 208307 (Turley on behalf of Girton College), 210603 (Turley on behalf of Imperial War Museum), 210981 (Turley on behalf of Kings College)
Reference to the Cambridgeshire and Peterborough Minerals and Waste Local Plan is supported. Amendments suggested to Paragraph 4.68.	210546 (Cambridgeshire County Council)
We note the inclusion for developers to consider waste management for all proposals. However, there is a lack of detail on post-development household waste management including Persistent Organic Pollutants, hazardous or problematic waste streams and the support of the circular economy. Reference should be included on how future growth will be supported by adequate infrastructure such as	211159 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
Household Waste Recycling Centres, recycling hubs, Waste Treatment Stations, Incinerators and treatment capacity.	
It has been noted that water scarcity is a concern for the local plan, please note that water is generally required alongside waste operations for the purpose of dust suppression and fire prevention. This would need to be considered in relation to any waste management infrastructure required as per the point above. It may also be required by constructors for dust suppression during building works.	211160 (Environment Agency)
Please ensure that Contractors are aware of the potential requirement to obtain Waste Permits and/or apply under DoWCoP in relation to construction waste.	211161 (Environment Agency)
We would recommend revision to reflect the following comments for waste management in the context of land contamination/remediation: Excavated materials recovered on a development site via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste Development Industry Code of Practice (DoWCoP) subject to certain conditions being met. This is sustainable approach. However, contaminated materials that are or must be disposed of are waste and must be managed in accordance with the relevant legislation. We recommend that the following guidance be referenced: The Definition of Waste: Development Industry Code of Practice; and The Waste Management page on gov.uk.	211162 (Environment Agency)
As drafted, it is insufficiently precise, not effectively enforceable, and risks duplication with existing regimes. The policy is vague in its duties, lacking clear enforceable requirements.	208968 (Persimmon Homes East Midlands)

Summary of issues raised in comments	Comments highlighting this issue
It is important that the reference in 1. to “where practical and viable” is retained in the Policy and that “where practical and viable” is similarly referenced in Policy S/CBN: Cambourne North 48 where is states “integrate circular economy principles into design (including Zero Avoidable Waste in construction, maximising opportunities for reuse and recycling of materials across whole life-cycle) and will encourage zero waste living in operation for future residents through provision of services and facilities.	208263 (Martin Grant Land Limited)

Policy CC/CS: Supporting land-based carbon sequestration and carbon sinks

Abbreviations

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

Summary of Main Issues:

A number of comments expressed general support for the policy. Natural England supported in principle, but requested a number of changes, to provide detail on the approach to soil management. Concern was expressed that requirements to explore carbon sequestration duplicated other policy requirements such as biodiversity net gain. Another comment considered the policy was too vague to be appropriately implemented. Some comments highlighted the need to avoid allocations on peat areas. The Cambridge Green Party proposed that the policy to be widened to include soils, grassland, woodland, wetlands

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach, are noted.

Peatlands are a particularly important store of carbon, and need a specific policy approach. A number of amendments have been made to the draft policy, including to add detail to the approach to soil management reflecting comments from Natural England. land-based carbon sequestration opportunities go beyond application of biodiversity net gain, and it is a reasonable and appropriate requirement to require developers to explore and implement opportunities.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for policy.	201350 (Royal Society for Protection of Birds (RSPB), 201567 (Stapleford PC), 202488 (J Neal), 204913 (Mothers CAN), 205480 (Max Fordham),205517 (Wildlife Trust BCN), 208264 (Savills on behalf of Martin Grant Land Limited), 210922 (Great Shelford PC)
The general principles of this policy are welcomed, however, Natural England does not support part 2a of Policy CC/CS which allows sites to be allocated on peat soil, or for those allocations which are later discovered to be on peat to proceed. Part 4 refers to the removal of peat soils. We advise strengthening this, along the lines of 'If there are any exceptional proposals allowed by the LPA to remove peat soils, this must only be done with the guidance and supervision of a suitably qualified and experienced soil scientist / practitioner, to an approved plan. The peat must be appropriately stored and then eventually used, all in a way that would limit carbon emissions into the atmosphere as far as possible.' We also note that part 4 refers to the DEFRA Code of Practice, however, the current (2009) version	207620 (Natural England)

Summary of issues raised in comments	Comments highlighting this issue
does not mention peat, which requires specialist handling techniques. Refer to: Broads Authority Guide to understanding and addressing the impact of new developments on peat soil. We also advise that it should be made clear that tree planting on areas of peat is not normally appropriate as this contributes to the drying and wasting of peat, therefore releasing carbon rather than storing it as intended. Please see Appendix 1 for additional comments relating to peat soils.	
There should be offsetting included in the policy where carbon sinks are damaged or removed.	202625 (C Pointon), 203033 (M Cleminson),
Policy should explicitly protect significant existing carbon stores, including soils, woodlands, grasslands and wetlands, not just peatlands or future sequestration opportunities. Concerns raised about the wording allowing harmful exceptions.	203673 (Cambridge Green Party)
Rural active travel routes should be bridleway to include equestrians.	203959 (S Rogers)
The policy reads as an extension to the Biodiversity Net Gain process rather than clearly defining requirements for carbon sequestration. The respondent suggests that opportunities for carbon sequestration should be proportionate, evidence-based, and appropriate to the site's scale and nature, considering landscape and ecological practices. There is uncertainty regarding how schemes will demonstrate a 'meaningful' level of carbon sequestration alongside significant BNG.	204357 (Bidwells LLP on behalf of Tritax Big Box Developments)
Concerns raised that allocation sites that are identified on peat based soil locations should not be supported. In this case it would be preferable to demolish an existing building on brownfield site (reference policy CC/CE) and intensify density there.	204913 (Mothers CAN), 205480 (Max Fordham),

Summary of issues raised in comments	Comments highlighting this issue
The policy should be strengthened by requiring a soil management plan on larger allocation sites regardless of whether they contain peat.	205480 (Max Fordham)
Natural England does not support part 2a of Policy CC/CS which allows sites to be allocated on peat soil, or for those allocations which are later discovered to be on peat to proceed. Part 4 refers to the removal of peat soils. We advise strengthening this. Note that part 4 refers to the DEFRA Code of Practice, however, the current (2009) version does not mention peat, which requires specialist handling techniques. Refer to: Broads Authority Guide to understanding and addressing the impact of new developments on peat soil.	620 (Natural England)
Support the principle of enhancing land-based carbon sequestration and green infrastructure but raises concerns that Policy CC/CS exceeds industry guidance and established practice. The policy reads as an extension to the Biodiversity Net Gain process rather than clearly defining requirements for carbon sequestration. Opportunities for carbon sequestration should be proportionate, evidence-based, and appropriate to the site's scale and nature, considering landscape and ecological practices. There is uncertainty regarding how schemes will demonstrate a 'meaningful' level of carbon sequestration alongside significant BNG. Policy CC/CS should allow flexibility for outcomes to align with established guidance rather than imposing prescriptive expectations that exceed standards.	204357 (Bidwells on behalf of Tritax Big Box Developments)
Support for general principles but part 2a needs to be strengthened, instead of referring to DEFRA Code of Practice in part 4 refers to the Broads Authority Guide. The policy should be clear that tree	207620 (Natural England)

Summary of issues raised in comments	Comments highlighting this issue
planting on areas of peat is not normally appropriate as this contributes to the drying and wasting of peat, therefore releasing carbon rather than storing it as intended.	
Support for policy. The wording of Policy CC/CS should include an additional numbered point to reinforce the need to consider the link between the impact of proposed development on water availability and peat condition.	208455 (The National Trust)
The policy introduces undefined obligations resulting is a policy that is overly vague, lacks objective compliance tests, and is potentially unenforceable in development management.	208969 (Persimmon Homes East Midlands)
There could be the opportunity for overall carbon benefits with a suitable peat restoration plan which should be encouraged within the policy to allow developers the flexibility to build new homes whist protecting or enhancing valuable peat soils.	210298 (Turley on behalf of Vistry Group)
The BHS objects because the policy should recognise that natural-surface public rights of way, including bridleways and restricted byways, can contribute positively to these objectives when appropriately designed and managed.	203564 (British Horse Society)
Rural active travel routes should be bridleway to include equestrians	203959 (S Rogers)

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
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.	
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.	201039 (P Spowart)
'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.	201244 (S Williams)
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.	201276 (H Painter)

Summary of issues raised in comments	Comments highlighting this issue
The Plan lacks sufficient focus on the area east of Cambridge, which includes villages like Balsham and West Wratting, highlighting its significance for green spaces and farmland. 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. 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. 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.	201442 (J Newton)
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.	201540 (N Sheffield)
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	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
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.	
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?	203373 (Great Wilbraham PC)
This summary should also include reference to geodiversity.	203433 (Cambridgeshire Geological Society)
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.	203681 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
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. New Local Plan's measures to protect and enhance biodiversity commended but believes an opportunity has been missed regarding local designations. 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). '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.	204698 (Girton Neighbourhood Plan Team)
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.	202169 (J Neal)
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	203594 (T Neal) 202279 (B Grieg)

Summary of issues raised in comments	Comments highlighting this issue
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.	
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.	203170 (Cambridgeshire ACRE)
What to amend of the policy: • 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.	203219 (Forestry Commission), 203248, 203249, 203250, (Fulbourn Swifts Group),

Summary of issues raised in comments	Comments highlighting this issue
• 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.	
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.	203757 (G Chamberlain)
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.	205614 (C Dunbar), 205615 (C Dunbar)
Threat to the chalk streams: • 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
• Cumulative impacts – including existing abstraction, climate change effects and inadequate assessment of mitigation – have not been properly evaluated, breaching the precautionary principle.	
Support and protection of green space and biodiversity: • 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.	205960, 205962, (Histon and Impington Community Land trust), 205988 205969, 205987 (R Randle), 206007 (M Goldberg), 206066 (A Marns), 206122 (Elsworth PC)
Rural active travel routes should be bridleway to include horseriders	203962 (S Rogers)
[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.	206563,206564, 206566 (Great Wilbraham PC)

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
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. Policies relating to green infrastructure and connectivity should: -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)
The 20 % biodiversity net gain requirement exceeds the statutory 10 % and lacks justification; a more realistic target is recommended.	209041 (Marshall Group Properties)
Consider: • 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
be good to understand and reduce the barriers to young women accessing these spaces and engaging in sport or exercise.	
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.	211075 (The National Trust)

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 rational 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
major sites contradicts the goal of doubling BNG within Cambridge (a disconnect between policy and aspiration).	
Support for the policy. • 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	202808 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 202921 (Cambridge Liberal Democrat Group), 204636 (M Cleminson), 207621 (Natural England), 208452 (National Trust), 210578 (Cambridgeshire County Council)
Support the requirement to secure 20% BNG as part of major developments. 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	210558 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
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.	
Policy should set higher targets and go further than 20% BNG for major development.	204636 (M Cleminson), 205226 (E Green)
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	210204 (Anglian Water Services)
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.	204915 (Mothers CAN Cambridge)
General support for policy intent/overall objective of policy to protect and enhance biodiversity. Specific comments that: • 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.	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-

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.	
Comments received which support the policy intent but which suggested specific amendments to the policy requirements for 20% BNG for major development: • 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	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)

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
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.	205205 (D Stoughton)
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 (he 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.	205250 (Home Builders Federation)
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.	210234 (Turley on behalf of Vistry Group)
Comments received about the evidence base upon which the draft plan Viability Assessment (2025) considers that the 20% threshold is viable: • 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	205250 (Home Builders Federation), 208909 (Nightingale Land on behalf of

Summary of issues raised in comments	Comments highlighting this issue
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, • 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	Nightingale Land and Hill Residential Ltd-132041)
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.	205250 (Home Builders Federation)
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. • 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	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-

Summary of issues raised in comments	Comments highlighting this issue
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. • 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. 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	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

Summary of issues raised in comments	Comments highlighting this issue
up delivery. 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. • 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	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

Summary of issues raised in comments	Comments highlighting this issue
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. • 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	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

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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. • 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 many not be appropriate.	(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)
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.	201675 (Stantec on behalf of British Land), 203933 (Bidwells on behalf of Emmanuel College (Wilberforce Road)-131570)

Summary of issues raised in comments	Comments highlighting this issue
The policy requirement of 20% Biodiversity Net Gain is not consistent with the National Requirements for BNG.	209701 (Lanpro Services on behalf of B Homent, J Tee and R Smith), 211237 (Living Space Housing), 211283 (Woolsington One Ltd)
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.	211237 (Living Space Housing)
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.	209701 (Lanpro Services on behalf of B Homent, J Tee and R Smith)
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%. 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	208280 (Turley on behalf of Imperial War Musuem), 208302 (Turley on behalf of Girton College), 2111405 (Persimmon Homes East Midlands),

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
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. 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.	201167 (M Foote), 201208 (M Foote), 203118 (M Foote)
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.	209026 (Hobson's Conduit Trust)

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
The additional requirement for major development to provide a minimum of 20% should only be an aspirational target (where sites can reasonably accommodate this)	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)
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'.	201458 (T Stone)
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.	201476 (H Brown)
Comments received on policy approach to Suitable Alternative Natural Greenspaces (SANGs): ➢ 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	201514 (RSPB)

Summary of issues raised in comments	Comments highlighting this issue
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.	
Support for inclusion and application of the mitigation hierarchy in the policy.	201514 (RSPB), 203194 (Cambridge Past, Present and Future)
Support for inclusion of reference to geodiversity and sites of geological importance such as Local Geological Sites in policy	203461 (Cambridgeshire Geological Society)
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.	201568 (Stapleford PC- Chair of the Stapleford and Great Shelford Neighbourhood Plan Steering Group)
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.	201568 (Stapleford PC-Chair of the Stapleford and Great Shelford Neighbourhood Plan Steering Group)

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)
Policy should be added to require wildlife enhancing features in all new development/ all new housing development, including: • 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
2) favour BNG offsite over onsite for any development if it a) enhances green belt land or b) adds to adjacent habitats increasing the landscape scale connectivity and/or contributes to specific habitat or species priorities	
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.	203065 (Bidwells on behalf of Barrett David Wilson Homes and the North West Cambridge consortium of landowners)
Rural active travel routes should be bridleway to include equestrians.	203964 (S Rogers)
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. Buglife has produced a general guidance note on practical measures to achieve this and is developing site-specific profiles. Solar panels adjacent to running water can also attract aquatic invertebrates with reflected polarised	207622 (Natural England)

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)
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. 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.	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
CSET is built on its currently proposed route. There appears to be a glaring inconsistency between the strategies for transport and for green infrastructure.	
Broad support for policy. However, clause 3: • 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	210923, 210924 (Great Shelford Parish Council)
Three key factors contribute to the success of the farmland birds and other wildlife in the fields around Nine Wells: • 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.	210886 (J Meed)

Summary of issues raised in comments	Comments highlighting this issue
• 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.	
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.	204461 (Swifts Local Network: Swifts Planning Group)
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	205272 (Swifts Local Network: Swifts Planning Group)
Policy supported but could be made stronger in the following areas. ➢ 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). 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.	204521 (Max Fordham)

Summary of issues raised in comments	Comments highlighting this issue
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. The respondent argues that the uplift is not supported by a robust evidence base and does not demonstrate proportionality or deliverability across all sites. The national BNG framework should guide local requirements, which must be justified, flexible, and based on site-specific ecological capacity. While biodiversity enhancement is supported, a blanket approach could hinder site delivery and overlook the merits of individual sites. 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.	203933 (Emmanuel College, Wilberforce Road), 204137 (Emmanuel College, Long Road)
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. 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	211163, 211164 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
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.	
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.	210927 (Great Shelford Parish Council)
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	211004 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
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.	
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.	211283 (Woolsington One Ltd)
The green spaces that separate Longstanton from the new Northstowe development are of historic significance and should not be re-classified for housing.	208461 (Longstanton PC)
Support for policy but concerns about applying to healthcare uses.	205111 (NHS Cambridgeshire and Peterborough Integrated Care Board)

Summary of issues raised in comments	Comments highlighting this issue
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".	211397 (Bidwells on behalf of Pemberton Family and Pemberton Family Trusts), 211398 (Quod on behalf of Cambridgeshire County Council)
Concerns raised about impact on SME developers of the higher 20% BNG, policy should be consistent with 10% in national guidance.	211462 (Hayfield Homes Construction Ltd)
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".	211086 (National Trust)

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: • 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
• 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.	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

Summary of issues raised in comments	Comments highlighting this issue
	Barton Road Landowners Group)
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). 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. 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). 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	207625, 207624,207625,207628 (Natural England)

Summary of issues raised in comments	Comments highlighting this issue
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. Projects that seek A-WINEP match funding must address two primary outcomes: • the reduction of nutrient pollution into rivers and • mitigating the impact of low flow. 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	210205 (Anglian Water Services)
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.	207626 (Natural England)

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)
Specific comments received in relation to Gog Magog Hills (in Policy BG/GI clause 5(3)): 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. 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: • 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.	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),

Summary of issues raised in comments	Comments highlighting this issue
• 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.	
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)	209680 (Stapleford PC), 208100 (Great Shelford PC)
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.	201592 (Stapleford PC)
Specific comments received in relation to Public Rights of Way (PROWs): • 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.	201718 (S Jeggo)
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	202813 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust)
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: • No.4 Enhancement of Eastern Fens • No.3 Gog Magog and Chalkland Fringe	201956 (Carter Jonas on behalf of KG Moss Will Trust & Moss Family), 202584 (Ely Diocesan Board of Finance), 203326 (Carter Jonas on

Summary of issues raised in comments	Comments highlighting this issue
• No.5 Great Ouse Fenland Arc • No.7 West Cambridge GI Buffer-Coton Corridor • No.2 River Cam Corridor 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.	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)
Concerns about its effectiveness in delivering strategic GI across Greater Cambridge, not clear at present how the policy aspirations will be delivered. 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. 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	202815, 202819 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust), 203210 (Cambridge Past, Present and Future)

Summary of issues raised in comments	Comments highlighting this issue
are aware of this as, however addressing this missing aspect of the local plan will be critical in determining whether the plan is sustainable.	
Plan must facilitate delivery of the strategic GI required through both policy and appropriate site allocations now. Immediate action is required to increase capacity for accessible natural greenspaces to prevent damage to existing nature sites, including SSSIs.	202815, 202819 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust), 203210 (Cambridge Past, Present and Future)
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.	202815, 202819 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust), 203210 (Cambridge Past, Present and Future)
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. 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	202819 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust), 203210 (Cambridge Past, Present and Future)

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
In principle support for Urban Greening Factor but specific points/suggestions for changes as follows: • 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.	202475 (University of Cambridge), 203074 (Bidwells on behalf of Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners),
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. 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)	204331 (Carter Jonas on behalf of Cambridge Investment Partnership), 208315 (The Planning Bureau Ltd on behalf of Churchill Retirement Living with McCarthy and Stone)

Summary of issues raised in comments	Comments highlighting this issue
Objection to 0.4 UGF target as minimum for major development: • 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.	204812 (Carter Jonas on behalf of Hill), 205257 (Home Builders Federation)
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.	203358 (Carter Joans on behalf of BMR Granta Park Propco Ltd.)

Summary of issues raised in comments	Comments highlighting this issue
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.	202831 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust)
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.	204852 (Turley on behalf of Vistry Group), 210237 (Turley on behalf of Vistry Group)
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	202813 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust)
All development should contribute to strategic GI and therefore the Local Plan must include strategic GI within a CIL requirement for new developments.	202837 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust),

Summary of issues raised in comments	Comments highlighting this issue
	203210 (Cambridge Past, Present and Future)
Suggestion to clarify areas targeted in BG/GI by relating them to the boundaries for the Landscape Character Types, for example: · 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. 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).	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. his 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
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.	
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: • 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.	208166 (Cambridgeshire Local Access Forum)
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.'	211165 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
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. 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.	202930 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)
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. 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. 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	202843, 202850, 202916 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)

Summary of issues raised in comments	Comments highlighting this issue
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. 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. 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? The Wildlife Trust welcomes the commitment to undertake further work on a SANGS. 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.	
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	211284 (Woolsington One Ltd)

Summary of issues raised in comments	Comments highlighting this issue
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.	
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.	210627 (Cambridgeshire County Council)
Concerns raised about introduction of UGF with no evidence base, viability and NPPF requirements for clarity and enforceability.	211406 (Perisimmon Homes East Midlands)
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.	210933 (Great Abington PC)
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	210932 (Great Shelford PC), 209683 (Stapleford PC),

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
Redrow requests that the Greening Factor requirement is reviewed and amended as follows: 1. Replace the mandatory Greening Factor of 0.4 (residential) and 0.3 (non residential) with a flexible, evidence based standard, such as: “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.” 2. Require the Local Planning Authority to produce a technical evidence base demonstrating: 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.	204578 (Carter Jonas on behalf of Redrow South Midlands)
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. It requires developments to achieve a number of ‘initiatives’ and ‘objectives’: Urban Greening Factor,	209209 (Urban & Civic)

Summary of issues raised in comments	Comments highlighting this issue
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.	
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. 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. Purpose, method and a clear demonstration of it could work is absent and very necessary if this approach is to be considered further.	209210 (Urban & Civic)

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**
Recommendation for increased buffer zones: ➢ 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)	202850 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 201354 (RSPB), 201382 (Gamlingay PC)
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.	204002 (Savills on behalf of Anglia Ruskin University-131574), 204864 (Abbey Properties Cambridgeshire Ltd), 205107 (Lichfields on behalf of Lolworth Developments Ltd-129685)
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	210206 (Anglian Water Services)

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	
General support for the policy. 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.	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)
Support specific points of the policy, that it: • Requires development to demonstrate how it will protect ‘space below ground’	201508 (B Greig), 201700 (J Neal), 201837 (T Neal),

Summary of issues raised in comments	Comments highlighting this issue
• 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)
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. Suggestion that hedgerows should meet Wildlife Trust size standards.	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

Summary of issues raised in comments	Comments highlighting this issue
	Buckingham), 205667 (D Storey), 207650 (Duxford PC)
Support for policy requirement for minimum tree canopy cover for major development. 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.	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)

Summary of issues raised in comments	Comments highlighting this issue
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).	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)
Ancient and woodlands tree should be explicitly defined as by the Woodland Trust.	201508 (B Greig), 201700 (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-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
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: ➢ 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)
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.	202353 (R Lund)
Suggestions that policy should encourage the planting of fruit trees (in residential neighbourhoods)	202836 (Dr H Cook), 208875 (R Lambert)
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.	202940 (Cambridge City Council Liberal Democrat Group)
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).	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)
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. Detailed comments: • 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
and does not strike the appropriate balance between landscape enhancement and the delivery of strategic growth. • 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	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

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)
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. 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.	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),

Summary of issues raised in comments	Comments highlighting this issue
Suggestion that a possible policy distinction between the City and area beyond may be appropriate.	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

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
	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

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 grater 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)
Point 1: + 30% minimum is supported, with adequate monitoring and enforcement. 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) Point 3a: hedgerows should meet Wildlife Trust size standards Point 3b support protecting "space below ground" Point 4a change text to "climate crisis" THROUGHOUT Point 4b support "long lived trees" Point 6 strongly support Point 7: ancient and woodland trees must be explicitly defined as by the Woodland Trust	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
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.	208990 (Barratt Homes Northampton)
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.	210238 (Turley on behalf of Vistry Group)
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.	210239 (Turley on behalf of Vistry Group)
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	21040 (Turley on behalf of Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
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.	
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.	210496 (Forestry Commission)
We are generally supportive of this policy but surprised to see no reference to prioritising native trees and hedgerows.	210934 (Great Shelford PC)
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.	210935 (Great Shelford PC)
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. 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.	210936 (Great Shelford PC)

Summary of issues raised in comments	Comments highlighting this issue
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.	211399 (Bidwells on behalf of Pemberton Family and Pemberton Family Trusts), 211400 (Quod on behalf of Cambridgeshire County Council and Prologis)
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.	211407 (Persimmon Homes East Midlands)
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.	(210240 Turley on behalf of Vistry)

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
We generally support this policy but would like to see the following amendments: We strongly recommend a re-ordering of policy criteria to reflect their significance and priority. As worded, the implication is that ALL development must demonstrate the requirements in the list. We would like the tourism and recreation clause removed. 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. 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.	205461 (Cam Valley Forum)
“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.	131415 (M Cleminson)
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.	8820 (RSPB)
Support for 15 m water buffer; suggest referencing flood zone boundaries within policy.	7618 (Gamlingay PC)

Summary of issues raised in comments	Comments highlighting this issue
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.	131255 (Girton PC)
Development should consider the global and local importance of chalk rivers, not only water supply issues.	131341 (S Berridge)
Strong support for policy; reiterates the suggestion to replace “river corridors” with “river meadows”. Recommends using rivers to spread tourism to wider heritage locations.	131356 (Riverside Area Residents Association)
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.	131723 (Cam Valley Forum)
Recommends 50 m buffer rather than 15 m, citing LNRS guidance for chalk streams. Wider buffer necessary to reduce nutrient run□off and bank erosion.	131762 (I Walters)
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	131790 (D Spiegelhalter)
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.	7033 (Federation of Cambridge Residents’ Associations)

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
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.	
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.	203464 (Ickleton PC)
This policy is well supported.	210674 (Newnham Labour)
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. 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.	204405 (Tritax Big Box Developments)

Summary of issues raised in comments	Comments highlighting this issue
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. This approach lacks proportionality and may reduce developable area, constrain site layouts, and undermine development capacity, conflicting with national policy objectives. The respondent recommends amending Policy BG/RC to adopt a more flexible, site-specific approach that differentiates between natural watercourses and engineered land drains. 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.	
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.	202498 (H Brown)
We argue the 10 m ditch-buffer requirement exceeds national guidance and could sterilise land.	208356 (Mr T Ebourne, Sworders)
We welcome the inclusion of this policy and are generally supportive of the wording. 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	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
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.	201337 (H Dawson)
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.	201355 (Royal Society for the Protection of Birds)
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.	201611 (Stapleford PC)
Girton's Washpit Brook and Beck Brook are locally critical river corridors for ecology, flood paths, and connectivity; they must be explicitly protected.	202221 (Girton PC)
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.	203216 (Cambridge Past, Present and Future)

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**
Comment that Protected Open Space is of vital importance and should be protected and enhanced • 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.	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)

Summary of issues raised in comments	Comments highlighting this issue
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.	203690 (Cambridge Green Party), 204747 (Maria Cleminson)
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. • 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.	201317 (Cambridge Architectural Research Ltd (CAR)), 202215 (L Fleming), 202956 (Cambridge City Council Liberal Democrat Group), 203560 (P Tribble)
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.	204943 (North Newnham Residents' Association), 208619 (Madingley Road Area Residents Association)

Summary of issues raised in comments	Comments highlighting this issue
Concern about criteria 2b, which requires replacement open space to be operational before the loss of existing space. • 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.	204345 (Cambridge Investment Partnership), 205283 (Home Builders Federation), 204828 (Carter Jonas on behalf of Hill)
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. • 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	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)

Summary of issues raised in comments	Comments highlighting this issue
• 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.	
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.	201361 (M Blackburn)
Comment that sites are missing or should be amended: • 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
• 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	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),

Summary of issues raised in comments	Comments highlighting this issue
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. • 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)
We support this policy and the reference to Natural England's Accessible Greenspace Accessibility Standards to guide the location of replacement open spaces. 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.	207631 (Natural England)
Land use, nature and orchards: some losses are irreversible Orchards, mature trees, historic green spaces and productive landscapes are non-renewable assets. Once removed, they cannot be meaningfully replaced within a generation. Any proposal that: • removes orchards; fragments countryside; or damages established ecosystems; must clear an exceptionally high bar of necessity, not convenience. 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.	208839 (D Smith)
Point 1: Inclusion "undesignated areas" – strongly support. Point 1 (Add) Where loss permitted, agree replacement should be like for like or better. Point 1 (Add): 'Cultural character & Biodiversity, including that relating to semi-natural areas and	204065 (Federation of Cambridge Resident's Associations)

Summary of issues raised in comments	Comments highlighting this issue
informal green space, should be key in assessing open space quality Point 2a: Open spaces in this policy already subject to official evaluation. Needs more compelling argument to allow evaluation to be overridden. Point 2b: “before” – strongly support. Point 3 Strongly object. Delete. Undermines whole purpose of strategy. Why should educational establishments be privileged? Points 4 & 5: – strongly support	
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.	204854 (Vistry Group)
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	209228 (Sports England)

Summary of issues raised in comments	Comments highlighting this issue
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.	
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.	209229 (Sports England)
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.	209230 (Sports England)
Where new development is likely to increase recreational pressure on the countryside, CLAF supports: •Proactive mitigation measures, including improved access infrastructure and circular routes, to disperse recreational use and reduce impacts on sensitive landscapes.	208169 (Cambridgeshire Local Access Forum)

Summary of issues raised in comments	Comments highlighting this issue
•Securing access improvements through planning agreements to ensure timely delivery and long-term maintenance.	
We welcome the proposed standard of 0.4 ha of allotment space per 1,000 population.	206957 (Y Dignon)
We welcome the updated Girton Policies Map and see it as a significant improvement on the 2018 version. • 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. 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.	206158, 206159, 206160, 206163 (Girton Neighbourhood Plan Team)
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.	204421 (Cllr T Bygott)

Summary of issues raised in comments	Comments highlighting this issue
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)	201695 (P Harradine)
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. 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	208462, 208463, 208464 (Longstanton Parish Council)

Summary of issues raised in comments	Comments highlighting this issue
We support the principle of a mixed□use development at North Cambridge Academy delivering about 150 homes and a community sports hub. 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.	206130, 206140 (Meridian trust)
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. 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.	203941 (Bidwells on behalf of Emmanual College)
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	206189, 206190, 202285 (I Cooper)

Summary of issues raised in comments	Comments highlighting this issue
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). 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.	
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?	205900 (P Harradine)
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. 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. 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.	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□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**
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	201385 (Gamlingay PC)
General support for policy: • 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	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)

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
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.	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)
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.	202223 (Girton PC)
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.	202352 (R Lund)
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	202357 (R Lund)

Summary of issues raised in comments	Comments highlighting this issue
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.	
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.	202480 (University of Cambridge)
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.	202934 (Bedfordshire, Cambridgeshire and Northamptonshire Wildlife Trust)
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.	207171 (Stantec on behalf of British Land)
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.	207632 (Natural England)
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.	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)
Concern about the accuracy of: • 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
Objections made due to policies lack of clarity on: • 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.	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)
Policy is too rigid and does not account for the varied operational and spatial needs of employment and commercial development in Greater Cambridge. 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.	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

Summary of issues raised in comments	Comments highlighting this issue
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. Railpen suggest that “hectares per employee” requirement is removed.	Ltd), 204435 (Bidwells on behalf of Tritax Big Box Development)
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). Suggestion from Redrow South Midlands that the policy should be reviewed for potential overlap with other requirements.	207173 (Stantec on behalf of British Land), 204857 (Carter Jonas on behalf of Redrow South Midlands)
The policy could inadvertently create an informal open space tariff through off-site financial contributions without a clear CIL compliant methodology.	204857 (Carter Jonas on behalf of Redrow South Midlands)
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. 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.	205302 (Home Builders Federation)

Summary of issues raised in comments	Comments highlighting this issue
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.	203536 (British Horse Society), 203794 (S Rogers)
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.	203693 (Cambridge Green Party)
Long-term maintenance of biodiversity values and nature, and funding must be secured, including replacement of failed planting and ongoing habitat management.	203693 (Cambridge Green Party)
Comments relating to support for integration youth and young people with open space, children's play space and public realm provisions: • 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)	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),

Summary of issues raised in comments	Comments highlighting this issue
• 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)
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).	204258 (A Giarlis), 204261 (L Cooke), 204375 (NEUBAU Architecture Ltd), 204523 (T Woodcock), 204768 (M Cleminson), 205221 (Cambridge Junction/Create Cambridge), 205420 (Z Svendsen)
In principle support for the provision of open space with new developments but that such provision needs to 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	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
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	208621 (K Weimer)
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.	210845 (Sports England)
We endorse the proposed standard of 0.4 ha of food-growing/allotment space per 1,000 people within open-space requirements.	208187 (Cambridge Sustainable Food)
Attenuation ponds should not be counted as accessible green space in the green space provision calculations.	203261 (Cllr C Hofman)
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.	203273 (Horseheath PC)
LSH supports the inclusion of public open spaces within future developments, as part of creating high quality functional spaces for residents to enjoy.	211238 (Living Space Housing)
Open spaces should include bridleway perimeter routes or cross routes so that horse riders are included.	203974 (S Rogers)

Summary of issues raised in comments	Comments highlighting this issue
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.	203357 (B Greig)
Labelling of the policy is incorrect.	210175 (Stantec on behalf of British Land)
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.	208270 (Savills on behalf of Martin Grant Land)
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.	208457 (The National Trust)
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.	210242 (Turley on behalf of Vistry Group), 211761 (Urban & Civic)

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.	
EEAST recommends for both physical and mental health and wellbeing: • 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 Quy 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)

Consultation Statement

Appendix 10: Response to Representations - Wellbeing and social inclusion



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

Wellbeing and Social Inclusion

Wellbeing and Social Inclusion Introduction

Abbreviations

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

Summary of Main Issues:

The importance of measures to address access to sport, to support good health, fostering community cohesion, community safety, and delivery of cultural infrastructure were raised in a range of general comments on this theme. It was identified that these issues apply to rural areas as well as urban areas. There was concern that some recent developments had not been supported by the right infrastructure to address these issues. The need for specific types of infrastructure, from skate parks to swimming pools were raised.

Some comments were concerned about developers not providing sufficient funding for new infrastructure, whilst some developers raised concern about the range of policies and their cost to implement. Comments made by ESCO Prospect raised concerns about

the policies being are too detailed and that the additional impact and costs to provide the information required will have on the viability and content of planning applications. A more considered approach should be taken to the amount of information sought for smaller schemes below 100 dwellings.

Comments made by Cambridgeshire County Council cited the need for new towns to safeguard land for high-quality municipal swimming pools and leisure centres to meet future demand and reduce car trips. Concerns were also raised about a number of social issues, many related to criminal activity. Other comments related to the provision of health care services, burial/cremation facilities, sustainable, well-designed places, green infrastructure and realistic alternatives to private car use to encourage walking, cycling, wheeling and use of public transport. No specific provision or uses for young people, either within sports and leisure or cultural hubs. Other comments noted the omission of supporting locally grown food, larger developments should provide affordable units for community food enterprises and design space for small walkable food retail. Essex County Council cited their keen interest to inform, shape, support and help refine development strategy and policies delivered by Local Planning Authorities within and adjoining Essex.

Comments made by Cambridge Past Present and Future suggested whether this section should include policy and/or supporting information on Assets of Community Value. One member of the public requested clarification about how CIL/s106 funds will benefit the parishes affected by development, which should be addressed to ensure local communities gain from the expansion.

There was considerable support, with reference to S/PRIA/EG that the Elizabeth Way bridge and Underpass(es) become a cultural hub project and benefits this project would bring to the local community. Great Wilbraham PC highlighted how restrictive development prevents villages from benefiting from new residents joining the village community to offset rural decline. One member

of the public commented on the poor provision of amenities and services in Great Abington which are inadequate to serve what would eventually be a vastly increased population within easy reach.

Comments made by Cambridge Sustainable Food asked for larger developments to include space for small, walkable food retailers and affordable units for community food enterprises, so everyday food is readily available. Cambridgeshire Constabulary highlight the need for policies to address crime prevention measures. The British Horse Society highlighted the need for public rights of way and provision for equestrians. Comments made by CPRE Cambridgeshire and Peterborough cited the need for Policy SC/1 (Health and Wellbeing) to comply with the Equality Act 2010, the UN Convention on the Rights of Persons with Disabilities, and NPPF paragraph 8.

Comments made by Cam Skate raised the need for a permanent accessible, high-quality indoor skate space in the city and explained the benefit such a facility can bring to the community. Their current facility is a short-term meanwhile use with a lease expected to expire in July 2026. The update to the 2016 Indoor Sports Facility Strategy should include reference to the need for a ‘restricted access skatepark’ would be offering an invaluable social resource for young people in the Cambridgeshire area. Research shows that skateboarding is not simply a recreational hobby—it is a reliable and evidence-backed tool for youth development, public health, and community cohesion. Comments made by Sport England support the plan’s overarching objective to protect, enhance and provide new sport opportunities, insisting that any loss of playing field be replaced with equivalent or better quantity, quality, accessibility and management.

Response to the main issues raised in representations

The Localism Act requires the Council to keep a 'List of Assets of Community Value' which will help to identify what facilities and services local communities consider to be valuable, however this is a separate process to the draft Local Plan which is informed by a series of evidence documents covering a range of uses including: indoor and outdoor sports; cultural and community facilities; retail; and leisure activities. These documents highlight how these facilities are important to local communities and have been used to inform draft local plan policies. The loss of any facility, important to the local community will normally be resisted.

A series of sports strategies have been developed to identify the need for future sports facilities including the retention of existing facilities to meet the needs of existing residents. These have also identified how new development should provide for a range of sports to support healthy lifestyles, including new swimming pools and sports halls. Any loss of a playing field would normally be resisted unless it could be re-provided in accordance with the policy's requirements.

Policy J/RC: Retail and other complementary town centre uses supports smaller food shops in smaller centres meeting day-to-day small-scale retail and service needs for local areas.

While all residential development is expected to contribute to infrastructure requirements, only larger developments of +200 dwellings are expected to submit more detailed assessments to inform infrastructure provision. Normally, off-site contributions will be spent on local infrastructure with the decision on what the money is spent on normally resides with the Parish Council in South Cambridgeshire or by Cambridge City Council.

Policy WS/NC: Meeting the needs of new and growing Communities had also been amended to include the provision of leisure routes. These would be suitable for people of all ages and abilities and for a variety of uses, to allow them to exercise outdoors and access nature and the wider countryside. Policy GP/PP: People and place responsive design includes requirements for development to remove the threat or perceived threat of crime and improve community safety. Policy BG/EO: Providing and enhancing open spaces includes the provision for new development to provide food growing spaces.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Strongly supports a ban on vans with unhealthy food near the schools, especially the ice-cream van near Mayfield school with put parent under pressure to buy their children what is bad for them, and just before lunch - because their peers are getting some. Sugar is addictive and is known to cause multiple health problems, to be pushed so aggressively. Same for vans driving around playing loud music	201033 (E Mitenko)
It should be noted that there are no allocations identified in the draft GCLP for Hardwick that could make financial contributions or provide land for new or additional services and facilities. It is not clear how additional services and facilities, including the aspiration for health services to be provided within the village, would be delivered in the absence of any related development.	204213 (Hill Residential Group Hardwick site)
Every person living with hydrocephalus & cerebral palsy in this city would disagree with the things you have highlighted as positives. This city is designed for cyclists, and no-one else.	201297 (M Bond)
I support Cambridge Junction and Create Cambridge in asking that:	202061 (H Chamberlain), 202136 (Cambridge

Summary of issues raised in comments	Comments highlighting this issue
• The Cultural Infrastructure Strategy strengthens its focus on delivery pathways, not only mapping of need • Clearer links are made to planning obligations, capital funding routes and operating models • Partnership/shared-service capacity is resourced • Creative Commons approaches are included as part of long-term stability, not only meanwhile use • Create Cambridge is engaged as advisor/consultee on the further development of the Cultural Infrastructure Strategy	Junction), 202194 (H Tam), 202204 (H Tam), 202315 (Cambridge Junction), 202396 (J Webber), 202417 (T Shaw), 202431 (Kettle's Yard), 202690 (T Altmann), 202720 (W Townsend), 202789 (S Lee), 202880 (Cambridge Junction), 202886 (Cambridge Junction), 203038 (The Arts Theatre Cambridge), 203855 (N Yeni) 203876 (University of Cambridge), 205010 (Wysing Arts Centre), 205065 (University of Cambridge), 205120 (H Paterson), 205213 (J Walsh), 205326 (A C de

Summary of issues raised in comments	Comments highlighting this issue
	Azevedo), 205359 (L Howse), 205362 (N Oakley), 205417 (Cambridge Junction), 205418 (A Sieglow), 201011 (H Chamberlain), 202761 (Cambridge Junction/Create Cambridge), 202762 (Cambridge Junction/Create Cambridge) , 204712 (A Giarlis), 202298 (Cambridge Junction), 202941 (R Terry), 202968 (T Flinders), 203635 (University of Cambridge), 203547 (D Lever), 203480 (L Heap), 203446 (S Ashworth), 203363 (N Ellis), 202466 (K Jones), 202329 (Cambridge Junction/

Summary of issues raised in comments	Comments highlighting this issue
	Create Cambridge), 204185 (Cambridge Junction/ Create Cambridge), 204697 (NEUBAU Architects)
Suggest that security and crime prevention measures be embedded in planning policies to promote health, wellbeing and community cohesion, supporting the Wellbeing and Social Inclusion objectives.	201336 (Cambridgeshire Constabulary)
We support these policies and their commitments to wellbeing and social inclusion.	203026 (Cambridge City Council Liberal Democrat Group)
The British Horse Society supports the Plan's objectives for improving wellbeing and social inclusion. However, there is a lack of clarity between policies promoting "active travel" and those relating to the public rights of way network. Active travel is largely framed around walking and cycling, while rights of way are not consistently recognised as a distinct and valuable health and wellbeing asset in their own right. Public rights of way provide accessible opportunities for physical activity, social connection and contact with nature for a wide range of users, including equestrians.	203571 (British Horse Society), 203613 (British Horse Society),
The introductory overview to this theme is lacking in explicit recognition of class, disability, chronic illness and economic inactivity, risking exclusion of people who are not young professionals. We recommend amending the list of policy aims to include providing opportunities with no barrier to entry for	203697 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
leisure, sport, arts and socialising. We also recommend revising the introduction to emphasise the importance of community spaces and adding an aim to foster community across ages and backgrounds. This will help to ensure that development supports genuinely inclusive communities rather than simply an 'ideal' lifestyle for the individuals who live there.	
Permeability and access to shops, doctors, schools and leisure facilities within walking distance is critical to both the formation and continuity of community and the health of its members. People meet each other at shared facilities or while walking to and from them are more inclined to form cohesive communities.	205181 (D Stoughton)
Our focus is on walking/wheeling as the healthiest form of sustainable local travel, so our main concern is that new settlements and developments deliver this as a primary priority. If there are good local shops and control of unhealthy fast food retail outlets as you suggest then this is a major boost for people's health. They are more inclined to walk and meet others walking, helping to build a sense of community. We would be happy to organise walks in developments that are being constructed providing it is safe to do so - see our attachments in Great Places section.	201631 (Cambridge Living Streets)
You're trying to mix a huge range of very different people together which clearly doesn't work. Cambourne is already a disaster. Antisocial behaviour, council housing, famous for being on 24 hours in police custody. And yet you think it's a good idea to build more of this? And even closer to villages, which have listed buildings and people who have lived there for generations.	201755 (K Smith)

Summary of issues raised in comments	Comments highlighting this issue
I agree what you say about supporting communities. But remember housing must be affordable for all. All communities need houses. It is not sufficient to say in general that housing should be appropriate. It is necessary to spell out that the low paid, often essential workers, need affordable housing. It is an obligation on us to ensure that affordable housing is always planned for.	202174 (M MacGinley),
The focus on healthy, inclusive communities is positive, but the policies appear geared mainly toward larger developments and urban style neighbourhoods. Rural health inequalities, isolation and access to services in smaller villages are not clearly addressed. Expectations around local facilities and sustainable travel may be harder to achieve in dispersed settlements without targeted support. There is little reference to community led provision or the role of village halls and outreach services. Stronger rural proofing would recognise rural delivery models, support multipurpose community hubs and ensure transport and digital access underpin inclusion.	203173 (Cambridgeshire ACRE)
Rural active travel routes and PROWs should be bridleway for social inclusion of females (mainly) who ride horses but also some men ride horses too.	203979 (S Rogers)
No recognition of or protection for local neighbourhoods who are going to disproportionately (in comparison to wider area) by developments, which will result in a decline in their quality of life and well-being.	204923 (M Jordan)
Support: Comment relating to a new cultural hub: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, a mix of uses will create employment opportunities for graduates, start-ups, makers and creatives seeking affordable workspace.	205310 (University of Cambridge), 204324 (Cambridge Junction/

Summary of issues raised in comments	Comments highlighting this issue
• creative hub helps to promote a sustainable, resource-efficient neighbourhood. • I support integration of young people with the arts and public realm • include youth outreach and education programmes, apprenticeships and learning opportunities, informed by council/ market research and needs/gaps. • provide commercial and self-organised recreation, open access sports provisions including urban skating, active landscaping a.o	Create Cambridge), 204214, 204219, 204232 (L Cooke), 204254 (A Giarlis)
Wellbeing and social inclusion sounds great but planning requirements such as section 106's are just a 'must look at' they have no legal standing and there a developer can promise to provide at some time in the future. Can you learn from examples such as Northstowe and the large new developments in St Ives, no facilities, not even a shop. This policy fails to mention sport facilities.	202823 (S Durman)
We must give more consideration to places for people to die peacefully and with as much dignity as possible. You mention that the demographic will include more elderly people but you don't say enough about how their health and death will be supported. Much more consideration needs to be given to the provision of both.	202703 (S Berridge)
Great Wilbraham residents have a huge love for their village, its historic homes and buildings and, crucially, a shared knowledge of the families who have lived in them over the years. This is based on continuity of people and place over hundreds of years and enables rapid integration of newcomers. We believe this ethos exceeds anything in a new development and is very hard to replicate. It should be cherished in all the South Cambridgeshire villages. However, it requires some refreshment or people	203377 (Great Wilbraham PC)

Summary of issues raised in comments	Comments highlighting this issue
and planned, thoughtful small development in the villages, rather than simply preservation of the status quo.	
No plans have been presented to increase doctor surgeries or NHS dentist capacity to match the new housing, putting extra pressure on existing health services. Do you have any plans to amend this and to do the same for further developments that are planned in other locations?	209170 (R Smith)
Great Wilbraham is an inclusive and caring community, in touch with a high proportion of its residents. However, our current facilities (School, Memorial Hall with social activities, Recreation Ground and sports facilities, public house, shop, quarterly magazine etc.) are jeopardised by a dwindling number of volunteers. Old people prefer to stay in the village, and with a policy of highly restricted development there is little refreshing of the population; our village community seems condemned to unmanaged decline. There are also poorer households in Great Wilbraham, but there is no indication through the strategy of how they will be assisted.	203378 (Great Wilbraham PC)
I know 15-minute neighbourhoods are politically toxic, but to meet active travel goals, there should be a requirement that no development will be permitted where reaching a food shop, doctor's surgery, school or community space requires the use of a car for the average adult in any of the houses in the development.	202633 (C Pointon)
Support this policy Point d regarding food growing should be strengthened to actively encourage integration of food bearing landscapes for urban foraging. This will become increasingly important with respect to future climate and	204935 (Mothers CAN Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
food security impacts recently cited in the government paper: Nature security assessment on global biodiversity loss, ecosystem collapse and national security. This policy should also include opportunities for playable landscapes	
In reviewing this chapter of the local plan, the policies stated are too detailed and provide significant overlap with national planning policies. The Plan does not recognise that the additional impact and costs which providing the information required will have on the viability and content of planning applications. Some of this information may be appropriate for a large application but for smaller schemes below 100 dwellings a more considered approach should be taken to the amount of information sought.	203212 (ESCO Prospect)
The Plan does not clarify how CIL/s106 funds will benefit the parishes affected by development, which should be addressed to ensure local communities gain from the expansion.	210455 (P Deer)
Support the plan's overarching objective to protect, enhance and provide new sport opportunities, insisting that any loss of playing field be replaced with equivalent or better quantity, quality, accessibility and management.	209214 (Sport England)
Expect larger developments to provide affordable units for community food enterprises and design space for small walkable food retail, ensuring healthy food is not an afterthought	206965 (Y Dignon)
Welcomes the focus on the creation of "healthy, sustainable and inclusive communities". ECC is keen to inform, shape, support and help refine development strategy and policies delivered by Local Planning Authorities within and adjoining Essex and would expect the Greater Cambridge councils to recognise ECC's role as neighbouring infrastructure and service provider. This is of particular interest to ECC	210463 (Z Smith, Essex County Council)

Summary of issues raised in comments	Comments highlighting this issue
given the potential cross border impacts for ECC and involvement is necessary and beneficial and ECC's statutory roles and responsibilities. Attention is drawn and an example of a relevant facility is at London Stansted Airport and the pioneering training campus - Stansted Airport College (STAC). The college opened in 2018 following an extensive partnership working with ECC, Harlow College and Manchester Airport Group (MAG).	
Consider whether this section should include policy and/or supporting information on Assets of Community Value.	203999 (Cambridge Past Present and Future)
I commend Greater Cambridge for the Draft of the Local Plan which has excellent proposals and detailed intentions that are well communicated. However, in my opinion, there is a huge omission to the plan. That of the provision for attitudinal change towards affordable, sustainable, healthy, local food.	205079 (Y Dignon)
New towns must safeguard land for high-quality municipal swimming pools and leisure centres to meet future demand and reduce car trips.	207999 (Cambridgeshire County Council)
None or little reference of crime, antisocial behaviour, domestic violence, county lines (growing), faith, tourism, those seeking sanctuary, transport, resident voice, integrated neighbourhoods, parish council opportunities. What will the added pressures be to the health support available? Will there be enough school places? enough activities for youth? extra curricular activities to allow parents to work, public toilets - accessibility and dignity? With health, one of the biggest themes is mental health, which links with outcomes for employment, citizenship, family etc.	210534 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
There is nothing that looks at specific provision or use for young people, which could be within either sports and leisure or within cultural hubs where perhaps a aim around supporting new and aspiring artists could be made there is very little in relation to youth or families.	210535 (Cambridgeshire County Council)
Public health welcome that health and wellbeing will be embedded throughout the plan e.g., that new development that creates sustainable, well-designed places which facilitate improving health, wellbeing and social interaction to reduce inequalities, promote inclusivity and support a sense of community will be prioritised. That there will be high quality new homes to meet the needs of all the community, including older people, those with care needs and younger people. That there will be investment in new or improved healthcare, public open spaces, community buildings, and active travel infrastructure making healthier lifestyles achievable. That there will be an extensive network of green infrastructure, green corridors and open spaces to increase the value of the environment for people and wildlife. That there will be realistic alternatives to private car use to encourage walking, cycling, wheeling and use of public transport.	210548 (Cambridgeshire County Council)
Expect larger developments to include space for small, walkable food retailers and affordable units for community food enterprises, so everyday food is readily available.	208195 (Cambridge Sustainable Food)
Our Sewage Plants can't take more bodily fluids as it is struggling currently. It's a major Health Hazard during predictable summer droughts when there's no 'flow' - just smell the drains in the Civic Quarter in July/August. Our streetscapes are dirty, water-less, unhygienic, ugly, bollarded and dangerously	208874 (R Lambert)

Summary of issues raised in comments	Comments highlighting this issue
potholed - it's shameful, it's a 'con' inviting overseas Visitors to see and experience closed public 'conveniences', 'disappointing'.	
For wellbeing and Social Inclusion, interaction with Nature, Soils, Seasons, Countryside is vital; don't fill new Developments with Betting Shops - Screen-Free Community activities should be our aspiration to balance mental health in ongoing CRISES of Climate, Cost of Living directly caused by depressing geopolitics and deliberately-stoked Wars which make millions for some.	208876 (R Lambert)
Cam Skate raise the need for a permanent accessible, high-quality indoor skate space in the city. Cambridge is an active, growing city, which has hugely benefited from the recent addition of The Warehouse indoor skatepark which was first opened in September 2024 on Coldham's Lane. Indoor skateboard facilities are a critical part of social infrastructure. Our community of skatepark users spans children, teenagers, adults, women and girls, neurodivergent people, and beginners who rely on supportive, safe environments to participate safely and confidently year-round. The current lease is a short-term meanwhile use (at the time of writing lease period ends July 2026) and only made possible through the constructive and community supporting outlook from landowners.	210560 (Cam Skate)
We welcome the reference to skateboarding in the Wellbeing and Social Inclusion Topic Paper, but the table sets out a response that references open space policy which lacks a clear reference in regards to indoor skateboarding. Open space policy is not relevant to indoor skatepark provision and should instead be addressed through the Indoor Sports Facility Strategy. A 'restricted access skatepark' would be offering an invaluable social resource for young people in the Cambridgeshire area.	210568 (Cam Skate)

Summary of issues raised in comments	Comments highlighting this issue
National and academic research demonstrates that skateboarding facilities improve wellbeing, reduce antisocial behaviour, and build stronger communities. This could be evidenced in topic papers: - Written evidence submitted to the UK Parliament reports, - Research by Iain Borden shows that skateparks produce clear social, cultural, health, and economic benefits, including significant reductions in antisocial behaviour. - A recent academic study on girls and non-binary young people found that skateparks act as “communities of care”. - Research from the Highlands shows skateparks contribute positively to identity formation, wellbeing, resilience, and community connection, highlighting their importance for youth and community health. These findings show that skateboarding is not simply a recreational hobby—it is a reliable and evidence-backed tool for youth development, public health, and community cohesion.	210569 (Cam Skate)
Cambridge’s success and identity has always been inseparable from its surrounding rural communities and landscape. If Greater Cambridge wishes to protect the city’s character, wellbeing and global reputation, it must also stand up for the rural communities beyond the Green Belt that help give it context, sustain and define it. As such, the Greater Cambridge Local Plan must recognise public access, tranquillity and landscape quality as critical health infrastructure, not optional extras.	209121 (S Hepworth)
Current amenities and services in Great Abington, for example school, Post Office/store, recreation ground, public house, Village Institute etc are inadequate to serve what would eventually be a vastly increased population within easy reach.	207977 (G Brown)

Summary of issues raised in comments	Comments highlighting this issue
Policy SC/1 (Health and Wellbeing) must ensure compliance with the Equality Act 2010, the UN Convention on the Rights of Persons with Disabilities, and NPPF paragraph 8.	211723 (CPRE Cambridgeshire and Peterborough)

Policy WS/HD: Creating healthy new developments

Abbreviations

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

Summary of Main Issues:

There was general support for the policy. The objections received included duplication with other policies, HIA thresholds, a belief that the policy is not supported by appropriate evidence or viability testing and the omission of equestrian activities, with the suggestion that policy should focus on high-level principles with topic-specific policies and site-specific assessments securing detailed requirements. A number of respondents supported the policy but with concerns regarding threshold levels, a desire to strengthen the policy, and requests for the inclusion of end of life services and facilities, Active Design, health hubs, the Public Rights of Way network, provision of sporting, play, recreational and mental health supporting green and blue spaces in policy wording. It was also requested that policy wording include and emphasize healthy, vibrant and connected communities, onsite and offsite infrastructure provision and increase emphasis on food security with provision of allotments and growing spaces, food hubs

and markets in new neighbourhoods, people first communities anchored in active lifestyle provision and mental health and amenity for existing and new residents. Comments also requested further evidence on harm from gambling and betting, and the inclusion of restrictions on gambling premises in the policy. Some comments questioned the need for elements of the policy, and repetition with other parts of the plan.

Health impact assessments (HIA)

A number of comments included concerns regarding HIA threshold levels and the application of Healthy New Town Principles with more flexibility and proportionality requested. The inclusion of HIA requirements at validation rather than in policy was suggested. Others supported HIAs, considering them to be a useful tool for planning applicants and for the Local Planning Authority to make informed decisions for healthy and safe communities. Additionally, comments requested that HIAs include a requirement to food access and food environment assessment and that older people's housing be explicitly excluded from the HIA requirements and instead the policy should recognise the health benefits that delivering older people's housing can bring to individuals.

Hot food takeaways

Concerns included the need for a hot food takeaway policy and repetition with national policy. A lack of formal identification, definition in glossary or Use Class was raised and the omission of retail or food destination centres from the restrictions. Whilst others support further strengthening of policy wording to prevent community asset loss to hot food takeaways, greater management where outlets are near schools with, for example, opening time restrictions and further clarity needed on threshold distance from

schools was requested as was a ban on advertising for High in Fat, Salt and Sugar foods. Public Health would like to be consulted on any planning applications for HFTs.

Active travel and lifestyles

Reference to active travel was welcomed but there were concerns that the policy should focus on wider forms of active travel, including equestrian activity, and provision to and from developments, and recognise that it is important for physical activity and social connection. A need for seating and toilets to facilitate active lifestyles for all and climate change mitigation measures such as water fountains were also raised. It was requested be more wide-ranging, not only referring to employment areas, that the policy include reference to public transport including requiring the inclusion of a good bus network at an affordable ticket cost and that it recognise that non-motorised user routes to leisure spaces can contribute to healthier lifestyles. Comments noted that the PPS is currently only at Stage C and listed as key supporting evidence.

Other comments

Other concerns include that the policy duplicates principles already covered in other draft policies related to housing, biodiversity, and green spaces.

Response to main issues raised in representations:

Comments on the policy are noted.

The policy seeks to highlight the importance of place in the health and wellbeing of individuals and communities and to outline how Local Plan policies seek to help to create healthy places. It is recognised that clarity is required that the policies listed in part 1 are not standalone policies and amplify rather than duplicate policies elsewhere in the plan. As such, many of the issues raised,

including in respect of active travel, are addressed in policies in other themes such as Great Places and Infrastructure. Evidence behind each element of the policy can be found in the Health and Wellbeing Topic Papers at each stage of the Plan as well as in the Consultation Statement. Including the policy requirements in an overarching policy prevents duplication and ensures consistency.

The Health Impact Assessment Supplementary Planning Document was consulted on in November 2024 to January 2025 and adopted in April 2025, this confirmed the thresholds for HIAs in Greater Cambridge. It is considered appropriate that the Plan requires their application across Greater Cambridge. The SPD HIA checklist includes a number of areas raised by respondents including Access to Healthy Food and older people as a protected group. The HIA process ensures that impacts on all groups are considered in the HIA process including residents, workers and visitors. It is expected that the application of Healthy New Town Principles will be proportionate to the nature of the site.

Recognising the remit and the tools and resources available to the local planning authority, with respect to the policy element on hot food takeaways and fast food outlets, the policy seeks to implement national policy and manage harmful concentrations in retail areas, at the same time responding to concerns around food poverty and the provision of healthy alternatives. The need for clarity in the policy requirements is acknowledged and a number of changes seek to address the issues raised. The policy element preventing community asset loss to hot food takeaways has also been strengthened.

Representations requested that control of gambling premises be included in the policy. As set out in the Wellbeing and Social Inclusion Topic Paper, evidence indicates that the demographic make-up of Greater Cambridge is such that that the risk of problem gambling is high. A new policy requirement has therefore been introduced risking harmful concentrations.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support selected	202090 (J Flynn, Great Shelford Village Charity), 202482 (M Parsons, University of Cambridge), 203028 (K Porrer, Cambridge City Council Liberal Democrat Group), 204571 (H Bennett, Max Fordham), 203142 (P Tribble), 203886 (T Burgoine), 204935 (H Tardrew, Mothers CAN Cambridge)
Object selected	204595 (Redrow South Midlands), 204847 (Hill), 203589 and 208658 (L Warth, British Horse Society)

Summary of issues raised in comments	Comments highlighting this issue
The Policy is supported subject to the thresholds at which different complexities of statements is retained.	203215 (ESCO Prospect)
Support the policy which sets out how place and space have a significant impact on health and wellbeing.	202482 (M Parsons, University of Cambridge)
I would like to have more walking routes - for me and for my child, maybe something more interesting than ordinary sidewalks - with paintings on the pavement, or some stories on the side. Maybe some sand	201034 (E Mitenko)
A stronger policy is needed to ensure that new properties are designed to enhance mental health and amenity of existing and future residents, particularly in higher density locations.	201386 (Gamlingay PC)
Broadly support but with the following caveats: • It does not consider the growing demand for end-of-life care services and facilities (e.g. hospices) that will sit alongside an expanding population. Providing for more and better end-of-life care is critical to overall quality of life. Recent pushback on a proposed reduction in bed capacity at Arthur Rank Hospice is testament to local strength of feeling on this matter and is one illustration of the local impact of a lack of joined up planning between health and social care. • Clause 1c of the policy should be expanded to read, “Providing, protecting and enhancing accessibility to green and blue open spaces FOR SPORTING, RECREATIONAL AND MENTAL HEALTH PURPOSES (Biodiversity and Green Spaces).” The benefits of access to green and open spaces are noted in supporting para 6.8 but should also be explicit in the policy’s wording.	201615 (Stapleford PC), 208101 (N Webster, Great Shelford PC)

Summary of issues raised in comments	Comments highlighting this issue
Recommend revising the stated aim of the policy to emphasize healthy and vibrant communities, not just individual healthy lifestyles. Point 1 should explicitly support compact, well-connected neighbourhoods to enhance sustainability and social interaction. Suggest: • Adding a new clause 1.j to ensure that homes are integrated with accessible local employment and services where appropriate. • Amending point 2 to place a clearer responsibility on developers to contribute to health strategies and • Strengthening point 7 to protect essential community assets from being lost to hot food takeaways.	203699 (R Comins, Cambridge Green Party)
it is questionable whether the hot food takeaways section is required as there is clear and unambiguous advice provided in the current and draft NPPF. It is unnecessary repetition of national policy	203215 (ESCO Prospect)
Strongly welcomes management of hot food takeaways near schools. Greater neighbourhood exposure to takeaways is linked to poor diet and health. Research has also demonstrated that managing takeaways near schools can reduce proliferation and achieve long-term positive population health impacts at no local economic cost. However: • The council will need to defend their regulation of “fast-food” outlets, which lack formal definition. • Evidence shows that exempting designated centres from regulation will substantially diminish potential health benefits. Other (more) profitable retail uses do exist. • Clarity on whether 400m is from the school boundary or otherwise, would aid implementation.	203886 (T Burgoine)

Summary of issues raised in comments	Comments highlighting this issue
Part 6 of the policy refers to a concentration of hot food takeaways and fast food outlets. Fast food outlets are not defined in the glossary nor in the Use Classes Order. Applying this to a food retail destination may not be appropriate given the nature of the use and destination.	204898 (A Brand, Abbey Properties Limited)
The control of fast-food takeaways - this does not match recent planning of 'retail parks' which have primary been fast-food takeaways, the one in St Ives is a prime example.	207435 (S Durman)
Supports the principle of new developments promoting healthy lifestyles but Part 1 of Policy WS/HD duplicates principles already covered in other draft policies related to housing, biodiversity, and green spaces. It is suggested that Policy WS/HD should explicitly reference the relevant existing policies to avoid redundancy and unnecessary wording or it paragraph 1 should be deleted.	204363 (Cambridge Investment Partnership), 204847 (Hill)
Supports the requirement for Health Impact Assessments (HIAs) for major developments as stated in Part 2 but requests an increase in the threshold for full HIAs from 100 to 500 dwellings. A proposal is made for a rapid HIA for developments of 200-500 dwellings, while no HIA should be required for schemes of 200 or fewer dwellings.	204363 (Cambridge Investment Partnership), 204847 (Hill)
The requirement for a full Health Impact Assessment at 100+ dwellings further adds technical cost and complexity for a mid sized scheme, despite the Topic Paper not providing evidence that such developments generate impacts warranting this level of assessment. Without clearer thresholds, proportionality tests, or a mechanism to rationalise overlapping requirements from related policies (open space, GI, active travel, climate adaptation), WS/HD risks imposing unrealistic expectations on smaller residential sites. The policy should therefore be amended to provide size based flexibility, proportionate	204595 (Redrow South Midlands)

Summary of issues raised in comments	Comments highlighting this issue
HIA requirements, and clear alignment with the Topic Paper's intent, ensuring that non strategic developments are not held to standards only deliverable in strategic growth locations.	
Supports a policy that supports healthy lives and the requirement for health impact assessments to focus on major developments with the potential for significant health impact. There is an established connection between planning and health and the planning system has an important role in creating healthy communities. The planning system is essential for improving health services and infrastructure to meet evolving healthcare needs and addressing wider determinants of health. Health impact assessments are considered to be a useful tool for planning applicants and the Local Planning Authority to make informed decisions for healthy and safe communities.	205125 (NHS Cambridgeshire and Peterborough Integrated Care Board)
Cambridge, like much of the UK, is heading towards a food security crisis. Local and organic food production needs greater emphasis in the Local Plan.	205658 (F Samuel)
Point d regarding food growing should be strengthened to actively encourage integration of food bearing landscapes for urban foraging. This will become increasingly important with respect to future climate and food security impacts recently cited in the government paper: Nature security assessment on global biodiversity loss, ecosystem collapse and national security.	204571 (H Bennett, Max Fordham), 204935 (H Tardrew, Mothers CAN Cambridge)
This policy should include opportunities for playable landscapes	204571 (H Bennett, Max Fordham)
Shisha lounges, including in restaurants, should be restricted. A clear policy would help enforcement on the unauthorised change of use to Sui Generis: shisha lounge.	201713 (K Mak)

Summary of issues raised in comments	Comments highlighting this issue
Mentally healthy communities are connected communities, those where social iterations are possible, easy and part of everyday life. How traversal a community is a big part of this. Residents traveling door to door inside private motor vehicles do not have incidental opportunity to connect with their neighbours. A community where it is easy, safe and convenient to walk and cycle has these connections. This policy should include need for people first design within the development.	201823 (T McKeown)
The policy should: prioritise local recreation and wellbeing spaces within/adjacent to Girton; ensure health infrastructure is village-scale, not only district-scale as village-scale provision improves mental health, reduces loneliness, and encourages safe activity; and anchor healthy development criteria to Active Travel connections and accessible community facilities. Health outcomes depend on safe cycling/walking routes, the Pavilion upgrade, and green space protection.	202224 (Y Murray, Girton Parish
Support the requirement for development to facilitate, encourage and to prioritise walking, wheeling and cycling and promote accessibility for all. Request that it go further and incorporate such provision for access to sustainable travel to and from the development, not just active travel within the development.	203142 (P Tribble)
Support the intent of Policy WS/HD, but objections to the policy include: • The policy's (and plan's) focus on walking and cycling as the primary forms of active travel is overly narrow and risks excluding other legitimate users. It is inconsistent with national transport and health evidence, which recognises horse riding as a physically active mode of travel that delivers significant physical and mental health benefits. • Public rights of way, including bridleways, are established health and wellbeing assets and provide inclusive opportunities for physical activity and social connection.	203589 and 208658 (L Warth, British Horse Society)

Summary of issues raised in comments	Comments highlighting this issue
• The majority of riders are women, often in age groups with traditionally lower rates of physical exercise, meaning improved equestrian access supports wider health equity. The omission of equestrian access creates an imbalance that is inconsistent with inclusive and equitable placemaking. Request that the policy: • Explicitly include equestrian activity within the definition of active travel, unless there is an exceptional justified reason for exclusion. • Recognise the contribution of equestrian access to physical activity, mental wellbeing, and social inclusion by improving accessibility for diverse demographic groups, including women and older adults. • Apply design criteria that allow safe horse movement alongside other users. • Signage and wayfinding must be clear for multiple user groups.	
Rural active travel routes and PROWs should be bridleway to include equestrians.	203980 (S Rogers)
Support the policy but would like evidence to be gathered around gambling and betting harm and restrictions on outlets to be added into the policy to avoid large concentrations in one area.	203028 (K Porrer, Cambridge City Council Liberal Democrat Group)
The Local Plan should recognise that a good bus network with affordable tickets is vital to make Greater Cambridge a place where everyone can thrive, including people who can't drive, disabled people and people with low disposable incomes. A good bus network ensures everyone can access education, employment, key services, large shops (cheaper supermarket as opposed to expensive village shop),	203107 (S Hughes)

Summary of issues raised in comments	Comments highlighting this issue
social networks and sports/leisure activities. It is particularly important for young people. Bus travel is therefore a vital tool to boost health, wellbeing and social inclusion.	
Support the objectives of the policy and the Council's proposed approach to creating healthy new developments. The site at Balsham Road, Linton will meet daily needs within walking distance to the services and facilities in Linton, encouraging active travel. This would reduce reliance on the private car, promote social interaction and contribute positively to both environmental quality and residents' physical and mental health. The proposed development would make a positive contribution to nature and deliver long-term health and wellbeing benefits for future residents.	204857 (S Boyd, Vistry Group)
Land north of Barton Road and at Grange Farm supports the aims of Policy WS/HD by including a local centre with potential healthcare services, extensive green space and recreation areas, and strong walking and cycling links to nearby sustainable transport routes	205185 (North Barton Road Landowners Group)
Supports policy WS/HD and recommends explicit reference to Active Design within it.	210846 (C Howe, Sport England)
Strong support for the direction of travel of the healthy place-making approach and the requirement for new development to provide access to healthy food through allotments and community growing spaces.	208185 (S Dyer, Cambridge Sustainable Food), 206955 (Y Dignon)
Welcome the policy intent to manage the local food environment, including controls on hot-food takeaways and fast-food outlets to protect children's health.	208186 (S Dyer, Cambridge Sustainable Food), 206956 (Y Dignon)

Summary of issues raised in comments	Comments highlighting this issue
Recommend tightening delivery by requiring food access as part of Health Impact Assessments: Where HIAs are required, include a simple “food environment” assessment: walkable access to affordable healthy food; quality of the local food offer; and measures to avoid concentrating unhealthy uses. (This builds directly on the Plan’s approach to health and takeaways.)	208191 (S Dyer, Cambridge Sustainable Food), 206961 (Y Dignon)
The plan should require space for community food assets in new neighbourhoods to support delivery of community-scale assets that make healthy food practical and affordable: neighbourhood food hubs, community kitchens, food co-ops/social supermarkets, and periodic markets (especially in larger allocations and growth areas). This aligns with the Plan’s stated intent to enable access to local services and support social enterprise.	208192 (S Dyer, Cambridge Sustainable Food), 206962 (Y Dignon)
Section 1e of this policy discusses how new developments should facilitate walking, wheeling and cycling and promote accessibility for all, but does not mention public transport. A new subsection should be added below 1e: Ensuring that developments provide easy access to bus stops, mobility hubs or railway stations for easy onward travel across the wider area.	203237 (R Wood, Cambridge area Bus Users)
To what extent is health provision considered in the Local Plan. Cambridge planning dept and Addenbrooke’s are commissioning a joint study about how planning can help to deliver a new model of healthcare (hub model).	205784 (Rustat road Neighbourhood Association)
Propose following text addition to policy 1.a: The design of new developments should include appropriate and sufficient seating spaces in open spaces, play areas, and footpaths alongside the development as well as ensuring there are public toilet facilities spread across the development.	208053 (J Turner, Northstowe TC)

Summary of issues raised in comments	Comments highlighting this issue
Propose following text addition to policy 1.g: The design of open spaces of new developments should encompass climate change mitigation measures at early phases of development where tree canopy has not yet developed sufficiently to provide shelter. Open spaces should include public drinking water fountains to facilitate healthy habits across the entire population, including those most at risk of being affected by dehydration in heat waves such as older and younger population.	208054 (J Turner, Northstowe TC)
Note that there is a common misconception that older person's housing places an additional burden on healthcare infrastructure and therefore rather than requiring applicants of older person's schemes to show that there is capacity in healthcare systems and to show that the scheme will not have a health impact, the policy should instead recognise the health benefits that delivering older people's housing can bring to individuals. For the plan to be in line with national policy and effective the following wording should be added the policy to recognise the health benefits of older persons housing: "Specialist Housing for older people has a number of health benefits and proposals for such schemes will not be required to submit a Health Impact Assessment".	208317 (Churchill Retirement Living with McCarthy and Stone)
This policy requires a Health Impact Assessment (HIA) to be prepared for development proposals for between 20 to 100 dwellings. This seems particularly onerous for smaller sites, and we suggest that a higher dwelling threshold, such as 50 dwellings and above would be more appropriate.	208357 (T Elbourn)
Object to Policy WS/HD because it is overly broad, prescriptive and insufficiently justified, placing significant and sometimes unrealistic burdens on developments of all scales. In its present form, the policy risks duplication with other parts of the Plan, lacks proportionality, and has not been supported by	208991 (L Robinson, Barratt Homes Northampton)

Summary of issues raised in comments	Comments highlighting this issue
appropriate evidence or viability testing. The policy should focus on high-level principles that support healthy placemaking, while relying on topic-specific policies and site-specific assessments to secure detailed requirements. Proportionality must be embedded through clear thresholds and flexibility for non-strategic sites. The HIA requirements need to be revised to only apply to major strategic developments, with rapid assessments or no assessment required for smaller schemes. The policies expectations must be tested through whole-plan viability analysis before the next iteration of the Plan.	
Policy would benefit from greater flexibility in its application to reflect local circumstances. In particular, it is suggested that the policy more clearly recognises that health principles should be applied to new development ‘wherever possible’ and ‘as appropriate’, drawing on the ten principles of creating healthy places from the Healthy New Towns programme or any future equivalent. This would ensure the policy remains proportionate and adaptable across a range of site types and scales.	210245 (Vistry Group)
Policy lacks clarity regarding the requirement for Health Impact Assessments (HIA). Where the Councils intend to undertake a plan wide HIA, it is considered unnecessary for development proposals that accord with the Local Plan to be required to submit a separate HIA, as such proposals should already be addressing the health outcomes identified through the plan-making process. Requiring additional HIAs at the application stage in these circumstances risks unnecessary duplication. If the Councils consider that HIAs should be required for individual development proposals, Vistry and The Quy Estate suggest that this is more appropriately addressed through application validation requirements rather than embedded within policy.	210246 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
Public Health are supportive of Policy WS/HD that HIAs should form an integral part of preparing a development proposal and undertaken early to inform the proposed design and layout. Topics that could form the HIA and that can affect the health and wellbeing of different groups within a community. PH acknowledge that an HIA needs to be proportionate to the development proposed.	210551 (C Fitzsimons, Cambridgeshire County Council)
Public health fully support the inclusion of 'Hot Food Takeaways'. However, public health is disappointed that it is implied that hot food takeaways will be supported in Greater Cambridge's designated centres irrespective of its distance from a primary or secondary school, further education college or youth centre, as there is evidence that promoting unhealthy eating habits, particularly high-fat, high-sugar and high-salt diets contribute to childhood obesity and poor oral health. They can lead to increased consumption of fast food over healthier school meals and a rise in health inequalities. Public Health would like to be consulted on any planning applications for HFTs as we would like to see restrictions on opening hours to reduce the accessibility to school children at the end of the school day which could be achieved by the imposition of planning conditions.	210552 (C Fitzsimons, Cambridgeshire County Council)
Public health recommends that Gambling is also included within this policy. Gambling presents significant public health issues, causing individual, family, and societal harm, including debt, mental health crises (anxiety, depression, suicide), relationship breakdown, substance misuse, and crime.	210553 (C Fitzsimons, Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
Public health recommends that advertising for High in Fat, Salt and Sugar (HFSS) is also included within this policy. This has been done by other councils. HFSS are a major public health issue because their excessive consumption drives obesity, type 2 diabetes, heart disease, and certain cancers, leading to increased mortality and burden on health systems; they are heavily marketed, especially to children, influencing poor diets, and their affordability/ promotions encourage overconsumption creating a cycle of poor health and growing non-communicable disease rates.	210554 (C Fitzsimons, Cambridgeshire County Council)
Paragraph 1.h. - Ensuring employment areas have the facilities for active travel (Jobs) - why is this for employment areas only? Suggest the following amendment: Ensure that developments are designed to encourage healthy lifestyles with high quality active travel routes which, for employment areas, connect to nearby population centres and for residential developments connect to key destinations.	210584 (C Fitzsimons, Cambridgeshire County Council)
The facilities to promote non-motorised access for all should seek to provide connectivity to the PROW network. To increase accessibility any existing barriers to access such as stiles or gates should be removed wherever possible.	210619 (C Fitzsimons, Cambridgeshire County Council)
Active travel facilities should be designed to link to networks beyond the development.	210620 (C Fitzsimons, Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
Support providing and enhancing accessibility to green and blue spaces, but the policy could recognise that non-motorised user routes to leisure spaces can contribute to healthier lifestyles.	210624 (C Fitzsimons, Cambridgeshire County Council)
The policy could support the establishment of PROW to enable and encourage users to connect to the wider PROW network, which can provide much greater opportunities for exercise than that available within one single development.	210625 (C Fitzsimons, Cambridgeshire County Council)
is welcome that Policy WS/HD 1.e and Policy GP/PP 1.b.ii. contain important principles for active travel.	210633 (B Serin, Transport 2000 Cambs & West Suffolk)
The aspirations of Policy WS/HD are supported in principle in accordance with the provisions of Chapter 8 of the Framework. However, Part b of the draft Policy text requires new developments to deliver community and health facilities to meet the needs generated by the development. Whilst it is recognised that it is essential that development is supported by the requisite infrastructure, it is recommended that the policy text is amended to identify that this infrastructure could be secured through on-site provision or by financial contribution towards off-site provision. It is considered that the reference at Part f of the Policy towards ensuring that developments are designed to mitigate the impact climate change is removed, given that the Draft Plan already contains extensive policies relating to climate change and the mitigation measures that are required of development.	211286 (Woolsington One Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Support the principle of addressing health impacts through development. However, a threshold of 20 dwellings is unusually low and risks being disproportionate, particularly on small or medium sized sites where impacts can be addressed through standard planning tools and contributions. We recommend raising the threshold to align with national practice (for example 200 units) or alternatively apply HIAs only where a screening assessment identifies specific health impacts that require further work. A higher site threshold of circa 200 units is much more likely to make the policy sound. Where sites allocated for development are consistent with the policies in the local plan the council should be clear that an HIA is not required.	208970 (T Vincent, Persimmon Homes East Midlands)

Policy WS/NC: Meeting the needs of new and growing Communities

Abbreviations

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

Summary of Main Issues:

Policy was broadly supported by both individuals and organisations including Anglian Water Services Ltd

Comments made by Stapleford PC broadly supported the policy, only that it omitted to mention palliative or hospice care. Great Shelford Village Charity cited their uncertainty about the applicability of the policy to their charitable almshouse association and suggests it could deter future expansion of almshouse units. Other individual comments made included: ensure infrastructure is provided with new housing; the need for community 'muster' points which a community recognises as a gathering point in emergencies.

Comments were made by many individuals and organisations recommending amendments to the policy: placing clearer responsibility on developments to fully mitigate impacts and maximise contributions to local facilities; requiring assessments to consider capacity, quality and accessibility alongside other planned developments, and to ensure infrastructure was delivered when it is needed.

Cambridge Investment Partnership (CIP) requested the merger of the policy's paragraphs 3 & 5 for clarification purposes. CIP should also suggested paragraph 5 be better aligned with other draft policies to ensure feasibility in meeting housing and infrastructure requirements.

Girton PC requested the Local Plan require school–parish shared-use agreements in new development proposals, support land identification for youth, sport, community space, and active recreation and embed localised service-provision expectations for Minor Rural Centres like Girton.

Comments made by Pioneer Group recommended the Council should follow the model as set out in emerging national decision-making policy HC3 to ensure ongoing consistency. Comments made by Redrow South Midlands and Railpen questioned the soundness of the policy requirements, imposing disproportionate and duplicative obligations on development. The requirement for developments of 200+ dwellings to conduct detailed community needs assessments is not supported by robust evidence or clear thresholds. The requirement for 129m² of indoor community space per 1,000 population lacks sufficient evidence and imposes a rigid quantitative standard that may not reflect local needs, it may also threaten the viability of development schemes. The policy's lack of clarity regarding on-site provision and its interaction with planning obligations and the Community Infrastructure Levy may lead to a cumulative financial burden on developers.

Comments made by the Homes Builders Federation also requested clarification for the assessments of community needs, these should focus on additional needs created by the development, rather than addressing existing shortfalls in the area. While Vistry Group supported the overall aspirations of the policy and suggested minor clarifications regarding the requirements in paragraph 4, specifically whether assessments of community needs should be included in existing documents or if they represent a separate requirement. They suggested the need for flexibility in the application of the requirement for on-site facilities, advocating for consideration of site-specific circumstances, viability, and the capacity of existing or planned off-site facilities; in certain situations, off-site provision or financial contributions may be a more effective and sustainable way to meet community needs, especially when

developments are well integrated with existing settlements. Bellway Strategic Land echoed these concerns. Woolsington One Ltd considered the policy unnecessary as is duplicated other policies.

NHS Cambridgeshire and Peterborough Integrated Care Board suggested referencing the emerging Planning Obligations SPD in policy/supporting paragraphs to ensure consistency in securing developer contributions for health infrastructure.

Other comments included the need for a modern health centre in Cottenham, the policy made no allowance for farming, equestrians, country sports and heritage. Provision should be made for public transport and active travel access.

Comments were made by many individuals and organisations supporting Cambridge Junction's and Create Cambridge's request that: cultural infrastructure's ongoing revenue and organisational capacity needs are recognised, not just physical buildings; culture is embedded in cross-cutting outcomes (innovation, health, education, community resilience); partnership frameworks between councils, cultural organisations and communities are referenced as delivery mechanisms.

Response to main issues raised in representations:

Policy WS/ND has been written in accordance with the current NPPF and informed by a number of studies including the Community Infrastructure Study and Cultural Infrastructure Strategy which will also inform the Infrastructure Delivery Plan to support the Local Plan. These studies recommend Community and Cultural Plans be developed, respectively to inform the type of infrastructure that should be provided and whether this should be on site or off site, or a combination of both. This will provide a flexible approach that takes into account local considerations and opportunities nearby to maximise investment in these facilities

and make the best use of development land. The policy has been amended to clarify how indoor and outdoor community and cultural facilities should be provided and secured.

The provision and location of healthcare facilities should aim to meet the need of existing and new residents, which may include the need for community-based, out-of-hospital facilities. The Local Planning Authorities have engaged with the relevant health organisations in developing the Infrastructure Delivery Plan that accompanies this Local Plan. Developers of large-scale sites and new communities will also need to engage with health providers to understand and respond to healthcare needs.

Policy WS/CH: Cultural and Creative Hubs, paragraph 2(l) includes a clause requiring new creative or cultural hubs to have a Management Strategy to ensure it will be viable in the long-term. This should outline, as a minimum, its long-term vision, objectives, market sector within the wider cultural or creative market, and financial resourcing. Where policy WS/NC: Meeting the needs of new and growing communities requires the provision of cultural infrastructure, Cultural Plans will need to be submitted as part of the planning submission process. These will need to demonstrate a robust, evidence-led and locally responsive approach to their provision and long-term viability. These plans will be secured through Section 106 agreements.

Policy WS/NC: Meeting the needs of new and growing Communities had also been amended to include the provision of leisure routes. These would be suitable for people of all ages and abilities and for a variety of uses, to allow them to exercise outdoors and access nature and the wider countryside. On or off-site contributions towards improved leisure routes would include supporting Public Rights of Way or providing leisure routes.

Some comments challenge the approach to requiring assessments to accompany development proposals of over 200 dwellings or 5000sqm of employment. Whilst the Councils have explored needs through topic studies and the Infrastructure Delivery plan, it is important that community needs are explored at the site specific level when detailed schemes come forward, including engaging with local communities. This ensures delivery is based on the most up to date information. It will also be particularly important for windfall proposals.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Please learn from Northstowe! There is nothing except houses and temporary infrastructure. The community has had to organise food swap, community pantry and other local amenities for the residents. Infrastructure (school, healthcare, shops, pub) needs to be built at the same time as the houses. Bar Hill benefited from having all these things in place before the village was expanded	201040 (P Spowart)
The respondent expresses broad support for the policy but highlights the absence of consideration for the increasing demand for end-of-life care services, such as hospices, due to population growth in Greater Cambridge. The respondent emphasises the importance of providing adequate end-of-life care as essential for overall quality of life and believes it should be explicitly included in the draft Local Plan. The recent community pushback regarding proposed bed capacity reductions at Arthur Rank Hospice illustrates local concerns about the lack of integrated planning between health and social care. The respondent notes that while para 6.25 of the supporting text to Policy WS/NC lists necessary facilities for new communities, it fails to mention palliative or hospice care, despite including provisions	201616 (Stapleford PC)

Summary of issues raised in comments	Comments highlighting this issue
for burials. Para 6.33 discusses healthcare facilities but also omits any reference to end-of-life care, indicating a gap in the planning policy	
Anglian Water is supportive of the policy approach which enables onsite delivery of services and facilities in new communities. This provides flexibility and offers different options and pathways for delivering key infrastructure that may better align with the pace of development and viability - depending on the specific circumstances and challenges the new community might present. We agree that such provision should be determined in consultation with the service providers and, where necessary, relevant regulators.	210209 (Anglian Water Services Ltd)
The respondent expresses uncertainty about the applicability of the policy to their charitable almshouse association and suggests it could deter future expansion of almshouse units. The respondent highlights the lack of provisions for housing provided by charities in the draft Local Plan, arguing that almshouse charities should be treated differently from developers. The respondent notes that almshouse charities serve financially disadvantaged individuals of all ages, contributing significantly to affordable housing numbers. The respondent emphasises the importance of maintaining charity properties for those in need and asserts that these houses will not be subject to right to buy or otherwise cease to be available. The respondent argues that planning obligations or CIL contributions could misuse charitable funds, benefiting individuals not entitled to those funds. Debates and disputes about such obligations/contributions might require expert input and consequent unnecessary use of charity funds.	202094 (Great Shelford Village Charity)

Summary of issues raised in comments	Comments highlighting this issue
The respondent requests that charities be exempt from the same demands placed on commercial developers.	
I support the weight being given to prioritizing the health and activity of communities and contribution to community centres where developments are large enough. I would like to suggest smaller housing developments, or existing street communities, include or identify 'muster' points which a community recognises as a gathering point in emergencies and would include a noticeboard for information, perhaps also a bench. This is a resilient back-up to Street WhatsApp groups and more inclusive, allowing the potential for face to face interaction	202367 (J Hobohm)
I support Create Cambridge in asking that: • cultural infrastructure's ongoing revenue and organisational capacity needs are recognised, not just physical buildings • culture is embedded in cross-cutting outcomes (innovation, health, education, community resilience) • partnership frameworks between councils, cultural organisations and communities are referenced as delivery mechanisms • This aligns community infrastructure with lived cultural use.	202394 (Kettle's Yard), 202681 (T Altmann), 202711 (W Townsend), 202776 (S Lee), 202860 (Cambridge Junction), 202922 (R Tarry), 202979 (T Flinders), 203012 (The Arts Theatre Cambridge), 203846 (Naz Yeni), 203864 University of Cambridge) 204906 (Wysing Arts Centre), 205106 (J

Summary of issues raised in comments	Comments highlighting this issue
	Walsh), 204668, 204665 (NEUBAU Architecture), 202288 (Cambridge Junction), 202381 (J Webber), 202393 (T Shaw), 202011 (H Chamberlain)
We recommend strengthening this policy by placing clearer responsibility on developments to fully mitigate impacts and maximise contributions to local facilities, to reduce the risk of cumulative strain from multiple schemes. We also recommend improving clarity and consistency in wording, requiring assessments to consider capacity, quality and accessibility alongside other planned developments, and correcting minor drafting errors. Finally, we call for clearer explanations of different facility types within the local plan itself, to improve transparency, accessibility and effective community infrastructure planning.	203700 (Cambridge Green Party), 205284 (N Oakley), 205306 (L Howse), 203620 (University of Cambridge, Z Svednsen), 204814 (L Matthews), 204154 (Cambridge Junction/Create Cambridge)
Policy WS/NC aims to ensure new development contributes to services and facilities for growing communities, including education, health, sports, libraries, and community uses. The made Fulbourn Neighbourhood Plan identifies aspirations for additional open space and health provision. Hill promotes Site Ref. 40271 in Fulbourn for housing and supports enhancing local facilities. The site could provide land for extending the recreation ground or allotments and make financial contributions if allocated. As	203903 (Hill Residential, (Fulbourn site))

Summary of issues raised in comments	Comments highlighting this issue
no sites are allocated in Fulbourn, it is unclear how these needs will be met. Directing growth to sustainable villages such as Fulbourn would help deliver required services. No changes to the policy are requested.	
It should be noted that there are no additional allocations identified in the draft GCLP for Sawston that could make financial contributions or provide land for new or additional services and facilities.	203956 (Hill Residential (Sawston site))
The respondent supports Policy WS/NC in principle but finds the wording regarding the delivery of on-site facilities vague, particularly the threshold for 'Developments of sufficient scale' which should be clearly defined. There is a request to merge Parts 3 and 5 of Policy WS/NC to avoid overlap and enhance conciseness. The requirement for on-site indoor community facilities under Part 5 is seen as restrictive against other policies, potentially impacting density uplift and housing numbers, as well as site viability for affordable housing and infrastructure delivery. The respondent requests that Part 5 of Policy WS/NC be better aligned with other draft GCLP policies to ensure feasibility in meeting housing and infrastructure requirements.	204371 (Cambridge Investment Partnership)
Objects, he principles of Policy WS/NC for delivering community facilities, emphasising their importance for community cohesion. The wording in paras 3 and 5 regarding on-site facility delivery is vague and requests a clear definition of 'Developments of sufficient scale' and a combination of overlapping requirements. Concerns are raised about the lack of clarity in para 4 regarding the geographic area for	204865 (Hill)

Summary of issues raised in comments	Comments highlighting this issue
assessing cumulative impacts of smaller developments, suggesting that the requirement for such assessments be deleted. The respondent argues that the requirement for on-site indoor community facilities in para 5 may restrict housing density and site viability, impacting affordable housing delivery. There is a call for better alignment of para 5 with other draft GCLP policies to ensure deliverability of community facility provisions. The respondent stresses that smaller sites should not be obligated to provide facilities beyond their own demand and that requirements should not delay site delivery. Clarification is requested regarding the adoption and funding of the long-term operation of on-site community facilities. The respondent suggests including wording to allow for improvements to existing facilities in lieu of new on-site delivery when more efficient.	
To meet active travel goals, there should be a requirement that no development will be permitted where reaching a food shop, doctor's surgery, school or community space requires the use of a car for the average adult in any of the houses in the development.	204750 (M Cleminson)
Objects, the policy is deemed unsound due to insufficient justification from the Wellbeing and Social Inclusion Topic Paper (2025), imposing disproportionate and duplicative obligations on development. The requirement for developments of 200+ dwellings to conduct detailed community needs assessments is not supported by robust evidence or clear thresholds.	204589 (Redrow South Midlands)

Summary of issues raised in comments	Comments highlighting this issue
The policy's 'one size fits all' approach contradicts the Topic Paper's recommendation for flexible, place-based strategies, risking unnecessary costs and delays. The presumption that larger sites must provide new on-site facilities does not align with the Topic Paper's view that enhancing existing facilities is often more effective. The requirement for 129m² of indoor community space per 1,000 population lacks sufficient evidence and imposes a rigid quantitative standard that may not reflect local needs. The cumulative impacts of the policy have not been viability tested, raising concerns given the existing obligations on development in the emerging Plan. The policy fails to meet the tests of being justified, effective, and deliverable, and should be revised to ensure flexibility and comprehensive viability testing	
Vistry supports the overall aspirations of the policy but suggests minor clarifications regarding the requirements in paragraph 4, specifically whether assessments of community needs should be included in existing documents or if they represent a separate requirement. Vistry suggest the need for flexibility in the application of the requirement for on-site facilities, advocating for consideration of site-specific circumstances, viability, and the capacity of existing or planned off-site facilities. Vistry believes that in certain situations, off-site provision or financial contributions may be a more effective and sustainable way to meet community needs, especially when developments are well integrated with existing settlements.	204861 (Vistry Group)
Other than Part 4 the policy appears to apply to all new development as opposed to just major housing developments. This should be refined.	204903 (Abbey Properties Cambridgeshire Limited)

Summary of issues raised in comments	Comments highlighting this issue
Draft Policy WS/NC outlines requirements for new facilities, mandating on-site delivery for larger developments unless off-site benefits are proven. The respondent supports the need for consultation with service providers to ensure appropriate facility provision. The inclusion of a section for healthcare facilities is welcomed, emphasising the need to meet local health service requirements. Flexibility for healthcare providers in determining mitigation is advocated, with encouragement for ongoing engagement with relevant health bodies at the earliest stages and throughout the planning process. The respondent suggests referencing the emerging Planning Obligations SPD in policy/supporting paragraphs to ensure consistency in securing developer contributions for health infrastructure	205133 (NHS Cambridgeshire and Peterborough Integrated Care Board)
The North Barton Road Landowners Group—including University of Cambridge, Corpus Christi College, Cambridge, Downing College, Cambridge, Jesus College, Cambridge, and St John's College, Cambridge—has promoted land north of Barton Road and at Grange Farm for a landscape-led urban extension known as South West Cambridge. Draft GCLP Policy WS/NC seeks to ensure development delivers services and facilities such as education, health, community, and sports provision. The promoted development would provide a primary school, community centre, health services, local centre, and outdoor sports facilities to serve new and existing communities. No changes to the policy are requested.	205190 (North Barton Road Landowners Group)
The healthcare needs of growing communities, such as Cottenham, must be addressed as local primary healthcare provision is insufficient due to increased population from speculative development.	205270 (E Wilson)

Summary of issues raised in comments	Comments highlighting this issue
Existing GP practices are overwhelmed, leading to difficulties in obtaining appointments, which causes frustration for patients and may result in them giving up on seeking care. There is a need for a modern health centre in Cottenham that is fit for purpose to adequately serve the community's healthcare requirements. Failure to improve healthcare facilities may lead to increased demand on all levels of health services due to neglected healthcare needs.	
Objects, the council's definition of the area for assessing the impact of smaller developments is unclear, and the practicality of requiring the first development to assess impacts before others is questioned. It is recommended that the requirement for smaller groups of sites to assess community needs be removed due to impracticality and potential conflicts with planning obligations outlined in paragraph 58 of the NPPF. The policy should clarify that assessments of community needs should focus on additional needs created by the development, rather than addressing existing shortfalls in the area. The current wording suggests a broader assessment of community needs, which may lead to the requirement of infrastructure not directly related to the development, necessitating clearer policy language.	205319 (Homes Builders Federation)
I support Cambridge Junction and Create Cambridge in asking that: • Cultural infrastructure's ongoing revenue and organisational capacity needs are recognised, not just physical buildings • culture is embedded in cross-cutting outcomes (innovation, health, education, community resilience)	205334 (A Sieglow), 205367, 202749, 202806 (Cambridge Junction/Create Cambridge, 205273 (AC de Azevedo Lamha), 205022 (University

Summary of issues raised in comments	Comments highlighting this issue
• partnership frameworks between councils, cultural organisations and communities are referenced as delivery mechanisms. This aligns community infrastructure with lived cultural use	of Cambridge), 205035 (H Paterson), 204688 (A Giarlis), 203502 (D Lever), 203491 (L Heap), 203426 (S Ashworth), 203321 (N Ellis), 202456 (K Jones),
NIE strongly support Cambridge Junction and Create Cambridge in asking that: • cultural infrastructure's ongoing revenue and organisational capacity needs are recognised, not just physical buildings • culture is embedded in cross-cutting outcomes (innovation, health, education, community resilience) • partnership frameworks between councils, cultural organisations and communities are referenced as delivery mechanisms, This aligns community infrastructure with lived cultural use.	204379 (New International Encounter)
National planning policy requires that development plans, not planning applications identify shortfalls in the availability of community facilities and infrastructure. Reforms to the NPPF include a proposed requirement for developments which significantly increase local populations to provide for community facilities and improvements to public service infrastructure – either by delivery or financial contribution. The Council should follow the model as set out in emerging national decision-making policy HC3 to ensure ongoing consistency.	207445 (Pioneer Group Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Objects, wishing to fund the NHS (including Social Care) and Defence from increased growth rather than increased per capita taxation is understandable (whether we think it unrealistic or not) and it is equally expedient to disperse the responsibility for that growth across local authorities. However, largely because of climate change, central government investment and policy in this time-frame will move north and to higher ground. This is not to say that Cambridge and Cambridgeshire shouldn't grow and have a comprehensive development plan, but it needs to be understood in this context and would be more sensible laid out in a much more modular way.	207343 (K Rhodes)
Rural Active Travel routes and PROWs should be bridleway to include horseriders.	203983 (S Rogers)
As a largely rural and farming county, this policy makes no allowance for the following: Farming; Equestrians; Country sports; Heritage. As has already been established in many of the recent developments Section 106 Agreements has no legal standing and are to be treated as a 'will do at some time in the future'. We need to ensure we can feed ourselves.	202828 (S Durman)
Provision should be made for public transport and active travel access to enable easy access from surrounding communities and settlements to help sustain the facilities and amenities in new and growing settlements. Provision should be made to absorb further growth. Provision should be made to cluster facilities around public spaces close to public transport hubs.	204703 (A Carpen)
Girton's needs revolve around youth provision, shared-use facilities, and accessible recreation land, reflecting its existing and emerging community profile. Parish councils spend up to 85% of budgets on	202225 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
youth/sport — signalling real need. Shared-use agreements with Girton Glebe and local schools will unlock vital space. Growth without matching community infrastructure risks further strain on limited local assets. GPC Requests to the Local Plan: Require school–parish shared-use agreements in new development proposals. Support land identification for youth, sport, community space, and active recreation. Embed localised service-provision expectations for Minor Rural Centres like Girton.	
It should be noted that there are no allocations identified in draft GCLP for Fulbourn that could make financial contributions or provide land for new or additional services and facilities. It is not clear how additional services and facilities, including open space and health facilities identified in the made Fulbourn Neighbourhood Plan, would be delivered in the absence of any related development.	201957 (KG Moss Will Trust & Moss Family)
Objects to Policy WS/NC, specifically part 4, stating that detailed assessments of community needs for residential sites of 200 or more dwellings should be the responsibility of the Councils, not developers. In relation to part 5, the respondent questions the clarity of the study informing the standard of 129 m2 of floorspace per 1,000 additional population for indoor community facilities, noting a lack of corresponding study for Cambridge city. The respondent highlights that the supporting text in paragraph 6.31 mentions ongoing preparation of further evidence by the Councils to assess community facility needs, suggesting that the current standard for indoor community facilities is not adequately justified.	203089 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
Object to Policy WS/NC, particularly Point 4, which requires detailed assessments of community needs for residential developments of 200 or more dwellings. They argue that these assessments should be	204510 (Bellway Strategic Land)

Summary of issues raised in comments	Comments highlighting this issue
the Council's responsibility, not the developers. The respondent references Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, stating that obligations must be necessary, directly related, and fairly related to the development. They assert that new developments should not be responsible for addressing existing community needs and that the policy's ambiguous wording creates uncertainty and potential additional burdens on developers. The respondent recommends that if the Council pursues this policy, it must clarify that developments are only required to address needs that align with the CIL Regulations tests.	
Minor clarification is required in relation to the requirements set out in paragraph 4 of the policy. In particular, the policy states that proposals for residential developments of “200 or more dwellings (or groups of smaller sites which cumulatively exceed this figure)” must be informed by detailed assessments of community needs and include strategies demonstrating engagement with local communities and stakeholders. It is unclear whether this requirement is intended to be addressed through existing submission documents, such as a Statement of Community Involvement or Statement of Community Engagement, or whether it represents an additional and separate requirement. Clarification on this point would assist in ensuring the policy is applied consistently and proportionately.	210247 (Vistry Group)
Support the principle of ensuring that larger developments respond to community needs, however, the wording in limb 4, could be construed to place the onus on the applicant to assess community needs and produce a strategy to meet them. The policy would be more effective and proportionate if it required	208971(Persimmon Homes East Midlands)

Summary of issues raised in comments	Comments highlighting this issue
that major applications demonstrate how they have engaged with the LPA and relevant providers to meet identified needs, rather than placing the responsibility on applicants to determine those needs. Suggested amendment to read: “For developments of 200 dwellings or more, applicants should engage with the Council and relevant service providers at pre-application stage to ensure that proposals address identified community needs and contribute to any site-wide strategy”	
Object. Policy WS/NC requires large residential and employment developments to conduct community needs assessments and engage local stakeholders, but lacks clarity on the specifics of these requirements, creating uncertainty for developers. The respondent argues that the burden of community needs assessments should be on the Council, not developers, to ensure clarity and consistency in planning. The proposed requirement for indoor community facilities may threaten the viability of development schemes due to its inflexible application of a fixed floorspace standard of 129m² per 1,000 additional population. The policy's lack of clarity regarding on-site provision and its interaction with planning obligations and the Community Infrastructure Levy may lead to a cumulative financial burden on developers. The respondent highlights that the policy conflicts with the National Planning Policy Framework and Planning Practice Guidance by imposing potentially onerous and duplicative requirements that could undermine the deliverability of the Local Plan. Changes to plan: Railpen therefore requests that the policy parts are removed.	204158 (Railpen)

Summary of issues raised in comments	Comments highlighting this issue
There needs to be awareness that not all health and emergency services can be provided locally due to capital and revenue cost implications. The NHS 10-Year Plan aims to provide more health service in communities and this will require a strategic change for health facilities and where services are provided from outside of the acute setting. This may be in a community hub or existing health care facility.	210344 (East of England Ambulance Service NHS Trust)
Developers are expected to provide community facilities alongside housing, but past performance has been poor, necessitating rigorous oversight from local authorities.	210453 (P Deer)
It should be noted that there are no allocations identified in draft GCLP for Great Shelford that could make financial contributions or provide land for new or additional services and facilities. It is not clear how additional services and facilities, including those identified in the made Stapleford and Great Shelford Neighbourhood Plan, would be delivered in the absence of any related development.	201977 (Shelford Investments)
Support this policy but note that the timely delivery of services and facilities in early phases (para 6) is critical to new developments and must be resourced and enforced. We are currently lacking means to enforce delayed infrastructure which has knock on effects for our new communities so the LPA and the local plan needs to be clearer about penalties that could be applied for delays in bringing key facilities forward.	203034 (Cambridge City Council Liberal Democrat Group)
Object to the wording of Policy WS/NC, stating it is primarily focused on residential growth and not suitable for large-scale commercial development. The requirement for employment developments over 5,000 sqm to undergo detailed community needs assessments and stakeholder engagement is disproportionate and not justified by national policy. Policy lacks clarity on the expected services and	204441 (Tritax Big Box Developments)

Summary of issues raised in comments	Comments highlighting this issue
facilities from commercial development, leading to uncertainty and viability risks. Commercial developments already contribute appropriately through CIL and Section 106 obligations, where impacts are clearly evidenced. The policy should differentiate between residential and commercial development, ensuring that requirements for community facilities and engagement are proportionate and evidence-based.	
The policies do not identify any demographic groups (including young people, older people, vulnerable adults, families, or disabled residents) and age-specific needs that should be catered for; this is particularly important in new developments for young people.	208052 (Northstowe TC)
Policy states that “developments of sufficient scale to generate the need for new on-site facilities will be required to do so, unless it can be demonstrated that there would be advantages in off-site delivery”. While Vistry and The Quy Estate support the principle of providing appropriate community infrastructure, it is important that this requirement is applied flexibly and takes full account of site-specific circumstances, including viability considerations and the capacity of existing or planned off-site facilities. In some cases, off-site provision or financial contributions may represent a more effective and sustainable means of meeting community needs, particularly where developments are well integrated with existing settlements.	210248 (Vistry Group)
Object to policy WS/NC as currently drafted. The policy is ambiguously worded, creating uncertainty that may impose an additional and unwarranted burden on development. Specifically, point 4 states that proposals for residential developments of 200 or more dwellings (or	204378 (Brookgate Land Ltd and Network Rail Infrastructure)

Summary of issues raised in comments	Comments highlighting this issue
multiple smaller sites that cumulatively exceed this threshold), as well as employment developments over 5,000 m², must be informed by detailed assessments of community needs and include strategies to address those needs. It is understood that these assessments should be prepared by the Council as part of their Infrastructure Delivery Plan, and the responsibility should not fall on developers to determine which community needs a development should meet.	
Objects to Policy WS/NC, particularly point 4, which requires residential developments of 200 or more dwellings to be informed by community needs assessments prepared by the Council. The respondent argues that it should not be the responsibility of developers to determine community needs that a development should meet. The respondent references Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, highlighting the necessary tests for obligations related to planning permissions. The respondent contends that new developments should not be responsible for addressing existing community needs and that the policy is ambiguously worded, potentially imposing an undue burden on developers. The respondent requests clarity from the Council that developments only need to address matters that meet the CIL Regulations tests.	204277 (Bellway Strategic Land)
Large developments should have discounted council tax as they are paying for services that others get free.	210497 (Cllr C Hofman)
Our assessment of the proposed allocations confirms that early years and school needs can be met through a combination of existing facilities and the new provision planned for each of the major developments. There is little reference to children SEND, with what there is focused mostly on housing	210528 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
being able to accommodate people with disabilities. There is a need for more SEND provision across the area through a mixture of more provision in mainstream schools and additional places in special schools. Similarly, there is limited reference to early years provision beyond what is planned within new developments. Demand is expected to rise due to the extension of free childcare eligibility to children from nine months of age. Meeting this need will require a combination of expansions at schools and by voluntary and private sector providers.	
The traveller policy mentions - be located where the needs of the residents can be met without placing undue pressure on existing local services and facilities. I could not see this reference as explicit as this in any other area e.g. a new housing estate is often built without thorough reference to this. We are consistently looking at career paths and opportunities for young people, the volume of work within this plan could provide opportunities within this area. Whether there was any opportunity within this to focus on a local workforce percentage or a commitment to apprenticeship, training opportunities for local young people as part of this whole process	210539 (Cambridgeshire County Council)
Paragraph 6.25 - There is no reference to special needs provision. Paragraph 6.32 - There is no reference to special needs provision. The inclusion of the reference to discourage the use of restrictive covenants that would restrict the ability to use homes for childminding business use is supported.	210592 (Cambridgeshire County Council)
The land south of the A428 (Kingsfields) demonstrates clear potential to accommodate residential development that aligns with the Plan’s spatial strategy and Policy WS/NC. The scale of the land allows	210618 (Church Commissioners for England)

Summary of issues raised in comments	Comments highlighting this issue
for the coordinated and timely delivery of homes, education provision, community facilities and green infrastructure, supporting inclusive, healthy and sustainable communities and enabling infrastructure to be planned holistically.	
We are broadly supportive of this policy, with the following caveat: nowhere in the policy or its supporting text is consideration given to the growing demand for end-of-life care services and facilities (e.g. hospices) that will sit alongside an expanding population. Arthur Rank Hospice is testament to local strength of feeling on this matter and is one illustration of the local impact of a lack of joined up planning between health and social care. Para 6.25 of the supporting text lists examples of the facilities and services which could be required to meet the needs of new and growing communities; provision for burials is included in the list but nothing relating to palliative/hospice care provision; para 6.33 is explicitly about healthcare facilities but, again, does not mention end-of-life care.	210941 (Great Shelford PC)
Policy WS/NC of the Draft Plan identifies the requirement for new developments to include or contribute to the delivery of services and facilities necessary to meet the needs of the development. Whilst this is supported, it is considered that Policy WS/NC represents an unnecessary duplication of Policy WS/HD which already incorporated the requirement for developments to address the infrastructure requirements they generate. As such, it is recommended that the requirements of these policies is consolidated into a single policy, to ensure that each of the policies contained within the Draft Plan serves a clear purpose as required by Paragraph 16 of the Framework.	211287 (Woolsington One Ltd)

Summary of issues raised in comments	Comments highlighting this issue
While the Draft Plan refers to schools and health facilities, it does not provide clarity on:When facilities will be delivered; Whether they will be accessible to existing village residents as well as new residents; How needs will be met for early years, special educational needs, adult social care, and older people. This creates uncertainty for residents and risks services lagging behind population growth. Include policy wording to ensure that healthcare and education services and facilities are delivered prior to or alongside housing occupation, with clear triggers and monitoring. Include a clear delivery and monitoring framework for Waterbeach Parish, identifying responsible bodies, funding mechanisms, and review points to ensure timely implementation.	208978 (J Williams)
It is recognised that services and facilities necessary to meet the needs of the development are a key element of a successful community.	211542 (Martin Grant Land Limited)

Policy WS/CF: Community, sports and leisure facilities

Abbreviations

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

Summary of Main Issues:

The policy was supported by The Theatres Trust.

Concerns were raised by Sport England about the reliance on dated evidence sports strategies. They have requested an up-to-date indoor and outdoor sports facility strategy be issued. Comments made by Cam Skate referenced the reprovision of an indoor skatepark facility within the Cambridge urban area. No reference to skateboarding or skateparks were made in the 2016 Indoor Sports Facility Strategy, the revised strategy update should include reference to the need for an indoor skatepark as a distinct facility type. A permanent year-round indoor facility in Cambridge would create continuity, safety, and inclusive access that outdoor spaces alone cannot deliver. Further comments included how the venue could be managed by the local community and the benefits such a facility would bring to the wider community.

Other individual comments made included the policy not referencing Public Rights of Way, not having sufficient ambition to deliver a stadium, rowing lake and 50m swimming pool. Sports facilities should take precedence over transport schemes.

One member of the public commented on the lack of high-end sports facilities that can be used for playing high level sports matches. Any plans to increase the residential population in Cambridge should consider providing a suitable space for national

league volleyball, basketball, handball, korfball etc, rather than just more of the same inadequate facilities. Cambridge needs an opera house and a new large lifelong learning college for the purposes of skills; tackling loneliness; tackling poor health and increasing the range of options for residents. An outdoor cycle race track, a BMX track and further cycling, 'town' athletics track and high impact sports should also be provided. Every major settlement should have a public venue / performing arts space. It is important that sports facilities can be accessed using sustainable and affordable forms of transport. There was a lack of accessible swimming facilities in Great Shelford with a request for a local pool that does not require driving. Great Shelford PC noted their Leisure facilities were limited. The co-location of related public services and at Easter Gate (Policy reference S/PRIA/EG) the Elizabeth Way bridge and Underpass(es) should be considered for indoor and outdoor sports uses. Another member of the public requested that the policy include play. Play areas are an important part of diverse, healthy and sustainable communities.

Cambridgeshire County Council commented on the difficulty of replacing services in multi-functional community centres and flexibility is needed to avoid imposing requirements that mandate replication of a traditional, standalone library model. Public Rights of Way are an existing leisure and cultural asset which can be maximised and the policy could do more to recognise and promote these. It also noted South Cambridgeshire has no public leisure centres and relies heavily on village college sports facilities and on Cambridge City to meet demand and new towns include high-quality municipal swimming pools. While operation through secondary schools may be acceptable initially, this approach is unlikely to be sufficient as towns grow.

Histon and Impington PC cited they were under resourced in terms of sports and recreation facilities. Local opportunities exist to expand these. New facilities should provide both subscription sports and ad hoc play at no charge. Girton PC requested the Local Plan to allocate land for youth, sport, community wellbeing facilities in/near the village, require shared access to school facilities and prioritise village-scale investment.

Comments from Pioneer Group objected to the policy approach as it was in conflict with emerging national planning policy. National decision-making policy HC6 which provides a simplified policy that should be applied. One member of the public commented that the policy's paragraph 2(c) lacked a requirement for public transportation (as in 2018CLP Policy 73). Comments by the Cambridge Green Party requested a number of amendments to the policy. Comments made by NHS Cambridgeshire and Peterborough Integrated Care Board supports the provision of quality community facilities but were concerned paragraph 5 may hinder NHS's ability to deliver essential services.

Comments made by Cambridgeshire Local Access Forum objected to the policy approach not being more explicit about protecting, enhancing and integrating public rights of way and access networks across Greater Cambridge. One member of the public cited the need for improved footpaths which the Local Plan omits while the Cambridge Group of the Ramblers commented on the policy omitting reference to the evidenced benefits of leisure walking for both physical and mental health wellbeing; the main infrastructure required for enjoyable, leisure walking is the public rights of way network. Another member of the public requested rural active travel routes and Public Rights of Way be bridleways so they can include horse riders. The East of England Ambulance Service NHS Trust requested community facilities and infrastructure include all emergency services (ambulance, fire and police) and be supported by s106/CIL monies to mitigate population growth and to improve emergency health equipment.

North Herts Council referenced need for sporting facilities arising from Royston.

Response to main issues raised in representations:

The Councils are updating both the GC Playing Pitch Strategy and Indoor Sports Facility Strategy to the support the emerging Local Plan. These follow Sport England's methodology and cover a range of outdoor playing facilities (football, rugby, cricket and hockey) and indoor sports facilities (swimming pools and sports halls). A separate Outdoor Courts & Rinks Strategy is also being prepared to cover many outdoor sports not covered by the Playing Pitch Strategy including bowling rinks, outdoor tennis courts and smaller Multi-Use Games Areas. Together, these form the evidence base informing WS/CF: Community, sports, and leisure facilities. The strategies will endeavour to reference additional sports needs beyond those required by Sport England, however without specific funding / delivery mechanisms in place for these additional sports, expectations about their implementation will need to be reflected in their funding prioritisation. Funding gathered by applicable developments will normally be directed to implementing the core sports needs identified in the respective strategies.

Policy WS/CF has been written in accordance with the current NPPF which requires polices to positively plan for the provision of a range of publicly accessible facilities. The policy takes account of proposals for new or replacement community, sports or leisure facilities, including city-wide or sub-regional facilities. Paragraph 1(a) refers to local need and not demand because of the difference in their meaning. Need relates to a deficit in provision while demand is a market driven concept based on preference and ability to pay. The policy is focused on providing for publicly accessible facilities. The inclusion of demand would broaden out the policy to include facilities already provided elsewhere in the area (including beyond Greater Cambridge) and as such may have the unintended consequence of undermining existing provision and lead to its displacement. This would include commercially or privately managed facilities that are also accessible to the local community. Paragraph 1(e) will ensure consideration is given to providing co-located facilities with other, complementary services and uses. Paragraph 1(f) has been worded to allow for new

facilities to provide multi-functional spaces that are open to the wider community. However, there may be circumstances where it is not suitable or appropriate to require proposals to provide these or provide access to the wider community.

In terms of protecting community, sports or leisure facilities, the policy's supporting text explains how the loss of a facility will need to demonstrate, both quantitatively and qualitatively, that the facilities are surplus to requirements and that the proposal will not cause significant negative impacts on the vitality of other local facilities (such as through demand pressures created by displaced users of the lost facility). In most cases, this will require a marketing exercise for a sustained period of at least 12 months to demonstrate a lack of demand; exceptions to this requirement include the loss of healthcare uses as the ongoing need for these facilities will need to be determined with the relevant Health Authorities.

Public rights of way are footpaths, bridleways and byways which have public access. They are protected by law and are maintained by the local highway authority (Cambridgeshire County Council). To support accessible community, sports and leisure facilities, Policy WS/CF paragraph 2(c) requires proposals for new, or replacement city-wide or sub-regional community, sports or leisure facilities to be provided in a sustainable location that supports sustainable travel. Sustainable travel is covered by policy I/ST: Sustainable transport and connectivity which would be applicable for new community, sports and leisure uses. The policy sets out how the transport impacts of development should be managed, and how new development should be located, designed and connected to the transport network to enable travel by sustainable modes. Policy WS/NC: Meeting the needs of new and growing Communities had also been amended to include the provision of leisure routes. These would be suitable for people of all ages and abilities and for a variety of uses, to allow them to exercise outdoors and access nature and the wider countryside. On or off-site contributions towards improved leisure routes would include supporting Public Rights of Way or providing leisure routes.

Officers have held discussion with North Herts Council and prepared a statement of common ground.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
This policy does not mention Public Rights of Way. PRoW 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. Especially for bridleways, these are used mostly by women and children who are the main riders of horses and often feel excluded where footpaths and cycleways are created.	201719 (S Jeggo)
Support this policy: The protection it affords the valued facilities in line with paragraph 98 of the NPPF (2024)	202018 (The Theatres Trust)
The draft plan for new community, sports and leisure facilities is disappointing and reactive rather than proactive. The Cambridgeshire Councils focus mainly on criteria to assess third-party proposals, offering little vision or leadership to deliver new facilities themselves. Apart from opposing hot food outlets near schools, there is no clear strategy. Ambitious projects proposed in 2005, including a stadium, rowing lake and 50m pool, have largely failed to materialise, with only the ice rink completed. Funding remains absent for others. It is suggested that taxpayers money should be used to prioritise sports facilities over transport schemes and believes residents would support this approach.	202453 (S Biggin)

Summary of issues raised in comments	Comments highlighting this issue
It's vital these can be accessed easily and affordably by bus (otherwise many people won't be able to use them, especially young people). This policy should ensure this comes about.	203113 (S Hughes)
In particular, the requirement in 2.c to support sustainable travel minimises climate impact and enables access for everyone.	203148 (P Tribble)
Please state clearly that Cambridge needs a new large lifelong learning college for the purposes of: Skills; Tackling loneliness; Tackling poor health; Increasing the range of options for residents.	203795 (A Carpen)
The former county adviser for music, Ludovic Stewart, who taught at the Cambs holiday orchestra for decades, had a dream for a new opera house for Cambridge. The parents of the late Dame Olivia Newton John (born in Cambridge) met at the guildhall in Cambridge where her father Brinley, later Headmaster of what is now Hills Road Sixth Form College, was singing as a baritone. Let's get that opera house built for their legacies. It must be in an accessible location i.e. not NW Cambridge. The opera house must be a first class work of art.	203796 (A Carpen)
Every major settlement should have at their heart a public venue / performing arts space that isn't simply a bland minimal cost 'multi-use' hall that Clay Farm has. Make provision for a general template of a main public transport interchange spilling out onto a civic square with a performing arts venue on the opposite sides, and facilities for whatever the local residents of the settlements choose should be on the other remaining sides / in the vicinity. It can be scaled up/down according to size of settlement population.	203799 (A Carpen)

Summary of issues raised in comments	Comments highlighting this issue
The GCSP needs to commission a survey and study to find out what attractions, facilities and amenities there are in other towns and cities that could be built in Cambridge or the surrounding new towns. The public and in particular children, teenagers, and people with lived experience of living in other cities and countries should be engaged with. Then survey the public to see what they want, and encourage groups to champion whatever choice they would like - especially where we don't have local provision. Eg an indoor roller rink (where 100 years ago Cambridge had three).	203800 (A Carpen)
Consideration should be made for the facilities mentioned in the abandoned Cambridge United Trumpington facilities application of the early 2010s which included an outdoor cycle race track, a BMX track and further cycling and high impact sports. See https://www.cambridgeunited.com/news/2013/november/plan-b-unveiled---grosvenor	204732 (A Carpen)
support point 2a-d- catchment area and wider community - with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, I support community facilities that help to meet the day-to-day needs of local residents. With reference to the above community project, I support a range of affordable facilities to be made accessible to local graduates and creatives, as well as target demographic groups (pupils, youth, students etc)	204791 (M Cleminson), 204713 (T Woodcock), 204362 (NEUBAU Architecture Ltd), 205211 (Cambridge Junction/Create Cambridge), 204254 (A Giarlis)
The respondent highlights the lack of accessible swimming facilities in Great Shelford, expressing a desire for a local pool that does not require driving.	204911 (A Sykes)

Summary of issues raised in comments	Comments highlighting this issue
The nearest public swimming option is Sawston Village College Sports Centre, which has limited availability and requires pre-booking. The pool at the Strawberry Fields development in Stapleford has a capped membership of 100 external members, which is currently full. Residents from recent Trumpington developments share similar issues regarding access to swimming facilities. The respondent suggests that the under-used pool at the Frank Lee Centre on the Cambridge Biomedical Campus could be repurposed as a more widely available leisure centre.	
We again consider there to be conflict with emerging national planning policy. National decision-making policy HC6 provides a simplified policy which should be applied.	207446 (Pioneer Group)
Provision should be made for sites that incorporate green space for outdoor purposes whether as private property or spilling out onto public green space	207457 (A Carpen)
Provision for allied public services (GPs, dentists, creches, health clinics, public libraries, performing arts facilities) to be co-located should also be made. Create awe-inspiring places where people would choose to go and be	207458 (A Carpen)
Histon and Impington are under resourced with regards to sports and recreation facilities. Areas such as Site ID: 115407 has the opportunity to provide these facilities. There is also additional land not owned by Histon and Impington Parish Council near to the current recreation ground which has the potential to increase facilities. New facilities should be not only for subscription sports but should also be available for ad hoc play at no charge.	201440 (Histon & Impington PC)

Summary of issues raised in comments	Comments highlighting this issue
Walking as a leisure activity might be expected to be covered by Chapter 6, Wellbeing and social inclusion. Policy: WS/CF: Community, .. places great emphasis on the need for sports facilities, but makes no reference to the benefits of walking the countryside for exercise or for wellbeing. The implication is clear: to exercise you should go to the gym. The front cover of the plan is very encouraging showing images of cyclists, wheelchair user, buggy user, dog walker and runners. And all of these activities need footpaths and open spaces. However, the Plan pays virtually no attention to improving footpaths.	201636 (P Cutmore)
My concern is the exclusion of walking in the countryside as a recreational activity in Chapter 6, Wellbeing and social inclusion. Policy WS/CF makes no reference to the evidenced benefits of walking for both physical and mental health wellbeing. And the main infrastructure required for enjoyable, leisure walking is the public rights of way network. The network is mainly soft surface, close to and amongst green infrastructure - but has shortcomings, because it is fragmented and there are some significant areas of housing which are cut off from access to public rights of way.	201792 (Cambridge Group of the Ramblers)
I would like explicit inclusion of play within this policy. Play areas are an important part of diverse, healthy and sustainable communities. However, it is an area often neglected as children and young people are not completing consultations.	201825 (T McKeown)
Sporting and leisure are required for all age groups, all abilities, indoors and outdoors.	202176 (M MacGinley)
Cambridge has a distinct lack of high end sports facilities that can be used for playing high level sports matches. Cambridge has several high performing sports teams competing at a national level who	202010 (R Noka)

Summary of issues raised in comments	Comments highlighting this issue
currently do not have easy access to suitable facilities with adequate playing area, home and away changing rooms, spectator space, and safe sprung sports floors (as opposed to concrete/tile). Any plans to increase the residential population in Cambridge should consider providing a suitable space for national league volleyball, basketball, handball, korfball etc, rather than just more of the same inadequate facilities.	
Rural active travel routes and PROWs should be bridleway to include horseriders	203986 (S Rogers)
1.a should be amended to read: “there is a local need or demand for the facility […]”, as there may be, e.g., no health need for a football pitch if there are already tennis courts, but there may well be high demand for both. In 1.f, “where appropriate” should be amended to “where possible.” This makes clear that developments including spaces open to the wider community are to be prioritised in planning. It also brings 1.f in line with the same “where possible” language in 2.d.	203703 (Cambridge Green Party)
Cambridge does not have a 'town' athletics track despite calls for one since the end of WW2. Could one be incorporated as part of a wider sports complex? (I wrote more in 2021 at https://cambridgetownowl.com/2021/09/14/how-do-we-secure-the-future-of-public-sport-and-leisure-services/)	203824 (A Carpen)
Girton’s identity and wellbeing depend on local sport and leisure, especially the Pavilion, recreation ground, and youth activity spaces. Key Points: Strong public support for Pavilion upgrades, youth sport, and accessible recreation. Active Travel enhances access to facilities and reduces parking stress.	202226 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
Shared school use is essential to meet rising demand. GPC Requests to the Local Plan: Allocate land for youth, sport, community wellbeing facilities in/near the village. Require shared access to school facilities. Prioritise village-scale investment, not only large district centres.	
Community facilities and infrastructure need to include all emergency services (ambulance, fire and police) and s106/CIL made available to mitigate population growth.	210329 (East of England Ambulance Service NHS Trust)
Given the national push toward early intervention and the ambulance sector's expanding role in community public health, defibrillator installation is a critical feature. EEAST would request: • S106 funding for community AEDs, including: AED device; Heated, outdoor-rated cabinet; 10-year consumables and maintenance; Placement near power sources and high-footfall areas; An AED every 800 metres (best-practice community resuscitation standard).	210330 (East of England Ambulance Service NHS Trust)
We are concerned the Council's 2016 Playing Pitch and Indoor Sport Strategies are a decade old and do not meet NPPF 103; assessments should be refreshed at least every five years and PPS updated every three years, and we request an up-to-date indoor and outdoor sports facility strategy before publication. A clear understanding of current and future community sports facility needs, including playing fields, is essential for informing and justifying a local plan policy such as Policies BG/EO and BG/PO which covers the protection, enhancement and provision of sports facilities. To address these concerns, it is requested that the Council issue an up-to-date indoor and outdoor sports facility strategy.	209232 (Sports England)

Summary of issues raised in comments	Comments highlighting this issue
CLAF objects to Policy WS/CF: Community, sports and leisure facilities.	208171 (Cambridgeshire Local Access Forum)
S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, the project sits in catchment area of 5 adjacent wards, connected by a shared infrastructure link, the Elizabeth Way bridge and related underpasses. The area sits within a public realm improvement area with potential to adapt leftover indoors and outdoors spaces for cultural and sports programmes, which would work well in line with the Cambridge tradition of skating and urban skating, providing indoors and outdoors recreation and youth engagement.	202037 (Skateboard Cambridge CIC)
1a "local need" strongly support; 1b "appropriate" strongly support; a "complement" strongly support; 2b "not have a negative impact" very strongly support; 2c lack of requirement for public transportation (as in 2018CLP Policy 73); 4 support; 5 support. Note that this proposed Policy would be thoroughly breached by the current (controversial and extremely badly received) Planning Applications to redevelop the essential central Cambridge Market Square… effectively changing it into an outdoor cafe/entertainment space catering for tourists and students instead of continuing to provide a circular-economy-rich food-, service- and employment-hub for local residents, craftspeople and farmers.	202519 (J Neal)
Community, sports and leisure facilities only benefit those who can travel to them easily and affordably. This policy should prioritise access to those facilities by walking, cycling and public transport. This will both reduce the negative impacts of increased car traffic and ensure they can be used by all.	203328 (Cambridge Area Bus Users)

Summary of issues raised in comments	Comments highlighting this issue
The respondent supports the provision of quality community facilities but finds the proposed policy approach ineffective, particularly regarding Point 5, which may hinder NHS's ability to deliver essential services. Flexibility in the use of NHS estate is crucial for delivering patient care and funding improvements, and the requirement for exploring alternative community uses for NHS disposals causes delays in reinvestment. NHS land disposals must maintain or enhance local healthcare services, with decisions made by local health commissioners and NHS England, ensuring that properties are only disposed of when they are surplus. The respondent argues that if health facilities are surplus or part of NHS reorganisation, policies should support alternative uses without requiring excessive information or marketing. The proposed modification to Draft Policy WS/CF adds new wording to facilitate that the loss of healthcare facilities if formally declared surplus to NHS operational requirements or identified as surplus in an estates strategy.	205160 (NHS Cambridgeshire and Peterborough Integrated Care Board)
We are looking to co-locate and work the Libraries harder, making the library flexible enough to host the library offer, targeted support (children's centres), community centres (well established in the City with Clay farm, Cherry Hinton and East Barnwell) and could do more under cultural hubs, NHS delivery etc.	210531 (Cambridgeshire County Council)
The application of building class to ensure facilities within a development is noted. However, experience indicates that this approach can be restrictive when delivering a modern, flexible community building or library. Such facilities often accommodate diverse activities, including hosting community banks, providing arts and creative spaces, supporting live sports events, offering room hire, and enabling NHS	210532 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
service delivery. In some cases, protracted negotiations with landlords have been required to permit these activities due to class restrictions. Flexibility is essential when replacing services to avoid imposing requirements that mandate replication of a traditional, standalone library model.	
Policy does not recognise the health and wellbeing benefits offered by the PROW network. This network enables people to make a connection with the natural environment, providing an opportunity to enhance mental wellbeing, and enables users to exercise at the same time as travelling to a destination. They offer clean, traffic free journey opportunities. PROW are an existing leisure and cultural asset which can be maximised and the policy could do more to recognise and promote this.	210623 (Cambridgeshire County Council)
It is essential that new towns include high-quality municipal swimming pools. While operation through secondary schools may be acceptable initially, this approach is unlikely to be sufficient as towns grow. Even if funding through Section 106 or CIL is not prioritised, land should still be safeguarded for future provision. Swimming pools are vital community assets: they support children, young people and older residents, help build a strong sporting culture, and can significantly reduce car dependency when provided locally. A lack of local pools is a major driver of car travel.	211001(Cambridgeshire County Council)
Leisure centres are critical for public health and for fostering a culture of sport and physical activity. South Cambridgeshire is the only district without its own leisure centres, relying heavily on village college sports facilities and on Cambridge City to meet demand. Purpose-built leisure centres offer higher-quality facilities and a wider range of activities. The current shortfall undermines participation in sport, increases car journeys, and leaves some residents unable to access facilities at all.	211002 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
The Protection of Existing Facilities is particularly relevant to our current site and a new location within central Cambridge must be identified to avoid losing an invaluable community sports facility and social resource for young people. Due consideration should be given for the reprovision of an indoor skatepark facility within the Cambridge Urban Area.	210566 (Camskate)
In the 2016 Indoor Sports Facility Strategy there is no reference to skateboarding or a skatepark. "Informal spaces" is not sufficient as a reference and does not accurately capture the proven demand for an indoor skatepark facility. In line with the document's recommendations, when the strategy is next reviewed (this is due for a review now), an indoor skatepark should be included as a distinct facility type within the strategy.	210567 (Camskate)
Without long term security of a permanent indoor facility for skateboarding, the ability of the city to deliver excellent year-round benefit to young people is significantly compromised. A permanent year-round indoor facility in Cambridge would create continuity, safety, and inclusive access that outdoor spaces alone cannot deliver.	210570 (Camskate)
At Cam Skate or community includes skaters of all ages, coaches, and volunteers ready to support structured programmes, but without a permanent indoor space, these cannot be delivered consistently. A permanent indoor venue would become a positive, stable anchor for community engagement, helping young people build identity, resilience, and supportive peer networks. This reflects findings from both national research and local case studies across the UK.	210571 (Camskate)

Summary of issues raised in comments	Comments highlighting this issue
An indoor skatepark would advance key Local Plan objectives by: • Improving health and wellbeing Skateboarding provides accessible physical activity for diverse groups, including those underserved by traditional team sports. • Supporting inclusive and resilient communities Evidence shows skateparks foster belonging, reduce antisocial behaviour, and encourage cross-age and cross-cultural interaction. • Providing essential youth and social infrastructure Cambridge lacks affordable, accessible indoor recreation for young people—an indoor skatepark would fill a clear infrastructure gap. • Enhancing social value and urban vibrancy Skate spaces contribute to inclusive place-building, urban regeneration, and community engagement.	210572 (Camskate)
I strongly encourage the Greater Cambridge Local Plan to: 1. Recognise a permanent dedicated indoor skateboarding facility as a critical element of social and community infrastructure within Cambridge and highlight the value The Warehouse indoor skatepark has brought to Cambridgeshire. 2. Allocate or support land allocation for an indoor skatepark within Cambridge city, ensuring active travel accessibility. 3. Collaborate with community organisations, Skateboard GB, and youth groups to co-design a space that is inclusive, sustainable, and future-proof. 4. Integrate this project into wider strategies for youth provision, health, and community wellbeing.	210573 (Camskate)
Leisure facilities in Great Shelford are limited.	210942 (Great Shelford PC)

Summary of issues raised in comments	Comments highlighting this issue
We note a significant deficit of outdoor sports facilities in the Royston area and request that the draft plan consider provision of such infrastructure to meet cross-boundary health and wellbeing objectives.	203258 (North Herts Council)
Community, sports and leisure facilities only benefit those who can travel to them easily and affordably. This policy should prioritise access to those facilities by walking, cycling and public transport. This will both reduce the negative impacts of increased car traffic and ensure they can be used by all.	203238 (Cambridge Area Bus Users)
It is recognised that community, sports and leisure facilities are a key element of a successful community.	211543 (Martin Grant Land Limited)
It should be recognised that football stadia are not Main Town Centre Uses, and that Part C does not apply to ancillary retail, food and beverage provision. The supporting information confirms that sports stadia are to be considered through this draft policy. It should be explicitly stated in the supporting text that the redevelopment or relocation of the Cledara Abbey Stadium is addressed under a specific allocation, and Policy WS/CF does not apply to the current Stadium or a relocation site.	211870, 211871 (Cambridge United Football Club)

Policy WS/CH: Cultural and creative hubs

Abbreviations

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

Summary of Main Issues:

Comments were made by many individuals and organisations supporting Cambridge Junction's request that: operational sustainability (management, revenue, long-term viability) is explicitly required alongside spatial and design briefs; flexibility is embedded to allow culture to evolve over time; and stronger links are made to delivery mechanisms, including the Cultural Infrastructure Strategy and partnership model. These should ensure cultural hubs are viable, adaptable and resilient. Other supporting comments raised the matter of funding these needs.

Comments about the definition of a cultural or creative hub were made by the Cambridge Green Party who supported the policy and recommended all the policy criteria in paragraph 1 be satisfied and not just 'most of'.

Brookgate Land Ltd & Network Rail Infrastructure Ltd. objected to this policy as currently worded. The policy should define what constitutes a 'cultural and creative hub', providing expected quantum, floorspace thresholds and relevant use classes.

Comments were made by many individuals and organisations supporting Create Cambridge's request for: the Agent of Change principle be explicitly embedded, placing responsibility for mitigation on new residential development, not existing venues; and major developments demonstrate access, including late-evening transport for the wider region, not just immediate residents.

There was considerable support, with reference to S/PRIA/EG that the Elizabeth Way bridge and Underpass(es) become a cultural hub project and benefits this project would bring to the local community.

Girton PC requested the Local Plan support local, flexible cultural hubs integrated into existing community buildings; recognise Girton's heritage assets as cultural anchors; and ensure cultural provision strengthens a distinct village identity, not urbanisation. The importance of libraries was also cited with Cambridgeshire County Council highlighting the opportunity to co-locate library operations in arts/cultural hubs.

Other comments included one member of the public stating that the policy lacked a reference to sustainable travel. Every new town, and district/area in Cambridge should have access to a neighbourhood centre and Cambridge North should have an equivalent "The Junction" style venue. Comments included the need for additional affordable and flexible cultural facilities, including 'makerspaces' or 'fablabs', available for booking by community groups and individuals. An indoor skatepark was also suggested which would provide enormous value to the mix of leisure and cultural facilities within the city. Recent creative graduates and young creatives should have access to shared workspaces, exhibition and networking spaces. The policy should also safeguard existing cultural and creative spaces. Workshop spaces should function as. Design processes for new cultural facilities should demonstrate serious public engagement at design stage.

Response to main issues raised in representations:

Policy WS/CH's paragraph 2(l) includes a clause requiring new creative or cultural hubs to have a Management Strategy to ensure it will be viable in the long-term. This should outline, as a minimum, its long-term vision, objectives, market sector within the wider

cultural or creative market, and financial resourcing. Where policy WS/NC: Meeting the needs of new and growing communities requires the provision of cultural infrastructure, Cultural Plans will need to be submitted as part of the planning submission process. These will need to demonstrate a robust, evidence-led and locally responsive approach to their provision and long-term viability. These plans will be secured through Section 106 agreements.

Cultural and creative hubs can take various forms and are generally defined by their unique combinations of uses, activities and cultural/commercial focus. For this reason, not all proposals would be expected to meet all the policy criteria. Regarding their expected quantum, floorspace thresholds and relevant use classes, it is difficult to define cultural and creative hubs in these traditional land use terms. Traditional examples would include: an arts centre, a performance venue, a national and, or internationally recognised museum which support cultural activities within the community and or provide training/learning opportunities. More diverse examples would might include a creative workspace space supporting independent yet related creative businesses. They might be separate sole-traders or entrepreneurs, but they all work in the same creative industry e.g. ICT or CGI digital post-production activities. There could be mix of small private businesses working with a public sector cultural organisation or a third-party provider, again working on similar or related projects. The size of these hubs may vary depending on the financing arrangements. These could include spaces secured via Policy J/AW: Affordable workspace and creative industries which seeks to seeks affordable workspace in large commercial developments. Cultural and creative hubs would have sufficient capacity to bring together and support an ecosystem of cultural activities and, or creative artists or creative/cultural organisations (public or commercial). The Local Plan is seeking to establish the policy criteria that would encourage new, genuine cultural and creative hubs to come forward that are sustainable over the long-term. That does not mean proposals such as Elizabeth Way bridge and underpass could not form a cultural hub in the future, subject to planning permission.

Policy J/RC: Retail and other complementary town centre uses, paragraph 4(b) explains that residential development in centres will only be supported where there are no nearby businesses linked to the evening / night-time economy and, or alternative cultural / live music / performance venues, which would be likely to attract noise complaints or have their operations restricted due to the development. Policy J/SA: Cambridge City's Primary Shopping Area (PSA), paragraph 5, reflecting the role of the PSA as a sub-regional centre for retail and other town centre uses, including the nighttime economy, proposals for residential development within the PSA (except for hotels) will be resisted to protect the wide range of existing cultural venues from residential uses that would put such spaces at risk from noise complaints or have their operations restricted from the development. New developments will normally contribute to transport improvements however they are unlikely to be large enough to support specific late-night transport.

Policy WS/CH explains the requirements that need to be satisfied for new cultural / creative hubs in new and existing designated centres. While the integration of cultural hubs into a community build may be feasible including heritage buildings, outside a designated centre this form of proposal may not be an appropriate sustainable location. New and enhanced cultural facilities are supported by Policy WS/CF: Community, sports, and leisure which sets out the policy guidelines for such proposals.

Policy J/RC: Retail and other complementary town centre uses establishes Greater Cambridge’s Hierarchy of Designated Centres. These should ensure all communities have access to a ‘local’ centre commensurate in size and function to their catchment area. It also includes emerging centres which will come forward during the plan period. The Junction is a sub-regional facility serving not just Cambridge but South Cambridgeshire residents and the wider surrounding area. These facilities also often need some sort of financial assistance to keep them open. Providing a second venue like ‘The Junction’ in terms of size and type would lead to direct competition with ‘The Junction’ and undermine its long-term viability. These types of facilities need to be carefully planned such that new cultural facilities, often supported by public subsidy do not undermine similar facilities.

Sustainable travel is covered by policy I/ST: Sustainable transport and connectivity which would be applicable for new cultural or creative hub. It should be noted that cultural hubs are only supported in Designated Centres listed under Policy J/RC. The location of designated centres and their constituent town centres uses are very much determined by their accessibility, as such their location is inherently central to the area they serve and highly accessible by a variety of sustainable forms of transport. Cultural facilities are protected under Policy WS/CF: Community, sports, and leisure facilities.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
I support Cambridge Junction in asking that: • operational sustainability (management, revenue, long-term viability) is explicitly required alongside spatial and design briefs • flexibility is embedded to allow culture to evolve over time • stronger links are made to delivery mechanisms, including the Cultural Infrastructure Strategy and partnership model This ensures cultural hubs are viable, adaptable and resilient. I support Create Cambridge in asking: • the Agent of Change principle is explicitly embedded, placing responsibility for mitigation on new residential development, not existing venues • major developments demonstrate equitable access, including late-evening transport for the wider region, not just immediate residents	202134 (Cambridge Junction), 202192 (H Tam), 202680 (T Altmann), 202710 (W Townsend), 202775 (S Lee), 202858 (Cambridge Junction), 202920 (R Tarry), 202980 (T Flinders), 204799 (M Cleminson), 202008 (H Chamberlain), 202746 (Cambridge Junction / Create Cambridge), 204662

Summary of issues raised in comments	Comments highlighting this issue
	(NEUBAU Architects), 205279 (N Oakley), 205385 (L Howse), 203618 (University of Cambridge, Z Svendsen), 204151 (Cambridge Junction / Create Cambridge), 202287 (Cambridge Junction / Create Cambridge), 202295 (Cambridge Junction / Create Cambridge), 202380 (J Webber), 202385 (Kettle's Yard), 202391 (T Shaw), 204811 (L Matthews), 205268 (AC de Azevedo Lamha), 204366 (New International Encounter), 203494 (D Lever), 203470 (L Heap), 203425 (S Ashworth), 203319 (N Ellis), 202805

Summary of issues raised in comments	Comments highlighting this issue
	(Cambridge Junction), 202457, 202455 (K Jones), 204685 (A Giarlis), 205003 (H Paterson)
I support Cambridge Junction in asking that: • Operational sustainability (management, revenue, long-term viability) is explicitly required alongside spatial and design briefs • Flexibility is embedded to allow culture to evolve over time. • Stronger links are made to delivery mechanisms, including the Cultural Infrastructure Strategy and partnership models. • This ensures cultural hubs are viable, adaptable and resilient.	203845 (N Yeni), 204899 (Wysing Arts Centre), 205017 (University of Cambridge), 205098 (J Walsh), 205338 (A Seiglow), 205356 (Cambridge Junction),
I support Create Cambridge in asking that: the Agent of Change principle is explicitly embedded, placing responsibility for mitigation on new residential development, not existing venues major developments demonstrate equitable access, including late-evening public transport, so hubs serve the wider region, not only immediate residents.	203863 (University of Cambridge), 207588 (N Yeni), 207521 (N Ellis)
Support the proposal to transform the Elizabeth Way underpass into a cultural and creative hub. This space is currently under-used and unwelcoming, acting as a physical and psychological barrier rather than a connector. Reimagining it as a place for culture, creativity and community activity would significantly improve the public realm while addressing safety, accessibility and wellbeing.	204972 (C Sharman), 205294 (Z Svendsen, University of Cambridge), 204350 (Cambridge Junction / Create

Summary of issues raised in comments	Comments highlighting this issue
	Cambridge), 204349, 204342, 204337, 204334, 204330, 204328 (Cambridge Junction / Create Cambridge), 204347 (Cambridge Junction/Create Cambridge), 204239 (A Giarlis), 204312, 201849 (NEUBAU Architect), 207918 (K Fisher) 205274 (R Good)
We welcome the policy's support for cultural infrastructure and affordable creative workspaces and recommend amending 2.a to require delivery of most or all criteria in paragraph 1. With reference to S/PRIA/EG and the Elizabeth Way bridge and underpass project, we support reusing bridge, underpass and leftover public realm spaces for affordable community and youth facilities, arts and culture, indoor and outdoor sport, markets, food and business uses that support learning, networking and employment.	203704 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
Support Point 1a: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, recent creative graduates and young creatives should have opportunities within the urban creative environment to afford shared workspaces, exhibit and network.	204464 (K Fisher)
Support Point 1b: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, combining Arts with an integrated Youth programme could generate natural overlaps and opportunities for Learning between youth and young adults including students and creative groups and individuals, this could include outreach programmes to include youth and young people requiring social integration.	207911 (K Fisher)
Support Point 2h: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I support proposals that seek public realm improvements and regenerate for use the empty spaces underneath the Elizabeth bridge and underpasses, for use as a cultural/creative, urban sports and community hub. This could diversify local cultural offerings and facilitate affordable, creative workspaces as well as promote a new urban identity for this currently neglected 70s site. Improvements of the adjacent public realm would seek public engagement with urban sports and recreation and link these offerings with existing and desired pedestrian and cyclist movements, between the wards and along the river promenade, linking back to the centre.	207912 (K Fisher)
Support Point 2i: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I support local labour and the provision of workspaces for local SMEs to promote Cambridge local small to medium size businesses and start ups through affordable space provisions	207913 (K Fisher)

Summary of issues raised in comments	Comments highlighting this issue
including Artists workshops, makespaces, exhibition spaces, shops a.o. as well as offering apprenticeships and access to the creative industry and opportunities for youth and young people / students and graduates.	
Support Point 2j: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I support a cultural hub which adopts external spaces attached for an active, outdoors programme and spontaneous public engagement. The Underpass project has already shown that an existing space can be re-imagined with active cultural engagement. This has worked well with artists seeking an urban venue or vessel for various installations, as an alternative to programmed spaces. Creative expression and engagement can be in the form of physical, audio, visual, digital, theatre or other modes of engagement for public events.	207914 (K Fisher)
Support Point 2k: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, research into demand for offerings should coordinate efforts with the council and the wider creative community active in Cambridge. Early feedback indicates a need for affordable, flexible and large cultural spaces which are not subject to market economical constraints.	207915 (K Fisher)
Support Point 2l: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I strongly support proposals that seek out commercial and community uses compatible with sustainable development and operations of a cultural/creative hub. Proposals should complement the nature and style of the 70s concrete infrastructure and programmes should support	207916 (K Fisher)

Summary of issues raised in comments	Comments highlighting this issue
new cultural provisions on the basis of market research and demand. A vision statement is required to identify early ambitions and long term operational viability of the venture.	
With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I support the reversal of public space uses to allow for spontaneous and active engagement, including reversal of common urban prejudice when it comes to urban sports and creativity, and encouragement such as ‘play ballgames here’, ‘paint this wall’ and ‘skater friendly furniture’.	207917 (K Fisher)
With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, a cultural hub can also include external spaces attached to an active internal programme.	207918 (K Fisher)
With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, a cultural hub can also include external spaces attached to an active internal programme.	204452 (K Fisher)
Buildings hosting cultural and creative facilities should be distinctive externally. Avoid the 'Clay Farm' model of a bland box with bland expensive abstract sculpture plonked in front. Such buildings should be landmark/wayfinding buildings that make it easy for people to find each other in what can be a sea of identikit buildings. Design processes should demonstrate serious public engagement *at design stage*.	203809 (A Carpen)
Support for the arts across the District should be widespread to ensure access for all residents, as individuals, small groups and potential businesses. The Plan should include provisions for community and ad-hoc groups in strategic new developments, ensuring access to cultural resources.	205447 (R Stobart)

Summary of issues raised in comments	Comments highlighting this issue
A performance and workshop space should be funded through S106 contributions, with staff support for a period of 12, 24, or 36 months to get the activity to a sustainable state. Workshop spaces should function as 'makerspaces' or 'fablabs', supporting activities like Lego and crafts, and be available for booking by community groups and individuals. Performance spaces should be well-equipped, bookable, and designed to accommodate a small audience.	
Cultural identity in Girton stems from heritage assets, village history, and community-led spaces rather than large cultural complexes. Pavilion and Rec serve as community gathering points. Heritage-based identity (e.g., Girton Gap, village form) must guide cultural development. Community-scale creative activity thrives in flexible, multi-use spaces. GPC Requests to the Local Plan: Support local, flexible cultural hubs integrated into existing community buildings. Recognise Girton's heritage assets as cultural anchors. Ensure cultural provision strengthens a distinct village identity, not urbanisation.	202227 (Girton PC)
Should insert into this policy that genuine efforts should always be made to reach out to, engage with, enrich and support activities that are already underway (or that would be valuable if they *were* underway) at local schools, diverse local community centres, youth groups, clubs, social clubs of all kinds - including for older residents or those with disabilities, and other elements of the community across the generations. Wouldn't it be good to try to build community - not just supplant it with something new?	202527 (J Neal)
This policy does not quite go far enough. It is missing the requirement for sustainable travel (such as in Policy WS/CF) or active travel (as in Policy WS/HD).	203150 (P Tribble)

Summary of issues raised in comments	Comments highlighting this issue
Rural active travel routes and PROWs should be bridleway to include horseriders.	203989 (S Rogers)
Opportunity to co-locate or better still make buildings work harder. Many libraries operate 28 hours a week, can the shelving fold away to be used as an arts/cultural hub outside – see Fore Street Living Room Library – Jan Kattein Architects | Architecture, planning & communities. Or at a smaller level Melbourn hub, Gamlingay Eco hub and EverySpace Everyplace – Jan Kattein Architects | Architecture, planning & communities. Trying to link up better quality community spaces that are sustainable through multi use and investment upfront inflexible buildings.	210533 (Cambridgeshire County Council)
An indoor skatepark offers a completely new piece of cultural infrastructure within Cambridge and through creative programming it provides a dynamic and varied offer within the city. From skate lessons to roller disco, to pop-up sauna and wellbeing events, an indoor skatepark can add enormous value to the mix of leisure and cultural facilities within the city	210565 (Cam Skate)
Policy should quantify the scale of need and recognise the need for major new cultural attractions and infrastructure to offset the pressures on city centre attractions. The policy should safeguard existing cultural and creative spaces.	203365 (Cambridge Past, Present and Future)
Libraries are an essential part of any community. This not just an education issue. Libraries are an introduction for children to our culture, a sources of information for all, a recreational facility, and a link between the past, present and future.	202178 (M MacGinley)
Strongly support, but this needs funding to be realised. This sort of arts environment is generated from the ground up, so needs a way to be bootstrapped by individual artists and small collectives.	202829 (H Cook)

Summary of issues raised in comments	Comments highlighting this issue
Every new town, and district/area in Cambridge should have access to a neighbourhood centre - one that has excellent public transport links that enables access beyond the immediate neighbourhood to help sustain them. An equivalent of "The Junction" should be built in North Cambridge with easy access to residential communities and close to medium-density housing and/or schools. There should be extensive meeting rooms and rehearsal spaces given the significant shortage in Cambridge. There should also be provision for large dance and exercise classes given the loss of affordable community hall space (eg St Columbas) in recent decades.	203802 (A Carpen)
Object to this policy as currently worded. Overly broad and lacks sufficient clarity, contrary to the requirements of the NPPF for policies to be clear and effective. In particular, the policy fails to define what constitutes a ‘cultural and creative hub’, providing no indication of expected quantum, floorspace thresholds, or relevant use classes.	204389 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
It is recognised that cultural/creative hubs are a key element of a successful community.	211544 (Martin Grant Land Limited)

Policy WS/MU: Meanwhile uses during long term developments

Abbreviations

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

Summary of Main Issues:

There was broad support for the policy and the important role of meanwhile uses in: providing flexibility; site activation and vibrancy; the maintenance and creation of activity in particular in addressing community needs; the promotion of inclusive growth; masterplan implementation and placemaking; the facilitation of efficient land use; helping with the logistics of setting up a new community; and the deliverability of allocations.

A large number of comments supporting Create Cambridge ask that: the policy is a requirement for Areas of Major Change and large scale phased developments; meanwhile strategies address the activation of vacant sites, governance and exit pathways; cultural / community uses are included throughout construction periods; long-term vacant units are proactively enabled for cultural use & artists are involved in shaping terms; and trust-style models are explored to secure permanent affordable space.

There was concern that the policy should allow flexibility in the duration of meanwhile uses on differing sites and ensure that meanwhile uses consider compatibility with surrounding uses and not impede long term site objectives. Increased clarity on what is considered “a long period of time” was requested, as was a site-specific based policy which in some circumstances may be to leave land unused.

Suggestions included strengthening of policy wording, to further encourage the efficient use of buildings and land, to support meanwhile uses that enable continuity of access to community, sports and youth facilities and to provide safe routes for horse riders. A gap in the provision of skate parks and their importance as social infrastructure, enhancing wellbeing, social cohesion, safety, and community belonging was raised. One comment made highlighted the importance of partnership working to ensure success of meanwhile use schemes. Another highlighted mixed results for meanwhile uses on sites in Cambridgeshire.

Response to main issues raised in representations:

Comments supporting the policy approach are noted.

A number of comments supported the principle but sought clarify and certainty on its implementation. The policy wording has been reviewed to address these points, including providing clarity on phased development where a meanwhile use strategy will be required.

The potential for cultural or employment uses at the Elizabeth Way bridge and Underpass(es) is noted. Policy S/PRIA/EG: Eastern Gate has been amended to reflect the opportunities of this area.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support selected	202483 (M Parsons, University of Cambridge), 203084 (Trinity College, Cambridge), 203354 (BMR Granta Park Propco Limited), 204446 (Tritax Big Box Developments), 204680 (B Lenz, NEUBAU Architecture Ltd)
Supportive of the policy as: • Meanwhile uses can provide flexibility during phased development, activate sites ahead of permanent development, and support the effective implementation of the overall masterplan strategy. • Meanwhile uses play an important role in maintaining activity, meeting community needs, and enhancing the vibrancy of sites during phased delivery. • For long-term, strategic development, for example, for whole-site outline applications at North East Cambridge, the ability to accommodate meanwhile uses is integral to the deliverability of the allocation.	202483 (M Parsons, University of Cambridge), 203084 (Trinity College, Cambridge), 203354 (BMR Granta Park Propco Limited). 203526 (E Pritchard, Cambridge

Summary of issues raised in comments	Comments highlighting this issue
• The supportive approach to meanwhile use (as put forward by Cambridge Ahead's Young Advisory Committee) is welcome, recognising its role in promoting inclusive growth and contributing to placemaking, particularly within large-scale developments. • The policy appropriately recognises that some large-scale development proposals may remain temporarily undeveloped for extended periods of time.	Ahead), 204446 (Tritax Big Box Developments)
Support for Create Cambridge's asks that: • a Meanwhile Strategy is required at validation for Areas of Major Change and large phased developments • strategies set out activation of vacant sites, governance arrangements, exit pathways to permanent provision • cultural/community uses are embedded throughout long construction periods, not only at completion • long-term vacant units are proactively enabled for cultural use; artists involved in shaping terms • clear exit pathways prevent displacement when redevelopment proceeds • creative commons/Creative Land Trust-style models are explored to secure permanent affordable space • Create Cambridge is engaged as a key consultee on delivery models, drawing on national and international precedents	202197 (H Tam), 202303 (L Mills, Cambridge Junction, 202314 (S Yusuf, Cambridge Junction/Create Cambridge), 202752 (C Woods, Cambridge Junction/Create Cambridge), 202866 (R Tinkler, Cambridge Junction), 204166 (M Burman, Cambridge Junction/Create Cambridge), 202384 (J Webber), 202869 (B Groisman, Cambridge Junction), 205394 (E Hine),

Summary of issues raised in comments	Comments highlighting this issue
	202406 (Kettle's Yard), 202408 (T Shaw), 202459 (K Jones), 202714 (W Townsend), 202781 (S Lee), 202928 (R Tarry), 202975 (T Flinders), 203020 (V Beechey, The Arts Theatre Cambridge), 203334 (N Ellis), 203432 (S Ashworth), 203488 (L Heap), 203514 (D Lever), 203627 (Z Svendsen, University of Cambridge), 203849 (N Yeni), 203869 (University Cambridge), 205033 (L Sheerman, University of Cambridge), 204992 (Wysing Arts Centre), 203869 (J Fritsch, University

Summary of issues raised in comments	Comments highlighting this issue
	of Cambridge), 204680 (B Lenz, NEUBAU Architecture Ltd), 204699 (A Giarlis), 204827 (L Matthews), 205064 (H Paterson), 205129 (J Walsh), 205287 (A C de Azevedo Lamha), 205303 (N Oakley), 205320 (L Howse), 205370, 205384 (A Seiglow)
The University supports this policy for suitable meanwhile uses during long term developments	202483 (M Parsons, University of Cambridge)
Partnership working between organisations, asset owners, developers and local authorities will be important to ensure the success of meanwhile use schemes.	203526 (E Pritchard, Cambridge Ahead)
Welcome this policy's encouragement of the efficient use of existing buildings and land. To further strengthen this encouragement, recommend amending "where appropriate" in point 2 to "where possible." This more clearly prioritises the accommodation of meanwhile uses.	203705 (R Comins, Cambridge Green Party)
Point 3 contains a typo: "meanwhiles" should be "meanwhile".	203705 (R Comins, Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
In the supporting information, we recommend adding a sentence immediately after the first paragraph to state “Meanwhile uses can be applied to any temporarily vacant property, whether commercial or residential, as well as to vacant land.” This encourages the efficient use of all types of buildings and land.	203705 (R Comins, Cambridge Green Party)
The policy should allow flexibility in the duration of meanwhile uses to reflect differing site circumstances, development phasing, and market conditions. Meanwhile uses must remain compatible with surrounding uses and should not impede the long-term development objectives for the site. A flexible, supportive approach will ensure sites contribute positively throughout the redevelopment period.	203354 (BMR Granta Park Propco Limited)
TCE is supportive of the principle of meanwhile uses, however clarification is needed in the policy wording as to what is considered “a long period of time”. The policy is currently too open ended; for instance an underused/vacant site or building for a period of 5 years in a 15-20 year masterplan might not be considered “a long period of time” on the context of the wider masterplan.	203587 (The Crown Estate)
The policy is not written well but it is a good idea.	201248 (S Williams)
The policy should require continuity of access to community, sports, and youth spaces during works and allow temporary recreation facilities where needed to keep social inclusion intact.	202228 (Girton PC)
Support community-led meanwhile uses that strengthen engagement.	202228 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
Meanwhile uses can include permissive bridleways to provide much needed safe routes for horseriders which walkers and cyclists can also enjoy.	203992 (S Rogers)
The application of the policy must be considered on a site-specific basis to ensure that the most appropriate strategy is pursued, which in some circumstances may be to leave land unused.	204446 (Tritax Big Box Developments)
When Cam Skate's current meanwhile use lease is finished at 3-5 Coldham's Lane, this will result in a major gap in year-round youth provision, physical activity access, and inclusive recreation. Evidence from national government, academic research, and community development studies strongly supports the role of skateboarding spaces as vital social infrastructure, enhancing wellbeing, social cohesion, safety, and community belonging.	210561 (Cam Skate)
Mixed success with this, we have had it at Northstowe, Alconbury and Waterbeach to help create new hubs for communities to engage with. However, things like building in spaces for visit from food trucks and the mobile library can help with logistics of a new community as it sets up before permanent facilities are in place (learning from Northstowe).	210596 (Cambridgeshire County Council)

Policy WS/IO: Creating inclusive employment and business opportunities through new developments

Abbreviations

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

Summary of Main Issues:

There was general support for the policy with a recognition that successful places are shaped not only by physical development but by inclusive, healthy and socially connected environments. It will help ensure that existing residents will be able to benefit from the economic growth of the area. Suggestions were made for the use of any funds received including education facilities and support for students and an offer was made of working with the Adult Education Service in the area.

A number of respondents supported the policy but with the caveat that it be applied in a flexible and proportionate manner, having regard to the nature, scale and phasing of individual developments, as well as the operational requirements of occupiers to ensure that is effective and deliverable.

There was also concern that policy thresholds, and the requirement for an Employment and Skills Plan could impact construction commencement and deliverability particularly if this is important for site viability, placing additional administrative burdens becoming barriers to commencing construction programmes. Concerns were also expressed the impact on the business plans of SMEs alongside requests that the threshold requirements for housing developments be raised. It was requested that construction not be halted if there are difficulties in implementing a plan.

Where there were objections, with one respondent stated that the policy lacks an evidence base, justification and consistency with national planning policy, potentially discriminating against those living outside Greater Cambridgeshire.

A number of comments support the creation of new hub at the Elizabeth Way bridge and Underpass(es), supporting cultural uses and artists enabling employment, training and outreach opportunities for young people.

Response to main issues raised in representations:

Representations supporting the policy and its approach are noted.

The policy approach is justified by national and local policy considerations, in to address local inequalities and skills shortages. Further information on both of these areas was set out in our Wellbeing and Social Inclusion Topic Paper in 2025. There are a range of examples of similar policies being operated in other areas where these issues are also present. Evidence for the need for a policy has been clearly established. Further details have been added to the Proposed Submission Local Plan to clarify elements of its implementation.

Some comments highlight opportunities regarding how the policy could be delivered, and linkages to other schemes. The policy is flexible enough that specific opportunities can be responded to during implementation. The policy also includes a mechanism for in lieu payments where measures cannot be delivered on site. Some comments raised issues regarding site specific implementation, but the policy has sufficient flexibility to respond to site specific circumstances.

One comment questions the threshold applied in the policy. The policy seeks to learn from examples of good practice in the implementation of Local Plan policies across the UK. 1,000 sqm of non-residential floorspace and 10 homes are considered a reasonable starting point for the requirement for Employment and Skills Plan. The use of the recently updated CITB benchmarks at construction stage ensures that the asks from developers are proportionate to the nature and scale of development. The asks at occupation stage will be similarly proportionate.

The potential for cultural or employment uses at the Elizabeth Way bridge and Underpass(es) is noted. Policy S/PRIA/EG: Eastern Gate has been emended to reflect the opportunities of this area.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support selected	202487 (M Parsons, University of Cambridge), 203037 (K Porrer, Cambridge City Council Liberal Democrat Group), 203088 (Trinity College, Cambridge), 204219 (L Cooke), 204243 (A Giarlis),

Summary of issues raised in comments	Comments highlighting this issue
	204326 (B Lenz, NEUBAU Architect), 204450 (Tritax Big Box Developments), 204726 and 204793 (T Woodcock), 204804 (M Cleminson), 205203 (M Burman, Cambridge Junction/Create Cambridge), 207447 (Pioneer Group Ltd), 211545 (Martin Grant Land Limited)
Object selected	202486 (M Parsons, University of Cambridge), 204989 (A Brand, Abbey Properties Cambridgeshire Limited)
Requests the plan: safeguard space for local enterprise, small business units, co-working. Residents favour small enterprises, retail, co-working, and shared community hubs; support community-scale	202229 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
enterprise hubs within Girton's development framework as this supports rural economic resilience; and recognise landowner diversification as part of inclusive employment.	
Some opportunities to work with Adult Education to support this offer and specifically the Business and Intellectual Property to support new opportunities that can develop in new community. Business & IP Centre Cambridgeshire (BIPC) | Cambridgeshire County Council. Potential to buy into specific project work in a community to support ambitions.	210597 (Cambridgeshire County Council)
No evidence is provided at this stage to assess the soundness of this policy. Evidence base needs to be provided prior to the next stage of plan.	202486 (M Parsons, University of Cambridge)
The University support the policy which keeps the special quality of Cambridge and the surrounding area, ensuring that it continues to be a place where people want to live, learn, work and play.	202487 (University of Cambridge)
We strongly support this policy with the new Employment and Skills plan at both construction and occupation stages.	203037 (K Porrer, Cambridge City Council Liberal Democrat Group)
The requirement for new developments of 1,000 sqm or more of floorspace within commercial and flexible use classes to submit and implement an Employment and Skills Plan at both the construction and occupation stages is SUPPORTED. In supporting this requirement, it is considered important that Employment and Skills Plans are applied in a flexible and proportionate manner, having regard to the nature, scale and phasing of individual	203088 and 211490 (Trinity College, Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
developments, as well as the operational requirements of occupiers. An appropriately tailored approach will ensure that Employment and Skills Plans remain effective, deliverable and aligned with existing initiatives across the Cambridge Science Park, while continuing to provide meaningful benefits to the local community and workforce.	
From a socio-economic perspective, a key factor affecting social inclusion is access to education and training opportunities for existing residents, which in turn facilitate the ability of those residents to access and reap the benefits of the jobs delivered by economic growth. Ensuring that residents have the opportunities to develop their education and training levels, such as those that would be afforded by Cambridge Science Park North (HELAA Reference 40096) through job opportunities, apprenticeships and the development of the Cambridge Regional College (CRC), would be key to promoting wellbeing and social inclusion for Greater Cambridgeshire residents. Without skilled manufacturing opportunities in Cambridge, there will be a shortage of job opportunities for people who want to work in a technical or engineering environment but do not have the qualifications to undertake the roles that require a university degree. These include students at the Cambridge Regional College and North Cambridge Academy. If Cambridge allocate sufficient space to accommodate the manufacturing space required by these companies in a sustainable location, a real opportunity exists to develop and nurture this category of jobs.	211483 (Trinity College (CSP) Limited)
Provision should be made for firms/developers to contribute towards	203804 (A Carpen)

Summary of issues raised in comments	Comments highlighting this issue
• a capital fund to pay for a new large lifelong learning college and similar facilities. • a fund that offers maintenance grants for people willing but unable to retrain/switch careers into sectors where the local economy has chronic skills shortages • facilities for the circular economy including repair centres and local reuse centres.	
Whilst the objectives of this policy are laudable it is contended that the threshold at which this policy applies should be set higher. In the case of schemes of 10 dwellings it is likely that the scheme would be built by a small contractor who has an established workforce in under a year from approval. The threshold should be raised to +50 dwellings.	203343 (ESCO Prospect)
Applaud the policy's intention to address the poverty and skills gap in Greater Cambridge and to support community wealth building. To better support these aims, amending 3.c is recommended to read: "How these opportunities will be made available and actively communicated to local residents […]" so that the onus is on the developer to make residents aware of new business, employment and training opportunities. This will help to ensure that jobs and training created by development genuinely benefit the local community.	203706 (R Comins, Cambridge Green Party)
The policy appropriately recognises that successful places are shaped not only by physical development but by inclusive, healthy and socially connected environments. The policy's emphasis on social inclusion, health and wellbeing, through accessible services, community facilities, inclusive design and connectivity, aligns with national planning policy and the Local Plan's placemaking objectives.	204450 (Tritax Big Box Developments)

Summary of issues raised in comments	Comments highlighting this issue
Inclusive design and community wellbeing as integral to sustainable development. Tritax Park, Cambridge will seek to incorporate measures that support social interaction, accessibility and active lifestyles, helping to create healthy, resilient and socially inclusive places.	
Support in principle. Concerns that the requirement for an Employment and Skills Plan could impact construction commencement and deliverability particularly if this is important for site viability. Mandatory training, apprenticeships, and supply-chain commitments could introduce administrative burdens, unforeseen S106 style costs and procurement complexity particularly difficult for smaller urban schemes with short construction programmes. A change is requested to allow flexibility in the policy wording, ensuring that construction can commence or not be halted due to difficulties concerning the implementation of an Employment and Skills Plan.	204855 (Hill), (Carter Jonas).
The policy lacks justification and consistency with national planning policy, potentially discriminating against those living outside Greater Cambridgeshire. Part 2 of the policy sets a low threshold for the Employment and Skills Plan, which may force small and medium-sized businesses to deviate from their business plans for developments of 10 dwellings, potentially deterring project progression. Part 4 references local residents, specifically those in Greater Cambridgeshire, but lacks a specified target. This could disadvantage workers in closer locations to developments but outside the district boundary. This seems unsustainable. Is the intention for such sites to have a lower target? The policy lacks clarity.	204989 (A Brand, Abbey Properties Cambridgeshire Limited)

Summary of issues raised in comments	Comments highlighting this issue
Active Travel corridors for commuting are also widely used for leisure. Therefore, they should be public bridleway to include horseriders.	203997 (S Rogers)
We support the Councils in seeking to maximise local economic opportunities through major developments	207447 (Pioneer Group Ltd)
Support for creating a new cultural hub at the Elizabeth Way bridge and Underpass(es) (S/PRIA/EG), a mix of uses will create employment opportunities for graduates, startups, makers and creatives seeking affordable workspace • A creative hub helps to promote a sustainable, resource-efficient neighbourhood. • Support integration of young people with the arts and public realm. • Include youth outreach and education programmes, apprenticeships and learning opportunities, informed by council market research and needs/gaps • Provide commercial and self-organised recreation, open access sports provisions including urban skating, active landscaping	204219 (L Cooke), 204243 (A Giarlis), 204804 (M Cleminson), 205203 (M Burman, Cambridge Junction/Create Cambridge), 204326 (B Lenz, NEUBAU Architect),
Support local retention of labour and SMEs with reference to S/PRIA/EG and Elizabeth Way bridge and Underpass(es) cultural hub project, Key to future-proofing operational sustainability is to promote Cambridge local small to medium size organisations through affordable space provisions including Artists workshops, makespaces, exhibition spaces, shops a.o. as well as offering apprenticeships and access to the creative industry and opportunities for youth and young people /students and graduates. Commercial anchor functions could include local, ethical food + beverage offerings as well as local	204726 (T Woodcock)

Summary of issues raised in comments	Comments highlighting this issue
sports clubs, entertainment, recreational provisions supporting day and nighttime economies, in line with local demand.	
With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project, the retention as a noteworthy 70's Heritage asset is supported. In 1950 the architect / town planner Lord William Graham Holford produced a report for Cambridge County planning, proposing a comprehensive road framework the scale of which was unprecedented in the history of Cambridge transport planning, leading to construction of the infrastructure in 1969. This introduced environmental and social challenges to the local residential area. I support regeneration and re-use of the EW Bridge and underpasses as a pedestrian/cycle friendly, cultural hub.	204793 (T Woodcock)
We propose securing the Employment and Skills Plan through a pre-commencement condition rather than at outline stage.	208358 (T Elbourn)
It is recognised that inclusive employment and business opportunities are a key element of a successful community.	211545 (Martin Grant Land Limited)

Policy WS/HS: Pollution, health and safety

Abbreviations

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

Summary of Main Issues:

A number of representors expressed broad support for the policy. Great Shelford and Stapleford Parish Councils supported the approach to addressing light pollution. Anglian water highlighted the need to ensure proposals do not put at risk the operation of existing infrastructure.

Natural England said the policy should include consideration of environmental impacts in relation to air pollution. On light pollution they advised the plan should reference impact in protected sites including Eversden and Wimpole Woods. The Cambridge Green Party suggested it should reference soil and water, and be clear the policy applies to construction and end use. Cambridgeshire County Council proposed adding reference to overheating. The Environment Agency request reference to various guidance documents that should be considered when assessing proposals. They also recommend greater emphasis and encouragement for the redevelopment of land affected by contamination as this is a sustainable approach which provides an important opportunity for environmental improvement via remediation.

Others thought the policy was not strong enough. North Newnham Resident's Association considered the policy did not have a clear enough approach to light pollution, which was a significant problem in Cambridge. Another representor expressed concern that the policy did not reference consideration of indoor air quality. The impact of air pollution in Cambridges narrow streets was also mentioned, as well as the noise impact from vehicles and heat pumps. It was asked whether more could be done to address noise insulation.

Other comments considered the policy too onerous. It needed to recognise issues covered by other regimes, or some of the matters covered were not necessary, such as indoor lighting. Requiring air quality statements for minor development was not

proportionate. Reference to ‘sensitive residential premises’ was ambiguous and not defined. Some matters could be addressed in the Councils’ validation list.

Response to main issues raised in representations:

A number of comments offer support for the policy in general or specific aspects of it, these are noted.

The policy provides a robust policy framework for ensuring appropriate consideration of air quality issues.

Additional clarification has been added to the policy and supporting text regarding consideration of the impacts of light pollution on wildlife. Air quality consideration of environmental impacts is already stated in the policy. There was a request to add reference to soil, but the protection of soils is addressed by other policies. Construction management is also addressed by a separate policy, as is water quality.

The Environment Agency request recommend greater emphasis and encouragement for the redevelopment of land affected by contamination as this is a sustainable approach which provides an important opportunity for environmental improvement via remediation. National Planning policy (the NPPF) says planning policies and decisions should support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. The draft policy does this, but supporting text can be added to highlight the opportunities development can provide for delivering remediation. Reference to technical guidance documents were also added in the supporting text.

Representors questioned why the policy referred to internal lighting, but indoor lighting can still have external impacts on wildlife, so in appropriate circumstances impacts need to be considered. Reference in the consideration of lighting to sensitive residential uses is also an appropriate approach. Some comments question the requirement for submission of Air Quality Statements. Air Quality Statements are a requirement in the adopted Cambridge Local Plan, supported by the Sustainable Design and Constriction SPD 2020. They provide a proportionate and effective method of identifying the impacts of a proposal. To enable this, templates have been published appropriate to different scales of development. They are also an appropriate method of identifying where full air quality assessment may be required.

Further guidance sources suggested by the Environment Agency have been added to the policy.

There was a suggestion that requirements could be made through validation lists. While they are a useful tool, it is important requirements are also made in planning policy.

Some comments raise concerns about the strength of the policy in preventing pollution. The policy is considered to provide a robust approach to considering applications. It takes an appropriate approach to taking account of the opportunities for mitigation. Another comment queries the coverage of policies from the adopted Cambridge Local Plan. The lighting policy approach is broadly similar but additional detail is included in the new local plan. The visual pollution policy is now addressed by policies in the Great Places theme. There were queries around the noise requirements, including noise insultation, but the policy is considered to go to the appropriate level of detail.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
We are broadly supportive of this policy, most notably those clauses relating to light pollution, which tally well with the aims of Policy S&GS 15: Preserving our dark landscape	201617 (Stapleford PC) 210943 (Great Shelford PC)
Local Plan should include indoor air quality standards. Filtering indoor air and providing sufficient ventilation will reduce harmful PM2.5 pollution and will remove airborne disease causing viruses and bacteria. Guidance should follow the ASHRAE standard, which requires a minimum of 6 air changes per hour. This is extremely hard to retrofit, so should be required in new builds.	202800, 202825 (H Cook)
Objects to Policy WS/HS. The requirement for major development proposals to submit an assessment of the impact of new external and internal lighting, and requirements in part 7 for all major and minor planning applications to submit an Air Quality Statement, are overly prescriptive and unjustified. Contributes unnecessary cost and burden on applicants	203085 (Barratt David Wilson Homes and North West Cambridge consortium) 204007 (Anglia Ruskin University)
The policy refers to the need for Noise Impact Assessments and Air Quality Assessments where relevant. These requirements should be referenced within the Council's validation requirements instead of being included in the policy.	210250 (Vistry)
Clarification is requested in relation to paragraph 2 of the policy, which refers to "sensitive residential premises". As currently drafted, this term is not defined and introduces unnecessary ambiguity.	210249 (Vistry)

Summary of issues raised in comments	Comments highlighting this issue
Policy is too extensive and needs to recognise that some of the adverse impacts can be mitigated by suitably worded conditions or via validation checklists. There is also a need to recognise that other regulatory regimes can rectify some of the issues specified. The policy could result in unnecessary cross-over between regimes.	203360 (ESCO Prospect)
Anglian Water supports the policy section regarding environmental nuisance/pollution and the agent of change principle. We consider that this provides a robust approach to managing development proposals for sensitive uses, including residential development, near our water recycling centres or sewer pumping stations, to ensure such proposals do not put at risk the operation of our existing infrastructure, and that the Agent of Change Principle will apply.	210210 (Anglian Water Services)
The proposed policy requires that new developments must not cause significant adverse environmental effects. However, it inadequately addresses pollution, appearing to accept its increase as inevitable and focusing only on mitigation. Light pollution is already a serious issue in Cambridge and should be reduced, not allowed to worsen. The policy relies on subjective judgments about what constitutes “significant” or “unacceptable” impacts, rather than clear evidence. Mitigation should be required for any demonstrable adverse effect. It assumes development should proceed even if it causes pollution, provided mitigation is possible. Yet, some impacts, especially from light pollution, can cause irreversible harm to wildlife and humans. The policy should not be based on the inevitability of increasing pollution, particularly given the negative effects of strong LED lighting. Developments that	205027 (North Newnham Resident’s Association)

Summary of issues raised in comments	Comments highlighting this issue
conflict with sustainability, environmental protection, health, or community objectives should not be permitted.	
The importance of emissions from vehicles involved in development and the potential amplification of these when travelling through narrow, canyon streets should be born in mind.	205194 (D Stoughton)
The draft Local Plan does not seem to include policies equivalent to Local Plan 2018 Policy 34: Light Pollution Control and Policy 65 Visual Pollution. The requirements in these policies should be carried forward	208628 (Madingley Road Residents Association)
Rural active travel routes and PROWs should be bridleway to include horseriders.	204000 (S Rogers)
Should include wording within this Policy about assessing environmental impacts, particularly in relation to Air Pollution. Your authority should follow Natural England's new Air Quality standard advice for guidance on this matter (see Appendix 2). Additionally, the Cambourne GBI document (page 13) refers to a buffer of 100m between Woodlands and Major Roads. Please note however that Habitats Sites and SSSIs (and woodland) at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition and/or acidification. The HRA includes an assessment of air pollution in relation to Habitats Sites (using a 200m buffer), but SSSIs should also be assessed by your authority as part of the	207633 (Natural England)

Summary of issues raised in comments	Comments highlighting this issue
The Light Pollution section of this Policy could also specifically mention the Eversden and Wimpole Wood SAC Impact Risk Zone (IRZ) and have requirements specific to this area, for example to follow the Institute of Lighting Professionals GN08 Bats and Artificial Lighting.	207634 (Natural England)
Make the content on eliminating light pollution - especially from poorly-designed street lighting strong. Strengthen the content on noise pollution especially from motor vehicles and generators - and air source heat pumps. Can provision be made for their sound insulation? Can improved provision on noise pollution and noise insulation in shared buildings and flats be strengthened?	203806 (A Carpen)
In this policy's stated aim, "odour, and/or light pollution" should be amended to "odour, soil, air, water, and/or light pollution" and "suitable for the end use" should be amended to "suitable for both the construction process and the end use." These make the aim more comprehensive. We recommend adding a new criterion 4.e to state "proposed development will not lead to excessive noise and/or vibration pollution during the development process" to address the risk of pollution during the construction process. The section "contaminated land" should be re-titled "contaminated land and water," as 10b discusses impacts on controlled waters.	203708 (Cambridge Green Party)
Health and safety in Girton depends heavily on safe Active Travel, reduced road danger, and flood-resilient environments. Unsafe severance points (Huntingdon Road, NIAB bridge area) undermine health. Flood-risk areas (Washpit, Beck Brooks) pose safety and wellbeing risks. Pollution reduction aligns with better cycling/walking infrastructure. GPC Requests to the Local Plan: Address unsafe	202230 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
junctions and severance points under WS/HS. Embed flood-risk mitigation in health and safety policy expectations. Prioritise active mobility safety measures.	
Infrastructure assessments should be fully outlined, such as Air Quality risk from new construction at presently congested areas, hence the case for Traditional Architecture that will confer longevity benefits in the long-term with as much free car parking as possible.	210372 (Community Campaigner D Barton)
Public health support Draft Policy WS/HS that seeks to ensure amenity for new buildings and neighbours. Would like to see water pollution and overheating included within this policy.	210608 (Cambridgeshire County Council)
Supports Policy WS/HS. The policy recognises the importance of ensuring that new development does not result in unacceptable impacts on health, amenity or safety arising from pollution, including noise, vibration, odour, light and air emissions.	204453 (Tritax Big Box)
Land south of Coldhams Lane is a very toxic old tip. Multiple piles are planned to be drilled through many metres of waste during construction. This WILL release toxic leachate into the chalk stream BELOW the site (Cherry Hinton brook) and probably will cause leachate also to flow SIDEWAYS into neighbouring land. It will also greatly increase traffic on Coldhams Lane.	201249 (S Williams)
EWR route is the worst route that could possibly have been chosen. It travels too close to local houses, it is insensitive, destructive, scarring, it will create mental stress and anxiety for thousands of local people, the noise pollution will be unbearable and the damage to the countryside and wildlife will be horrific. A new route should be chosen.	201586 (P Brown)

Summary of issues raised in comments	Comments highlighting this issue
We would recommend greater emphasis and encouragement for the redevelopment of land affected by contamination as this is a sustainable approach which provides an important opportunity for environmental improvement via remediation.	211167 (Environment Agency)
We are pleased to see these included and that Plan highlights the necessity for soil and groundwater investigations and mitigation of any contamination prior to development. Any development proposed on brownfield sites, historic landfill sites, or sites suspected to have been affected be contamination, should follow the requirements of our Land Contamination Risk Management (LCRM) guidance. This would initially require a Preliminary Risk Assessment, which would likely be followed by intrusive site investigation, and potentially detailed quantitative risk assessment to assess whether remediation can be undertaken to ensure the protection of the surface water and groundwater environments.	211168 (Environment Agency)
We recommend that the following guidance be referenced: Paragraphs 123, 146, 180, 189 and 190 within the National Planning Policy Framework (NPPF); Part IIA of the Environmental Protection Act 1990; The Land Contamination Technical Guidance on gov.uk including the Land Contamination Risk Management (LCRM) guidance. Our guidance is regularly revised, and therefore, throughout the plan's duration, the most recent version or replacement guidance for superseded versions should be consulted.	211169 (Environment Agency)
We question the justification for requiring an Air Quality Statement in respect of all development sites, particularly those that are not within any Air Quality Management Area. We consider it therefore unnecessary for the policy to require planning applicants to also provide an assessment of air quality.	208359 (T Elbourn)

Summary of issues raised in comments	Comments highlighting this issue
Further, a CEMP is a standard condition for new development, and this typically contains information on dust and air quality, including monitoring provisions throughout the construction phase. As such, this policy requirement represents duplication of both air quality assessments within the district and information contained in a CEMP which will add unnecessary burden to applicants.	
It is recognised that successful development should take account of sources of pollution.	211546 (Martin Grant Land Limited)

Policy WS/PH: Public houses

Abbreviations

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

Summary of Main Issues:

The policy was supported by Cambridge Past, Present and Future and other individuals. The Cambridge Green Party suggested amendments to allow for more than just one public house to serve a wider range of clientele. One member of the public was concerned that the policy made no specific requirements for new public houses in any large developments and that the caveat of the policy b(iii) is too wide (1000m) which would not protect Cambridge based public houses where they are more concentrated in

areas like Mill Road. Girton PC requests the Local Plan: treat pubs as essential social infrastructure; resist their change of use unless equivalent social value is demonstrated; encourage partnerships between pubs and community groups.

Comments made by one member of the public stated there are now too many public houses, those not being used should be closed. Another requested safe inclusive of horse rider routes to/from rural pubs to enable horse riders to support public house business by frequenting them.

Response to main issues raised in representations:

In response to the comments submitted, the policy has been amended to clarify the circumstances where proposals will be supported for new or enhanced public houses, wine bars, and other drinking establishments where food is ancillary to the premises' use. It should be noted that even when planning permission is granted for a public house or equivalent establishment selling alcohol, both the premises and operator will still need to have a licence to sell alcohol in to operate and the licensing process is separate to planning.

The policy has also been amended to reference a List of Safeguarded Public House Sites (listed in the Appendix J) to clarify the list of public houses including their curtilage that the policy will apply to. The list will be reviewed periodically.
Further clarification about the evidence needed to support the loss of a safeguarded public house has also been provided in the policy along with additional guidance regarding public house viability appraisals (featured in Appendix G). While there is no specific requirement to provide a public house in the area's large development sites, the revised policy provides greater clarity about their provision including other forms of drinking establishments where food is secondary. The broader range of drinking establishments should also provide greater flexibility for such operators to open in new settlements and urban extensions.

Policy WS/NC: Meeting the needs of new and growing Communities had also been amended to include the provision of leisure routes. These would be suitable for people of all ages and abilities and for a variety of uses, to allow them to exercise outdoors and access nature and the wider countryside.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Times have changed. There are now too many public houses. Close them where they are not being used. Move on.	202179 (M MacGinley)
Support the protection of Public Houses.	203372 (Cambridge Past, Present and Future)
The caveat of the policy b(iii) is too wide (1000m) areas of Cambridge would not have the benefit of this policy protection, for example the many existing pubs on Mill Road would not be protected. Greater policy protection wording required to help preserve the pub landscapes within the city.	202502 (H Brown)
So far as I know, you have not required new pubs in any of your large developments.	201250 (S Williams)
Supporting the diversification of public houses to help them remain viable within the Local Plan is essential. Denying permission for change of use will not work unless they can remain financially viable.	202026 (S Williams)
Safe inclusive of horserider routes to/from rural pubs enables horseriders to support pub business by frequenting them.	204003 (S Rogers)
We welcome this policy's recognition of public houses as community infrastructure rather than just commercial assets. However, in point 1, "need for the public house" should be amended to "need or significant demand for the public house." In cases where one public house is available but of a character unsuitable for some residents' usage, there is no community-wide need for an additional public house, but there may be significant demand from those residents who are under- or un-served by the existing provision.	203709 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
GPC Requests to the Local Plan: Treat pubs as essential social infrastructure, not optional amenities. Resist change-of-use proposals unless equivalent social value is demonstrated. Encourage partnerships between pubs and community groups.	202231 (Girton PC)
It is recognised that public houses are a key element of a successful community.	211547 (Martin Grant Land Limited)

Consultation Statement

Appendix 11: Response to Representations - Great places



Greater Cambridge Local Plan

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

GREATER CAMBRIDGE
SHARED PLANNING

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

Great Places

Great Places Introduction

Abbreviations

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

Summary of Main Issues:

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

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

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

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

Response to main issues raised in representations:

The general support for policies under this theme is noted.

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

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

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

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

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Recommend that new developments incorporate Secured by Design principles – physical protection, well□defined routes, safe lighting, clear separation of public and private spaces, surveillance and management – as an early□stage design requirement, in line with NPPF 12(135)(f).	201335 (Cambridgeshire Constabulary)
Support Cambridge Junction and Create Cambridge in asking that: • Cultural infrastructure is embedded across strategic chapters, not confined to Wellbeing • Culture is treated with parity alongside housing, transport and utilities as core civic infrastructure • Create Cambridge is engaged as advisor/consultee on the further development of the Cultural Infrastructure Strategy and the Local Plan where this relates to cultural infrastructure and embedding Culture across the city's plans. • This reflects how cultural venues function in practice and ensures consistent delivery across the plan	202153, 202320, 202898, 202902, (Cambridge Junction), 202402 (J Webber), 202421 (T Shaw), 202694 (T Altmann), 202724 (W Townsend), 202768 204197, 205433

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

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

Summary of issues raised in comments	Comments highlighting this issue
natural habitat and urban green spaces are crucial for cooling local temperatures. Finally, we recommend adding a new policy on Tree-lined streets.	
It is unclear how the plan will respond to and deliver Public Art. It is currently unclear whether its preservation and implementation fall under the general design quality standards of GP/QP (landscape and public realm) or the protection of Non-Designated Heritage Assets (GP/ND). Without a specific designation, significant public art installations may lack the necessary protections against removal or decay. Irrespective of how the plan will approach public art, it should emphasise the importance of early collaboration on the appropriate siting and integration of public art in the design of greenspace and/or public realm	203917 (Cambridge Past, Present and Future)
The governance of Street Lighting requires further definition within the plan. It is presently uncertain whether lighting standards will be dictated by shopfront guidance or broader design policies like GP/QP. Clear policy language is essential to ensure that lighting schemes are sensitive to the historic character of Cambridge and do not contribute to visual clutter or inappropriate illumination of the heritage environment	203920 (Cambridge Past, Present and Future)
Security and Crime prevention measures should be considered at the earliest opportunity as an integral part of any initial design for a proposed development. Proposals should demonstrate well-designed security features; well-defined routes, spaces and entrances that provide for convenient movement without compromising security; Safe routes: direct, wide, well lit, without hiding places; Places that are structured so that different uses do not cause conflict; appropriate and non-obtrusive	204652 (Cambridgeshire Constabulary)

Summary of issues raised in comments	Comments highlighting this issue
lighting levels; Clear separation between public and private spaces, avoiding public routes next to back gardens; Places that promote a sense of ownership and community; Places where the level of human activity is appropriate to the location reduces the risk of crime; Places that are designed with management and maintenance in mind	
Greater Cambridge also has examples of some truly depressing architecture. Of little boxes of blandness. Is there any way of requesting that some effort is put into the design of new buildings? This does not need to cost a lot. There are examples where modest brick detail is enough to make the building more appealing. There may not be, but I plead anyway.	205201 (B Nicolson),
Most of the are laudable aims but too often developments create high levels of traffic or provides a route that other traffic prefers which cuts off one part of a community from another, thus effectively isolating them. If the walking route to local facilities crosses a high traffic zone this then creates yet another incentive for car use and exacerbates the problem.	205238 (D Stouhgton)
Dense development needs strong walking, cycling and public transport to succeed. Introduce mandatory permeability standards based on site size. Walking and cycling connections should be required, not optional	205242 (J Thomas)
As a Cherry Hinton Resident, it is currently difficult to get an appointment at the local surgery without having to wait at least a couple of weeks and the NHS dentists are full. Even though you have already built houses and flats in Cherry Hinton you have not compensated with additional	208618 (R Smith)

Summary of issues raised in comments	Comments highlighting this issue
facilities. Do you have any plans to amend this and to do the same for further developments that are planned in other locations? If not, this place is a great deal of extra pressure on existing surgeries	
Good to make HIAs a formal requirement and important points about social isolation and poorer health outcomes but add community severance issue where high traffic levels/layout impede neighbourliness. Walkers/wheelers don't always feel safe near cyclists and micromobility vehicles/skateboards (?) - speed, footway abuse, lack of lights -build in remedies. Add building continuous footways at junctions fostering pedestrian priority/wheeling accessibility/slowing vehicle speeds.	201632 (Cambridge Living Streets)
Rural active travel routes and PROWs should be bridleway to include horseriders.	204008 (S Rogers)
Recent houses at Springfield Village and the flats near Cherry Hinton High Street are aesthetically poor and have ruined the character of the village.	208615, 209169 (R Smith)
There should be a clause allowing for increased scale, density, and form in new developments, enabling them to deviate from existing low-density patterns while maintaining good quality. Policies that mandate car-free streets may lead to negative outcomes, such as rear parking; a balance should be struck to create multi-use streets that accommodate parked cars. Encouraging robust and flexible building designs is positive, but the current approach may overlook the adaptability of various building types, particularly those that are less adaptable. There is a lack of emphasis on material quality in the policies regarding skyline and tall buildings, which should be addressed.	202662 (Mole Architects)

Summary of issues raised in comments	Comments highlighting this issue
The plan fails to recognise and protect Cambridge's world-heritage significance. The plan does not recognise or manage the conflicts between the proposed growth and Cambridge's finite physical and environmental constraints. Tall-building proposals are presented without visualisations or impact assessments, breaching the required heritage and skyline controls.	206574 (J Preston)
I would like to see consideration for different types of development, such as garden or forest developments, where cars are pushed to the edge of the development in hidden multistories/screened single stories, and access roads are minimised to create semirural villages that one can walk around. I think there is a lack of ambition in terms of providing at least some space for these more radical housing design schemes. I think wherever possible when parking is present, it should be hidden (Look at Great Kneighton as a good example). Proper use of architects should be encouraged within these developments, rather than revision to quantity surveyor. Full service Supermarkets (Such as the Sainsburys in Eddington) are very useful to provide cheaper, more varied food than smaller metro shops.	208732, 208734, 208736 (Cllr M Morgan)
Redevelopments are too often causing social exclusion of poorer residents. Measures are needed to improve public consultations. Questions should be open and impartial. North Cambridge Framework, and Cambridge Market examples provided. Social inclusion of communities needs to be far better protected.	204928, 207547, 207548, 207549 (A Copping)
We often see developers rely on government-sponsored NSIP legislation to ensure they can bypass local planning frameworks entirely, presenting residents and businesses with proposals that are	209119 (S Hepworth)

Summary of issues raised in comments	Comments highlighting this issue
poorly designed, poorly evidenced, and that embody none of the vital investment in local host-communities that could bring real, lasting benefits and sustainability, helping them to build greener, happier futures. If Cambridge is serious about shaping its future responsibly, it cannot allow its carefully planned growth strategy to be overridden by speculative, profit-driven proposals that treat surrounding rural areas as expendable or as commodities to be consumed and exploited for their private financial or 'greenwashing' potential. The Greater Cambridge Local Plan must Strengthen policy language to prevent NSIP-scale or speculative developments from undermining local landscape, green infrastructure and wellbeing objectives.	
Villages like Weston Colville are not simply buffers to absorb growth pressure from Cambridge or elsewhere and we are not here so that private individuals or corporations can asset strip us for our proximity to a growing city. We are living communities with deep historical roots, active social networks, local family businesses, farms, valuable wildlife habitats and heritage assets. What we seem to lack though, are any meaningful protections. For the Greater Cambridge Local Plan is to be a meaningful and credible policy document, it must explicitly recognise and protect rural communities beyond the Green Belt as an integral part of Cambridge's setting, identity and future resilience.	209120 (S Hepworth)
Secure parking for motorbikes and electric bikes is essential; future developments must improve bike-storage safety in workplaces and residential sites.	208010 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
One of Greater Cambridge's greatest attributes for cycling is its ability to connect people to their destinations via green space and alongside water. Routes such as those across commons and along river corridors are not in conflict with nature but instead provide people with a powerful experience of nature everyday. Development should build on this strength, treating cycling as a means of stitching together landscapes, communities and daily life. Two policies should be added to the Local Plan: Policy 1: Active travel design principles Potential draft policy: All development must be designed to support walking and cycling as the default choice for everyday journeys. Proposals will only be supported if they demonstrate compliance with the five active travel design principles. Policy 2: Mandatory permeability Potential draft policy: To ensure directness and convenience for walking and cycling, development proposals must meet minimum permeability standards based on site size. For example: ● Developments of up to 50 homes or equivalent floorspace must provide at least two direct outward walking and cycling connections to the surrounding area. ● Developments of 51 to 100 homes or equivalent floorspace must provide at least three direct outward connections, aligned to different cardinal compass directions. ● Developments of more than 100 homes or equivalent floorspace must provide direct outward	209081 (Camcycle)

Summary of issues raised in comments	Comments highlighting this issue
connections in all four cardinal compass directions, unless it can be robustly demonstrated that this is physically impossible.	

Policy GP/PP: People and place responsive design

Abbreviations

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

Summary of Main Issues:

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

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

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

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

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

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

Response to main issues raised in representations:

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

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

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

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

Table of representations:

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

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

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

Summary of issues raised in comments	Comments highlighting this issue
development responds effectively to the climate emergency. An effective response needs to go beyond mitigation and extend to adaptation and resilience.	
We support the strategic vision of Policy GP/PP, particularly its emphasis on development responding positively to context and maximising active travel through new and improved cycle routes. This focus on connectivity aligns well with the locational advantages of settlements such as Horningsea, which have benefited from recent Greenway investment. By prioritising character, climate, connectivity and community, the policy provides a strong framework to ensure that new housing, including deliverable fringe sites, contributes positively to a lasting legacy of high-quality development.	202070 (M Asplin)
Connectivity without coercion; Good permeability matters — but it should apply to all users, not selectively. Creating routes that: work well for cyclists but poorly for pedestrians; or exclude vehicles regardless of context, creates division rather than connection. Design principles should aim for: safety; legibility; and coexistence.	208878 (D Smith)
1. Design Codes based on Traditional Vernacular Architecture (TVA) should be utilised in preference to Design Guides 2. LAs should establish recurring partnerships with key Consultation Bodies, such as Create Streets and The King's Foundation, etc who specialise in getting through to a huge swathe of grassroots members of the public with tried and tested previous experience in Local Plans, such as Lichfield, etc. 3. Option for people to provide feedback even if out of time for additional documents, such as SPDs or at the discretion of Councils where feedback may be particularly assistive or lead to additional academic	210354 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
and architect guidance. Option for public publishing of feedback should be encouraged with the consultee's consent to encourage wider consultation uptake moving forwards.	
EEAST requests: • Permeable surfaces that can be used by wheelchairs, mobility scooters, pushchairs, walking aids) and reduce localised flooding. • Lighting designed to reduce crime and improve perceived safety whilst supporting nocturnal habitats. • The needs of adults, children and older people with disabilities but not wheelchair users should also be considered. This might include provision of seating at regular intervals to allow people to sit and rest before continuing with their journey, provide mental health benches and benches at different height levels for children and those who have difficulty lowering/rising. • EEAST would encourage the development of dementia friendly streets, shared space design to promote inclusive access and safety. Street play areas should integrated facilities for disabled children (physical and/or mental health) and be accessible for adults who may be disabled (physical and/or mental health) who are supervising children. • Consideration that not all disabled people are wheelchair users but may still have difficulty negotiating stairs/accessing outdoor or communal spaces.	210331 (East England Ambulance Service NHS Trust)
I strongly support this policy and encourage its strict implementation. I might suggest going further and adding a point:1.b.iii Whilst encouraging cycling and other forms of active travel, protecting pedestrians from speeding scooters, e-bikes and bikes and ensuring infrastructure that prioritises pedestrians.	204813 (M Cleminson)

Summary of issues raised in comments	Comments highlighting this issue
The Draft Plan lacks sufficient reference to the transport/place-making needs of those using walking aids or wheeled mobility aids. It should be clear that when the Plan is considering the needs of pedestrians, it is also considering the needs of walking aid/wheelchair users. The term 'wheeling' is now commonly used to mean active travel at pedestrian speed using mobility aids such as wheelchairs, mobility scooters, and rollators. I think it would be much better if the plan referred to 'walking and wheeling' throughout, instead of just 'walking'. A definition of wheeling should be added to the glossary.	203994 (S Hughes)
Point 1d is a crucial part of the policy and as it relates to point a., it should be given greater prominence and be renumbered as point b.	203927 (Cambridge Past, present and Future)
Support the policy which keeps the special quality of Cambridge and the surrounding area, ensuring that it continues to be a place where people want to live, learn, work and play.	202489 (University of Cambridge)
Design in Girton must respond to the historic rural village character, protect the Girton Gap, and reinforce the parish’s distinct identity separate from Eddington or urban Cambridge. Place-responsive design must reflect rural scale, green edges, and low building heights.	202232 (Girton PC)
Support the objectives of the policy. In particular, support is given to the emphasis on development responding to local character and distinctiveness. Given the significant variation in character across Greater Cambridge, it is important that the policy is applied in a way that avoids a homogenised approach to design and instead allows proposals to respond appropriately to the specific qualities, scale and identity of their local context. Important that the policy is implemented proportionately through the planning process.	210251 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
The policy seeks to maximise active travel. It should also seek to make best use of opportunities to enhance countryside access through an expanding network of PROW and permissive access routes for leisure journeys.	210614 (Cambridgeshire County Council)
Rural active travel routes and PROWs should be bridleway to include horseriders.	204010 (S Rogers)
Concerns that inclusive design and accessibility are treated as aspirations rather than enforceable requirements.	208982 (J. Williams)
It is recognised that high quality design is a key element of a successful community.	208271 (Martin Grant Land Limited)
Active travel safety must be understood through two lenses. The first is actual safety. Too many developments prioritise vehicle capacity at site access points, resulting in oversized junctions that encourage excessive motor traffic speeds and form hostile barriers to walking and cycling. Junctions are the biggest risk to cyclists and pedestrians. The second is perceived safety. Lighting remains a major weakness across the network. Important everyday routes remain unlit and solar studs (while a useful guidance solution) are presented as a substitute for lighting when they are not. The barrier this presents in particular to young adults and women is well known and researched but environmental concerns are frequently cited as reasons not to act, yet the environmental cost of journeys not made by bike and instead made by car is rarely	209079 (Camcycle)

Summary of issues raised in comments	Comments highlighting this issue
acknowledged. Sadly, in Cambridge many locations that are lit and only lit after a serious incident have occurred. We should not have to wait for a horrible assault or a collision before lighting is installed.	
For active travel infrastructure, comfort continues to be treated as optional rather than essential. Surface quality, width, drainage and maintenance remain points of dispute despite clear national guidance. Poor surfacing and constrained widths disproportionately affect less confident users and those using non-standard cycles, directly undermining inclusive mode shift. Comfort is not about luxury. It is about enabling predictable, smooth and accessible journeys for everyday use, across seasons and user types.	209080 (Camcycle)

Policy GP/QD: Achieving high quality development

Abbreviations

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

Summary of Main Issues:

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

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

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

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

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

Response to main issues raised in representations:

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

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

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

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

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

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

Table of representations:

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

Summary of issues raised in comments	Comments highlighting this issue
The policy and supporting information should be strengthened by referring to waste collection as well as storage, and to environment and heritage as well as neighbouring amenity. Suggested wording for point 2.i. - new text shown in capitals Ensure the layout and design of development successfully incorporates functional needs such as waste storage AND COLLECTION, recycling and bicycle parking, in a way that does not negatively impact on THE ENVIRONMENT, HERITAGE or neighbouring amenity. The policy must be backed by a clear commitment to refuse applications that do not meet the highest possible standards of architectural integrity.	203946 (Cambridge Past, Present and Future)
The overview should replace “designed with communities in mind” with “designed to reflect the needs and priorities of communities, as determined through robust consultation processes” to ensure meaningful engagement. In 2.c, “highquality building materials” should read “high-quality, sustainable building materials.” Section 2.d should prioritise safe, active streets, minimise car use, and integrate parking. 2.i should separate waste/recycling from parking, ensuring both are safe, convenient, and non-intrusive. 2.k should be moved earlier and read “Prioritise mixed-use proposals.” Supporting text should address climate, nature, and biodiversity, and circulation should avoid cul-de-sacs to improve safety and connectivity.	203713 (Cambridge Green Party)
Vistry support the vision of the proposed policy. However, Vistry wish to reiterate the point made in response to Policy GP/PP that it is important the policy is applied proportionately, with detailed matters assessed at the reserved matters stage and clear design principles established at outline planning application stage where appropriate	204866 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
• The quality of the design of these needs to be tested early on at the planning stage, not later on when 'spades' are in the ground. • Getting this right is key to encouraging people to adopt sustainable methods of transport and meeting any climate targets.	205047 (B Nicolson)
• Developments often feature indirect, unsafe, uncomfortable, or fragmented routes due to the lack of mandatory design quality requirements, making future corrections difficult. • The Local Plan should incorporate the five active travel design principles – coherent, direct, safe, comfortable, and attractive – as mandatory policy tests for all developments. • Mandatory permeability standards should be introduced based on site size, requiring multiple direct walking and cycling connections to surrounding areas to avoid car dependency. • Best practices from proven approaches in places like the Netherlands should be adopted in local policies to enhance active travel. • Design quality should be assessed at the planning stage and considered throughout the entire development process, from initial vision to construction completion.	205285 (R De Beaux)
This policy must ensure that active travel routes meet the five core design principles – coherent, direct, safe, comfortable and attractive – as a clear policy test for all development. It should also introduce mandatory permeability standards based on site size, requiring multiple direct walking and cycling connections into surrounding areas. Design quality should be tested at the planning stage, not left to later detail.	205358 (A Williams)
Design quality should be tested at the planning stage, not left to later detail.	205675 (S Nuttall)

Summary of issues raised in comments	Comments highlighting this issue
Transport considerations are a key component to the design process and if not included (and reviewed) at an outline stage it is often impossible to find suitable solutions later. I would like to support the submission provided by CamCycle (the Cambridge Cycling Campaign), in particular: Policy must ensure active travel routes must meet the five core design principles; Design quality should be tested at the planning stage, not left to later detail	204936 (A Brown)
Clause 4 – we are very pleased to see reference to the role of neighbourhood plans in setting design principles. We request that a similarly explicit reference is also incorporated into Policy GP/PP: People and place responsive design.	201619 (Stapleford PC), 210945 (Great Shelford PC)
The public celebrate good design but there are grey over-tall rectangular blocks proposed currently for prominent sites, Kett House replacement Station Road, and the Histon Road/Castle Street corner. Will these be "appreciated by future generations" ? Poor external design adversely affects people's mental health and wellbeing. If built they could feature in Hideous Cambridge 2nd ed. Main routes and junctions should have statement buildings, not dull ones. And the power and influence of the Colleges and other bodies (Railpen) have over planning decisions is worrying. They are so powerful and influential they seem to ride roughshod over all rules.	201783 (H Jackson)
I would like to see explicit inclusion of children - including teenagers - and their needs within this policy. Landscaping can include opportunities for imaginative place and natural play equipment. Safe open spaces and active streets should include formal play equipment for younger children and social spaces for teenagers. Safe locations where they are not chased off for being a nuisance. I think this is	201830 (T McKeown)

Summary of issues raised in comments	Comments highlighting this issue
extremely important as this demographic are completing consultations or commenting on planning applications.	
Active travel needs designing into developments at an early stage. Too many developments are designed round a single major road junction, with no other accesses for other modes. Developments need to be permeable to walking and cycling, with access to the development in multiple locations. This enables day-to-day trips by these sustainable modes. This would allow the developments design to best meet the Local Plans overall sustainability goals.	201832 (T McKeown)
Do what Cambourne did.	204013 (S Rogers)
The Local Plan must make active travel a real priority: all development should meet the five design principles - coherent, direct, safe, comfortable, attractive - and include mandatory permeability standards. Sites should have multiple direct walking and cycling connections to surrounding areas. Without this, cul-de-sacs and single-access layouts will continue to trap families in adult-dependent or even car-dependent routines for decades, limiting children's freedom and independence and keeping limiting the time parents have to work, cook/clean and invest in community.	204690 (R Humphrey)
The plan must require designing walking and cycling as the main form of transportation for new developments. To achieve that, active travel routes need to meet the five core design principles set out by Active Travel England's national guidance and standards: routes should be (1) coherent, (2) direct, (3) safe (both actual and perceived), (4) comfortable and (5) attractive. Without these the percentage of trips done by people via active travel will be a fraction of what it could be.	203675 (T Preud'homme)

Summary of issues raised in comments	Comments highlighting this issue
Policy must ensure active travel routes must meet the five core design principles Design quality should be tested at the planning stage, not left to later detail	204540 (D Potts), 202859 (J Williams), 204576 (R Hoadley), 202292 (R MacDonald), 205047 (B Nicolson), 205429 (P Colledge), 205355 (S Nuttall), 205144 (J Grantham), 201704 (M Hickford), 203306 (A Hoare), 202875 (J Williams), 203333 (S Hughes)
High quality new development should replicate successful sustainable developments like Eddington. Policy must ensure active travel routes must meet the five core design principles – coherent, direct, safe, comfortable and attractive Design quality should be tested at the planning stage, not left to later detail Following these principles not only makes the development better for those who live there it also enhances the value for the developer in the long term.	202875 (J Williams)

Summary of issues raised in comments	Comments highlighting this issue
The Local Plan should embed the five active travel design principles (for infrastructure for walking/wheeling and cycling) – coherent, direct, safe, comfortable and attractive – from Active Travel England's national guidance and standards as a clear policy test for all development. The ability for a site to support these principles should be a prerequiste to it going ahead, not a later add-on if it is feasible.	203333 (S Hughes)
• More emphasis needed on active transport / design for people not cars • Require active travel routes to be coherent, direct, safe, comfortable, attractive • Mandatory permeability requirement as per LTN 1/20 • Test quality requirements met at design stage, not later	202596 (A Lawrence)
High-quality development means context-sensitive, community-friendly design that protects green space, fits rural morphology, and contributes positively to village life. High quality = appropriate scale, low massing, high environmental standards. Protect the Girton Gap and avoid over-intensification. Community-scale enterprises and buildings preferred over large centres. GPC Requests to the Local Plan: Set quality expectations that prevent over-intensification. Require green-infrastructure integration and rural-fit design. Ensure all development refers to Girton NP design principles.	202233 (Girton PC)
Modern “Carbuncle” extensions should not be permitted at any one area- instead an authentic style addition may be used to retain blending.	210367 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
Extensions- there must be a proactive emphasis on in-keeping structural fabric to prevent future errors, such as the Municipal Building depicted in the SPD being replicated again thereby harming the Conservation value. Building Form shouldn't permit for dated modern structures that delineate and essentially divide communities between the old and new parts of any one location. Façade Design mustn't be compromised for contemporary architecture, especially in view of coveted Heritage Status for any one area being at risk of being lost if said contemporary architecture is pursued.	210370 (Community Campaigner D Barton)
Supports the proposals as quality design which builds in nature conservation helps the physical and health and well-being of residents eg interesting and varied roof lines, mental health benches, places for those with mobility issues to rest and enjoy the views (both blue and green). Include as part of residential and commercial design places for nature to be incorporated into the buildings (eg Swift nesting boxes), fencing (eg hedgehog shelters/gaps, planted living walls instead of fencing). All of these help residents to enjoy nature and provide nature corridors. Scooter/mobility scooter parking also needs to be included (and not just in care homes/specialist housing) with safe charging options to prevent the potential risk for fires. Similar issues should be considered for electric wheelchairs which are used indoors and provision of charging facilities. Ensure sufficient parking spaces/road width and design to enable emergency vehicles to pass safely without delaying attendance on a call. Similar issues exist for refuse lorries.	210326 (East England Ambulance Service NHS Trust)

Summary of issues raised in comments	Comments highlighting this issue
Design of bridges should consider the use of curved walls to increase safety and reduce the ability of death by suicide. Underpasses should be well lit and feel safe for uses at all times of day and night. Use of bright colours and designs can also improve mental and physical health.	210343 (East of England Ambulance Service NHS Trust)
The Local Plan should embed the active travel design principles of coherent, direct, safe, comfortable and attractive, as a policy test for all development. This design quality should be tested at the planning stage. The plan should also introduce mandatory permeability standards based on site size, requiring multiple direct walking and cycling connections into surrounding areas, to shops and amenities.	204088 (K ap Garth)
While the Local Plan places appropriate emphasis on healthy ageing, accessibility, and inclusive design, there is no specific reference to neurodiversity or sensory inclusive design principles. Neurodivergent people, including those with autism, ADHD, learning disabilities, and sensory processing differences, may experience barriers in the built environment such as noise, visual clutter, poor legibility or unpredictability. Therefore, it is recommended to include incorporating sensory-inclusive principles into policies and design principles, such as clear layouts, controlled lighting, reduced overstimulation, and quiet spaces. These measures would create healthier, more inclusive environments for neurodivergent people, older adults, and others with cognitive or sensory impairments.	210636 (Transport 2000 Cambs & W Suffolk)
Supports Policy GP/QD and its overarching objectives, particularly creation of walkable neighbourhoods that align well with the design principles underpinning the approved Bourn Airfield masterplan. The	208985 (Barratt Homes Northampton)

Summary of issues raised in comments	Comments highlighting this issue
principles set out in Policy GP/QD provide a helpful and flexible framework that complements the ongoing Reserved Matters work at Bourn Airfield. In particular, the policy allows for a context-led approach that recognises the site's unique characteristics, masterplan vision, and locally distinctive design aspirations.	
Support the vision of the proposed policy. However, Vistry and The Quy Estate wish to reiterate the point made in response to Policy GP/PP that it is important the policy is applied proportionately, with detailed matters assessed at the reserved matters stage and clear design principles established at outline planning application stage where appropriate	210252 (Vistry Group)
Support the policy which encourages good design as a key aspect of sustainable development and has the potential to maintain and enhance existing environments, alongside bringing benefits in terms of the health and wellbeing of students and staff of the University as well as residents of Cambridge.	202491 (M Parsons)
Early layout decisions fragment new build areas. The Local Plan should embed the five active travel design principles – coherent, direct, safe, comfortable and attractive – as a clear policy test for all development.	201814 (J Baumberg)
point 2d is not enough to safe guard and ensure high quality walking and cycling routes. Plans should be required to show that active travel routes are designed in at the outset, that are:- coherent- direct- safe- comfortable – attractive. Mandatory requirements should be set for permeability of sites, preventing cul de sac developments that do not allow convenient walking and cycling routes.	201736 (B Brierton)

Summary of issues raised in comments	Comments highlighting this issue
Chair and Vice-chair of Environment and Green Economy Committee Designing streets, towns, and cities with properly secure parking facilities is essential if we are serious about supporting alternative modes of transport. For example, motorbike parking in Cambridge city centre does not allow riders to secure their vehicles to a fixed anchor, such as a rail or ground-embedded locking ring. As people are increasingly encouraged to travel longer distances by electric bike, greater attention must be given to improving the safety and security of bike storage—particularly in workplaces and residential developments.	211011 (Cambridgeshire County Council)
Future development should be of quality design and should contribute and respond to the local character of the surrounding settlement.	211239 (Living Housing Space)
Coherence remains one of the most consistent shortcomings in recent development. Routes may exist in theory, but are broken, diluted or overridden by other priorities on the ground. Two case studies have been presented in the accompanying attachments where this shortcoming is clear and apparent. We have to learn that public space and cycling work together, but segregation is required.	209077 (Camcycle)
Directness and permeability (the ability to move easily through urban environments) are inseparable. Direct routes only exist where layouts are permeable, and permeability is the structural condition that allows walking and cycling to be convenient. Across Greater Cambridge, walking and cycling routes are routinely diverted, interrupted or deprioritised, when motor traffic circulation is prioritised or due to unfounded safety concerns. The cumulative effect of these small decisions is profound. Each detour, signal delay or loss of priority reduces the usefulness of the network and discourages everyday trips by	209078 (Camcyle)

Summary of issues raised in comments	Comments highlighting this issue
foot or by cycle. In places where cycling works well internationally, very high levels of convenience are achieved not through speed, but through directness and continuity. Minimal stopping, few barriers and consistent priority allow people to cover distance comfortably and predictably.	
Hayfield agrees that future development should be of quality design and should contribute and respond to the local character of the surrounding settlement.	211464 (Hayfield Homes Construction Ltd)
It is recognised that high quality design is a key element of a successful community.	211548 (Martin Grant Land Limited)

Policy GP/HD: Housing density

Abbreviations

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

Summary of Main Issues:

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

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

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

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

Response to main issues raised in representations:

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

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

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

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

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

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

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

Table of representations:

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

Summary of issues raised in comments	Comments highlighting this issue
	(Cambridge Ahead), 208341 (Thakeham Homes Ltd), 210502 (Barratt Homes Northampton)
Land Release and Green Belt Concern: • Appropriate building densities are required for land released from greenbelt adjacent to existing developments, ensuring they reflect the surrounding area and present a soft edge of the surrounding landscape. • Creating a soft edge to the landscape should involve not only planting but also incorporating gaps and longer sightlines between buildings, which may lead to a necessary reduction in building density	201620 (Stapleford PC)
We welcome the reference to a context led approach and also the reference to heritage assets. Reference should also be made to gentle densification.	210172 (Historic England)
The relationship between higher density development, lower car ownership and parking and the need for high quality active travel provision: • High density housing both enables and requires low car ownership. The Plan should explicitly link these two. It is important to break the "one car per household" assumption made by many developments.	202284 (A Lawrence), 202290 (R MacDonald), 203072 (S Hughes), 203204 (G Orwell), 203669 (T Preud'homme), 204877 (A

Summary of issues raised in comments	Comments highlighting this issue
• Parking uses scarce land area and drives up costs; and often dominates estate layout and amenability. • Higher-density development should include strong alternatives to driving to support sustainable travel. Current dense schemes in Greater Cambridge often include high levels of private parking, which consumes land and undermines walking and cycling. • High private parking levels increase housing costs, forcing non-car-owning households to subsidise parking through higher prices. • Dense housing estates without this are either dominated by car parks and/or result in large numbers of cars parked on pavements/in cycle lanes/in public space. • Higher density development should include high quality walking/cycling/public transport network in order to succeed. • Central Cambridge developments should be car free	Brown), 204924 (K Brightwell), 205281 (S Nuttall), 202507 (H Brown), 202856 (J Williams), 203301 (A Hoare), 203715 (A Hofer), 203728 (D Peters), 203884 (J Prince), 204077 (K ap Garth), 204368 (F Sanchez Garcia), 204512 (D Potts), 204568 (R Hoadley), 204651 (M Fordham), 204666 (R Humphrey), 205126 (J Grantham), 205304 (A Williams), 205350 (P Colledge), 203666 (V Ashton), 201813 (J Baumberg), 201827 (T McKeown), 209071 (Camcycle)

Summary of issues raised in comments	Comments highlighting this issue
High density is a great opportunity to encourage cycling and other forms of wheeling, but must come with really good quality storage/parking that is convenient, secure and feels safe to use day and night.	205281 (S Nuttall), 205350 (P Colledge)
Development density is a key factor in delivering community scale rainwater reuse schemes. The report Water reuse in new housing: Understanding the business case published on the EWSC website identifies the benefits of examining in greater detail the relationship between development density and the respective cost of community versus on-plot installations, due to the significance of external pipework costs as a component of the total cost within community systems. Community scale systems yield cost savings over on-plot reuse above densities of around 60 units/ha - concluding that it is density, not size of development which is the deciding factor.	210213 (Anglia Water Services)
Support for higher housing density: • Support the policy that supports higher density development central and adjoining Cambridge as well as areas that are well connected by high quality infrastructure and active travel options. • Higher density development should be actively encouraged, and encouraged everywhere, as it minimises use of precious land resource while creating more walkable environments, enhances the viability of local businesses by having a larger population within a fixed distance, and frees up land for public amenities • Mixed-use developments are essential to provide necessary facilities, reducing the need for car travel.	202492 (University of Cambridge), 202640 (P Tribble), 204775 (R De Beaux)

Summary of issues raised in comments	Comments highlighting this issue
Development should take into account of the needs and priorities of existing local communities to ensure development responds to local context	203716 (Cambridge Green Party)
Increased density can create a critical mass of people that fosters a sense of place, supports community uses, services and facilities: High density development at Darwin Green would efficiently utilise land in a sustainable location, enabling residents to live near their workplaces.	203094 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
The policy should be applied with sufficient flexibility, recognising that prevailing local densities are not always an appropriate to the location, particularly where sites are well located or benefit from strong accessibility. In such circumstances, higher densities may be both suitable and sustainable and should be assessed on their individual merits rather than constrained by surrounding built form that may no longer reflect the most efficient or appropriate use of land.	204869 (Vistry Group)
Policy proposals for tree canopy and biodiversity should be mandatory, not subject to developer modification. Increased open space requirements should be established for high density developments that lack gardens whilst additional open space requirements should be considered in areas adjacent to existing high density developments.	204877 (A Brown)
Negotiations on land price should occur if economic feasibility cannot be demonstrated, rather than relaxing planning requirements.	204877 (A Brown)

Summary of issues raised in comments	Comments highlighting this issue
Prevailing character and context: • The design-led approach in the policy is overall supported but it is unduly constrained to densities 'that reflect local character and context....' This is not the approach that the NPPF takes, which acknowledges that densities should "take into account… the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change." • Allow greater flexibility in density on small sites where this reflects local character and efficient land use.	208612 (Pigeon Land & LIH), 202078 (M Asplin)
Heritage considerations: • Part (c) of the policy should be removed. It is essentially repeating the heritage tests that are already put in place by draft Policy GP/HE and through the balancing exercises set out in Chapter 16 of the NPPF. Those balancing exercises in turn recognise that there may be some impact to heritage assets arising from new development to heritage assets and their settings, but that nonetheless those harms can be found to be acceptable if sufficiently outweighed by the public benefits the development would deliver. That is a more nuanced exercise that than set out in Policy GP/HD, which does therefore not need to repeat the point in a more constricted way • The policy requires greater flexibility to enable higher density development to come forward without being constrained by existing context and heritage considerations.	208612 (Pigeon Land & LIH), 203527 (Cambridge Ahead)

Summary of issues raised in comments	Comments highlighting this issue
The policy should align with the draft NPPF and provide a minimum density similar to 40-50 dwellings per hectare.	201711 (K Mak), 208341 (Thakeham Homes Ltd)
Density should be context and infrastructure led in rural villages and intensification should be avoided.	202234 (Girton PC)
Higher density development does not necessitate high-rise residential development, as demonstrated through a range of housing typologies	203973 (Cambridge Past, Present and Future)
An additional requirement should be added that proposals must demonstrate that water can be adequately and sustainably sourced given the region's water scarcity and to ensure development is environmentally sustainable	203716 (Cambridge Green Party)
High density housing tends to be Leasehold but should be Share of Freehold	202567 (A Lawrence)
Support the overall principles of the policy. Although, Vistry and The Quy Estate consider that the policy should be applied with sufficient flexibility, recognising that prevailing local densities are not always appropriate to the location, particularly where sites are well located or benefit from strong accessibility. In such circumstances, higher densities may be both suitable and sustainable and should be assessed on their individual merits rather than constrained by surrounding built form that may no longer reflect the most efficient or appropriate use of land.	210253 (Vistry Group)
There is enormous tension between the NPPF's requirement for local plan policies to make efficient use of land versus clauses b and c of this policy. In the absence of further evidence for the policy (as noted in para 7.27), it is difficult to comment on its merits or otherwise. This is unfortunate given how significant this policy will be in determining future planning applications in Greater Cambridge.	210946 (Great Shelford PC)

Summary of issues raised in comments	Comments highlighting this issue
When considering how density should be applied in different locations, it is vital that explicit consideration is given to appropriate building densities for land released from Green Belt which is adjacent to an existing development framework. Such densities should reference density in the immediate surroundings but also present a soft edge to the surrounding landscape. A soft edge is created not just through planting but by gaps and longer sightlines between buildings, which will inevitably – and appropriately – reduce building density.	210947 (Great Shelford PC)
Supports the Council's view that for housing density to be appropriate it should reflect the local character and context. Making the efficient use of land through increasing densities is an existing national planning policy requirement. The emerging Local Plan should align with national policy in order to assist Greater Cambridgeshire in meeting their housing requirement. Terra note that no density figures have been provided within the draft policy. Whilst it is acknowledged that character and local context should inform appropriate density levels, the absence of any minimum figures creates uncertainty at the early planning, feasibility and land valuation stages. The inclusion of broad density guidance as part of the policy's design-led and context-led approach, would improve consistency in decision-making, ensure that sites come forward with proposals which make efficient use of land in line with national planning policy. Therefore, it is recommended that draft Policy GP/HD is amended to include indicative density ranges that provide clarity for developers and decision-makers	211222, 211266 (Terra Strategic), 211240 (Living Space Housing)
MGL welcomes the approach to defining appropriate density, and avoiding undue prescriptive requirements.	208260 (Martin Grant Land Limited)

Summary of issues raised in comments	Comments highlighting this issue
EWR Co welcomes the draft Local Plan's focus on ensuring that land is used effectively when being developed, as set out in draft Policy GP/HD. In line with this draft policy, EWR Co would support maximising densities around stations which will be served by EWR at Cambourne, Cambridge South, Cambridge, and Cambridge East, as development in these areas would benefit from being in highly sustainable locations.	211889 (East West Rail Company)
Hayfield supports the Council's decision for housing density to be appropriate in order to reflect the local character and context. However, Hayfield note that no density figures have been provided. Whilst it is acknowledged and supported that character and local context should inform appropriate density levels, the absence of any benchmark figures creates uncertainty at the early planning, feasibility and land valuation stages. The inclusion of broad density guidance, alongside the policy's design-led and context-led approach, would improve consistency in decision making and provide greater certainty for delivery. Therefore, it is recommended that Policy GP/HD be altered to include indicative density ranges that provide clarity for developers and decision-makers. While a design-led approach is welcomed, clear benchmarks would support early feasibility work, improve consistency across decisions, and reduce uncertainty at pre-application and application stages.	211465 (Hayfield Homes Construction Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Note that no density figures have been provided within the draft policy. Whilst it is acknowledged that character and local context should inform appropriate density levels, the absence of any minimum figures creates uncertainty at the early planning, feasibility and land valuation stages. The inclusion of broad density guidance as part of the policy's design-led and context-led approach, would improve consistency in decision-making, ensure that sites come forward with proposals which make efficient use of land in line with national planning policy. Therefore, it is recommended that draft Policy GP/HD is amended to include indicative density ranges that provide clarity for developers and decision-makers.	211587 (Terra Strategic)

Policy GP/ST: Skyline and tall buildings

Abbreviations

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

Summary of Main Issues:

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

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

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

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

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

Response to main issues raised in representations:

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

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

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

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

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

emerging above an established treeline remains dominant from relevant viewpoints.' It specifically identifies Cambridge in part b) and the need to 'ensure that the character and appearance of a city of spires and towers emerging above an established treeline remains dominant from relevant viewpoints.'
Appendix I provides an overall approach to the assessment and justification of proposals that include tall buildings and therefore have the potential to impact on the skyline. The use of Appendix I and the criteria in Policy GP/ST and other related policies, is part of the approach of providing the clear justification for development proposals.

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

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

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

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

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

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

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

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

Regarding the comment requiring development proposals to be to consider all viewpoints, the policy has not been amended as not all the identified viewpoints in Appendix I will need to be assessed as part of every proposal that triggers the application of the skyline policy. Appendix I makes it clear that there will be a process of identifying and agreeing relevant viewpoints, this process not only picking up the strategic views, but also local views to ensure comprehensive assessment of likely impact is made.
Additional wording ‘to ensure a well-articulated skyline’ has been added to address concerns are raised about height limits leading to a monotonous roofscape, suggesting the policy should encourage varied heights to maintain the character of the skyline.
The use of the word ‘adequate’ is consistent with the BRE guidelines ‘Site layout planning for daylight and sunlight: a guide to good practice’, which are the industry standard approach for the assessment of impact relating to daylight and sunlight.
Urban heat island effects are part of the microclimatic assessment have been added to the revised wording for part e).

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

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

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

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

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

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

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

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

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

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

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support of the Policy Points 1 a,b,c,d,e and Point 3, 6 and 7: • Strongly support Points 1b, c, d & Point 3 • Support Point a and E • Strongly Support 6 • Point 7: define ancient and woodland trees explicitly as by the Woodland Trust	201872 (J Hurst), 207649 (Duxford PC), 207664 (K Holland)
Concern over the height of new buildings within Cambridge. The policies in the draft Local Plan sound reassuring, but the reality of the buildings around the main rail station (which make me feel like I'm in London rather than Cambridge) and the five-storey buildings currently being built right next to Coleridge Rec (Fanshawe Road development) leave me feeling concerned.	201934 (I Rudy)
The policy should not exclude tall buildings on other sites where they can be justified on a site by site bases through submitted evidence.	202496 (University of Cambridge)
Concerned about some limits and constraints in the current approach to density within the Local Plan, particularly the emphasis on conformity and heritage considerations. Automatic assessment triggers linked to building heights across different location types risks unduly constraining well-justified higher density development that would deliver benefits in terms of amenity, future transport provision, and long-term viability and sustainability. Greater flexibility needed.	203528 (Cambridge Ahead)

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

Summary of issues raised in comments	Comments highlighting this issue
• Throughout this Policy AND the whole Local Plan: replace “changing climate” with “climate crisis”. • Point 1: Design solutions must "respond proportionately and actively to the emerging climate crisis" (not "positively respond to our changing climate"). • Point 2 must explicitly address the impact of any development not only on future edifices but (more importantly) on surrounding townscape and biosphere. • Point 2: all applications must explicitly address the impact of any development not only on future edifices but (more importantly) on surrounding townscape and biosphere. • Point 3: delete the words “where possible”	
Generally support policy, but concern that it will still give developers too much freedom to extend the heights of buildings beyond the scale of neighbouring infrastructure. Having "hard" figures for heights is a necessary, but not sufficient condition. Any development must fit in with the local skyline, as well as complying with the height limits - this is a stronger requirement than any absolute height limit.	201300 (N Campbell)
Policy GP/ST clause 1(e) – glare (i.e. reflection of light from a glazed surface onto another surface or into a building or other amenity area) needs to be added to the list of adverse impacts on amenity and microclimate.	210948 (Great Shelford PC)
Clause 1(e) – glare (i.e. reflection of light from a glazed surface onto another surface or into a building or other amenity area) needs to be added to the list of adverse impacts on amenity and microclimate.	201621 (Stapleford PC)

Summary of issues raised in comments	Comments highlighting this issue
We welcome the inclusion of a policy for tall buildings and the skyline. We are keen to support growth in appropriate locations whilst protecting and enhancing what is important in relation to the skyline of the City and surrounding area. Cambridge is set within a low-lying landscape. Much of the city is hidden within a well treed skyline, punctuated by a few landmark buildings. Maintaining the settings of highly graded heritage assets and well-known features on the skyline, including how they sit within the skyline, particularly from key views in and out of the City, will be important. In the wider area, we are seeking to ensure that the rural character of the area is maintained and that even within the new settlements, buildings do not over-dominate the wider landscape and have a negative impact on the historic environment. The relatively flat nature of the area means that impacts can be felt over considerable distances; We welcome the detailed work that has been undertaken to prepare an evidence base in the form of the Skyline and Tall Buildings Baseline, Strategy and Guidance (although the detail is, at times, hard to follow – we recommend an executive summary is prepared to draw out the main points). We note that the Local Plan policy wording itself is very similar to the previous Local Plan, albeit with greater emphasis on design quality and the addition of a further criterion relation to suicide prevention. We welcome the reference to the historic environment in criterion b of the Policy and seeking to protect important views; More generally, we consider that the policy currently underplays the semi-rural nature	208926,208927,208928, 208931, 210173 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
of parts of Cambridge and the surrounding area. In addition, development should be seen as an opportunity to enhance Conservations Areas and the skyline of the city in general. Finally, it will be important that increases in height do not affect our experience and perception of coalescence between the city and surrounding villages. The policy should be amended to better reflect these three points; We have some ongoing concerns regarding the densities and heights on some of the edge of Cambridge sites. Development at very high densities/heights has the potential to impact on the overall setting of this historic city. We appreciate that there will inevitably be a trade-off between height versus further urban expansion. We have particular concerns about heights in north-east Cambridge and remain so about impacts on views from Ditton Meadows and the Conservation Areas, as well as wider views approaching the City from the north-east and east; In relation to new settlements, there will still need to be some caution in relation to heights owing to nearby Conservation Areas and other heritage assets such as the Roman Road. In particular, we note that the Strategy does not consider Grange Farm. This needs to be addressed prior to Regulation 19, perhaps through an addendum to the Tall Buildings Strategy.	
Higher-density development in areas with strong transport and public service provision is fundamental to ensuring long-term viability. Significant concerns about some of the limits and constraints specified in the current approach to density, particularly the emphasis on conformity and heritage considerations. The automatic assessment triggers linked to building heights across different location types (as per Appendix H: Skyline and tall buildings guidance) risks unduly constraining well-justified higher density	201678 (British Land)

Summary of issues raised in comments	Comments highlighting this issue
developments which would deliver clear benefits in terms of amenity, future transport provision, and long-term viability and sustainability.	
Financial Incentives for the demolition of Carbon-poor Glass Towers and contemporary construction should be utilised to restore the skylines across any one area whilst providing better mathematical application of the space for residential and commercial use, such as larger tenement buildings or the original streetscape reinstated yet designated specifically for housing where there may be a deficit.	210355 (Community Campaigner D Barton)
Point a (Add): Mandatory protection for domestic-scale building heights, particularly in Conservation Areas. Point b "For Cambridge.... relevant viewpoints" - support. Point d - strongly support. Point e: the use of "adequate" is too weak and undefined, particularly for surrounding properties or spaces. Must be clarified, strengthened and improved. On "microclimate", Point e is far too weak. It must also require that the effect of any development should prove that, at minimum, it will not increase (and, ideally, decrease) the Urban Heat Island Effect.	205467 (C Aman) 204883 (Federation of Cambridge Residents' Associations) 204820 (M Cleminson) 203691 (J Johnson) 202991 (Cambridge Glenys Self) 201512 (B Greig) 201799 (J Neal) 201841 (T Neal) 201873 (J Brightman) 201876 (J Hurst)

Summary of issues raised in comments	Comments highlighting this issue
	205584 (S Buckingham) 205664 (D Storey) 207652 (Duxford PC) 207661 (K Holland)
Policy is an improvement over the 2018 plan, but there are concerns about creating a permanent 'ring' of tall buildings that could alter the Cambridge skyline. Concern about identification of four sites for tall buildings. Clarification is sought on how Policy GP/ST aligns with existing masterplans, especially regarding the necessity of tall buildings for the West Cambridge site's objectives. Support is expressed for tall buildings that demonstrate architectural excellence, with a focus on creating distinct 'Landmark Buildings' rather than just maximizing height. Concerns are raised about height limits leading to a monotonous roofscape, suggesting the policy should encourage varied heights to maintain the character of the skyline. There is a lack of confidence in the Councils' ability to enforce high design standards, emphasising that Policy GP/ST must include a commitment to reject substandard applications. Detailed policy amendments are suggested to strengthen the policy.	204059 (Cambridge Past Present and Future)
Welcome policy's emphasis on design quality and on protecting Cambridge's heritage assets and historic skyline. At 1.b, replace "relevant viewpoints" with "all viewpoints" to strengthen this protection. At the same time, however, we recommend amending 1.a to recognise that building taller buildings in appropriate locations can have significant environmental benefits over lower buildings. In the supporting	203717 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
information, we recommend explicitly broadening suicide prevention guidance to all building types and noting that most suicides occur at or near residential dwellings.	
Brookgate has already destroyed the skyline and views from Lime Kiln Hill. This should be used as a case study/example of what to avoid.	202373 (A Carpen)
At Mission Street (Land south of Coldhams Lane) you are allowing buildings up to 20 metres? That is totally out of keeping with surrounding RESIDENTIAL BUILDINGS of two storeys	201251 (S Williams)
The commitment to domestic-scale building heights is not strong enough especially in view of the current pressure to build tall and densely (to fit many people into a small space and make huge statements for the sake of it rather than with truly uplifting buildings). Domestic scale buildings fit with the existing character of the city, create a sense of peace and calm and neighbourhood, and allow large views of the sky, rather than being overshadowed and hemmed in (especially in a largely flat city) and a sense of being connected to the countryside around.	203838 (U Crook)
Tall buildings are not appropriate within Girton's village landscape, which depends on open views, treed horizons, and the Girton Gap. The skyline is integral to Girton's identity. Tall buildings undermine heritage setting and rural landscape. The Girton Gap must remain visually open. GPC Requests to the Local Plan explicitly rule out tall buildings in Girton. Treat the Girton Gap as a sensitive skyline zone. Require visual impact assessments aligned with NP evidence.	202235 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
It is necessary to define 'tall buildings' within Policy GP/ST to avoid ambiguity. Point (b) should be revised to align with the NPPF and accommodate future clusters regarding impacts on the historic environment. Point (c) needs amendment to ensure the policy does not exceed committed development and remains consistent with guidance. Point (e) should allow for judgement and planning balance, rather than requiring applicants to demonstrate no impact. The term 'must' in the criteria for tall buildings should be replaced with 'should' to provide discretion for decision makers. Changes are needed to reflect Government intentions for effective land use and increased development density.	204192 (RailPen) 204429 (Brookgate land ltd and Network Rail)
Policy GP/ST and its supporting evidence fail to recognise the requirements of freight and logistics development and established employment areas, such as Bar Hill, which have buildings exceeding domestic scale. The policy applies a uniform urban-led approach that does not consider the diverse character of the Greater Cambridge area, particularly in South Cambridgeshire. Appendix H should define higher thresholds for tall or large-scale buildings in established employment areas, acknowledging existing structures that exceed domestic scale. The current policy may constrain appropriate industrial and logistics development by applying urban assessment criteria to rural and employment locations, which is seen as disproportionate.	204463 (Tritax Big Box Developments)
Policy repeats an issue with Policy 60 of the 2018 Cambridge Local Plan policy by continuing to imply that any building which breaks the skyline is unacceptable. Even modest additions at high level can break the skyline – it depends on where you are looking from. The policy would be clearer if it stated	208284 (Imperial War Museum)

Summary of issues raised in comments	Comments highlighting this issue
'developments that cause significant change to the existing skyline and / or are significantly taller….'. The policy extends into the villages and rural areas of South Cambridgeshire, so this clarity is necessary for new development at IWM Duxford – otherwise any new building or addition to the height, no matter how modest, would break the skyline from somewhere and potentially be unacceptable.	
It is unfortunate that this policy repeats an issue with Policy 60 of the 2018 Cambridge Local Plan policy by continuing to imply that any building which breaks the skyline is unacceptable. Even modest additions at high level can break the skyline – it depends on where you are looking from. The policy would be clearer if it simply stated: 'developments that cause significant change to the existing skyline and / or are significantly taller….'. As this policy effectively uses the old Cambridge Local Plan Policy and extends it into the villages and rural areas of South Cambridgeshire, the above clarification is even more necessary – otherwise any new building or addition to the height, no matter how modest, would break the skyline from somewhere and potentially be unacceptable.	208244 (Kings College)
The Tall Buildings Policy GP/ST will have a substantial effect on the character of Cambridge and any surrounding areas where they are applied. The skyline and streetscapes of Cambridge are distinctiveness and historic and the policy is weak as it does not assess and justify why there should be harm to that distinctive character.	210993 (C Newell)
The Tall Buildings policy GP/ST1 relies on an assessment of local context heights in Appendix H. This assessment is not one of those documents linked to the web page on Policy GP/ST and is confusing to access, being a large number of separate documents.	210994 (C Newell)

Summary of issues raised in comments	Comments highlighting this issue
Appendix H is not always comprehensive and accurate and does not consistently assess the predominate height and character of the locality. Instead heights are based on the tallest, without considering why there is a single building, a historic landmark or small group of ‘landmark’ buildings of greater height than their surrounding buildings. The Tall Buildings Map in Appendix H includes rural villages in South Cambridgeshire and well outside the designated Cambridge City extent. There is no clarity about their inclusion in the Tall Buildings policy and why their townscape is being assessed in this section. If intended to be within the Tall Buildings Policy, their inclusion should be clear and justified, and if not, they should be excluded from the Tall Buildings Map.	210995 (C Newell)
Unlike the London Tall Buildings Policy, there is no aspiration on of outstanding design and landmarks, but instead the policy wording suggests tall buildings as the default. 1.18 The policy should emphasise high quality design at street level as well as the mentioned skyline and services. 1.19 The historic environment GP/ST1b should make clear that the towers to remain dominant within the last sentence are historic rather than new towers.	210996 (C Newell)
Unlike the London Tall Buildings Policy, there is no aspiration on of outstanding design and landmarks, but instead the policy wording suggests tall buildings as the default. 1.18 The policy should emphasise high quality design at street level as well as the mentioned skyline and services. 1.19 The historic environment GP/ST1b should make clear that the towers to remain dominant within the last sentence are historic rather than new towers.	210997 (C Newell)

Summary of issues raised in comments	Comments highlighting this issue
Subject to the above, the Tall Buildings Map for outlying villages is at too small a scale to provide clarity about character areas. For example, many of the existing green spaces are missing and these maps are inconsistent with the village maps of the same locations.	210998 (C Newell)
The policy would be clearer if it simply stated 'developments that cause significant change to the existing skyline and / or are significantly taller….' As this policy effectively uses the old Cambridge Local Plan Policy and extends it into the villages and rural areas of South Cambridgeshire, the above clarification is even more necessary for Girton College – otherwise any new building or addition to the height, no matter how modest, would break the skyline from somewhere and potentially be unacceptable.	208299 (Girton College)
Support, recognising that Appendix H includes "While new settlements and employment areas such as science and technology parks may accommodate taller buildings due to their evolving context heights, proposals in these areas will still be assessed against these guidelines to ensure appropriate skyline integration and design quality."	211549 (Martin Grant Land Limited)
Skyline and Tall Buildings Strategy The prescribed height thresholds (19 m, 25.5 m, 32 m) and the 13 m limit in the Suburban/Rural Height Zone are overly prescriptive for Cambridge East and should be replaced by a design-led approach.	209040 (Marshall Group Properties)
Cambridge is located in an environment where the land is flat and views are extensive. Such views need to be preserved. In this environment 'big boxes', with eaves hights of 24m, equivalent to a seven story building would be inappropriate. Neither Tritax and Newlands developments meet policy	211114 (Boxworth Parish Meeting on behalf of A14

Summary of issues raised in comments	Comments highlighting this issue
requirements nor the implied restrictions on the size and scale of rural developments. Any developments should be required to clearly demonstrate (including through 3D illustrations), at consultation phase, maximum size, including overall heights, of the buildings on developments and how through comprehensive landscaping their developments will not be visible beyond the site boundaries. Supported logistic/commercial developments on the A14 corridor should consist of small to medium size buildings. Eaves heights should be restricted and clearly set out; In this context 10/12 m would seem appropriate.	Logistics Forum), 211436 (Boxworth Parish Meeting)
The proposed warehouses are excessively large and tall for the flat, open landscape near villages, causing significant environmental and visual impact.	207727 (Swavesey PC)

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

Abbreviations

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

Summary of Main Issues:

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

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

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

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

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

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

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

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

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

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

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

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

Response to main issues raised in representations:

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

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

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

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

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

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

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

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support Create Cambridge in asking that: • public art and cultural activation link to a Percent for Art initiative or Cultural Infrastructure Levy • the Public Art SPD is explicitly referenced • artists are appointed at RIBA Stage 2–3, embedded in masterplanning • Create Cambridge is engaged as advisor/consultee/co-curator (with communities) in developing plans and strategies for public art and cultural activation This ensures cultural value is designed in from the outset.	202056 (H Chamberlain), 202139, 202870, 202871, 202305 (Cambridge Junction), 202198 (H Tam), 202317, 202753 (Cambridge Junction/ Create Cambridge), 202409 (T Shaw), 202411 (Kettle's Yard), 202685 (T Altmann), 202715 (W Townsend), 202782 (S Lee), 202931 (R Terry), 202974 (T Flinders), 203023 (The Arts Theatre Cambridge), 203046 (Cambridge City Council Liberal Democrat Group), 203337 (N Ellis), 203434 (S Ashworth), 203486 (L Heap),

Summary of issues raised in comments	Comments highlighting this issue
	203515 (D Lever), 203629, 203870, 205040 (University of Cambridge), 203850 (N Yeni), 204683 (NEUBAU Architecture), 204836 (L Matthews), 204998 (Wysing Arts Centre), 205062 (H Paterson), 205135 (J Walsh), 205293 (A C de Azevedo Lamha), 205314 (N Oakley), 205323 (L Howse), 205389 (A Seiglow), 205399 (Cambridge Junction), 202386 (J Webber), 202460 (K Jones)
Existing policy on Public Art is based on SPDs originating with SCDC and City respectively over 10 years ago. New thinking on art policy and public art has developed significantly and the Local Plan needs to reflect this new reality. Similar cities to in mainland Europe and North America have well developed and modern policies that consider public art as an element of an arts eco-system that	202148 (R Stobart)

Summary of issues raised in comments	Comments highlighting this issue
includes healthy living and sustainable communities. Co-operation between the arts communities, authorities and residents are the basis for vibrant cultural life.	
The area around the Elizabth Way bridge should be transformed including a cultural infrastructure project. S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project. • Crossing the Elizabeth bridge should be a pleasant experience causing active users to pause and take in the advantageous views. Provide green links between open spaces and facilitate vertical growth and urban greening where possible, including the bridge • Provide streetscapes encouraging active lifestyles, skate friendly seating, sheltered spots, bicycle/scooter parking, sufficient street lighting, access to water, toilets, F+B offerings • With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, the new urban realm surrounding the infrastructure should aim to achieve better quality materials, increase landscaped areas and biodiversity and create green corridors connecting N/S and E/W - promoting desire lines and prioritising active transport modes (pedestrians of all ages, cyclists, scooters a.o.) around the infrastructure and to and across the river • With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, crossing the Elizabeth bridge should be a pleasant experience causing active users and visitors to pause and take in the advantageous views. • Re-design of the car dominated transport roundabout to include cycle lanes and four required pedestrian & cyclist crossings, all of which should prioritise pedestrians and cyclists over cars, and integrate practical and desired lines for better N/S and E/W connectivity.	208508 (Cambridge Green Party), 208513, 208514, 208518, 208519, 208520, 208521, 208522, 208523, 208524, 208525, 208526 (NEUBAU Architecture), 204894 (M Cleminson) 204537 (T Woodcock)

Summary of issues raised in comments	Comments highlighting this issue
• End of Walnut tree avenue access road into a shared surface for recreational use, offering advantageous West facing views of the river with additional integrated seating and planting - a public realm outdoors area.	
All new developments should include dog-friendly open spaces where dogs can be exercised off-lead.	203260 (Cllr C Hofman)
Wording of this policy should be strengthened at multiple points. Criterion 1.a.ii should explicitly include space for biodiversity and nature alongside drinking water, shade and shelter. Criterion 1.b.ii should be amended to require street design to encourage active travel and discourage car use, not merely avoid vehicular dominance. Criterion 1.c.i should remove reference to historic street furniture, while 1.c.ii should require at least 20% of land area to be allocated to nature. The supporting information should emphasise flood risk reduction, biodiversity, and the use of natural, permeable paving materials.	203718 (Cambridge Green Party)
Policies GP/QP and BG/EO are interrelated; consider placing them in the same topic area or cross-referencing them. Definitions of external spaces are inconsistent; a standardised description should be provided across policies. The policy should include more guidance on the design of public realm areas, such as streets and civic squares. The wording of the policy is repetitive and unclear. Retain and update Policy 66 on paving over front gardens, as current guidance lacks clarity and enforcement. Factors increasing front garden conversions include parking competition, avoiding permit fees, and enabling EV charging. Introduce a financial mechanism for monitoring and enforcing landscape quality to address resource gaps in delivery. Developers should contribute to a landscape monitoring fund to ensure compliance with approved conditions and management plans.	204101 (Cambridge Past Present and Future)

Summary of issues raised in comments	Comments highlighting this issue
1. c. ii. In our experience at Northstowe Phase 1, native varieties are often now unsuitable and experience high failure rates in the recent hot, dry summers, wet winters, and clay soil. We would encourage the LPA to emphasise the second clause in this point. Establishment must be improved via careful species selection at the design stage, maintenance during the first years after planting, with a backstop of robust planning enforcement when schemes are not effectively implemented.	208057 (Northstowe TC)
Policy must ensure active travel routes must meet the five core design principles. Design quality should be tested at the planning stage, not left to later detail	202509 (H Brown)
The policy is very positive in that it prioritises pedestrian led movement. There is space for improvement: the policy on street clutter needs to also apply to the infrastructure policy around communications facilities in Policy I/DI 1.a, and the policy as laid out here in section 1.a.iii should require adequate footway for pedestrian movements when parking is occupied, not just when it's not.	202635 (P Tribble)
Extensive natural grazing in Cambridge and keeping it affordable deserves more attention as it is a distinctive and valued feature of the city. Open spaces are being heavily encroached on and the small open areas within developments are often formal and boring. Many of the aims and aspirations listed are laudable but as many are advisory they lack teeth resulting in open spaces which are of low quality and have little consideration for supporting biodiversity. Just as with climate change, measures are	205099 (A Copping)

Summary of issues raised in comments	Comments highlighting this issue
considered, then dismissed because to expensive, or the development would have to be scaled back to afford them	
Recommend adopting policies similar to The London Plan S4, which emphasises accessible routes for children to play areas, schools, and youth centres to promote safe and independent movement. And for large-scale public realm developments to include incidental play spaces to enhance playability.	205597 (Mothers CAN Cambridge)
Advocate for incorporating more engaging elements for children in public realm designs, referencing the success of Dinky Doors as an example of effective engagement.	205598 (Mothers CAN Cambridge)
Good to make HIAs a formal requirement. Important points about social isolation and poorer health outcomes but add community severance issue where high traffic levels/layout impede neighbourliness. Active Travel glib phrase - walkers/wheelers don't always feel safe near cyclists and micromobility vehicles - speed, footway abuse, lack of lights -build in remedies. Add building continuous footways at junctions fostering pedestrian priority/wheeling accessibility/slowing vehicle speeds. Tree management issue - fine to plant but leaf fall/lack of maintenance brings trip hazards/impassable footways. Address exiting as well as new routes.	201633 (Cambridge Living Streets)
There seems to be a disconnect between what people think and what planners propose. The main complaint about delivery of pleasant places to live in is potholes. But planning is (mostly) City and District while roads are (mostly) County so there appears to be a disconnect. Even where the cityscape is the responsibility of the same local authority as the planning, we see a dreadful mess of street	201733 (T Stone)

Summary of issues raised in comments	Comments highlighting this issue
furniture with bad maintenance, poor cleaning and a proliferation of fly-posting. Could we have it recognised in the Local Plan that work is being done on this? Meanwhile forget public art	
We welcome this policy, particularly part 1c, which recognises the many benefits of incorporating natural elements into development to respond to climate change.	207635 (Natural England)
Anglian Water welcomes reference to the inclusion of green and blue infrastructure as one of the key factors to achieving high quality development. Public art requirements should exclude applications for utilities development.	210214 (Anglian Water)
Enhancement of Historic Areas to remove modern street furniture with the integration of classical style timepieces should be encouraged and pursued wherever possible with clear preferred guides set out for each part of the City. Fascia Frontage details should be reinstated whether in a Conservation Area or not, especially where approval has been granted to rebuild an entire house using breeze block to produce a stereotypical black, white and grey dwelling out of place.	210359 (Community Campaigner D Barton)
Highways & Street Furniture should be duly supported across the whole of an area to enhance its historic appeal to the commercial community as much to its indigenous community; as this is supported greatly in equivalent Public Realm Strategy SPDs- where any and all guidance and support must and should be provided, with key at risk projects being an exceptional anecdote that may be cited in future documents or versions of this and other consultations to stimulate economic construction and restoration across other designated Conservation Areas, etc or otherwise.	210363 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
Clearance of vegetation along the Railway Lines alongside other equivalent parts of the Line to eradicate the perceived neglected aesthetic.	210366 (Community Campaigner D Barton)
The Plan throughout barely references transport by wheeled mobility aid, giving the impression it does not address the needs of disabled people.	204124 (S Hughes)
Transport at pedestrian speed by wheeled mobility aid is commonly referred to as 'wheeling'. Every reference to 'walking' in the Plan should either be changed to 'walking and wheeling', or it should be made absolutely clear that when the term walking is used, it is used inclusively, encompassing the use of wheeled mobility aids (the former is preferable).	205496 (S Hughes)
There is confusion in this policy over what 'wheeling' means'. It should not refer to skateboarding, which is entirely separate.	205497 (S Hughes)
More seats in public green spaces, especially for the elderly. Greater efforts to reduce traffic speed and reduce pollution - providing charging points throughout residential areas, not just in public car parks. Better control of e-bikes etc. More encouragement of pedal bikes with obvious priority on all streets without cycle lanes for pedestrians and pedal bikes.	202361 (R Lind)
Please commission a specialist paper on neuroarchitecture and the impact of urban design and building facades on the levels of mental stress within the brain, and particularly people who are neurodivergent / ADHD / Autistic.	202363 (A Carpen)

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

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

Summary of issues raised in comments	Comments highlighting this issue
It is recognised that high quality landscaping and public realm are a key element of a successful community.	211550 (Martin Grant Land Limited)

Policy GP/LC: Protection and enhancement of landscape character

Abbreviations

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

Summary of Main Issues:

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

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

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

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

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

Response to main issues raised in representations:

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

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

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

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

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

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

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

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

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

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support Point 1a & e. Strongly support Point 1b, c & d & Point 3.	202164 (J Neal), 203694 (J Johnson), 205469 (C Aman), 205669 (D Storey), 202997 (Cambridge G Self), 204983 (Federation of Cambridge Residents' Associations), 201511 (B Greig), 201844 (T Neal), 201875 (J Brightman)
Fully support this important policy	201018 (M Colville)
Object and request changes to plan: • The policy must explicitly require that development proposals demonstrate no net harm to existing landscape character, including microclimate, biodiversity, and historic townscape. • Replace "should" with "must" throughout • Add requirement for independent landscape character assessments for all major developments	204901 (M Cleminson)

Summary of issues raised in comments	Comments highlighting this issue
• Add explicit reference to the Urban Heat Island Effect and the need to mitigate it through landscape design. • Add requirement for long-term maintenance plans for landscape interventions.	
Support the policy in all respects. Preservation of landscape character is vital if fostering a sense of living in a great place is desired. We agree the setting of villages in South Cambs should be protected and enhanced. We also specifically support the continued protection of identified Important Countryside Frontages.	203550 (Ickleton PC)
Strongly supports but suggests amendments for clarity and effectiveness. Consider whether other documents should be referenced such as the Tall Buildings Baseline, Strategy and Guidance (2025) and the townscape study. The respondent believes evidence of consideration for the GC Landscape Character Assessment should be required during the pre-application stage, rather than just accompanying the planning application. They propose amendments to the text, 1a) addition of 'diversity and natural beauty'. New 1b) is suggested to ensure that changes are appropriate to the landscape character type. New subsection to identify opportunities for introducing new landscape features to compensate for any loss or degradation	204113 (Cambridge Past, Present and Future)
Vistry supports the principles of the policy aimed at protecting and enhancing landscape character but stresses the need for a balanced application to avoid hindering housing delivery in sustainable locations. Vistry advocates for a site-specific assessment of landscape contributions based on existing conditions. Vistry notes that not all land in the wider landscape setting of Cambridge contributes	204874 (Vistry Group)

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

Summary of issues raised in comments	Comments highlighting this issue
distance views, and erode rural tranquillity, contradicting Policy GP/LC. The Local Plan inadequately justifies the acceptance of EWR as infrastructure, failing to assess its landscape impacts in accordance with Policy GP/LC and neglecting alternative alignments. Claims of potential mitigation through future planting and earthworks are deemed insufficient, as they cannot restore lost landscape character or historic features within the Plan period.	
Although the Landscape Character descriptions in the CBA 2021 LCA are reasonable, the boundaries shown for them in Stapleford and Sawston are wrong so should be corrected to ensure that the open Chalk Hills are properly segregated from the lower lying settled and wooded valleys that they look over. The current boundary was challenged by the inspector during the appeal that granted a new retirement village on the hill outside Stapleford.	202863 (M Foote)
Support Policy GP/LC, highlighting its recognition of the importance of safeguarding landscape character and green corridors in the Greater Cambridge area. The policy's requirement for development to positively respond to its landscape context aligns with national planning policy objectives for environmental protection and landscape quality.	204472 (Tritax Big Box Developments)
Object to Policy GP/LC since the proposed requirements of the draft Policy are considered to be unduly onerous and are not justified, positively prepared or consistent with National Policy. The proposed wording of the policy should explicitly recognise that both new settlements or extensions of settlements	205063 (Endurance Estates)

Summary of issues raised in comments	Comments highlighting this issue
may not be deemed to “protect, conserve and enhance” the local landscape character, and features in full since development provides an inherent and unavoidable change.	
Part 1.a. of Policy GP/LC, to be consistent with the NPPF (paragraph 187), should be revised to conserve the intrinsic character and beauty of the local landscape as there are no valued landscapes.	205134 (Lolworth Developments Ltd)
Where there are existing public rights of way the character of those should be retained by green corridors or other means.	210615 (Cambridgeshire County Council)
Paragraph identifies the need to consider the cumulative effects of development on local landscape character. The local plan should consider opportunities to improve connectivity between adjoining or adjacent development sites so that provision is made for non-motorised routes that link developments. The existing practice of treating each development as an isolated site, even where there are separate parcels within a larger development, restricts the ability of the highway authority to require each individual development to contribute to the creation of a more connected PROW and no-motorised user network.	210616 (Cambridgeshire County Council)
The assessment of landscape setting and contribution should be undertaken on a site-specific, case by case basis, having regard to the existing condition and character of the land concerned. Not all land within the wider landscape setting of Cambridge currently makes a meaningful contribution to its character or special qualities. Where development proposals can deliver landscape enhancement, strengthening green infrastructure and reinforcing defensible settlement edges, they can positively contribute to the objectives of the policy while also supporting the wider growth strategy	210254 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
• Support the policy but highlights the need to update the draft Policies Map to include the Stapleford & Gt Shelford Neighbourhood Plan and specifically Policy S&GS 13, which designates a new Important Countryside Frontage. • Concerns are raised regarding Policy GP/LC clauses 1 and 3, stating that their application to Stapleford parish is inappropriate due to inaccurate mapping of the Gog Magog Hills. An urgent review of the Gog Magog Hill Landscape Character Area is requested. • Concern that the mapped extent of the Gog Magog Hills is inexplicably shrinking over time, which undermines Policy GP/LC. Specific inaccuracies regarding the landscape character area 7B: Gog Magog Chalk Hills and its boundaries are detailed. • Inaccurate mapping has already impacted local planning decisions, including an appeal decision that approved a retirement care village on Green Belt land in part due to discrepancies in landscape character assessments.	201622 (Stapleford PC)
Include the Stapleford and Great Shelford Neighbourhood Plan (adopted Oct 2025), in particular to include Policy S&GS 13 which introduces a new Important Countryside Frontage between 41 Gog Magog Way and houses at Chalk Hill, Stapleford.	210949 (Great Shelford PC)
Support the policy to protect Important Countryside Frontages where landscape with strong countryside character penetrates or separates villages and retains their sense of connection with their rural surroundings. There are two in Stapleford that meet this objective and the visual and physical tests set out in the GP/LC policy and supporting documents, yet the policy map shows no protection for these frontages even though similar or less important frontages are protected in neighbouring villages. The	202909 (M Foote)

Summary of issues raised in comments	Comments highlighting this issue
policy should be consistently applied across the villages and these two ICFs (on Mingle Lane and Gog Magog way) added on the policy map.	
Object as consider that the land off Home End, Fulbourn does not meet the definition of Important Countryside Frontage and is deleted. It is surrounded by buildings and a car park. There are sport and recreation facilities and associated car parking areas between the site and the countryside beyond.	201959 (KG Moss Will Trust & Moss Family)
Object because it is considered that the land off Ditton Lane in Fen Ditton does not meet the definition of an Important Countryside Frontage, and it is requested that this designation is deleted from this site.	202093 (J Francis)
Remove the ICF allocation on the northern boundary of the Land south of Church Street, east of High Street, Guilden Morden (HELAA Ref. 40300). Site does not have a strong countryside character and it is visually enclosed by significant vegetation screening; there are no views out to the countryside side to protect.	206698 (E W Pepper Ltd)
Land to the South of Station Road, Harston The Station Road frontage of the Site, together with the Station Road frontage of Baggot Hall farm to the east, is proposed to continue to be subject to the 'Important Countryside Frontage' Policy, under Policy GP/LC: Protection and enhancement of landscape character. Object to Policy GP/LC and question the robustness of the Protected Open Spaces Review (2025) as merely a desk-based review. We believe this requires a more detailed assessment including site visits to better understand the specific context and landscape character. This should be undertaken to inform the preparation of the Regulation 19 consultation of the Plan.	203436 (Jesus College)

Summary of issues raised in comments	Comments highlighting this issue
The countryside east of Cambridge is not empty land awaiting “opportunity”. It is an established and strategic green resource, already referenced in the existing Cambridge Plan, and it underpins Cambridge’s success in multiple ways. The existing Greater Cambridge Plan rightly identifies this area as important green infrastructure and recognises its role in safeguarding landscape character and environmental connectivity. However, these policy aspirations are currently being undermined by external NSIP proposals. The Greater Cambridge Local Plan must require that proposals affecting land outside the Green Belt demonstrably align with Greater Cambridge’s vision, evidence base and environmental strategies.	209118 (S Hepworth)
Current policy wording of South Cambs Local Plan (2018), Policy NH/2 would be more appropriate, which states that “Development will only be permitted where it respects and retains, or enhances the local character and distinctiveness of the local landscape and of the individual National Character Area in which it is located.” If the current drafting remains, it needs to be recognised that the LVIA and GI Strategy for the planning application for Cambourne North will state that the scheme takes account of the Specific Landscape Sensitivities, and complies with the Specific Landscape Guidelines, of LCA 4A Croxton to Conington Wooded Claylands (within which the site lies), as defined in the GC LCA (2021).	211551 (Martin Grant Land Limited)
The policy GP/LC is inconsistent with NPPF Paragraph 174 in that it should allow for the designation of Valued Landscapes. The CA assessment does not include development of the last 5 years and assessments do not include the whole Plan area as the Assessment Units Areas do not extend to parish boundaries. Part 1 paragraph 1.2.13 gives the specific planning issues not covered by the study,	211909, 211910 (C Newell)

Summary of issues raised in comments	Comments highlighting this issue
which include ecological factors, cultural heritage/archaeological factors, visual amenity and technical design/feasibility factors. It is clear that these omissions do affect the assessments, such as the merging of Pampisford and Linton landscape areas, the detail of the Assessment Units Areas (such as for LIN01-04) and the conclusion that the Pampisford CA 8A is not of ecological interest.	
The eastern Granta Valley of Hildersham, Linton and Bartlow should have been assessed separately in the CA. Pampisford Lowland Chalklands Landscape Character Area 8A extends further eastwards to Linton and Bartlow. The slightly sloping valley edges photographed as Area 8A on page 164 are of Pampisford and are not characteristic of the landscape of the River Granta Valley further east and the map on the same page shows the fields eastwards are no longer the large fields described in paragraph 2 of the text. In the same paragraph on page 164, it is stated that 'This is not an ecologically rich landscape' which is incorrect, as the relevant ecological records in the mapped area around Linton and Hildersham show. By excluding the eastern Granta from LCT9, the assessment also excludes part of the County Wildlife Site, the chalk river, the Pocket Park. The reference to Linton having 'grown substantially since 1950s' obscures its role in the 1970s Local Plan as a planned village expansion to protect the Cambridge Green Belt.	211911 (C Newell)

Policy GP/HE: Historic Environment

Abbreviations

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

Summary of Main Issues:

A number of comments offered general support for the policy.

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

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

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

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

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

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

Response to main issues raised in representations:

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

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

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

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

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

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

Table of representations:

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

Summary of issues raised in comments	Comments highlighting this issue
iii.The part of the policy and supporting text relating to enabling development should be deleted. iv.Additional clarification is needed regarding the identification of non-designated heritage assets	
Historic England welcomes this policy. We welcome the positive strategy for the historic environment as set out here and elsewhere in the Plan. We welcome the requirement for Heritage Impact Assessments. Although these are often known as Heritage Statements at Application stage. We recommend adding more about the importance of heritage in place-making, quality of life and well-being as well as being a key economic driver as well as the importance of protecting and enhancing heritage because of this. We recommend adding text that that recognises the growing pressures on heritage of a rapidly growing population. We recommend including in the strategy something about seeking to enhance existing provision and create greater access to other heritage assets to spread the impact on heritage destinations. This might include specific encouragement of other heritage/nature base areas to open up to visitors.	210174 (Historic Environment)
Figure 134: Non-designated heritage assets (rather than non-designed)	210189 (Historic England)
Vistry support the intent of the policy. However, it is considered that the reference within the policy to proposals being supported by a Heritage Impact Assessment would be more appropriately addressed through the Council's validation requirements, rather than forming part of the policy wording itself. In addition, while the policy states that “The Local Planning Authorities will balance the need for development with the conservation, enhancement and enjoyment of the historic environment”, wording	204875, 210255, 210256 (Vistry Group),

Summary of issues raised in comments	Comments highlighting this issue
does not reflect the structured approach required by the NPPF. It is therefore recommended that the policy is refined to explicitly reflect this test.	
There is a concern that the policy does not address heritage, prompting a recommendation for a Historic Environment Strategy and an additional policy (1g) to protect and enhance heritage assets.	207391 (Cambridge Past, Present and Future)
Believes the policy is weak and not significant: • The draft plan lacks an overall Statement of Significance and fails to acknowledge Cambridge's world heritage significance, particularly along the river corridor. • The Historic Environment Strategy is criticized for being a mere list of existing tools without strategic assessment or evaluation of Cambridge's heritage. • The 2021 Strategic Heritage Impact Assessment did not provide a holistic analysis of Cambridge's significance or threats, ignoring Conservation Area Appraisals. • The Council has not completed the Historic Core Conservation Area Management Strategy or the Making Places for People SPD, which are essential for addressing capacity issues in the historic core. • The proposed Policy and Strategy are deemed premature and ineffective without clear statements of significance and addressing key capacity issues	205451 (J Preston),

Summary of issues raised in comments	Comments highlighting this issue
• There is a concern that the policy does not address heritage, prompting a recommendation for a Historic Environment Strategy and an additional policy (1g) to protect and enhance heritage assets	
Before the 2006 Cambridge Local Plan, planning polices sought to protect the special character of the historic university city. There has been no strategic review of the success or failure of the 2006 Plan in achieving its objectives in relation to the historic environment. This lack of strategic review is compounded by the new Local Plan (and the development strategy). There is little mention of the role of the historic environment in making Cambridge an attractive place in which to live and work. Cambridge meets UNESCO's criteria for World Heritage status.	211448 (J Preston)
Rural Active Travel routes and PROWs should be bridleway to include horseriders so that we can get to/from historic environment.	204022 (S Rogers)
Girton's historic environment includes heritage buildings, village form, and landscape setting, especially the Girton Gap and church environs. Village heritage contributes strongly to identity. Urbanising forms undermine heritage setting. Heritage interacts closely with landscape/green space. GPC Requests to the Local Plan: Require heritage-led design for all development in Girton. Protect settings of key heritage assets, including views. Consult Girton NP heritage evidence.	202238 (Girton PC)
Non-designated heritage asset with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project. The designation of this asset as a noteworthy architectural asset,	204482 (T Ziromskas)

Summary of issues raised in comments	Comments highlighting this issue
albeit where the asset should be championed through regenerative and community-focused practices. The space is currently undervalued and transition experiments such as the 'Out of the dark' urban light show showcased an alternative, community-led and culturally-advancing use for the space. Attention should be paid to how the cultural economy of such an asset can be utilised, with a designation and allocation for cultural use in the Local Plan being the first step.	
All Powers to monitor, collaborate with existing and/ or new property owners to conserve these buildings should become mandatory with appointed Community Champions for Civic Heritage that area direct link between Local Authorities and said wider key stakeholders to prevent demolition of structures that may be at risk of destruction from vandalism, urban exploration and demolition	210360 (Community Campaigner D Barton)
Defining Character Areas- zoning symmetrical parallel construction recommended where distinctive individualised properties remain as checked against authentic archive blueprints. This will ensure high-quality housing for everyone reducing the societal divides between misperceived “good areas” where affluent people reside in historical style properties and less advantaged reside in contemporary ones.	210361 (Community Campaigner D Barton)
Alterations for Listed Building Consent must be simplified with additional streamlined testing methodologies, such as proof of legitimate third party support, such as correspondence chains between applicant and Groups, such as The Victorian Society that can assist LAs complete workload much sooner allowing more attention for challenging cases, such as Non-Designated Heritage Assets at live or upcoming risk of demolition by Housebuilders, etc.	210362 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
Provide incentives for the return of lost adornments and decorative features, such as roof fixtures like Chimney Stacks once again with an approved contractor directory to make Old Builds practical to own, live and work in the 2020s onwards.	210364 (Community Campaigner D Barton)
New Conservation Areas should be established covering areas of surviving built historic environment to positively reverse fascia changes to more modern ones.	210365 (Community Campaigner D Barton)
Non-designated heritage asset with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project, I support retention as a noteworthy 70's Heritage asset. I support regeneration and re-use of the EW Bridge and underpasses as a pedestrian/cycle friendly, cultural hub.	204309 (L Cooke), 204307 (A Giarlis)
Objects to the wording of Policy GP/HE, stating that Part 2(b) is overly prescriptive and inconsistent with national policy regarding the historic environment. The use of the term 'must' is seen as problematic as it may hinder high-quality, sustainable development by suggesting an absolute requirement to conserve or enhance heritage assets.	203947 (Emmanuel College), 206063 (Brookgate land and Network Rail Infrastructure Ltd), 204483 (Tritax Big Box Developments)
The plan must include a formal statement recognising the city's global heritage value as a cohesive whole. Broaden the Scope of Protection: Policy must explicitly recognise the world-heritage significance of the city. Shift from "Narrow" to "Cumulative" Heritage Impact Assessment. Heritage-Driven Green	204163 (Cambridge Past Present and Future)

Summary of issues raised in comments	Comments highlighting this issue
Infrastructure, mitigate Visitor Pressure, and strategic park expansion. Reform the Historic Environment Strategy. Include dynamic strategy diagram which considers whole life of heritage assets. Complete a Making Space for People SPD to manage pressure on limited space in historic core.	
As there are specific policies relating to both designated and non-designated heritage assets, why is this policy needed? The requirement for a Heritage Impact Assessment could (if considered necessary given the Council's application validation requirements) be easily added into the other policies. Notwithstanding this comment, in limb b), the meaning of 'nature' with respect to heritage assets needs to be clarified.	208245 (Kings College), 208300 (Girton College)
Strong support for the policy, especially 2a, where it takes in account "the positive contribution that conserving heritage assets can make to the sustainability of communities".	204926 (M Cleminson), 204561 (The St Andrew the Less Community Project), 204766 (NEUBAU Architecture Ltd)
Pleased to see the Plan recognises Greater Cambridge's historic environment as an important social, cultural, economic, environmental and community resource, which adds to the quality of life of residents and visitors (para 7.56) and Wimpole's contribution to this as an important visitor attraction with historic merit.	208458 (The National Trust)

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

Summary of issues raised in comments	Comments highlighting this issue
- Area 211 comprises 21st century infill, an exception site of affordable housing and 2 unplanned sites outside the village, which do not contribute to townscape character. - Page 138 does not show the key open spaces which form the core and separation of the two settlements. - Area 194 is Granta Park centred on the listed C18 Abington Hall and its historic Lodge, Gardeners Cottage, walled garden and parkland. It is separate to the historic villages. Page 140 incorrectly describes this as Up to 4 storeys Industrial/Scientic type and that the Building style is of warehousing and offices in sheet metal and glass. The assessor has clearly not visited the site.	
The policy and supporting information for GP/HE does not appear robust because it appears inconsistent with the NPPF and should refer further to significance and harm. The supporting information should be more robust; for instance to work with communities etc to conserve and enhance the historic environment wherever possible could be inconsistent with the statutory duty. If the Heritage Impact Assessment is not to accompany every application that potentially affects a heritage asset or its setting, the last paragraph of supporting information should make clear that it is the local authority (not the applicant) who will decide whether the proposal will have an impact on heritage assets.	211912 (C Newell)
The CBA maps accompanying the proposed Allocation Sites confusingly show the listed buildings as a small dot of similar pink to red colours whereas the locally listed buildings are shown to the full outline of the buildings. It would be clearer and more proportionate if both groups and the Monuments were	211913 (C Newell)

Summary of issues raised in comments	Comments highlighting this issue
shown to the outlines of the buildings and if there were more variation in the colours of the listed building categories.	
Figure 134 has an error - Non-designated heritage assets (rather than non-designed)	211981 (Historic England)

Policy GP/HA: Designated heritage assets

Abbreviations

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

Summary of Main Issues:

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

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

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

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

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

Response to main issues raised in representations:

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

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

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

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

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

Table of representations:

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

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

Summary of issues raised in comments	Comments highlighting this issue
builders to allow buildings to deteriorate, such as the Historic Pub that had to be rebuilt in Kilburn, London post 2015. Area Expansion of housing must revert to traditional timeless designs that confer many practical advantages over modern styles that are harder to maintain are timeless with regard to dating and ensure a more evenly distributed community atmosphere in the long-term future.	
Strongly support. Just as Scheduled Ancient Monuments and Conservation Areas are shown on the Policies Map, It would be useful for listed building to be annotated.	204168 (Cambridge Past Present and Future)
St Andrew the Less is a site of historic interest and I support any efforts made by the community group to restore and bring the church building and grounds back to community use. A viability will decide if the church building currently on the HAR can be restored and upgraded to include modern utilities. Support the retention of historically important features including the Grade I listed organ attached to the church building.	204792 (NEUBAU architecture ltd)
Welcome this policy's emphasis on adaptive use and regeneration of heritage buildings, which can deliver significant carbon savings. However, in 2.c, "Use high-quality materials" should be revised to "Use high-quality, sustainable materials," encouraging more environmentally sustainable building practices.	203721 (Cambridge Green Party)
Objection to the wording of Policy GP/HA, stating it does not allow for any harm to designated heritage assets and neglects the required balancing exercise as per the National Planning Policy	204490 (Tritax Big Box Developments), 203960

Summary of issues raised in comments	Comments highlighting this issue
Framework (2024) and the Planning (Listed Buildings and Conservation Areas) Act 1990. The respondent highlights that Sections 66 and 72 of the 1990 Act require decision-makers to consider the desirability of preserving the setting of listed buildings and the character of conservation areas, indicating that harm should be identified and weighed in the planning balance. The NPPF (2024) allows for harm to designated heritage assets if justified and outweighed by public benefits, which the proposed policy fails to reflect, making it inconsistent with national policy and legislation. The mandatory language in Part 2 of the policy overstates statutory and policy tests, limiting professional judgement and balancing, which the respondent argues should be revised. The respondent recommends amending Policy GP/HA to align with statutory wording and the NPPF approach, suggesting the use of proportionate language that allows for a comprehensive assessment of impacts on heritage significance.	(Emmanuel College), 207449 (Pioneer Group Ltd), 204078 (Brookgate Land Ltd and Network Rail Infrastructure)
Support the overall vision and objectives of the proposed policy. Although, it is noted that the principles set out within the policy closely mirror those contained within Policy GP/HE. In Vistry and The Quy Estate's view, the policy would benefit from being combined with Policy GP/HE.	210257 (Vistry Group)
The requirement in point 2 that development proposals must 'preserve or enhance' and comply with the rest of strands a) to g) of this policy is not in line with statutory duty in Sections 16, 66 or 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (which requires 'special attention' to be paid). It is similarly not in accordance with paragraphs 213 to 215 of the NPPF where, in some	208246 (Kings College), 208285 (Imperial War Museum), 208301 (Girton College)

Summary of issues raised in comments	Comments highlighting this issue
circumstances, public benefits can outweigh harm to heritage significance. As drafted, this is unreasonably prescriptive. In point 3 (a) who 'formally' assesses this (ie whose opinion determines if a building is considered unsound)? Similarly, how could an applicant ever demonstrate that 'all possible measures' have been explored in point b). It is not clear if all of strands a), b) and c) must be met or if these are either / or situations.	
Para. 7.66 notes historic landscapes including historic parks and gardens are particularly important in South Cambridgeshire where they add interest and variety to the countryside. Grade II* Pampisford Hall and Grade II* Croxton Park are specifically highlighted in the South Cambs district but Grade I Wimpole Hall RPG which is by far the largest Registered Park and Gardens, and one of only two Grade I RPG in Greater Cambridge, is not mentioned which fails to recognise its importance and rarity (only around 10% of England's RPG are designated Grade I). The text should be amended to include Wimpole Hall Registered Park and Garden.	208459 (The National Trust)
It is recognised that the requirement to 'preserve and enhance' is rooted in Section 72 of the Planning (Listed Buildings and Conservation Areas) Act, whilst the similar concept of 'sustain and enhance' is found at Paragraph 210 of the current NPPF. 2.a. should be reworded to: "Pay special attention to the desirability of preserving or enhancing the significance of the designated heritage asset(s) and its setting, and the character or appearance of Conservation Areas including views into, within and out of them" as development may not always meet the current wording of "Preserve or enhance the significance of the designated heritage asset(s)	211553 (Martin Grant Land Limited)

Summary of issues raised in comments	Comments highlighting this issue
and its setting”. This rephrasing will bring the policy in line with the wording of the Act and NPPF as referenced above, and removes the apparent contradiction created by the current wording. Reordering this section so that the current points 1. and 2. are reversed would also seem logical to help this.	
This policy also appears to be trying to do quite a lot and might benefit from being split into policy relevant to listed buildings and policy relevant to conservation areas (rather than trying to do both under one heading, leading to comments on importance of original fabric and layouts, alongside more generic requirements). This could still be in the same policy, but under separate headings.	211554 (Martin Grant Land Limited)
For consistency with the 1990 Act, GP/HA1 should include setting and curtilage listed structures. For consistency with NPPF, there should be mention of designated landscapes and mitigation of harm. GP/HA2c when referring to character of the area, it should be clear that this is the designated area, not the locality of the asset, especially if the surroundings of an asset are unsympathetic.	211914 (C Newell)

Policy GP/ND: Non-designated heritage assets

Abbreviations

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

Summary of Main Issues:

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

Some comments highlighted specific buildings that they considered warranted stronger protection.

Other comments considered the policy is not consistent with national planning guidance. Care should be taken to ensure that non-designated heritage assets are not by default elevated to the status of Designated Assets. The policy needed greater flexibility.

Response to main issues raised in representations:

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The Councils note the strong support expressed for the protection of non-designated heritage assets and their contribution to local character, identity and sense of place.

The Councils also acknowledge representations which raised concerns that the draft policy could be interpreted as requiring the retention and enhancement of non-designated heritage assets in all circumstances, potentially going beyond the balanced approach set out in national planning policy.

In response, the policy has been amended to align more closely with the National Planning Policy Framework (2024). The previous wording seeking to ensure the retention and enhancement of non-designated heritage assets has been revised to seek their protection and enhancement, while retaining the requirement for a balanced judgement to be made based on the significance of the asset and the scale of any harm or loss.

Comments regarding the identification of non-designated heritage assets, including local lists and the Historic Environment Record, are noted and are addressed through supporting text rather than policy wording.

Overall, the principal amendment arising from consultation has been to refine the policy wording to better reflect the proportionate and balanced approach set out in national planning policy while continuing to support the protection and enhancement of non-designated heritage assets.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Can stronger protections be put in place on buildings like the Romsey Labour Club and the Hobson Street cinema buildings?	203810 (A Carpen)

Summary of issues raised in comments	Comments highlighting this issue
Care should be taken to ensure that non-designated heritage assets are not by default elevated to the status of Designated Assets. The policy implies a similar level of assessment, protection and recording for non-designated assets as would be expected for, for example, listed buildings	203387 (ESCO Prospect)
South Cambridge (but not Trumpington) has very few listed buildings or non-designated heritage groups of buildings south of Hills Rd Bridge. Yet the attractive red brick group buildings of Homerton College align with attractive nineteenth century buildings on Hills Road (St Johns Church). There are many attractive Arts & Craft houses in the area. The Capturing Cambridge website has documented their history. Surprisingly there is no listing for Homerton apart from the College's Arts and Craft Dining hall? No mention either of Homerton avenue of mature trees with its cow parsley or gardens	205416 (Federation of Cambridge Residents' Associations)
The draft policy seeks to "ensure the retention and enhancement" of non-designated heritage assets. National policy does not require retention in all circumstances, but instead requires a balanced judgement, having regard to the significance of the asset and the scale of any harm or loss. The proposed wording removes this necessary flexibility and risks precluding appropriate development regardless of context or public benefits. Draft Policy GP/ND should be amended to reflect the NPPF's proportionate approach and allow impacts to be assessed through balanced decision-making.	207450 (Pioneer Group Ltd)
Girton's non designated heritage includes village pattern structures, open rural edges, and valued community spaces. NDHAs shape village identity even without formal listing. Loss would erode local	202240 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
character. They interact with green spaces and the Girton Gap. GPC Requests to the Local Plan: Require assessment and retention of NDHAs. Integrate NDHAs into development layouts. Avoid erosion of rural character.	
Non-designated heritage asset with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project, I support retention as a noteworthy 70's Heritage asset. Support regeneration and re-use of the EW Bridge and underpasses as a pedestrian/cycle friendly, cultural hub.	204305 (NEUBAU Architecture Ltd)
Strongly support the protection of non-designated heritage assets.	204179 (Cambridge Past, Present, and Future)
LAs should adopt a Local List of Valued Buildings (Non-designated Heritage Assets), which have been a Government requirement since the policy introduction through the NPPF in 2012. Historic England produced a guide to help Councils in May 2012. Bristol produced an exemplar list in 2015, which is well worth reviewing. Existing Action Plan if present for Designated and Non-designated Heritage Assets needs identifying and/ or establishing (I may support this if invited). Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of landmark buildings, especially those with key links to an area's founding or history locally or places of worship	210358 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
Object to the proposed wording of Policy GP/NP. The policy goes beyond national planning policy by seeking to 'ensure the retention and enhancement' of non-designated heritage assets. The NPPF does not require retention in all circumstances, but instead requires a balanced judgement, having regard to the significance of the asset and the scale of any harm or loss. The proposed wording removes this necessary flexibility and risks precluding appropriate development regardless of context or public benefits. Policy GP/ND should be amended to reflect the NPPF's proportionate approach and allow impacts to be assessed through balanced decision-making.	204082 (Brookgate Land Ltd and Network Rail Infrastructure)
We welcome the inclusion of a policy on non-designated heritage assets. Paragraph 7.76 We recommend including a link to the criteria. Paragraph 7.76 The final bullet point – it should be noted that not all entries on the HER are Non-designated heritage assets. A planning judgement (by a 'plan-making body') is needed to determine whether or not something is a non-designated heritage asset. Inclusion on the HER alone is not sufficient. Please refer to this in this paragraph. Paragraph 7.78 We welcome the inclusion of links through to the Cambridgeshire Local Heritage List Portal. Paragraph 7.79 This paragraph should make it clear that other ways that non-designated heritage assets may be identified are through: Local Plans; Neighbourhood Plans; Conservation area appraisals and reviews.	210176 (Historic England)
Rural Active Travel routes and PROWs should be bridleways so that horseriders are included and can visit heritage assets.	204026 (S Rogers)

Summary of issues raised in comments	Comments highlighting this issue
Objects to the wording of Policy GP/NP, stating it exceeds national planning policy by mandating the retention and enhancement of non-designated heritage assets.	204497 (Tritax Big Box Developments)
It is recognised it is helpful that the policy sets out how proposals to alter, extend or demolish non-designated heritage assets will be assessed.	211555 (Martin Grant Land Limited)

Policy GP/CC: Adapting heritage assets to climate change

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There is broad support for this policy. Historic England welcomed the inclusion of this policy. It should highlight the need to take a whole buildings approach. National Trust supported the policy approach.

Girton Parish Council raised a range of issues, including that the plan should support sensitive, heritage compatible climate adaptations, and should not compromise heritage significance. Cambridge Past, Present, Future consider the plan lacks a clear sequential approach to retrofitting historic buildings. Without a requirement to prioritise less harmful measures first, such as improved insulation, there is a risk of unnecessary harm to heritage assets through more intrusive options like solar panel installations.

Response to main issues raised in representations:

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- The Councils note the support for the policy and the desire to balance heritage conservation against energy efficiency measures. It is felt the policy and supporting text strike the right balance between these issues, actively encouraging innovative, sensitive and high-quality interventions.

- The Council notes the support for landscape based carbon measures and CC/DC set out how this can be achieved as well as BG/EO to utilise greening for adaption and cooling.
- The suggestions to promote a sequential Whole Building approach are noted. It is agreed this is widely considered best practice and therefore wording has been added to the policy to recommend this approach is employed where appropriate.
- The Councils note the comment regarding retention of older buildings. Policies CC/CE, GP/HA and GP/ND are felt to strongly cover this point in their policy wording and supporting text.
- In response to Historic England, the suggested guidance has been added into the policy wording.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Climate adaptation must respect heritage fabric while promoting resilience through nature□based measures and sensitive retrofits	202241 (Girton PC)
The policy lacks a clear sequential approach to retrofitting historic buildings. Without a requirement to prioritise less harmful measures first, such as improved insulation, there is a risk of unnecessary harm to heritage assets through more intrusive options like solar panel installations. The plan should explicitly reference standard BS EN 16883, which provides a structured sequential process for energy upgrades in heritage settings. This is seen as a necessary addition because the current reference to PAS 2035 is insufficient for protecting the unique significance of historic fabric.	204186 (Cambridge Past, Present, Future)

Summary of issues raised in comments	Comments highlighting this issue
We strongly support this policy and would like to see a greater reference to applying weight to climate considerations in the valance of affecting heritage, for example the use of PVs on heritage roofs, or adapting windows	204969 (Mothers CAN Cambridge)
Heritage must be adapted without compromising significance. Landscape□based climate measures (shade, planting) work well in Girton. Avoid intrusive urban solutions. Requests to the Local Plan: Support sensitive, heritage□compatible climate adaptations; Use rural□fit landscape interventions to reduce heat/flood risk; Prohibit intrusive, large□scale engineered forms.	205575, 205576 (Girton PC)
Rural Active Travel routes and PROWs should be bridleways so that horseriders are included and can visit heritage assets.	204028 (S Rogers)
We welcome reference to heritage assets in this policy. We recommend that the policy should highlight the need to take a whole building approach. We welcome the various hyperlinks to publications. We also recommend including the following link: Energy Efficiency and Retrofit in Historic Buildings | Historic England	210177 (Historic England)
Non-demolition of historic buildings prior to the 1950s must be made policy or adhered to as part of LCC's commitment to combatting the Climate Crisis through sequestering carbon in its Old Builds. Where demolition is proposed for 1950s style housing onwards- any new construction must be in the historic building style and local materials to ensure high carbon capacity, quality aesthetic and true blending of the interconnected conurbations of any one area, place or location. Era-style Buildings, especially rows of Georgian, Victorian and Edwardian architecture must be faithfully restored, retained	210356 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
and recreated to complement surrounding historic streets that may or may not be classed in official Conservation Areas preventing harsh contrast with newer built housing estates from the 1950s onwards.	
Concerted efforts to identify and locate core suppliers for raw materials and specific heritage skills should encourage new uptake of these limited artisan craft skills by new contractors locally based to support the local economy, provide employment, and reduce the cost of product and service in the long-term. Volunteer labouring assemblies should be fully encouraged and supported identifying key individual and group skillsets that can be utilised to protect historic buildings or areas at risk with a view to supporting the construction of new authentic style housing (as and where appropriate) and the reconstruction of demolished prized old buildings beloved by the community, such as community pubs, libraries and community centres.	210357 (Community Campaigner D Barton)
We would like to see more historic buildings retrofitted with sustainability measures. Max Fordham have experience of successfully doing this with case studies such as Trinity College New Court Grade I listed retrofit, The Engine Shed stirling, integration of heat pumps and solar panels onto a number of heritage assets including the Kings College Cambridge Chapel roof. We would like to see great consideration of the importance of climate change mitigation and adaptation be considered weighing up any impacts on heritage assets.	204615 (Max Fordham)
It is important for heritage assets to contribute to addressing climate change. The National Trust is supporting research into delivering retrofit for heritage buildings to identify issues in practical delivery of	211083 (National Trust)

Summary of issues raised in comments	Comments highlighting this issue
historic building retrofit and better understand the challenges. We support Policy GP/CC which establishes how works to enhance the environmental performance of heritage assets will be balanced against the need to protect and enhance the character and significance of that asset.	

Policy GP/AR: Archaeology

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy's objective of protecting archaeological assets as an important part of Greater Cambridge's historic environment and local identity.

Comments were made seeking stronger requirements for archaeological assessment to be undertaken at an early stage and to inform planning proposals, site layouts and masterplans. Respondents also requested clearer guidance on the timing of archaeological investigations.

Concerns were raised about the potential for development to harm buried archaeological remains. Respondents emphasised the importance of protecting archaeological deposits and avoiding unnecessary disturbance through appropriate design and mitigation measures.

Further representations supported the integration of archaeological assets into development where feasible, enabling archaeology to contribute positively to place-making, heritage interpretation and local character. Comments were also made on the wider role of heritage in supporting regeneration and enhancing the attractiveness of local centres.

Overall, respondents supported the policy direction while seeking stronger emphasis on early archaeological assessment, the protection of archaeological remains, and the contribution of archaeology and heritage to local identity and development

Response to main issues raised in representations:

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The Councils note the support expressed for the proposed policy and the importance of archaeology in understanding and conserving the area's historic environment. The Councils also acknowledge representations seeking stronger recognition of the need for archaeological assessment to inform planning proposals at an early stage and to ensure archaeological considerations are integrated into the design and masterplanning process.

In response, the policy has been amended to clarify that Archaeological Assessments should inform planning proposals, including through masterplanning. This change reinforces the importance of considering archaeological constraints and opportunities early in the development process and supports the objective of preserving archaeological remains in situ wherever possible.

The Councils consider that the policy already provides a robust framework for the assessment, investigation and protection of archaeological assets, including requirements for appropriate assessment, investigation and recording, and a presumption in favour of in-situ preservation where development affects scheduled monuments or archaeological sites.

Comments relating to active travel routes and bridleway access to heritage assets are noted. However, these matters fall outside the scope of this policy and have not resulted in amendments.

Overall, the principal amendment arising from consultation has been to strengthen the role of archaeological assessment in informing planning proposals and masterplanning from an early stage in the development process.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Archaeology is important as it links past and present and helps develop a sense of continuity	202183 (M MacGinley)
Archaeological assets must be treated as integral to Girton's long historical continuity. Archaeology should be assessed early in the planning process. Development must avoid harm to buried remains. Archaeology strengthens heritage identity. GPC Requests to the Local Plan: Require early archaeological assessment; Protect archaeological deposits from disturbance; Integrate archaeology into design where feasible.	202242 (Girton PC)
The policy should reference the importance of archaeological assessment informing planning proposals including masterplans. The policy should provide clearer guidance on the appropriate timing of archaeological assessment.	210178 (Historic England)
The respondent supports the proposed wording of Policy GP/AR.	204501 (Tritax Big Box developments)
Rural Active Travel routes and PROWs should be bridleways so that horseriders are included and can visit heritage assets.	204030 (S Rogers)
It is recognised it is helpful that the policy sets out how proposals that may affect sites of known or potential archaeological importance or interest will be assessed.	211556 (Martin Grant Land Limited)

Summary of issues raised in comments	Comments highlighting this issue
This policy appears more robust than that relating to other heritage assets. It includes significance, the NPPF tests, harm and justification and the presumption in favour of preservation.	211915 (C Newell)

Policy GP/SF: Shopfronts

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Comments received expressed broad support for the policy's objective of ensuring that shopfronts contribute positively to local character and distinctiveness. Respondents supported the protection of historic shopfronts and their contribution to the area's heritage and townscape.

Comments were made seeking stronger controls on illuminated displays and shopfront lighting. Concerns were raised regarding the increasing use of bright, flashing and excessive LED lighting, with respondents highlighting potential impacts on visual amenity, energy consumption, street safety and the wellbeing of people with neurological and neurodiverse conditions. It was suggested that the policy should include measures to limit light spill and ensure lighting remains proportionate to its surroundings.

Concerns were raised that a uniform approach to shopfront design may not be appropriate in rural areas. Respondents emphasised the need for village-scale retail development and shopfronts that reflect local character, avoiding urban commercial forms that could detract from rural identity. Historic England considered more could be done to encourage the restoration and reinstatement of historic shopfronts.

Overall, respondents supported the policy direction while seeking stronger controls on lighting and signage, continued protection of historic shopfronts, and a more locally responsive approach to shopfront design in rural communities.

Response to main issues raised in representations:

The Councils note the support expressed for the protection of historic shopfronts and the representations seeking stronger policy protection for traditional and historic shopfronts, including the restoration and reinstatement of historic features and greater recognition of the contribution that heritage can make to the vitality and character of centres.

In response, the policy has been strengthened to provide greater protection for traditional and historic shopfronts. The revised policy introduces a clearer presumption against the removal of traditional shopfronts that are appropriate to the building or are of architectural or historic significance in their own right. Additional wording has also been included to ensure that the replacement of traditional shopfronts within Listed Buildings and Conservation Areas will only be permitted where the existing shopfront is inappropriate and the replacement would improve the character of the building or area.

The Councils note comments relating to illuminated displays, light spill and excessive shopfront lighting. While these concerns are recognised, they are considered to be more appropriately addressed through the shopfront guidance appendix, advertisement consent and other design and amenity policies. As such, no amendments have been made to the policy in this regard. Comments relating to active travel, bridleway access and village-specific retail provision are also noted. However, these matters are either outside the scope of this policy or are considered to be adequately addressed within other local plan policies or through the policy's existing requirements for shopfronts to respond positively to the character, scale and appearance of their local context.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support the protection of historic shopfronts	204194 (Cambridge Past, Present and Future)
Can anything be done in this Local Plan to reduce (or, better still, eliminate) the use of flashing, bright illuminated displays. These are a distraction for those concentrating on street-safety/surveillance (for themselves, or for children or other vulnerable individuals in their care). They can also be distressing (if not actually downright dangerous) for those with some autistic, epileptic and other neurological or neurodiverse characteristics. This request also applies to bus stops, and to stand-alone signage on pavements and in 'pedestrianised' areas	202537 (J Neal)
This policy should include a requirement to limit the light spill from shop fronts which has become an issue in the high street in the last few years with new shops using excessive LED lighting that is disproportionate to the streetscape at night and consumes more energy than is necessary.	204938 (Mothers CAN Cambridge)
Rural Active Travel routes and PROWs should be bridleways so that horseriders are included and can visit shops and cafes	204032 (S Rogers)
Girton does not currently have traditional shopfronts, but it does have strong community interest in local retail, small enterprise, and village-scale business. Shopfront policy must therefore support future village-appropriate retail, not urbanised frontages. Survey data shows strong support for local retail and small businesses. Village identity requires a rural, modest, contextual approach. Any future shopfronts must avoid urban commercial typologies. GPC Requests to the Local Plan: Support village-appropriate	202243 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
retail units with modest rural shopfront design; Avoid imported urban high-street forms; Ensure any shopfront proposals respect village scale and character.	
We welcome the reference to historic shopfronts in this policy. The policy could go further and encourage the restoration and reinstatement of historic shopfronts. This is both in terms of the positive contribution historic shopfronts make to the character of an area, but also the economic benefit of providing traditional and bespoke shopping units to shop owners. Our recent High Street Heritage Action Zones across the country are unlocking the potential of high streets, fuelling economic, social and cultural recovery and breathe new life into it for future generations. The Policy should make more reference the role of heritage in the re-vitalisation of retail areas.	210179 (Historic England)

Consultation Statement

Appendix 12: Response to Representations - Jobs



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

Jobs

Jobs Introduction

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The representations received were wide ranging. They included the need to direct hi-tech industries to the deindustrialised parts of the UK; a request that cultural infrastructure be embedded across plan policies as core civic infrastructure and for Create Cambridge is engaged as an advisor/consultee and the need for greater consideration of walking/wheeling accessibility in new retail and office developments. The relationship between housing and employment was mentioned including planning for mixed-use neighbourhoods with specifics on how to achieve hyperlocal and interconnected employment and community amenities, the need for a clearer link between the timing of jobs coming forward and the homes needed for the growing workforce and for a mix of

homes and jobs on or nearby active travel routes. There was support from the Cambridgeshire Chamber of Commerce for the Cambridge Science Park North development.

Comments from neighbouring authorities included support for excluding large-scale warehousing and distribution centres and a call for joint working on logistics challenges across the Ox-Cam corridor. The plan for the "delivery of a flourishing, dynamic and mixed economy" within Greater Cambridge was welcomed and there was a recognition of the economies of scale that a flourishing Greater Cambridge economy brings to other areas. Requests included the need for the Plan to appreciate the factors that attract existing and future businesses, training facilities and institutions to locate, continue to reside and facilitate the opportunity for future investment in the locality and to clearly articulate the benefits and opportunities of close proximity to London Stansted airport.

Response to main issues raised in representations:

Policies in the Jobs Chapter and Strategy Chapter of the Local Plan, supported by evidence, seek to provide both an environment for a range of uses including cultural uses and to support existing key sectors recognising not only regional importance but also national and international importance. The plan has sought to consider the development strategy as a whole, considering not only economic needs, but also need for homes, infrastructure, and to protect and enhance the environment. We recognise wider links. The role of Greater Cambridge siting at the heart of several economic corridors: the Oxford Cambridge Growth Corridor, the UK Innovation Corridor (London-Stansted-Cambridge-Peterborough) corridor and the Cambridge-Norwich Tech Corridor, has been added as a reference in the economic portrait section at the beginning of the plan. The Councils have also engaged with neighbouring authorities on the warehousing and distribution sector.

Cultural infrastructure needs have been considered to inform the local plan, including preparation of a Cultural Infrastructure Strategy and Community Facilities Studies, which have informed the Infrastructure Delivery Plan as well as policy requirements in other theme chapters.

Transport and accessibility was raised by a number of general comments on this theme. Transport has been a key consideration when identifying site allocations, and the Infrastructure and Great Places theme policies seek to ensure sites deliver well connected places. Policies on retail seek to support a range of centres to ensure facilities are accessible.

Policies Individual developments at Histon and Cambridge Science Park North are addressed in the allocations section. Having reviewed the employment land supply, there are no exceptional circumstances for release of green belt land in these locations.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support selected	203053 (K Porrer, Cambridge City Council Liberal Democrat Group)
Support Cambridge Junction and Create Cambridge in asks that: • Cultural infrastructure is embedded across strategic chapters, not confined to Wellbeing • Culture is treated with parity alongside housing, transport and utilities as core civic infrastructure	202065 (H Chamberlain), 202152 (M Ridler, Cambridge Junction), 202207 (H Tam), 202319 (L Mills, Cambridge Junction), 202401 (J Webber), 202420 (T Shaw), 202470 (K Jones), 202693 (T

Summary of issues raised in comments	Comments highlighting this issue
• Create Cambridge is engaged as advisor/consultee on the further development of the Cultural Infrastructure Strategy and the Local Plan where this relates to cultural infrastructure and embedding Culture across the city's plans. This reflects how cultural venues function in practice and ensures consistent delivery across the plan.	Altmann), 202723 (W Townsend), 202767 (C Woods, Cambridge Junction/Create Cambridge), 202894 (B Groisman, Cambridge Junction), 202899 (R Tinkler, Cambridge Junction), 202951 (R Tarry), 202964 (T Flinders), 203370 (N Ellis), 203452 (S Ashworth), 203498 (L Heap), 203647 (Z Svendsen, University of Cambridge), 203858 (N Yeni), 203879 (J Fritsch, University of Cambridge), 204195 (M Burman, Cambridge Junction/ Create Cambridge), 205076 (L Sheerman, University of Cambridge), 205159 (H Paterson), 205222 (J Walsh), 205375 (L Howse), 205378 (N Oakley), 205431 (E Hine, Cambridge Junction/ Create Cambridge), 205442 (A Seiglow)
Support for the policy but would like to see a clearer link between jobs coming forward and the homes needed for the growing workforce. The targets for both homes and jobs are not connected and for good placemaking, we need to be sure that a mix of homes both rented	203053 (K Porrer, Cambridge City Council Liberal Democrat Group)

Summary of issues raised in comments	Comments highlighting this issue
and to purchase, can come forward in time for those taking the additional jobs, on active travel routes or nearby. If we don't do this, workers will be forced to live outside the area, with long, usually car based commutes, and new communities won't be established successfully.	
Criticise the focus on clustering hi-tech industries in Cambridge, likening it to 19th-century manufacturing and asking why central government does not direct investment to other de-industrialised regions.	203254 (I Ralls, Cambridge Friends of the Earth)
Horseriding and keeping is a vital and large part of the rural economy and job force in Cambridgeshire, even excluding Newmarket.	204036 (S Rogers)
The best business transport policy is the one that most reduces transport needs in the first place. This section needs greater focus on mixed-use zoning with specifics on how to achieve hyperlocal and interconnected employment and community amenities which can be easily reached with tightly integrated active transport. Cambridge already suffers from scattered zones with many residential areas lacking local leisure and shopping areas, now is the time to fix that.	205209 (P Colledge)
Support plans to provide varied and relevant jobs and emphasise the need for residents as well as commuters to benefit. One key is accessibility not just by cycle or public transport but by walking/wheeling. Not enough consideration is being given to this in new retail and office developments e.g. the Beehive and Grafton centre redevelopments, walkers/wheelers will have to travel across busy roads and via a significantly longer	205567 (L Jones, Cambridge Living Streets)

Summary of issues raised in comments	Comments highlighting this issue
journey for to shops that are less likely to be cheap/bargain retail. They will have greatly reduced choice. This is likely to increase home deliveries, increasing the number of vehicles and level of congestion. The 'doughnut effect', the hollowing out of cities to periphery supermarkets and facilities, increases motor traffic and reduces walking/wheeling. It has a disproportionate negative effect on older people who rely on local shops and on walking/wheeling.	
Support for excluding large-scale warehousing and distribution centres and a call for joint working on logistics challenges across the Ox-Cam corridor.	208227 (C Barnes, Bedford Borough Council)
Support for the proposed development at Cambridge Science Park North, promoted for allocation in the Local Plan. • The proposals will provide local people with access to high-value careers, strengthen the city's innovation ecosystem, and ensure that Cambridge remains competitive globally. The focus on mid-tech and advanced manufacturing addresses a critical gap in the region, enabling research and invention to translate from nearby R&D facilities, into production and tangible economic growth. • It will strengthen Cambridge's position within the Oxford–Cambridge growth corridor and the UK's wider science and technology ecosystem. By providing flexible, high-quality workspaces and fostering collaboration across sectors, the site ensures that Cambridge can continue to lead in innovation, attract global investment, and support a diverse economy. • The development will create a well-balanced environment that integrates work, learning, leisure, and wellbeing. By combining economic, social, and environmental	203242 (H Stewart, Cambridgeshire Chambers of Commerce)

Summary of issues raised in comments	Comments highlighting this issue
objectives, it demonstrates a commitment to inclusive growth that benefits residents, employees, and future generations. • It will strengthen education and skills development through meaningful partnerships with local schools and colleges. The inclusion of a dedicated STEM will provide learning and event space to inspire the next generation of innovators, offering practical experience and engagement with emerging technologies. Such opportunities are vital to ensuring that young people across the city and region are equipped for the jobs of the future. • The construction and delivery of the development presents a valuable opportunity to employ local people, support apprenticeships, and strengthen links between education providers, employers, and the local supply chain. • At Cambridge Regional College, has seen significant growth in construction-related courses, and the proposals would provide invaluable work and site experience for these learners. • Beyond construction, the development will create real-world learning environments and apprenticeship opportunities across a diverse range of subjects, supporting the local skills economy and helping businesses access the talent they need.	
Welcomes that jobs and the “delivery of a flourishing, dynamic and mixed economy” is sought to be delivered within Greater Cambridge and recognise the economies of scale that this brings, and the spread of these industries within western Essex (including Harlow and Uttlesford (Chesterford Research Park)). Recognises the fast growing economy, and the importance of Cambridge, as well as its worldwide prestige, supported by successful businesses, industries, training and educational institutions. In developing Local Plans and future planning policy, it is imperative that there is an appreciation of the factors that	210464 (Z Smith, Essex County Council)

Summary of issues raised in comments	Comments highlighting this issue
attract existing and future businesses, training facilities and institutions to locate, continue to reside and facilitate the opportunity for future investment in the locality.	
The Plan must ensure that the benefits if close proximity to London Stansted airport are clearly articulated, and the opportunity this provides for those living, working, residing and investing in Greater Cambridge.	210464 (Z Smith, Essex County Council)

Policy J/NE: New employment development proposals

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

- There were a number of comments related to that element of the policy that restricts the size of warehouses/distribution centres. Responses were received from developers objecting stating that the policy imposes disproportionate constraints on warehousing and distribution uses and limits the Plan's ability to meet identified economic needs and provide a flexible supply of employment land that can respond effectively to changing economic and employment floorspace requirements. It was considered to be inconsistent with the current NPPF, Planning Policy Guidance, the direction of travel in the draft new NPPF, recent appeal decisions and market conditions and therefore it is considered to be unsound. There was an objection and a request from West Suffolk Council to work collaboratively to identify and address wider needs for large scale strategic logistics provision and data centres and a request for sufficient flexibility to respond effectively to changing industrial and commercial needs over time from Cambridge Ahead.

- Swavesey Parish Council and the A14 Logistics Forum supported the size limit on warehouses/distribution centres, stating that it is necessary to preserve Greater Cambridge as a university city in a rural setting and requesting that information on size, height and landscaping be provided at consultation phase. It was also stated that logistics sites should be sited as close as possible to residential centres to encourage walking or cycling and each proposed A14 sites is reviewed using this criteria. The two organisations state that logistic/commercial developments on the A14 corridor should consist of small to

medium size buildings as it would be inappropriate for scarce resources of land and water together with fragile flood management to be used to support logistics hubs where the primary focus is not on supporting the local economy.

- There was support for the Plan's intention focus on jobs growth including the provision of additional headroom and a diversity of space and for its recognition of and supportive approach to clusters but a request for sites and infrastructure to design-in flexibility to enable them to adapt to the changing economic environment and for the Plan to more explicitly recognise the value of existing innovation infrastructure and the benefits of intensifying and expanding the parks and clusters to fully realise agglomeration benefits.

- Other comments included an objection to the use of conditions limiting occupants to first occupants and concern that the policy element relating to the expansion of existing business premises in countryside is overly restrictive and impacts on businesses' ability to respond to a changing economic climate. Specific concerns were raised included the over development of the Cambridge economy and the fact that the Plan does not adequately recognise rural employment uses such as equestrian and equine enterprises.

- There were suggestions for policy changes to ensure public and active travel to sites with consideration given to see if public rights of way can be instated to provide access opportunities, the need to ensure that suitable small-scale workspaces are prioritised in villages and to widen the scope of potential Class E restrictions. The location of TTP's new Campus, Cambridge Research Park and Cambourne Business Park outside the Defined Development Extent (DDE) was queried. With TPP requesting policy alterations were its DDE inclusion not to be considered. There was a request for additional employment areas within the countryside to be identified to enable able to adapt to the evolving economic climate and meet future

business needs including at Evolution Business Park. A number of other specific sites and premises are also mentioned including concerns relating to one or more of the proposed A14 logistics/industrial sites.

- There were suggestions for policy changes to ensure public and active travel to sites with consideration given to see if public rights of way can be instated to provide access opportunities, the need to ensure that suitable small-scale workspaces are prioritised in villages and to widen the scope of potential Class E restrictions

Response to main issues raised in representations:

Comments on the policy are noted. The concern over the restrictions on large-scale of warehousing and distribution is acknowledged. It is considered that warehousing and distribution facilities serving national or regional markets are best addressed at the sub-regional level. The councils have developed a Statement of Common Ground with the Cambridgeshire & Peterborough Combined Authority, neighbouring authorities within and neighbouring the functional economic area in which Greater Cambridge sits which confirms the need to assess the need for strategic warehousing facilities serving national or regional markets across the functional economic market area (FEMA) that includes but goes beyond Greater Cambridge, working in collaboration with authorities within and authorities neighbouring the FEMA. In principle, the Cambridgeshire & Peterborough Combined Authority Spatial Development Strategy (SDS) is considered to be the appropriate planning process by which to determine the need for warehousing and logistics serving national or regional markets. Preparation of the SDS will commence in 2026 and the CPCA intends to progress it at pace. Subject to confirmation of the scope of SDS's by Government, the SDS therefore provides a credible prospect that a long term solution to the need for warehousing and logistics serving national or regional markets will be identified in the foreseeable future.

Recognising the requirements of national planning policy and guidance, Local Plan policy J/NE has been altered so that Proposals for large scale warehousing and distribution facilities providing for national or regional needs will not be permitted unless it can be demonstrated that: there is an unmet need for such facilities that must and can be appropriately provided within Greater Cambridge having regard to other policies and priorities within and arising from the Local plan; a proposal will not impede delivery of warehousing and distribution and industrial space that meets local market needs in market sector priority locations. The supporting text to the policy provides an example of what "appropriately provided" can mean - that the development does not generate traffic movements that impede the delivery of the wider development strategy. It also highlights that market sector priority locations are identified in the Greater Cambridge Warehouse and Industrial Space Needs Study (March 2025).

It is considered that the Jobs policies and allocations within the Plan support the Greater Cambridge economic ecosystem including seeking to maximise the benefits of key clusters and knowledge based sectors. Evidence has been commissioned for this stage of the plan to help improve understanding the needs of our key sectors, policy J/NE supports the development of existing employment floorspace and Policy J/PB seeks to protect it from redevelopment to other uses and policies for Wellcome Genome Campus, Babraham Research Campus, Cambridge Biomedical Campus, Granta Park, West Cambridge and North East Cambridge (including Cambridge Science Park) support development and intensification with additional allocations to provide a range of space for new R&D development. One comment sought additional reference to the planning policy changes that were made in the 2018 Local Plans regarding the selective management approach to the economy. As those changes were made in the previous plan, those references are not necessary.

Planning Policy Guidance on The Use of Conditions states that "A condition limiting the benefit of the permission to a company is inappropriate because its shares can be transferred to other persons without affecting the legal personality of the company." The use of a condition to ensure that there is a named user who will be the first occupant of the development has therefore been

removed from the policy and is replaced with the stipulation that occupation and use of the building by the named user will be secured for at least 1 year through a S106 agreement. To clarify that changes to Use Class E will impact development across Greater Cambridge, in the supporting text to the policy, the following sentence has been removed: “In particular, it has the potential to impact the economic function of Established Employment Areas in the Countryside.”

The requests for individual employment parks to be included in the Defined Development Extent (DDE) of settlements have been reviewed. Cambourne Business Park, the TTP site in Melbourn and Waterbeach Research Park are retained as Established Employment Area in the countryside due to the low density/landscaped nature of the sites and their rural setting. Cambourne Business Park lies outside the proposed DDE for Cambourne, noting that housing development to the south of the Park has yet to be completed. As such, for this Plan, Cambourne Business Park is located within the countryside and so is proposed to continue to be included as an Established Employment Area. It is considered that there is sufficient flexibility in Policy J/NE which allows for development of the edge of towns and villages in Greater Cambridge where proposals are well related to the built form of the settlement, the scale and form of the development would be in keeping with the category and scale of the village. Evolution Business Park is not included as an Established Employment Site in the countryside due to its location within the Green Belt.

It is considered that the policy requires employment development within villages to be appropriately scaled. Public and active travel to sites and public rights of way are addressed in Policy I/ST: Sustainable transport and connectivity.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support selected	201984 (L Miller, Swavesey PC), 203055 (K Porrer, Cambridge City Council Liberal Democrat Group), 204090 (Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204474 (The Royal London Mutual Society Ltd)
Object selected	201712 (K Mak), 203990 (KWA Architects), 204218 (Railpen), 204507 (Tritax Big Box Developments), 205300, 211684 and 211685 (Newlands (Cambridge) Limited)
The Cambridge economy has been over-developed (and thereby ruined) for years. Jobs are needed elsewhere in the UK.	201254 (S Williams)

Summary of issues raised in comments	Comments highlighting this issue
Personal permission to the first occupant violates national PPG 21a-015-20140306: A condition limiting the benefit of the permission to a company is inappropriate because its shares can be transferred to other persons without affecting the legal personality of the company.	201712 (K Mak)
The Newlands development 220 acre ‘big box’ distribution centres to the west of Boxworth Road will dominate the landscape and blight Boxworth. It will add significant vehicle journey to the already overloaded Swavesey Roundabout. This development is not intended to meet the local needs of Greater Cambridge - but is a large-scale national hub.	201282 (E Grant)
Part (g) should be amended to read “The site can be easily accessed by public transport and by foot and cycle” to link the development to public transport networks to benefit decarbonisation of the transport network.	203724 (R Comins, Cambridge Green Party)
Under “Established employment areas in the countryside” a point should be added which states “Any further development must contribute positively to employees being able to access the site using low carbon methods of transport via planning conditions, for example to subsidise greenways or the development of improved public transport infrastructure along with the increase in employee numbers using the site.”	203724 (R Comins, Cambridge Green Party)
Where consideration is given regarding access to employment sites by foot or cycle, consideration should be given to see if public rights of way can be instated to provide access opportunities. Where PROW are unachievable, permissive footpaths and bridleways should be considered.	210621 and 210622 (Mr C Fitzsimons, Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
The policy should prioritise small business units, flexible workspaces, co-working, and shared-use hubs. Small-scale workspace strengthens local economy and reduces car travel; ensure new employment fits the village character. High density research parks overshadow village needs; support landowner diversification compatible with rural identity.	202244 (Y Murray, Girton PC)
Support that element of the policy that does not support proposals for large scale warehousing or distribution centres generally exceeding 9,300 square metres (100,000 square feet) and which serve a wider regional or national function.	201984 (L Miller, Swavesey PC)
Objections to the wording of Policy J/NE. It should be modified to adopt a more proportionate and flexible approach, explicitly recognising the distinct characteristics of industrial and logistics development. This should allow proposals in rural and edge-of settlement locations to be assessed on their individual merits where they can demonstrate sustainability, suitable access and appropriately managed impacts. Currently the policy is overly prescriptive, misinterprets the function and dynamics of the logistics industry and risks unduly restricting the delivery of large-scale industrial and logistics development serving national and regional needs. It is considered to be inconsistent with current and emerging national policy, guidance, economic strategy and market conditions, not effective in the absence of any joint working on cross-boundary strategic matters, not positively prepared and unsound. It risks	204218 (Railpen), 204507 (Tritax Big Box Developments), 205061 (Lolworth Developments Limited), 205300, 211684 and 211685 (Newlands (Cambridge) Limited)

Summary of issues raised in comments	Comments highlighting this issue
excluding sustainable employment proposals that would meet identified economic needs and contribute to a diverse and resilient supply of employment land. • Part 7 imposes disproportionate constraints on warehousing and distribution uses, limiting the Plan's ability to respond effectively to changing economic and employment requirements. • Paragraph 8(a) of the NPPF 2024 states that the planning system must help to build a strong, responsive and competitive economy, to make sure that sufficient land is available in the right places at the right time to support growth. • Paragraph 23 of the NPPF is clear that Local Plans should include strategic policies that provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period. There is no differentiation between Local and Strategic need. Indeed Paragraph 24 of the NPPF actively looks to enforce "effective strategic planning across local planning authority boundaries" to build economic resilience, through the duty to cooperate. • Paragraph 26 stresses that effective and on-going joint working between strategic policymaking authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere. This approach has not been adopted by Greater Cambridge. There is no such evidence within either the Duty to Cooperate' Statement of Common Ground '(October 2025) or 'Duty to Cooperate' Statement of Compliance (October 2025) as to how wider economic growth, or specifically strategic industrial/warehousing need, is to be met across the wider region. This is in direct conflict with Paragraph 36 of the NPPF, which requires Plans to be positively prepared. None of the adjoining authorities, currently in the	

Summary of issues raised in comments	Comments highlighting this issue
process of preparing their Local Plans refer anywhere to meeting the employment needs of Cambridge and South Cambridgeshire. This is despite the Greater Cambridge Employment and Housing Evidence Update 2025 (para. 2.88) stating that 'big box' demand is met in the wider sub-region. • Paragraphs 85, 86 and 87 NPPF 2024 set out planning policies and decisions should: o "...help create conditions in which businesses can invest, expand and adapt. Significant weight should be places on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development." o Be "...flexible enough to accommodate needs not anticipated in the plan.... to enable rapid responses to changes in economic circumstances." o Recognise and address the specific locational requirements of different sectors. o Make provision for "storage and distribution uses at a variety of scales in suitably accessible locations that allow for the efficient and reliable handling of goods." o "Pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics..." • The approach is inconsistent with the direction of travel in the draft new NPPF. o E1 emphasises that plans supporting long-term economic growth should avoid overly prescriptive requirements on acceptable uses and instead enable flexibility to respond to evolving commercial property demands. o E1.1.a also sets out a clear alignment between the economic strategic priorities and the Industrial Strategy with the plan-making. The Industrial Strategy emphasises the role of the freight and logistics sector and its part in growing the economy nationally and has stated that a new plan for the sector will be published in due course. It on this basis that anticipated regional and national priorities for the sector will be further weighted in the	

Summary of issues raised in comments	Comments highlighting this issue
near future, making it even more important to consider those needs now as part of emerging plans. ○ E1.1.c. echoes Paragraph 85 of the NPPF by requiring plan makers to allocate sites to meet anticipated needs, and facilitating development to meet the needs of a modern economy, including storage and distribution operations at a variety of scales and in suitably accessible locations. ○ E1.2 states that development plans should not be overly prescriptive about the types of uses that would be acceptable on particular sites (other than where there is a clear and justified rationale for being specific about acceptable uses at the plan-making stage) ○ Paragraph E3 further recognises the particular physical and locational characteristics of freight and logistics development, including the need for access to strategic transport infrastructure and, in some cases, larger buildings. • The only apparent justification for not planning for anything other than local logistics/warehousing need is predicated on the 'high land take' and undefined 'local pressures' on land supply of specialist sectors, yet the Council's own evidence base already provides allocations for R&D/Life Science Space, well beyond the need that has been assumed by Iceni. To argue there is insufficient land to accommodate specialist sectors is wholly untrue. To the contrary, a very large amount of land has been proposed for release in other locations, closer to central Cambridge for a large quantum of R&D/Life Science floorspace, which has not been supported for release by the Authorities. • NPPG clearly acknowledges that storage and distribution uses have a set of inherent locational requirements, in that developments must be located close to a strategic road network on large sites, with sufficient access to power and labour (NPPG 031 ref: 2a-031-20190722). These characteristics clearly demonstrate that the locations typically occupied by Life Sciences and R&D uses are not suited for storage and distribution uses, so there is no competition for land	

Summary of issues raised in comments	Comments highlighting this issue
between these operators. • Guidance in the Housing and Economic Needs Assessment section of the NPPG Paragraph 031 (Reference ID: 2a-031-20190722) advises plan makers on how local authorities should assess need and allocate space for logistics uses. By only accommodating for local industrial/warehousing needs, the Draft Local Plan departs from this NPPG. Engagement with other local authorities and logistics developers/occupiers is lacking from the evidence base, while demand for large-scale logistics uses, serving regional and national operations, has not been assessed. • A similar West Suffolk policy as reworded by the Inspector and the restriction on large scale strategic logistics was removed. The new wording reflected Policy SP22(d) which enables large-scale logistics uses so long as it can be demonstrated that such proposals would not be detrimental to more localised needs. This is not relevant to Greater Cambridge as there is evidence of need. • There is evidence of latent demand for larger scale units in the area from market signals, reflecting enquiries and activity and stakeholder engagement. Evidence shows that warehouses are becoming larger in scale to suit occupier demands. • Evidence also suggests that average clear heights for buildings have also increased and demand for taller buildings has significantly increased. Therefore the size and height of buildings is essential to ensure properties are successfully let and do not become obsolete in a short period of time. • There is no evidence that large-scale warehousing units above 9,300 sq.m (100,000 sqft) are solely accommodating national or regional needs. A fixed threshold does not determine the type of occupier or the market being serve. • There are already a number of both local and national/international companies operating in Greater Cambridge that occupy industrial units above 100,000 sqft e.g. Hain Daniels, Hexcel etc.	

Summary of issues raised in comments	Comments highlighting this issue
• Compared to other locations with similar economic dynamics, such as Oxford, Sheffield, Bedford, Bristol, and Norwich, the presence of larger-scale of industrial units is significantly higher. This highlights that markets need this segment to function appropriately, and emphasises Greater Cambridge market's gap in the stock offer. • As a result of the policy restriction for the last eight years - there have already been two businesses - namely Marshalls and DHL - that have had to relocate from Greater Cambridge due to a lack of availability of premises of sufficient scale. • Given the Planning Practice Guidance ('PPG') paragraph 031 advises that, where needs for strategic facilities exist, policy-making authorities should collaborate with infrastructure providers and other parties to identify the scale of need across the relevant market, and the authorities will then need to consider the most appropriate locations for meeting these identified needs and E2.2 of the draft reformed NPPF states that, if market signals demonstrate undersupply of specific types of land or premises, considering the relevant catchment area (which could expand beyond Greater Cambridge's boundaries), or specific locational requirements exist, then, in compliance with the proposed NPPF S5, the development could be permitted, there is the risk that such units would be promoted outside the provisions of the GCLP. • Bidwells note 'Need for B2/B8 in Greater Cambridge' (January 2026); "By 2024, Oxford Economics local forecasts (April 2025) showed that only 9.7% to of the total GVA generated by Greater Cambridge was from the Manufacturing and Transport and Storage sectors1 ("the B2/B8 sectors"), compared to 14.7% for the entire Cambridge to Oxford Arc. Clearly there has been an intentional suppression of these industrial sectors in Greater Cambridge through planning policy since at least the 1990s and is now manifesting itself through a notable difference in economic output." • Recent appeal decisions reinforce the importance of flexibility and choice within employment land markets. For example, the Beehive appeal decision (APP/Q0505/V/25/3360616), the Inspector	

Summary of issues raised in comments	Comments highlighting this issue
emphasised that maintaining an adequate and diverse supply of employment land is critical to keeping the market fluid, accelerating delivery, and reducing the risk of investment being lost overseas. The decision makes clear that quantitative targets, including those in the Iceni analysis The Greater Cambridge Growth Sectors Study September 2024, should be treated as reference points rather than caps, and that a diversity of site types, locations and offers is essential to meeting demand and maximising job creation. • There is clear evidence that industrial, storage and distribution uses are essential parts of the supply chain that support those sectors that are perceived to be of higher value by Greater Cambridge. Therefore, a failure to plan sufficiently for local and strategic industrial and logistics space will serve to undermine the wider economic ecosystem. • The policy creates a disproportionate bar for industrial and logistics development, which typically requires larger plots, specific access arrangements and locations beyond tightly constrained settlement boundaries. • It risks excluding sustainable employment proposals that would meet identified economic needs and contribute to a diverse and resilient supply of employment land, contrary to national policy and recent appeal findings. It is not effective, as it may prevent appropriate industrial and logistics schemes from coming forward simply because they cannot satisfy the policy requirements, despite being sustainable in principle. • The policy provides limitations in terms of any future proposal's viability, as it constrains market flexibility and future occupiers' choice by limiting options for larger units which, based on market evidence, are subject to high levels of demand.	
Recommend that the policy read "Large scale warehousing and distribution centres providing for national or regional needs will not be permitted prioritised in Greater Cambridge. The focus is on	205061 (Lolworth Developments Limited)

Summary of issues raised in comments	Comments highlighting this issue
meeting the identified Greater Cambridge needs for an appropriate range of warehousing and industrial uses and unit sizes." With supporting text “However, proposals for large scale warehousing or distribution centres will not be prioritised as the aim of the policy is to provide for a wide range of uses, types and sizes to meet demand across the local area”.	
TTP continues to grow, in particular its core consulting activities are expanding rapidly. To support this growth and deliver for its expanding client base, there is a continuing need to create additional office and research space on the TTP Campus. It is critical that the new Local Plan policies support this. The Campus opened in Spring 2023 following planning approval in 2018 and a Section 73 permission granted in 2020 (S/4535/19/VC). The Campus has been the recipient of a number of major design awards including the Greater Cambridge Design and Construction Award 2024 and more recently in October 2024, winning the national Corporate Workplace Award from British Council of Offices which is one of the most prestigious awards in the country. Welcome the designation of the TTP Campus at Melbourn as an Established Employment Area in the countryside. Consider the TTP Campus to be clearly part of the extent of the built-up area and not isolated in open countryside or detached from the main concentration of buildings within Melbourn. A Local Plan that is positively prepared, justified, effective and consistent with national policy should	204851, 210719, 210720 (TTP)

Summary of issues raised in comments	Comments highlighting this issue
identify the TTP Campus as a site on which new employment development should be supported, and (having regard to the Councils' own Supporting Information to 'Policy S/DE) it should be designated as being part of the Melbourn Defined Development Extent. In the alternative situation that the Site remains designated as an 'Established Employment Area in the countryside', it is important that the proposed requirement for developments to 'reflect their location' is considered having regard to the aims of the policy as set out in the Supporting Information, namely to support businesses to locate, grow and evolve, and that the provisions of the Local Plan are clarified to make clear that applications within Established Employment Areas on the edges of villages will be assessed having regard to their village location.	
Support the policy approach in principle but question the basis on which the Established Employment Areas have been identified. J/NE should go further by identifying additional employment areas within the countryside that already make a strong contribution to the rural economy and support a number of jobs. This is vital in ensuring such areas are able to adapt to the evolving economic climate and meet future business needs to maintain vitality of the rural economy and negates the need to plan for access requirements and connectivity to sustainable modes of transport, as these are already established. To ensure that the Council not only meets this minimum need, but is also able to respond to evolving need, additional land should be identified to accommodate growth including additional sites as	206950 (Cambridge Realty Limited)

Summary of issues raised in comments	Comments highlighting this issue
Established Employment Areas, and especially those that relate well the settlement hierarchy for directing growth and that already make a strong contribution to employment within the area. Therefore it is requested the Evolution Business Park, including the adjacent parcel of land that is suitable to accommodate expansion, is included within the list of Established Employment Areas.	
Support the policy element relating to the expansion of existing business premises in countryside in principle but it is overly restrictive. Specifically, the requirement to demonstrate 2 years of operation and identify a named user for the development inhibits the ability of businesses within the countryside to respond robustly and dynamically to material shifts in business needs. It should be reconsidered to ensure that rural business is truly afforded the conditions by which to grow and evolve in response to an ever-changing economic climate.	206950 (Cambridge Realty Limited)
Question whether a. Cambourne Business Park is located within the countryside under Part 5.	204997 (A Brand, Abbey Properties Cambridgeshire Limited)
Support for Cambridge Research Park's (CRP) designation as an Established Employment Area in the countryside under Section 5b, although highlight that CRP should be viewed as being within an urban location given it's adjacent to the new town of Waterbeach.	204474 (The Royal London Mutual Insurance Society)
Endorse the policy approach of Section 4, which allows employment development in Established Employment Areas in the countryside, where they are of a scale and character that reflects their	204474 (The Royal London Mutual Insurance Society)

Summary of issues raised in comments	Comments highlighting this issue
location to promote job creation, and their exclusion from 'Expansion of existing businesses in the countryside' section 6.	
Flexibility regarding the removal of restrictive planning conditions in the Draft Greater Cambridge Local Plan into policy J/NE, as outlined in the current South Cambridgeshire Local Plan 2018, and in line with paragraph 85 of the NPPF 2024 is requested to support economic growth and facilitate business investment and expansion, particularly for established high-tech and R&D sites.	204474 (The Royal London Mutual Insurance Society)
In light of the West Suffolk local plan approach, NPPF and PPG, the council asks Greater Cambridge to work collaboratively with its neighbouring authorities, including West Suffolk to seek to identify and address wider needs for large scale strategic logistics provision and data centres arising from national and regional demand and taking a strategic cross border approach. In particular as no provision for large scale B8 units or those meeting regional or national demand is made in allocations S/RRA/SCS and S/SHF and neither does policy J/NE support such proposals.	204769 (J Baird, West Suffolk Council)
Para 8.18 of the supporting information - the Class E restrictions seem to only apply to Employment Areas in the Countryside - should this not also be available across Greater Cambridge as the issues with change of use may impact on other developments when permission is granted.	203055 (K Porrer, Cambridge City Council Liberal Democrat Group)
Welcome: • The Local Plan's intention to take projected jobs growth as far as is defensible and supports the use of robust local evidence that Cambridge Ahead commissions.	203530 (E Pritchard, Cambridge Ahead)

Summary of issues raised in comments	Comments highlighting this issue
• The inclusion of additional headroom in both jobs and housing projections which appropriately reflects Cambridge's growth potential and aligns with wider ambitions across the place. This approach is vital for long-term viability and enhances the overall robustness of the draft Plan. • The draft Local Plan's supportive approach to clusters, which appropriately reflects the increasingly clustered nature of the Cambridge knowledge economy over the past decade, is welcomed. • Recognition of infrastructure supporting the innovation economy, including densification at Whittle Laboratory, proposed growth at Babraham, and the proposed innovation hub. • The Plan's recognition of the global importance and growing breadth of scientific activity within major clusters • The Plan's support for developments that strengthen clusters, including its recognition that the Cambridge ecosystem requires a diverse range of commercial space to accommodate different stages of business growth. • The approach the Local Plan has taken to setting out how land should be used to support the wider economy is welcome, particularly the allocation of space for industrial, logistics and mid-tech uses, which helps promote a more balanced economy and address existing shortfalls. Would like to see: • The Local Plan, future spatial and housing strategies and supporting infrastructure need to design-in flexibility so that they can adapt to changing patterns of economic activity, new economic sectors and the future needs of a growing and more diverse population. • The Plan more explicitly recognise the value of existing innovation infrastructure and the benefits of intensifying and expanding the parks and clusters to fully realise agglomeration benefits.	

Summary of issues raised in comments	Comments highlighting this issue
• The approach to industrial and warehousing provision retains sufficient flexibility to respond effectively to changing industrial and commercial needs over time.	
The policy does not adequately recognise rural employment uses such as equestrian and equine enterprises. These are typically sui generis businesses that require large areas of land, modest built form and countryside locations, and cannot be accommodated within defined employment areas. The policy should: • be amended to explicitly recognise specialist rural and land based businesses, including equine and equestrian enterprises falling within sui generis use, as a distinct and important component of the rural economy. • Support the development, expansion and modernisation of such businesses in countryside locations where a functional need for extensive land holdings can be demonstrated, acknowledging that the built footprint may be limited relative to the site area. • Make clear that proposals which are necessary to secure the viability of established rural businesses, including stud farms, training yards and associated facilities, will be supported where landscape, environmental and amenity impacts can be satisfactorily mitigated. • Give greater weight to economic benefits, including employment generation and contribution to the rural economy, particularly in areas with functional links to the wider equestrian and racing industry. This would ensure the policy is consistent with national guidance on supporting a prosperous rural economy.	203990 (K Warth, KWA Architects)
Horseriding and keeping is a vital and large part of the rural economy and job force in Cambridgeshire, even excluding Newmarket.	204037 (S Rogers)

Summary of issues raised in comments	Comments highlighting this issue
Since the policy makes specific reference to site allocations, it is requested that the allocations be updated as per the submissions requested on the NEC and Station Road West sites, to ensure that new employment development can be delivered in accordance with Policy J/NE.	204090 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
There should be a site specific exception from the Green Belt for site 115407 for commercial and recreational use. 71% of residents in a recent consultation support the proposal and the high-quality recreational space it would provide. It would provide a net benefit to the community. It is uniquely positioned for sustainable development, benefiting from exceptional connectivity. To meet regional economic demands, consolidated, high-impact employment hubs are advocated rather than fragmented, smaller developments. By integrating a dedicated Country Park and diverse employment opportunities (including apprenticeships), this proposal offers greater long-term community value than its current Green Belt designation.	201727 (S Jocelyn, Histon & Impington PC)
The Council should be considering the higher job figure as it realistically responds to the Government's ambitions for the region. It is considered that the proposals for Land to the North of A505, Duxford meet the criteria set out in part 3 of the draft Policy J/NE. Therefore, the Site should be allocated to help meet this increased demand	209702 (B Homent, J Tee and R Smith)
There is clearly significant pent-up demand for warehouse space across the plan period, including across a range of different unit sizes. Whilst the large allocation on the A14 will deliver a large amount of this residual demand, this will likely be larger floor plates, and as identified above there is also demand for smaller scale units which can be accommodated on sites 115388 and 115413. Given the	210434 (G Pritchard, Bidwells),

Summary of issues raised in comments	Comments highlighting this issue
Site's sustainable location on the Cambridge urban fringe and its strong access to the strategic road network; it could function across many of the identified warehouse uses identified in the evidence base and, in the case of site 115413, accommodate occupiers that may look to take up warehouse space across Greater Cambridge.	
There is clearly significant pent-up demand for warehouse space across the plan period, including across a range of different unit sizes. Whilst the large allocation on the A14 will deliver a large amount of this residual demand, this will likely be larger floor plates, and as identified above there is also demand for smaller scale units which can be accommodated on this Site 115388. Given the Site's sustainable location on the Cambridge urban fringe and its strong access to the strategic road network; it could function across many of the identified warehouse uses identified in the evidence base and accommodate occupiers that may look to take up warehouse space across Greater Cambridge.	206050 (Hardwick Farming Company Limited)
Meldreth is also specifically mentioned in respect of the 'Eternit Site' as per policy J/NE - we agree. Local employment of all types is important for sustainable village life and we are happy with the continued use, and possible expansion of business activities on this existing brownfield site.	209135 (J Damant, Meldreth PC)
The Centre for Computing History (CCH) plays a crucial role in documenting Cambridge's technological contributions and houses significant collections that preserve both technological milestones and human stories. It attracts 22,000 visitors annually, including 7,500 young people, providing hands-on learning experiences that foster digital confidence and support the development of the future tech workforce.	202343 (L Salter, The Centre for Computing History)

Summary of issues raised in comments	Comments highlighting this issue
The centre offers volunteering opportunities, accessible programming for neurodivergent visitors, and serves as an informal and welcoming space for all ages to engage with technology. CCH contributes £410,019 to the local economy each year, highlighting its cultural and economic significance as a community museum. The current location on Coldhams Road limits CCH's offerings and is at risk due to potential EWR development, lacking necessary environmental controls and accessibility. CCH requires a new building in a more accessible location to expand educational programmes, enhance community engagement, and safeguard its collections for future generations.	
Logistics sites should be sited as close as possible to residential centres to encourage walking or cycling. It seems that Slate Hall Farm/C25 can meet this requirement, although there are significant issues with other forms of traffic generated by this site. It is less clear that Jaynic's site is within reasonable active travel distance for existing or proposed housing sufficient for its needs. The Newlands site would seem to be too remote from centres of housing to result in a significant number of employees choosing active travel as a regular means of commuting. Noon Folly, or Tritax may provide more scope for active travel although this proposal suffers from other deficiencies referred to in the sections of this note covering traffic and size and scale of the development.	202743, 206377 (Boxworth Parish Meeting on behalf of A14 Logistics Forum), 211429 and 202478 (Boxworth Parish Meeting)
Future developments should support future industries whilst maintaining the essential nature of a university city in a still, largely, rural setting. It would be inappropriate for scarce resources of land and	202743, 206382 (Boxworth Parish Meeting on behalf of

Summary of issues raised in comments	Comments highlighting this issue
water together with fragile flood management to be used to support logistics hubs where the primary focus is not on supporting the local economy.	A14 Logistics Forum), 211435 and 202478 (Boxworth Parish Meeting)
Cambridge is located in an environment where the land is flat and views are extensive. Such views need to be preserved. In this environment 'big boxes', with eaves hights of 24m, equivalent to a seven story building would be inappropriate. Neither Tritax and Newlands developments meet policy requirements nor the implied restrictions on the size and scale of rural developments. Any developments should be required to clearly demonstrate (including through 3D illustrations), at consultation phase, maximum size, including overall heights, of the buildings on developments and how through comprehensive landscaping their developments will not be visible beyond the site boundaries. Supported logistic/commercial developments on the A14 corridor should consist of small to medium size buildings. Eaves heights should be restricted and clearly set out; In this context 10/12 m would seem appropriate.	211114, 202743 and 202478 (Boxworth Parish Meeting on behalf of A14 Logistics Forum), 211436 and 202478 (Boxworth Parish Meeting)
The Newlands development does not meet the policy requirements relating to providing support for Greater Cambridge nor the implied restrictions on the size and scale of rural developments.	202743 (N Turton, Boxworth Parish Meeting on behalf of the A14 Logistics Forum) and 202748 (N Turton, Boxworth Parish Meeting)

Summary of issues raised in comments	Comments highlighting this issue
The Tritax development does not meet the policy requirements relating to providing support for Greater Cambridge nor the implied restrictions on the size and scale of rural developments.	202743 (N Turton, Boxworth Parish Meeting on behalf of the A14 Logistics Forum)
It is noted that this policy does not include new employment developments as part of new / expanded settlements.	211557 (Martin Grand Land Limited)
Clearly, land, which is not within the Green Belt, is available, and being actively promoted by our client to deliver development that would go some way to meeting that strategic industrial /warehousing and logistics need, in a location, for which there is no demand for any other more prioritized or specialist sectors (by which we assume is referring to Life Sciences; R&D). To argue there is insufficient land to accommodate specialist sectors is wholly untrue.	211684 (Newlands Cambridge Limited)

Policy J/RE: Supporting the rural economy

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was concern from one respondant that there was insufficient focus on rural economies, their unique needs and the needs of rural businesses in the Job theme with the focus of opportunity on urban Cambridge potentially increasing commuting and weakening rural resilience. Another respondant was concerned that the policy should protect agricultural land, rural businesses, and water-dependent enterprises and that development should not undermine food production, water availability, or land management. A number of changes to the policy were requested to incorporate environmental criteria into the policy including carbon reductions, environmental improvements assessed over the life span of the project and accessible locations. There was objection to the policy due to concern that there was insufficient recognition of other land based rural businesses, with requests for a number of revisions to address the needs of equestrian and other specialist rural enterprises in the countryside. There were also specific requests to protect equestrian access by, for example, connecting up public bridleways and to support small holdings. Girton Parish Council recognised the importance of the rural economy, viewing sympathetic employment development within the village boundary positively but wishing to maintain a separation with urban employment typologies. Shelford Parish Council strongly agree with the policy but expressed concern that a proposed development within the parish is inconsistent with its rural setting.

Response to main issues raised in representations:

Comments on the policy are noted. The policy seeks to appropriately support the rural economy, reflecting the National Planning Policy Framework. A number of the comments raise issues already addressed by other policies, such as requirements regarding digital connectivity, sustainable transport opportunities, and building standards. The focus on clustering development around existing buildings is an appropriate policy requirement, protecting the character of the countryside. Some comments specifically reference equestrian businesses, but the proposed policy provides an appropriate framework consider proposals for these land bases businesses in combination with H/DC: Dwellings in the countryside.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Object selected	204005 (K Warth, KWA Architects), 208661 (L Warth, British Horse Society)
Girton's rural economy depends on landowner diversification, small-scale businesses, local services, and environmental stewardship. Rural development is essential for community resilience. Rural diversification consistent with village identity and landscape character should be supported. Local retail and small enterprises should meet real surveyed demand and the Plan should enable small-scale enterprises integrated with the Development Framework.	202245 (Y Girton PC)
The Plan should protect the Girton Gap and rural edges from urbanised employment types.	202245 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
The Jobs theme is too heavily weighted to Cambridge based clusters and major employment centres. Limited reference to the specific needs of rural businesses such as farm diversification, small rural enterprises, home based businesses and workspace in villages risks concentrating opportunity in urban areas, longer commute with reduced jobs and weaker resilience in rural areas.	203128 (H Neal, Cambridgeshire ACRE)
Policies should more clearly address rural employment land, digital connectivity, transport access for workers and support for rural high streets and services.	203128 (H Neal, Cambridgeshire ACRE)
Replacement buildings should be permitted only where they deliver an overall carbon saving, including embodied emissions.	203725 (R Comins, Cambridge Green Party)
The policy should require environmental improvement to be assessed over the full lifespan of existing and proposed buildings, covering construction and operational emissions.	203725 (R Comins, Cambridge Green Party)
Wording should be strengthened so that developments generating significant employee or visitor numbers are located near larger settlements or are accessible by public transport, cycling and walking, rather than any single mode.	203725 (R Comins, Cambridge Green Party)
The Local Plan is overly restrictive and risks discouraging new rural enterprises from establishing in Cambridgeshire. Rural policy support is largely framed around agricultural operations, with insufficient recognition of other land based rural businesses. The Policy should be revised to explicitly recognise and support the development of equestrian and other specialist rural enterprises in the countryside.	204005 (K Warth, KWA Architects)

Summary of issues raised in comments	Comments highlighting this issue
The policy should recognise that equestrian businesses require access to large areas of land, while the built footprint is often limited, and that development may need to be separated for health and safety or operational reasons.	204005 (K Warth, KWA Architects)
The policy should make clear that proposals necessary to establish or maintain the viability of rural businesses will be supported where landscape, environmental, and amenity impacts can be mitigated.	204005 (K Warth, KWA Architects)
The policy should clarify that development can occur in countryside and Green Belt locations where justified by operational need, in line with NPPF guidance.	204005 (K Warth, KWA Architects)
The policy should reflect the significant contribution of rural businesses, including equestrian enterprises, to employment, tourism, and the wider rural economy.	204005 (K Warth, KWA Architects)
The policy should avoid overly prescriptive requirements that are impractical for specialist rural uses, such as restricting car parking to within clusters of buildings.	204005 (K Warth, KWA Architects)
Existing structures are often unsuitable for modern equine operations. Limiting development to existing buildings risks undermining business viability and the wider rural economy. The policy should recognise that some businesses may require new buildings in the countryside and that the rural economy has the right to thrive with access to necessary facilities and amenities (even if new build) in the same way as urban economies.	204005 (K Warth, KWA Architects)
Providing better infrastructure to tempt and persuade people out of cars is a good idea. Equestrian provision should always be included in rural Active Travel schemes and not just "where appropriate". The current network is extremely disjointed and a minimal part of the Public Rights of Way network.	204038 (S Rogers)

Summary of issues raised in comments	Comments highlighting this issue
This impacts on the safety of equestrians most of whom are women. Providing such give safe access to the countryside allows them to safely enjoy health and fitness. Cyclepaths and footpaths are joined up; Bridleways should be too.	
Equestrian activity is a vital and large part of the rural economy nationally and locally. Access to a safe and connected Rights of Way network is fundamental to the viability of businesses in this sector. BHS suggests that the plan should recognise the economic importance of the equestrian sector, the role of Rights of Way and multi-user routes in supporting rural livelihoods and the need to protect and enhance equestrian access as part of sustainable rural development.	204038 (S Rogers), 208661 (L Warth, British Horse Society - BHS)
The Plan should reference supporting small scale local agriculture, in particular smallholdings. These support sustainability and resilience in the food chain compared to large farms. It should actively encourage the creation of smallholdings with attached dwellings with an agricultural occupancy condition (which should not be allowed to end). The production of local food distributed via local farmers markets and Cambridge Market should be given a priority.	204673 (F Gawthrop)
We strongly agree with the policy including: not changing the character and impact; where there are no environmental improvements; not well-designed in form and bulk; not consistent in scale with its rural location; not located near to a settlement.	210950 (N Webster, Great Shelford PC)
In respect of change of use of the large barn at Shelford Bottom to be used as a Phlebotomy Centre, this proposed development is entirely inconsistent with its rural setting.	210950 (N Webster, Great Shelford PC)

Summary of issues raised in comments	Comments highlighting this issue
Policy E/1 (Rural Economy) should protect agricultural land, rural businesses, and water-dependent enterprises. Development should not undermine food production, water availability, or land management.	208956 (CPRE Cambridgeshire and Peterborough)

Policy J/AL: Protecting the best agricultural land

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was a mix of support for and objections to the policy. A number of objections from developers did not consider that the policy was consistent with the NPPF which, since 2024, has a greater emphasis on balancing the economic benefits of development with the loss of agricultural land, with agricultural land no longer explicitly protected. Given development pressures in Greater Cambridge this risks preventing sustainable, plan-led development regardless of wider benefits. There was also a respondent that considered that the approach taken was sufficiently balanced. Concern was also expressed over part b of the policy which was considered to require a sequential approach to development on agricultural land. This was considered to be too onerous and not supported by the NPPF. Suggested changes to the policy sought to ensure that it reflects the scale of any proposed loss, for example the use of the Natural England 20 ha threshold for consultation, and allows greater flexibility where alternative development delivers economic and other benefits. It was also requested that the policy acknowledge that land within agricultural designations may not be actively or viably farmed.

Support of the policy acknowledged the need to avoid the loss of agricultural land, its impacts on Priority Species and Habitats and its importance in food production, food security and equestrian activity. One responder stated that policy needed to be more stringent with a more precise mechanism to quantify benefits against the loss of agricultural land. There was concern from the CPCA and Stapleford and Great Shelford parish councils over the use of prime farmland for solar farms with suggestions that the

policy should seek to restrict them on the best and most versatile agricultural land. There were specific requests to specify whether both or just one of the criteria in part 1 needs to be met, to make links to other policies in the plan, such as Greenbelt Policy, to help safeguard land, to protect agricultural land around Girton and prioritise rural uses that prioritise landscape character. Positive support in the policy for urban/peri-urban food production was requested and local supply chains was requested. The RSPB requested reference to the Local Nature Recovery Strategy and local habitat map. Requests were made by Natural England around detailed land surveys and soil management.

Response to main issues raised in representations:

Representations received are noted. A number of comments seek greater protection, for example for food security reasons. Agricultural land is a valuable asset which should be appropriately weighted in planning decisions, but it must also be balanced against the need for other uses. Other representations seek to make the policy more flexible. National Planning Policy has consistently required local planning authorities to take into account the economic and other benefits of the best and most versatile agricultural land, and that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. Part 1b of the policy reasonably requires evidence that the loss is justified and issues that should be considered. Weakening the policy, to exclude land not actively farmed for example, would not fully reflect the potential permanent loss of land that could go back into agricultural use. In identifying allocations in the local plan consideration has been given to opportunities to reuse brownfield land, and to the impact on agricultural land. Soil management issues have been addressed in Policy I/CM: Construction management.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support selected	211558 (Martin Grant Land Limited)
Object selected	205448 (A Cannard, CPCA), 204597 (Redrow South Midlands), 204033 (K Warth, KWA Architects), 202561 (P Tribble), 204515 (Tritax Big Box Developments), 204288 and 204513 (Bellway Strategic Land)
Strongly/fully support the policy	201623 (J Flynn, Stapleford PC), 203555 (Ickleton PC)
There was a reiteration of the need for the plan to avoid the loss of high-quality farmland.	202246 (Y Murray, Girton PC)
It is unclear whether development needs to satisfy 1.a AND 1.b or 1.a OR 1.b.	202561 (P Tribble)
Food security is a major problem that is only going to get worse as a result of climate change, water scarcity, and geopolitics. The bar for development on the best agricultural land needs to be set higher, and needs a more precise mechanism to quantify benefits against the loss of agricultural land, otherwise it's ripe for abuse.	202561 (P Tribble)

Summary of issues raised in comments	Comments highlighting this issue
The NPPF recognises the importance of high quality agricultural land but no longer provides explicit protection.	204597 (Redrow South Midlands), 204033 (KWA Architects)
The policy is not consistent with the 2024 NPPF which now requires recognition of the economic value of best and most versatile agricultural land. It also fails to acknowledge that land within agricultural designations may not be actively or viably farmed. The policy should be revised to allow greater flexibility where alternative development delivers clear economic and rural benefits. Suggested wording: "Development proposals on land designated as the best and most versatile agricultural land will be supported where they demonstrate that: (a) the land is not actively or viably farmed; and/or (b) the proposed development delivers clear economic, employment, or wider rural benefits; and (c) any impacts on soil quality, landscape character, and the wider rural environment can be appropriately mitigated."	204033 (K Warth, KWA Architects)
Land in the Greater Cambridge area is subject to significant development pressure, and lower-grade agricultural land may not be available, deliverable or sustainable due to ownership constraints, infrastructure capacity, access limitations, environmental designations or competing development needs. In this context, the policy risks preventing sustainable, plan-led development	204515 (Tritax Big Box Developments)

Summary of issues raised in comments	Comments highlighting this issue
regardless of wider benefits. This is inconsistent with national policy, which requires impacts on agricultural land to be balanced.	
Part (b) of the policy implies a sequential approach to development where it should be demonstrated that lower quality land has been considered first. This approach is: • Not supported by national guidance which states that where significant development of agricultural land is necessary, areas of poorer quality land should be preferred, rather than requiring proof that no alternative location exists. • Unnecessarily onerous and places a potentially unrealistic evidential burden on applicants. A justification for the loss of agricultural land will have already been considered through the first part of the policy.The policy should be amended to align with national policy.	204597 (Redrow South Midlands), 204515 (Tritax Big Box Developments), 204288 and 204513 (Bellway Strategic Land)
Where the loss of BMV agricultural land is limited in extent and outweighed by the benefits of development the policy should allow for a balanced and proportionate assessment rather than operating as an absolute constraint. The Natural England Guide 20 ha threshold for consultation with Natural England provides a clear indication of the scale at which the loss of high quality agricultural land is considered significant in planning terms. Accordingly, the application of the policy should reflect both the scale of any proposed loss and the wider planning balance, including housing need, sustainability, deliverability and the availability of alternative sites.	204881 (S Boyd, Vistry Group), 210258, 210259 and 210260 (Vistry Group)
Support consideration of impacts on Priority Species and Habitats. Reference should be made to the Local Nature Recovery Strategy and local habitat map.	201468 (D Pullan, RSPB)

Summary of issues raised in comments	Comments highlighting this issue
Agricultural land is vital with set aside schemes providing much needed permissive horseriding routes linking villages and places. Farms provide livery yards to keep horses at.	204036 (S Rogers)
Great Shelford Parish Council's development framework is surrounded by high quality farmland (Grade 2). As such, the strongly support this policy.	210951 (N Webster, Greater Shelford PC)
Concern over the use of prime farmland for solar farms. Potential solutions: • Policy should state that the best agricultural land should not be used for solar farms and/or an explicit link to CC/RE: Renewable energy projects and Infrastructure. • Alter policy to apply the 'permanent loss' test to significant-scale solar farms on the highest grades of agricultural land.	201623 (J Flynn, Stapleford PC), 205448 (A Cannard, CPCA), 210951 (N Webster, Greater Shelford PC)
Much of the higher quality farmland in S Cambs is also Green Belt land. It would be helpful to link Policy J/AL to Green Belt policy, either explicitly in policy wording or in the supporting text, as a double safeguard of the best agricultural land.	201623 (J Flynn, Stapleford PC), 210951 (N Webster, Greater Shelford PC)
Advise adding to this Policy the requirement for detailed Agricultural Land Classification (ALC) surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would also be welcomed.	207636 (C Duerden, Natural England)
The authority should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable or sufficiently detailed information is available, it	207637 (C Duerden, Natural England)

Summary of issues raised in comments	Comments highlighting this issue
would be reasonable to expect developers to commission a new ALC survey, for any sites they wish to put forward for development.	
To assist in understanding agricultural land quality within the plan area and to safeguard Best and Most Versatile agricultural land in line with the NPPF, strategic scale ALC Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally by contacting Natural England. Some of this data is also available on the magic website.	207637 (C Duerden, Natural England)
A requirement for soil handling and sustainable soil management strategies is advised. This should be based on a detailed assessment of the soil resource following best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning. This would help to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would also be welcomed. Sustainable soil management should aim to minimise risks to the ecosystem services which soils provide, through provision of suitable soil handling and management advice. The planning authority should ensure that sufficient site-specific soil survey data is available to inform decision making. To include, for example, assessment of suitability of soil properties for type of landscaping and planting proposed to inform beneficial re-use, appropriate soil management, and drainage, where required.	207638 (C Duerden, Natural England)

Summary of issues raised in comments	Comments highlighting this issue
Further guidance for protecting soils (irrespective of their ALC grading) both during and following development is available in Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, to assist the construction sector in the better protection of the soil resources with which they work, and in doing so minimise the risk of environmental harm such as excessive run-off and flooding. The Code should be referred to where relevant in the development plan.	207639 (C Duerden, Natural England)
Rural uses that prioritise landscape character should be prioritised and agricultural land around the Girton Gap should be protected.	202246 (Y Murray, Girton PC)
Agricultural land of top quality should be used for food production (regeneratively) not housing, + solar farms should be on warehouse roofs and car parks, not on this land.	209677 (H Hale)
Support the protection of the best and most versatile agricultural land (Grades 1-3a).	208189 (Cambridge Sustainable Food), 206959 (Y Dignon)
Recommend adding positive support for urban/ peri-urban food production and local supply chains, including: supporting appropriate farm diversification that strengthens local food supply (e.g., small-scale processing, storage, distribution, farm shops and community-supported agriculture models), where impacts are well managed; identifying opportunities for community food growing at scale (where suitable) as part of resilience planning; and ensuring employment and rural diversification approaches recognise food as a strategic sector, not just "countryside uses."	208194 (Cambridge Sustainable Food), 206964 (Y Dignon)

Summary of issues raised in comments	Comments highlighting this issue
Supports the principle of protecting the best and most versatile agricultural land and recognises the importance of safeguarding Grades 1, 2 and 3a land where reasonable alternatives exist. Policy sets out in criterion (b) that the protection of agricultural land must be balanced against wider sustainability considerations and demonstrable development needs. This planning balance strand is supported and consistent with national policy, which requires decision-makers to take a proportionate and pragmatic approach where the benefits of development clearly outweigh the loss of agricultural land and where there are no suitable or available lower-grade development.	207035 (Mac Mic Land)
Agricultural land is vital with set aside schemes providing much needed permissive horseriding routes linking villages and places. Farms provide livery yards to keep horses at.	204041 (S Rogers)
Support reference to policy wording accepting loss of Grades 1, 2 or 3a agricultural land where the land is allocated for development in the Local Plan.	211558 (Martin Grant Land Limited)

Policy J/PB: Protecting existing business space

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The objection to this policy considered that it did not recognise current office market trends and would prevent the effective reuse of underutilised brownfield sites. It was also considered to be overly restrictive and inconsistent with Government policy around permitted development rights. It was requested that the policy adopt a more flexible approach by removing the 12-month marketing or vacancy requirement where office-to-residential conversion is proposed and support office to residential conversions. Parish councils focused on the need to protect and promote small business space in villages and the risk to jobs in schools, shops or pubs without further opportunities for new housing in villages. Histon Parish Council asked that Neighbourhood Plan policy on the Hain Daniels site be respected. The omission of Linton Industrial Estate was questioned. Suggestions for changes included expanding the range of meanwhile uses supported by the policy and adding a biodiversity net gain element. The opportunity for active travel that rural business units provide was recognised. Anglian Water Services highlighted the impact the increase in capacity at Cambridge Waste Water Recycling Centre may have on the identification of Strategic Industrial Estates, or other employment opportunities in North East Cambridge.

Response to main issues raised in representations:

Representations received are noted. As set out in the Jobs Topic Paper, employment sites and business premises in Greater Cambridge are under pressure for redevelopment from residential and other uses. The uncontrolled loss of employment land

reduces the sustainability of local communities. Less local employment opportunities can reduce the vibrancy of communities, and mean people have to travel further for work, or to access local services. The protection requirements, including the length of the marketing period, strike the right balance of protecting sites whilst not unreasonably applying longer term restrictions. It is acknowledged that changes to class E mean that some changes of use can take place without planning permission, and the policy can only apply where permission is required. Similar policies have been found sound in the adopted 2018 local plans. Minor changes have been proposed to the policy to expand the potential range of meanwhile uses. Policy S/PA/LN: South of A1307, Linton seeks to prevent windfall residential development in a defined area south of the A1307 other than improvements to existing properties. This is carried forward from the 2018 South Cambridgeshire Local Plan. Some representations seek to address issues which are already addressed in other policies, but the plan should be read as a whole.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Object selected	204024 (K Warth, KWA Architects)
Site 5g. Hain Daniels Site is covered by priority HIM08 in the Histon and Impington Neighbourhood Plan 2020 – 2031. A reference to all the points made in the Neighbourhood plan are to be respected.	201439 (S Jocelyn, Histon & Impington PC)
Girton needs to retain its limited local business space, as these support essential local services and small-scale employment. The Local Plan should protect existing village-scale employment sites and resist change-of-use to housing unless community benefit is proven.	202247 (Y Murray, Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
The Local Plan should support small enterprises as core to the Development Framework. New business space should favour small, flexible formats.	202247 (Y Murray, Girton PC)
Anglian Water notes Policy J/PB seeks to retain existing employment sites and premises, and any loss would only be permitted where the site is allocated for an alternative use in the Local Plan (or a Neighbourhood Plan). As previously referenced, one of the current key priorities for Anglian Water to facilitate sustainable growth is to bring forward a phased scheme to increase the capacity to treat wastewater at our existing Cambridge WRC site, following the withdrawal of government funding to relocate the works to the north of the A14 under the CWWTPR DCO. We recognise that this will have implications for the current North East Cambridge site allocation, and this will have a bearing on future policy direction in the emerging Local Plan, potentially including the identification of Strategic Industrial Estates, or other employment opportunities within the North East Cambridge area defined by Policy J/NE.	210215 (T Saunders, Anglian Water Services)
Without meaningful opportunities for further housing, rural jobs are at risk. Declining and/or aging populations do not provide sufficient inhabitants to keep schools, shops or pubs running without patronage from outside. To hold on to a successful school and pub without encouraging too much car traffic there is a need to ensure the local population does not decrease.	203052 (H Livermore, Little Wilbraham and Six Mile Bottom PC)
The following should be added to the end of part 1c of the policy: “(in this scenario biodiversity net gain should be evidenced in any application),” to ensure environmental improvements accompany redevelopment.	203727 (R Comins, Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
Part 6 of the policy should be altered to read ""6. Meanwhile uses that generate employment opportunities, community benefit, increased biodiversity or food sustainability will be encouraged while the marketing of a vacant site takes place."	203727 (R Comins, Cambridge Green Party)
Rural business units provide opportunity for Active Travel routes including horseriders to and from local villages.	204042 (S Rogers)
The policy should adopt a more flexible approach by removing the 12-month marketing or vacancy requirement where office-to-residential conversion is proposed as: • The Policy does not reflect post-Covid changes in office use. Demand for traditional office space has reduced. Requiring the demonstration of 12 months' vacancy risks preventing the effective reuse of underutilised brownfield sites for much-needed housing. • The Policy is overly restrictive and inconsistent with national policy. Permitted development rights under Class MA allow office-to-residential conversion without the need to demonstrate 12 months' vacancy. The policy should supporting the conversion of office buildings to residential use where they comply with relevant design, amenity, and environmental requirements. It should also explicitly recognise the contribution of such conversions to housing delivery and the efficient use of land.	204024 (K Warth, KWA Architects)
The policy J/PB appropriately supports the vibrancy of local communities provided by employment sites. The list does not appear to include the Linton Industrial Estate south of Cambridge Road allocated on the village map and in previous Local Plans but it is unclear whether that is because it is an error or	211917 (C Newell)

Summary of issues raised in comments	Comments highlighting this issue
whether the list refers only to sites where a change to Mid-tech would be appropriate. It should be clarified.	

Policy J/AW: Affordable workspaces and creative industries

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Concerns were expressed that there was insufficient information on the policy parameters e.g. thresholds levels, to be able to comment on the policy. If left undefined, this would cause uncertainty for applicants and investors contrary to the NPPF. It was suggested that the lack of definition of affordable workspace could lead to inconsistencies in the implementation of the policy however it was also suggested that inflexibility caused by requirements would not enable it to meet local needs and would challenge deliverability and viability, deterring investment. A suggested alternative would be for the policy to explicitly confirm that affordable workspace provision will be assessed on a case-by-case basis. There was concern that there was insufficient (non-London) up-to-date evidence to support the policy and that policy requirements had not been viability tested, risking embedding requirements not yet demonstrated to be viable or deliverable. The impact of the policy (including alongside other plan requirements) on viability, was a key concern for respondents particularly for those schemes already facing viability constraints; it would stimy growth generally. It was requested that a viability clause be added and clarity provided on how competing objectives are prioritised which viability is threatened. General objections to the policy from developers concerned the fact that it was not justified by or consistent with national planning policy.

There were objections from developers over how the timescale requirement for the implementation would impact on scheme delivery and viability. There was a request for flexibility for developers and/or occupiers to be given an appropriate degree of control

over the delivery of affordable workspace on-site so that it is contextual and reasonable. Clarity was requested on how an owner would demonstrate competence to deliver affordable workspace. Specific concerns were raised that it would not be appropriate for small scale affordable workspace to be required on sites with large scale logistics sheds.

There was support for allowing affordable workspace to be provided off-site. Cambridge Science Park was cited as an example were provision on alternative parcels within the Park might be a better option. It was highlighted that affordable workspace can come in many forms. A large number of respondents supported Create Cambridge's asks to clearly distinguish cultural production space, ensure that is affordable, prioritised over generic co-working space with a minimum requirement. The was a request for affordable workspace to be located in villages. Respondents who supported Elizabeth Way bridge and Underpass(es) cultural hub / Community project:

It was requested that the affordable workspace should be of an equivalent quality to the other space and that science and technology developments should make provision for general employment, arts and creative spaces to increase the economic resilience of the economy.

Response to main issues raised in representations:

Representations questioning whether the parameters of the policy were clear enough received are noted. Ahead of Proposed Submission the Councils commissioned a study to further explore the case for requiring affordable employment space, the appropriate way it should be applied, and to test viability. The evidence demonstrates that a policy for Greater Cambridge is justified by local circumstances, and recommends specific parameters and implementation approaches. Informed by the study, the policy in the Proposed Submission Plan sets clear parameters to enable it to be effectively implemented.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support selected	201862 and 204676 B Lenz, NEUBAU Architecture), 203061 K Porrer, Cambridge City Council Liberal Democrat Group), 204247 and 204695 (A Giarlis), 204610, 204624, 204633 (T Woodcock), 204940 (M Cleminson), 205087 (C Sharman), 205206 (M Burman, Cambridge Junction/Create Cambridge), 205266 (R Good), 205453 (B Smith), 211491 (Trinity College, Cambridge)
Object selected	204528 (Tritax Big Box Developments) 204466 (The

Summary of issues raised in comments	Comments highlighting this issue
	Royal London Mutual Insurance Society Ltd), 204230 (Railpen), 205043 (Abbey Properties Cambridgeshire Limited), 203449 (Babraham Research Campus), 207451 (Pioneer Group Ltd)
The policy is not considered to be justified or consistent with national planning policy as there is no requirement in the NPPF to deliver affordable workspace. The policy is not justified and does not propose any threshold for where affordable workspace would be required to be delivered. Any threshold would require consideration in terms of practical considerations and viability.	205043 (A Brand, Abbey Properties Cambridgeshire Limited)
Fully support affordable spaces to work.	205453 (B Smith)
The inflexibility of the policy contradicts part 1 of the policy that affordable workspace should meet an identified needs therefore the policy is unsound.	204466 (The Royal London Mutual Insurance Society Ltd)
On sites with large/strategic logistic sheds, providing an affordable provision on the Site is not considered to be appropriate (for start-ups) or feasible. It will conflict with national priorities for making an effective use of land.	204528 (Tritax Big Box Developments)

Summary of issues raised in comments	Comments highlighting this issue
Large-format employment and logistics developments are typically designed for single occupiers and are not compatible with subdivided, small-scale units. Requiring on-site affordable workspace risks constraining efficient site layout and undermining economic viability.	
The requirement for affordable workspace to be made available for occupation at, or prior to, the first occupation of 50 per cent of the non-affordable economic floorspace: • Introduces a delivery risk. This would be ahead of the point at which sufficient market floorspace has been occupied to support scheme cashflow. • For large and complex commercial developments, the front-loading of non-market floorspace has the potential to undermine development viability and delay delivery, contrary to the National Planning Policy Framework (December 2024), which requires plan policies to be supportive of economic growth. • Start-up business in the science and technology market prefer to co-locate close to established, more mature, businesses so that they can fully take advantage of the clustering benefits which can in turn drive innovation. Part 4, as drafted, therefore may not properly reflect market signals and again may hinder quick delivery of floorspace within the early parts of the plan period.	204466 (The Royal London Mutual Insurance Society Ltd), 204230 (Railpen), 204047 (Mission Street & BGO Propco Newton Ltd)
A requirement for a prescriptive percentage provision of affordable workspace over a fixed period, or in perpetuity is inflexible and will challenge the deliverability and viability of some commercial development. Development won't be able to respond to market signals in an effective way. It creates uncertainty, deterring investment.	204466 (The Royal London Mutual Insurance Society Ltd), 204230 (Railpen)

Summary of issues raised in comments	Comments highlighting this issue
The policy does not define the floorspace thresholds, the percentage of affordable workspace to be delivered, the level or duration of rental discounts and does not have a proper definition of 'affordable' workspace. In its current form it is not possible to provide comprehensive comments on the policy wording. Further clarity is needed on the types of development which will trigger Policy J/AW. Comments included: • These matters are fundamental to assessing development feasibility. • The absence of this information creates significant uncertainty for applicants and investors, which is inconsistent with the NPPF requirement for planning policies to be clear, unambiguous and supportive of growth (para 16d). • Support the overarching objective but it currently lack clarity. • It is acknowledged that a number of affordable workspace policies exist in London where land values and construction costs are high making the delivery more feasible. However, even in these circumstances, scheme viability is greatly compromised.	204528 (Tritax Big Box Developments), 204094 (Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204230 (Railpen), 203090 (Trinity College, Cambridge), 203449 (Babraham Research Campus)
Should the Council intend for affordable workspace to be delivered as part of larger commercial developments, it is considered necessary for the policy to clearly define both the minimum size of development to which the requirement applies and the percentage of floorspace to be allocated. Alternatively, if the Council does not wish to prescribe specific thresholds or figures, the policy should explicitly confirm that affordable workspace provision will be assessed on a case-by-case basis. This approach should be set out within the policy wording itself, rather than relying on supporting text or supplementary information.	203090 (Trinity College, Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
Support the inclusion of flexibility to allow affordable workspace requirements to be met off-site in exceptional circumstances. These circumstances may include, but are not limited to, developments where an occupier requires exclusive use of a single office building, or where mixed-use sites comprise multiple landownerships that make on-site provision impractical.	203090, 211491 (Trinity College, Cambridge)
The term ‘affordable’ lacks proper definition, affordability might mean different things in different contexts, leading to inconsistencies in how the policy is applied.	204230 (Railpen)
Policy J/AW should retain flexibility for bespoke solutions such as incubator hubs.	209039 (Marshall Group Properties)
The NPPF is explicit that policies should be underpinned by proportionate, up-to-date evidence (para 32) and that policy requirements should be tested through plan-wide viability assessment. Introducing a policy of this nature before the completion of the required work risks embedding requirements that have not been demonstrated to be viable or deliverable. Policy is not considered to be justified or consistent with national planning policy as there is no requirement in the NPPF to deliver affordable workspace. The policy is not justified and does not propose any threshold for where affordable workspace would be required to be delivered. Any threshold would require consideration in terms of practical considerations and viability.	204230 (Railpen), 205043 (Abbey Properties Cambridgeshire Limited)
The cumulative effect of uncertainty around thresholds, rental levels, delivery timing and management requirements risks placing a disproportionate burden on development at a time when viability is already a limiting factor for schemes due to interest rates, inflation and material costs. This may result in	204230 (Railpen)

Summary of issues raised in comments	Comments highlighting this issue
reductions to contributions elsewhere. Paragraph 35 of the NPPF makes clear that the cumulative impact of policy requirements should not undermine the deliverability of the Plan. In its current form, Policy J/AW coupled with other obligations fails to meet this test and risks discouraging investment, delaying delivery and reducing the overall quantum of employment floorspace that can be brought forward. This is particularly worrying as Cambridge is reliant on a small number of large sites, which if not brought forward will mean that development will need to be sought from elsewhere.	
London should not be used as a benchmark for provision. It is a very different market in terms of economic conditions/market values and the scale of units that may be delivered.	204528 (Tritax Big Box Developments)
While the principle is to be supported the policy is still subject to full justification. However, in London, affordable workspace policies don't work and usually the evidence base doesn't justify them on viability grounds. If this policy is to evolve it must set out clear and realistic targets based on Cambridge evidence and include 'subject to viability' within any policy to allow for market variations throughout the plan period.	202499 (M Parsons, University of Cambridge)
The need for, and form of, affordable workspace provision should be considered on a case-by-case basis, informed by site characteristics, intended occupiers, operational requirements and local evidence of demand, with flexibility to allow alternative approaches where on-site provision would be impractical or ineffective.	204528 (Tritax Big Box Developments)
Strongly support proposals that prioritise the provision of affordable workspaces for the creative industries in Cambridge. Cambridge's success as a centre for innovation depends not only on science	205087 (C Sharman)

Summary of issues raised in comments	Comments highlighting this issue
and technology, but also on its creative sector: artists, designers, makers, illustrators, musicians and cultural producers who contribute to the city's identity, economy and quality of life. However, rising property costs have made it increasingly difficult for creatives to find and retain suitable, affordable places to work.	
An affordable workspace policy is not considered to be necessary or appropriate in the industrial and warehouse sectors, having regard to the economic needs, market demand and signals in these sectors, or indeed for any other reason.	205145 (Lolworth Developments Limited)
The requirement for affordable workspace may significantly affect development viability for schemes that are already facing significant pressures. In the absence of detailed viability testing, and appropriate flexibility within the policy to account for unknown viability pressures, it is considered that the policy conflicts with requirements of the NPPF. If the policy is carried forward, a viability clause should be added in. This could allow for negotiated contributions and provide justification for alternative delivery mechanisms as outlined in the draft policy.	207451 (Pioneer Group Ltd)
We support this policy which will support smaller businesses and community organisations to succeed in Cambridge, where rents can be expensive.	203061 K Porrer, Cambridge City Council Liberal Democrat Group)
Support clause 1a - level of affordable workspaces provided: with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub / Community project. Support the Community Group running this project in place of a commercial developer, with council rents affordable enough to	201862, 204341 B Lenz, NEUBAU Architecture), 204610, 204624, 204633 (T

Summary of issues raised in comments	Comments highlighting this issue
offset the initial investment. A viability and operational business plan will help understand the level of affordable workspaces supplied, % will depend on market demand for affordable creative / commercial programmes. Support market discounts applied to a Community-led development located within the Eastern Gate improvement area, surrounded by high cost areas.	Woodcock), 204940 (M Cleminson), 205206 (M Burman, Cambridge Junction/Create Cambridge), 205325 (Z Svendsen, University of Cambridge)
With reference to with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub / Community project: • Support clause 1a - level of affordable workspaces provided: support affordable workspaces and facilities management using a third-party organisation, if so required. Promote continued involvement of a Community Group with charitable interest, rather than a commercial developer, to ensure maximum impact on sustainable, affordable and social goals through planning stages, build and operations. • SUPPORT Community Access to public funding and S106: a community led project with charitable interest and %affordable provisions for local SMEs should be made eligible for funding or match funding via S106 or similar, enabling planning and construction phases and with pragmatic, sustainable goals and management to ensure financial profitability and returns in the operational phase.	204247 (A Giarlis), 201862 B Lenz, NEUBAU Architecture), 204610, 204624, 204633 (T Woodcock), 204940 (M Cleminson)

Summary of issues raised in comments	Comments highlighting this issue
• SUPPORT Affordability of workspaces for the creative industry: Affordability and access to low-cost high social impact shared spaces are key concerns for smaller creative businesses and start ups who require networking and interaction to promote their business. A Community-run group with charitable interest has the advantage of not being subject to financial fluctuations and market demands as would be the case under commercial ownership, inevitably causing the project to 'gentrify' and draw creatives away from city centre location. An affordable cultural hub could potentially offset rents with other community and commercial leaseholders integrated, to ensure community agenda but maintain financial profitability to ensure continued operations. Other affordable measures might include hot desking, shared workspaces and/or membership schemes to facilitate low entry thresholds for local creatives, artists and craftspeople, individuals and businesses.	
• SUPPORT Community Access to public funding and S106: a community led project with charitable interest and %affordable provisions for local SMEs should be made eligible for funding or match funding via S106 or similar, enabling planning and construction phases and with pragmatic, sustainable goals and management to ensure financial profitability and returns in the operational phase.	205335 (Z Svendsen, University of Cambridge)
Support the proposal to transform Elizabeth Way bridge area into a cultural hub.	205266 (R Good)
Rural business units provide opportunity for Active Travel routes including horseriders to and from local villages	204044 (S Rogers)

Summary of issues raised in comments	Comments highlighting this issue
Affordable workspace and community-scale creative enterprise align with Girton's economy and support residents who seek local, flexible work. • The plan should provide affordable, flexible workspaces suitable for small businesses and creatives. Residents support small enterprise and flexible workspace. • The plan should locate affordable workspace within the village, not in remote employment areas, and design workspace that respects rural scale and character. Community-scale creative industries fit village character. • Affordable units reduce commuting and strengthen local resilience.	202248 (Y Murray, Girton PC)
Would like to see explicit inclusion of artist studios and art spaces.	202809 (H Cook)
Support Cambridge Junction and Create Cambridge in ask that: • "Affordable Office Space" is clearly distinguished from "Cultural Production Space" • genuinely affordable cultural production space is required (e.g. peppercorn, with rental charges well-below market rates and established based on evidence, ie Wysing Arts Centre's research on affordable artist studios) • rehearsal, making and sole-use studios are prioritised over generic co-working • a minimum requirement (e.g., 10% in schemes over 1,000 sqm) is introduced. This safeguards usable creative space from being diluted.	203625 (Z Svendsen, University of Cambridge), 203848 (N Yeni), 203866 (J Fritsch, University of Cambridge), 204159 and 204162 (M Burman, Cambridge Junction/Create Cambridge), 204394 (L Elmer, New International Encounter), 204676

Summary of issues raised in comments	Comments highlighting this issue
	NEUBAU Architecture Ltd, 204695 (A Giarlis), 204984 (R Cooper, Wysing Arts Centre), 205030 (L Sheerman, University of Cambridge), 205049 (H Paterson), 205123 (J Walsh), 205282 (AC de Azevedo Lamha), 205298 (N Oakley), 205316 (L Howse), 205364 (A Seiglow), 205390 (E Hine, Cambridge Junction/Create Cambridge), 202053, 202054 (H Chamberlain), 202138 (M Ridler, Cambridge Junction), 202196 (H Tam), 202302 (L Mills, Cambridge Junction), 202310 (S Yusuf, Cambridge

Summary of issues raised in comments	Comments highlighting this issue
	Junction/Create Cambridge), 202383 (J Webber), 202404 (S Biller, Kettle's Yard), 202407 (T Shaw), 202458 (K Jones), 202683 (T Altmann), 202713 (W Townsend), 202751 (C Woods, Cambridge Junction/Create Cambridge), 202779 (S Lee), 202865 (R Tinkler, Cambridge Junction), 202868 (B Groisman, Cambridge Junction), 202925 (R Tarry), 202977 (T Flinders), V Beechey, 203017 (The Arts Theatre Cambridge), 203330 (N Ellis), 203430 (S Ashworth),

Summary of issues raised in comments	Comments highlighting this issue
	203489 (L Heap), 203508 (D Lever)
It is crucial that sustainability is embedded into all aspects of the local plan in the light of ongoing climate breakdown. Therefore, the key strategic priority should be amended to read “Encourage a sustainable and successful mixed economy in Greater Cambridge within ecological limits which includes a wide range of jobs, while maintaining our area's global reputation for education, research and innovation.”	203723 (R Comins, Cambridge Green Party)
“7. Affordable workspace within a development should not be inferior in terms of location, exposure to noise or other pollution, facilities, light availability, bicycle and vehicular parking, as compared to the non-affordable workspace.” should be added.	203729 (R Comins, Cambridge Green Party)
The cumulative impact of Local Plan requirements on viability and delivery is a concern. There is a need to recognise the cumulative effect of multiple policy requirements which can place significant pressure on scheme viability. The Plan would benefit from a clearer, aggregated assessment of viability outcomes, informed by both permissions granted and historic delivery, to better understand where negotiated reductions have occurred and how trade-offs are being made. Greater clarity on how competing objectives are prioritised when viability becomes constrained would provide increased certainty and help ensure that high-quality growth can be delivered at pace.	203531 (E Pritchard, Cambridge Ahead)
All sci-tech developments should make provision for general employment spaces and also for arts and creative spaces given the lack of provision and the significant economic and social risks of building an	203811 (A Carpen)

Summary of issues raised in comments	Comments highlighting this issue
economy based on a narrow economic base. This will increase the economic resilience of the Cambridge economy.	
Several science and technology schemes in the local area appear to have stalled and simply are not being delivered at the required rate. Many of these projects will cite development viability as the core reason for this. As such, a mandatory policy requirement to deliver affordable workspace is likely to put added strain on viability and ultimately stimy delivery.	204047 (Mission Street & BGO Propco Newton Ltd)
The application of a flat rate proportion of 10-20% of permitted floorspace is inflexible and would contradict with part 1 of the policy which requires affordable workspace to meet a local identified need. In that sense, there is a risk the policy will be found to be unsound.	204047 (Mission Street & BGO Propco Newton Ltd)
Object to the proposed wording of Policy J/AW. The requirement for affordable workspace would significantly affect scheme viability for schemes that are already facing viability constraints. In light of the requirement for thousands of new jobs in Greater Cambridge, this would severely impact the number of schemes coming forward to deliver this level of growth.	203449 (Babraham Research Campus)
The policy allows affordable workspace to be managed and operated by the owner where they can demonstrate the necessary skills and experience. Given the absence of existing guidance, it should be clarified how an owner would demonstrate competence to deliver affordable workspace effectively.	203449 (Babraham Research Campus)
Affordability also comes in many forms. For example, at Babraham Research Campus they have a 'Live Labs' scheme whereby new start-ups rent bench space and desk space underpinned by the	203449 (Babraham Research Campus)

Summary of issues raised in comments	Comments highlighting this issue
support services running that facility. The company/individual enters into a facility agreement to use the space. For start-ups in other buildings, they benefit from more flexible lease terms (shorter leases and break terms).	
There is an imperative that a viability clause is added in to the policy wording. This could allow for negotiated contributions and provide justification for the alternative delivery mechanisms outlined in the policy such as off-site provision, or financial payments where on-site affordable workspace is not feasible.	204094 (Brookgate Land Ltd and Network Rail Infrastructure Ltd), 203449 (Babraham Research Campus)
The policy should be drafted to allow developers and/or occupiers an appropriate degree of control over the delivery of affordable workspace on-site. This should allow for flexibility on the location of affordable workspace within the development, duration of occupation and form of affordable workspace. A prescriptive approach where the Council are gifted control of affordable workspace would likely lead to incompatible development. A more flexible approach however, would allow for affordable workspace to be contextual and reasonable, so as to not undermine the developers' wider ambition.	204094 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
Clarity is requested on how an owner would demonstrate competence to deliver affordable workspace effectively	204094 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
Cambridge Science Park already provides a broad and established range of workspace typologies, supporting businesses at all stages of growth, from early-stage start-ups and incubator space, through	203090 (Trinity College, Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
grow-on and scale-up accommodation, to bespoke headquarters buildings for established companies. In this context, the ability to meet affordable workspace requirements flexibly across the wider Cambridge Science Park estate, rather than within each individual development parcel, is supported. This would allow affordable workspace provision to be aligned more effectively with the operational needs of occupiers and the evolving lifecycle of businesses, while still contributing to the overall supply of affordable workspace across the site.	
Support in principle. It is noted that the Local Plan states that “The Councils are still refining the nature and scale of the employment floorspace the policy will apply to, the affordable workspace percentage to be applied to total floorspace, the level of discounts applied to different areas of Greater Cambridge and payments in-lieu calculations. We would welcome feedback on the approach though this consultation.” It is important that this detail is carefully considered and viability tested, and that stakeholders have further opportunity to consider these details before these matters are concluded.	211559 (Martin Grant Land Limited)

Policy J/EP: Supporting a range of facilities in employment parks

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy suggesting the balance between ancillary/complementary uses and employment uses was appropriate and citing the alignment of the policy with national policy and good use of these facilities on Cambridge Science Park. Caveats included that facilities need to be appropriate, viable and assessed on a site-by-site basis. The potential benefits highlighted included: creating a stronger sense of place; enhancing employee wellbeing; and reducing off-site travel. One respondent suggested that the policy could help develop the local bridleway network. Concerns included the impacts of employment parks on village-scale employment and a request to support small village facilities. Two developments were highlighted as delivering the types of facilities highlighted in the policy.

Response to main issues raised in representations:

Representations are noted. The need for appropriate supporting facilities to support employment park has been a theme in our employment space, and a number of comments support that principle. The policy acknowledges the need to also consider the impact on nearby centres, which was also raised as a concern.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support selected, including where appropriate and viable and where the type and amount of space is assessed on site-by-site basis. Reasons for support: • Strikes an appropriate balance by ensuring such uses remain ancillary or complementary to existing or proposed employment uses. • Aligns with national policy, particularly paragraph 85 of the NPPF (2024), promoting conditions for business investment and expansion. The policy is deemed positively prepared, justified, and effective as per paragraph 36 of the NPPF 2024. • These facilities at Cambridge Science Park are widely used and contribute positively to the day-to-functioning and attractiveness of the Park for both occupiers and visitors.	204533 (Tritax Big Box Developments), 204471 (The Royal London Mutual Insurance Society Ltd), 203093 (Trinity College, Cambridge), 202501 (M Parsons, University of Cambridge), 211560 (Martin Grant Land Limited)
Employment parks nearby can overshadow local needs. The policy should ensure that employment-park policies do not divert investment away from village-scale employment. Local enterprise requires modest, accessible facilities.	202249 (Y Murray, Girton PC)
The policy should provide support for small business facilities within Girton itself to reduce commuting pressure and recognise the village's rural context in any employment-park policy application.	202249 (Y Murray, Girton PC)
A new recommended policy point: "3. Facilities will be particularly supported when they contribute to sustainability, for example through reuse schemes, recycling facilities, encourage active transport and reducing food waste."	203731 (R Comins, Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
Rural business units provide opportunity for Active Travel routes including horseriders to and from local villages. Providing better infrastructure to tempt and persuade people out of cars is a good idea. Equestrian provision should always be included in rural Active Travel schemes and not just "where appropriate". The current network is extremely disjointed and a minimal part of the Public Rights of Way network. This impacts on the safety of equestrians most of whom are women. Providing such give safe access to the countryside allows them to safely enjoy health and fitness. Cyclepaths and footpaths are joined up; Bridleways should be too.	204045 (S Rogers)
Meaningful and facilities on employment facilities deliver benefits. These include: • Creating a stronger sense of place • Enhancing employee wellbeing • Reducing off-site travel	204533 (Tritax Big Box Developments), 204471 (The Royal London Mutual Insurance Society Ltd)
I have been told you have no cafe facilities at Cambridge Science Park? If so, why not? When I worked there, my employer provided free chocolate, and we all ate that at lunchtime, obviously a very bad idea.	201255 (S Williams)
The emerging masterplan for Cambridge Science Park seeks to build upon this strong existing provision through the introduction of additional services and facilities designed to further support the employment function of the site. These include enhanced indoor and outdoor social and collaboration spaces, leisure and wellbeing facilities, and improved green and public realm spaces. Collectively, these measures will	203093 (Trinity College, Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
help reinforce Cambridge Science Park as a high-quality, sustainable employment location capable of supporting future growth and development.	
As part of the public consultation, feedback was gathered on the types of facilities the community would like to see. Tritax Park, Cambridge will provide facilities for employees, visitors and local residents, provisionally including sports facilities and circular walking routes to promote recreation and wellbeing.	204533 (Tritax Big Box Developments)
Facilities in centrally located employment hubs like the Cambridge Retail Park and the Beehive Centre should meet the needs of the wider community through offering a diverse mix of community, sports, leisure, culture or creative hubs facilities.	210564 (J Lewis, Cam Skate)
It is recognised that it is important that there is support for proposals for shared facilities in employment parks and campuses.	211560 (Martin Grant Land Limited)

Policy J/MS: Market and street trading

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The policy was supported by several individuals and organisations, including the Cambridge Liberal Democrats. The Riverside Area Residents' Association and other public and private organisations along with individual members of the public stated their support for the establishment of a designated centre for street trading operations, particularly regular outdoors markets on Walnut Tree Avenue to host various types of markets for residents and visitors, and by Stourbridge Common entrance.

Comments were made by the Cambridge Green Party requesting amendments to paragraphs 2(c) & (d) to ensure appropriate public realm, utilities improvements and flexible spaces are designed to not adversely affect the vitality of the market. Girton PC requested the policy support periodic markets and micro-trading options in Girton, ensure siting prioritises Active Travel access and encourages community-led models that fit village identity. Cambridge Past, Present & Future, while supportive of the policy requested the supporting information refers to the unique historic legacy of Cambridge's traditional market. One member of the public objected to the draft's omission of the special historic significance of Cambridge Market.

An objection was also made to the reference in the supporting text regarding the need to ensure only complementary uses are retained within market stalls, based on similarity of physical products or services. Other objections to the policy were made regarding the lack of provision to retain traditional traders and the services they provide, nor to encourage local food producers and resulting low food-miles produce, including the graziers whose cattle are a greatly valued feature of Cambridge's

commons. On this matter, one member of the public commented on the recent planning application for the Market Square 25/04382/FUL not have regard to traditional traders and the services they provide and local food producers.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The first paragraph of the supporting information has been amended to acknowledge the historic legacy of Cambridge's traditional market.

The policy is applicable to markets and street trading located with the existing and emerging Designated Centres listed in Policy J/RC: Retail and other complementary town centre uses. Suggested locations for markets submitted during the public consultation would therefore fall outside the remit of the policy.

Public spaces suitable for market and, or street trading are also compatible with other public uses. This means a balance needs to be reached where these multi-functional spaces are designed to be safe, accessible and practical for a variety of market/street trading, cultural pursuits and community activities. While markets can help support the vitality and vibrancy of local centres, other temporary uses such as community and cultural activities can have both economic and social benefits. The policy's current wording is considered to reach that balance without prejudicing anyone of these uses, especially if public spaces can host a variety of these different yet complementary activities at the same time.

If the current criteria are met, development proposals should positively enhance the experience for both shoppers and traders while ensuring the markets themselves remain viable, vibrant and safe. Criterion (c) is focussed on ensuring a safe and accessible environment for all market users (both shoppers and traders). Criterion (d) is aimed at ensuring theses spaces are also usable for both community and cultural activities. These uses would normally be temporary activities when market activity

is not present, this is particularly important in new centres where market frequency will normally be quite limited and community spaces may not have been fully developed. No policy change is therefore proposed.

An objection was also made to the reference in the supporting text regarding the need to ensure only complementary uses are retained within market stalls, based on similarity of physical products or services. It is important that local markets and street traders complement the local retail and service offer within the Designated Centre to maintain the viability and vitality of permanent retail and service facilities. Permanent retail units will have additional costs compared to temporary market stalls and street traders. Small retailers and food store operators are unlikely to commit to operating permanent retail units if local markets and street traders are allowed to dominate the local retail scene. The provision of cafés is one example whereby a mobile café provider, often small enough to fit on or adjacent to a market stall will, in an emerging new Designated Centre discourage a café opening up in a fixed retail unit. Unless there is sufficient demand for both providers, it is inevitable that the mobile provider will have less risk and low costs compared to the fixed café provider. It is therefore important that local markets are of a size, frequency and type that allows the permanent retail units/operators to trader profitably without significant trade diversion. This is particularly important in new settlements where their designated centres are still emerging; in these circumstances, the market or street trader offer should be subject to additional testing when proposed, to ensure they support these new centres with complementary good and services.

Regarding the objection lodged about the retention of traditional traders, the services they provide and the encouragement of local food producers, the policy relates to the provision of public markets and street trading, it is beyond the scope of planning to determine the nature of the public market and the provenance of their produce. Rather, the policy supports the development of new spaces that can facilitate markets and street trading that might otherwise not be a consideration for new centres and the design of their public realm. These spaces offer the opportunity for established traders to be retained in new locations that might otherwise not come about, especially in the area’s new settlements and urban extensions.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support this policy: • Strongly support protecting the daily market in market square, especially local veg traders and other local sellers. • We support this Policy	202812 (H Cook), 203062 (Cambridge City Council Liberal Democrat Group)
Point 2.c should be amended to read “c. secure appropriate public realm and utilities improvements, where necessary, to ensure the safe operation of street trader activities and maintain public access; and to positively enhance shoppers and traders experience and promote the vitality of the market.” Point 2.d should be amended to read “d. are designed to enable flexible usage for a range of other community and cultural activities only if it can be demonstrated this will not adversely affect the vitality of the market.”	203733 (Cambridge Green Party)
RARA supports establishing a designated centre for street trading operations, particularly regular outdoors markets on Walnut Tree Avenue, an under-used access road, and the space before the entrance of Stourbridge Common, hosting various types of markets for residents and visitors. The areas are not currently designated but have strong potential for smaller markets to emerge and grow over time, given pedestrian footfall and cycle flow data E/W along the river promenade and also N/S between the wards with better connectivity	204456 (Riverside Area Residents Association)
support: designated temporary, flexible outdoors markets/street trading: with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, • I support establishing a designated centre for street trading operations.	204950 (M Cleminson), 205224 (Cambridge

Summary of issues raised in comments	Comments highlighting this issue
• I support regular outdoors markets on the Walnut Tree Avenue under-used access road, hosting various types of markets for residents and visitors, and by Stourbridge Common entrance. • The area is not currently designated but has strong potential for smaller markets to emerge and grow over time, given pedestrian footfall and cycle flow data E/W along the river promenade and also N/S between the wards with better connectivity	Junction), 204650 (T Woodcock), 204386 (NEUBAU Architects), 204266 (A Giarlis), 204267 (L Cooke)
I strongly believe that the recent planning application for the Market Square 25/04382/FUL doesn't recognise and safeguard the significance and value of our traditional traders, the services they provide, the importance of local, low food miles produce, nor balances the need of both traditional traders and hot food providers. I strongly encourage the drawing of a Local Plan that would protect local food producers, including the graziers whose cattle are a greatly-valued feature of Cambridge's commons, and traditional traders that make up the core of Cambridge appeal to the world. Finally, the high number of traders shouldn't be lowered	205297 (D Fornari)
The draft doesn't even mention the special historic significance of Cambridge Market (which predates the University). Its importance in bringing sustainable, fresh, low food miles produce to the people of Cambridge, and the historic links it provides between the city and its hinterland. The policy needs to promote and protect Cambridge's traditional market and its traders, and enshrine its traditional role in the face of pressures to turn into an outdoor food court	205470 (J Preston)
Against the plans aims, the proposals for Cambridge central market, will reduce the number of stalls and stall holders (who number more than the stalls - different businesses, different days), and their	205483 (A Copping)

Summary of issues raised in comments	Comments highlighting this issue
variety. it will destroy some of the greenest businesses in Cambridge increasing greenhouse gas emissions, which the council claim they want to reduce, and cause social exclusion. The market traders have been operating successfully for many years without undue noise, smell, litter or traffic problems, and without presenting a danger to the public. If you want to avoid undue noise, don't replace the market with an events space!!	
J/MS 1 daily market in Market Square The selling of affordable, fresh, local seasonal fruit and vegetables will probably disappear from the market in the near future if local producers are not helped by subsidised stall rates and a free parking to allow selling healthy food to the Community. Please have a proportion of the market stalls must be for fresh, local, healthy food.	207536 (Y Dignon)
Cambridge Market isn't broke, so you are going to fix it! Obviously your opinions about it are much more expert than those of the market traders themselves. I think maybe you have an idea of listening to string quartets there in the evening or something??!! Some of the money you are going to spend there should be saved for RUNNING THE LOCAL ELECTIONS IN MAY!	201256 (S Williams)
Markets and street trading could support local enterprise and community activity, fitting well within Girton’s identity. (Your document references interest in community-scale business and small local retail.)	202250 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
Key Points: Strong interest in small/local retail → markets are a natural extension. Markets reinforce local economy and community cohesion. They require careful siting to avoid parking and traffic impacts. GPC Requests to the Local Plan: Support periodic markets and micro-trading options in Girton. Ensure siting prioritises Active Travel access. Encourage community-led models that fit village identity.	
Visiting the market provides a social experience for locals and tourists alike. For locals, like myself, this forms a vital sense of community. Permanent retail units cannot and will not offer this social experience. Thus, a market stall offering the same physical goods or service as a permanent retail unit offers a different overall experience. Because of this I think it would be unjustified to remove market stalls based on similarity of physical products or services. This will be a great loss of community in Cambridge.	203415 (C Long)
The plan makes no provision to retain our traditional traders and the services they provide, nor to encourage local food producers and resulting low food-miles produce, including the graziers whose cattle are a greatly-valued feature of Cambridge's commons. Market Square has been the heart of Cambridge since the Middle Ages and is still an essential asset for Cambridge residents, the same ones who pay rates, contribute to local economy, live their lives here, and have the right to reject a plan which favours turning this site into yet another tourist trap - Cambridge already has enough of these.	202954 (J Addison)
You need to consider all the market square traders, and not just the shops around them. The small businesses need council help & support to continue to provide the goods & services that locals want	203203 (C Diston)

Summary of issues raised in comments	Comments highlighting this issue
and require. The market square DOES NOT & SHOULD NOT operate for tourists. The craft market provides for both locals & visitors.	
The supporting information should state that Cambridge's traditional market possesses a unique historical legacy, having served as a vital community hub since before the founding of the University. The daily and Sunday stalls providing fresh food and produce represent a living connection to the city's medieval heritage and its enduring relationship with the surrounding agricultural landscape, as well as a sustainable low carbon economy.	204198 (Cambridge Past, Present and Future)
It is recognised that it is important that policy explains the circumstances in which local markets and street traders will be supported in Designated Centres.	211561 (Martin Grant Land Limited)

Policy J/RC: Retail and other complementary town centres uses

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The policy was broadly supported by Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners including the flexibility, in particular Parts 4 and 5. These respond to changing trading patterns and retail needs and given continued fluctuations in economic trends. This is especially the case for large strategic sites that are subject to a phased delivery over a significant period of time.

Stapleford PC commented on the supporting data for planning policy paragraph 2 being flawed because they incorrectly combine Great Shelford and Stapleford as a single ‘local centre’. Stapleford PC consider them to be two distinct villages with separate histories, identities, and markedly different levels of services. Great Shelford contains most of the shops and amenities and could reasonably qualify as a local centre on its own, while Stapleford, considered independently does not meet the criteria.

Comments made by Girton PC highlighted the value of local retail, not large town-centre-scale uses. Retail should be modest, flexible, and village-appropriate. There is high interest in local retail which must respect rural character and avoid urban commercial forms. Small shops and services can reduce reliance on car trips. Girton PC requested the Local Plan support modest, village-scale retail units and not large retail formats inappropriate to Minor Rural Centres. It is also important to integrate local retail within the Development Framework.

Comments were made by Abbey Properties Cambridgeshire Limited seeking clarification about paragraph 2 of the policy which refers to a hierarchy of centres with three tiers being suggested. They noted that the National Framework (NPPF) paragraph 91 requires a sequential test where development it outside of an existing centre. The current policy wording could be construed as requiring a proposal for a small shop in a Local Centre needing to assess whether that same shop could be located within Cambridge City Centre.

A member of the public commented on the policy requirement (paragraph 8a) requires proposals for uses outside designated centres to be "well served by sustainable modes of transport, as appropriate", it places no such requirement on uses in designated centres. The requirement should be applied to all proposals.

Comments made by Cambridge Investment Partnership supported the sequential approach to the location of retail and main town centre uses in Greater Cambridge. They also acknowledged paragraph 4 of the policy regarding acceptable residential development in designated town centre locations. The respondent notes that paragraph 5, specifically criteria 5a and 5b, outlines conditions under which the loss of retail uses, or merging/subdivision of units is supported. The respondent requested that the justification criteria for Parts 4 and 5 include wording that allows for commercial viability considerations regarding the loss of retail uses or merging/subdivision of units with residential uses.

A member of the public commented on the potential of the Riverside area for small-scale retail and complementary uses. The policy should recognise the importance of neighbourhood-serving retail in areas undergoing regeneration, such as Riverside / Eastern Gate.

The Pioneer Group objected to the proposed policy approach incorporates a restriction on use which results in fundamental conflicts with the NPPF and Town and Country Planning (Use Classes) Order which render the proposed policy to be unsound. It is well established that clear intention of Class E is to allow flexibility for businesses to adapt and diversify to meet

changing demands. The current policy wording is inconsistent with this approach and without sufficient evidence to support. To achieve our understanding of the Councils' aims in respect of Policy J/RC, it could choose to adopt a requirement for active frontage and a requirement to consider the well-established principle of 'Agent of Change'.

Comments submitted by Railpen included a request for the former Beehive Centre site to be excluded from the list of designated Retail Centres in the Local Plan. Its current designation would conflict with the comprehensive, major redevelopment of the site which includes a commercial R&D led scheme, a new local centre, enhanced public realm, and improved connectivity.

Comments submitted by McDonald's Restaurants Ltd questioned the current omission of Bar Hill within the proposed hierarchy of centres which could instead be a Local or District Centre given the current location of a large supermarket with a parade of supporting shops.

Response to the main issues raised in representations:

In response to Stapleford PC's comments about the supporting data for planning policy paragraph 2 being flawed, it should be noted that the corresponding defined local centre for 'Great Shelford and Stapleford' on the draft Policies Map is covers the high street uses in Great Shelford and not Stapleford. This means new retail and other town centres uses, commensurate in size to the centre's role within the hierarchy, will be directed to designated centres in areas they are intended to serve. Such developments in Stapleford (outside the high street boundary designation) would need to satisfy the requirements listed in paragraph 8 to be permitted.

Comments made by Girton PC highlighted the value of local retail, not large town□centre□scale uses. Retail should be

modest, flexible, and village-appropriate. There is high interest in local retail which must respect rural character and avoid urban commercial forms. Small shops and services can reduce reliance on car trips. Girton PC requested the Local Plan support modest, village-scale retail units and not large retail formats inappropriate to Minor Rural Centres. It is also important to integrate local retail within the Development Framework. The draft policy supports this approach, ensuring retail and other town centres uses are directed to designated centres in areas they are intended to serve. Village-based retail uses would need to be appropriate to their village location.

Comments were made by Abbey Properties Cambridgeshire Limited seeking clarification as the current policy wording could be construed as requiring a proposal for a small shop in a Local Centre needing to assess whether that same shop could be located within Cambridge City Centre. Paragraph 8 of the policy explains the conditions that need to be satisfied for retail and other main town centre uses outside designated centres. For a local shop intended to serve a particular local catchment area, it should be located in accordance with the sequential test. In this instance it should consider all appropriate centres, commensurate to the shop’s size and intended catchment area. It is also worth noting that rural shop premises falling within Use Class F2(a) (Local community) category are treated as community facilities. As such a proposal for an F2(a) shop would be considered under Policy WS/CF: Community, Sports, and Leisure facilities. F2(a) are defined as shops (mostly) selling essential goods, including food, where the shop’s premises do not exceed 280 square metres and there is no other such facility within 1000 metres. The supporting text has been amended to clarify the application of the sequential test.

A member of the public commented on the policy requirement (paragraph 8a) requires proposals for uses outside designated centres to be "well served by sustainable modes of transport, as appropriate", it places no such requirement on uses in designated centres. The requirement should be applied to all proposals. The location of designated centres and their constituent town centres uses are very much determined by their accessibility, as such their location is inherently central to the area they serve and highly accessible by a variety of sustainable forms of transport.

Comments made by Cambridge Investment Partnership requested that the justification criteria for Parts 4 and 5 include wording that allows for commercial viability considerations regarding the loss of retail uses or merging/subdivision of units with residential uses. The marketing requirements, listed in paragraphs 4(a) and 5(a) are intended to test the commercial viability of the existing units and their current configuration. The output from these requirements should inform the commercial viability of these uses/spaces. The policy breadth of permissible uses (office, retail, leisure or cultural development) also provides a flexible approach to their continued use as a commercially viable use.

A member of the public commented on the potential of the Riverside area for small-scale retail and complementary uses. The policy should recognise the importance of neighbourhood-serving retail in areas undergoing regeneration, such as Riverside / Eastern Gate. The policy has already proposed to designate a part of Newmarket Road as a Local Centre. The supporting text also recognises Neighbourhood Centres as valuable means of providing for the everyday needs of smaller communities.

Both Railpen and Pioneer Group objected to the proposed policy approach which incorporates a restriction on use which results in fundamental conflicts with the NPPF and Town and Country Planning (Use Classes) Order which render the proposed policy to be unsound. The draft policy has been written with full regard to the NPPF and makes no mention of applying restrictions that result in fundamental conflicts with the NPPF or Town and Country Planning (Use Classes) Order. The supporting text explains how Changes to the Town and Country Planning (General Permitted Development) Order have resulted in various planning uses that were previously distinct being categorised under Use Class E (commercial, business and service). Change of use between the different types of planning uses listed under Class E does not constitute development and subsequently does not normally require planning permission. Whilst recognising the benefits and flexibility that Class E can bring, it also increases the risk of main town centre uses emerging in inappropriate edge-of-centre and out-of-centre locations, which could harm the vibrancy and vitality of Greater Cambridge’s network of centres and eventually lead to the loss of retail and other town centre uses.

Similarly, valuable retail, leisure and other main town centres uses could in some cases be changed to other uses within Class Use E. The policy seeks to minimise this by establishing clear criteria for most development involving main town centre uses outside of Greater Cambridge's existing and emerging designated centres. However, the councils may apply other planning controls to safeguard main town centre uses in the most appropriate locations in the hierarchy of centres and reduce the proliferation of such uses elsewhere, including applying conditions on new development limiting the ability to change key retail or leisure floorspace to other uses within Use Class E without the need for planning permission. Other Permitted Rights may also be subject to restrictions dependent on local circumstances.

Comments submitted by Railpen included a request for the former Beehive Centre site to be excluded from the list of designated Retail Centres in the Local Plan. Its current designation would conflict with the comprehensive, major redevelopment of the site which includes a commercial R&D led scheme, a new local centre, enhanced public realm, and improved connectivity. The proposed outline includes a replacement Local Centre and therefore it is considered necessary to designate the site accordingly. This does not preclude other uses coming forward on site.

Comments submitted by McDonald's Restaurants Ltd questioned the current omission of Bar Hill within the proposed hierarchy of centres. Bar Hill is currently designated as an existing Minor Rural Centre; this designation was reviewed as part of the review of the area's existing Settlement Hierarchy which concluded it should remain as a Minor Rural Centre.

Greater Cambridge Retail & Leisure Study – Interim Findings Report (2026) indicates the Tesco Extra Superstore, referred to in the comments has a sales floorspace of approximately 10,566 square metres net and a benchmark turnover of approximately £75 million. The report establishes that it is currently the largest supermarket in Greater Cambridge. The Tesco Extra Superstore is of a size that clearly serves a much wider catchment area than that of Bar Hill. The adjacent parade of shops also provide other town centre uses (at the time of writing this report) two opticians, one audiologist, a locksmith offering

other services including engraving & shoe repairs, a pet food supermarket, a restaurant and a café. Given Bar Hill's resident population of approximately 4,000 people, it is again reasonable to assume these shops and services serve a much wider catchment than just Bar Hill It is therefore reasonable to describe both the supermarket and other shops as an out-of-centre development. The NPPF's description of a 'Town centre' clearly excludes "existing out-of-centre developments, comprising or including main town centre uses" as such and in accordance with the NPPF, the town centre facilities at Bar Hill do not constitute a town centre and therefore these have been omitted from the proposed hierarchy of centres.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The supporting data for Clause 2 are flawed because they incorrectly combine Great Shelford and Stapleford as a single "local centre." They are distinct villages with separate histories, identities, and markedly different levels of services. Although their development boundaries touch in one area, they are otherwise divided by Green Belt. Great Shelford, which contains most of the shops and amenities, could reasonably qualify as a local centre on its own. Stapleford, considered independently, does not meet the criteria. Treating them as one would misapply planning policy in Stapleford, creating inappropriate retail pressures and unacceptable development impacts on both communities.	201639 (Stapleford PC), 210952 (Great Shelford PC)
While section 8.a of the policy requires proposals for uses outside designated centres to be "well served by sustainable modes of transport, as appropriate", it places no such requirement on uses in designated centres. The requirement should be applied to all proposals.	202566 (P Tribble)

Summary of issues raised in comments	Comments highlighting this issue
The respondent supports the sequential approach to the location of retail and main town centre uses in Greater Cambridge. The respondent acknowledges Part 4 of the policy regarding acceptable residential development in designated town centre locations. The respondent notes that Part 5, specifically criteria 5a and 5b, outlines conditions under which the loss of retail uses or merging/subdivision of units is supported. The respondent requests that the justification criteria for Parts 4 and 5 include wording that allows for commercial viability considerations regarding the loss of retail uses or merging/subdivision of units with residential uses.	204406 (Cambridge Investment Partnership)
The Riverside area has potential for small-scale retail and complementary uses, especially if Newmarket Road is re-established as a local centre and high street. The policy should recognise the importance of neighbourhood-serving retail in areas undergoing regeneration, such as Riverside / Eastern Gate.	204982 (M Cleminson)
Part 2 of the policy refers to a hierarchy of centres with three tiers being suggested. It must be noted that NPPF paragraph 91 does not require an assessment of each centre in order - it requires a sequential test where development it outside of a existing centre. As worded the policy could be construed as requiring a proposal for a small shop in a Local Centre needing to assess whether that same shop could be located within Cambridge City Centre. Clarification should be provided.	205075 (Abbey Properties Cambridgeshire Limited)

Summary of issues raised in comments	Comments highlighting this issue
The proposed policy approach incorporates a restriction on use which results in fundamental conflicts with the NPPF and Town and Country Planning (Use Classes) Order which render the proposed policy to be unsound. It is well established that clear intention of Class E is to allow flexibility for businesses to adapt and diversify to meet changing demands. The current policy wording is inconsistent with this approach and without sufficient evidence to support. To achieve our understanding of the Councils' aims in respect of Policy J/RC, it could choose to adopt a requirement for active frontage and a requirement to consider the well-established principle of 'Agent of Change'.	207452 (Pioneer Group)
Girton values local retail, not large town-centre-scale uses. Retail should be modest, flexible, and village-appropriate. Key Points: Survey shows high interest in local retail. Retail must respect rural character and avoid urban commercial forms. Small shops and services can reduce reliance on car trips. GPC Requests to the Local Plan: Support modest, village-scale retail units. Avoid large retail formats inappropriate to Minor Rural Centres. Integrate local retail into the Development Framework.	202251 (Girton PC)
We request that the former Beehive Centre site is excluded from the list of designated Retail Centres in the Local Plan. Designating the site as a Retail Centre creates a direct policy conflict with the Council's ambition to achieve a comprehensive, major redevelopment of the site, which includes a commercial R&D led scheme, a new local centre, enhanced public realm, and improved connectivity.	203451 (Railpen)
Railpen objects to the inclusion of the Beehive Centre in Policy J/RC part 5, stating that the current wording imposes unnecessary and disproportionate requirements that could undermine development effectiveness. Railpen requests the exclusion of the former Beehive Centre site from the designated	203988 (Railpen)

Summary of issues raised in comments	Comments highlighting this issue
Retail Centres in the Local Plan, citing a conflict with the Council's plans for comprehensive redevelopment, including a commercial R&D-led scheme. Railpen objects to the wording of paragraph 8.92 related to Policy J/RC, advocating for greater flexibility to prevent empty shop locations and enhance deliverability, aligning with the goals of the NPPF.	
Broadly support Policy J/RC. The local centre at Darwin Green has been implemented in part and will establish further as occupations increase. The flexibility within the Policy, in particular Parts 4 and 5, are welcomed in order to adapt to changing trading patterns and retail needs and given continued fluctuations in economic trends. This is especially the case for large strategic sites that are subject to a phased delivery over a significant period of time.	203104 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
Policy J/RC supporting text 8.80, It is unclear how Bar Hill meets this definition, Bar Hill is not a small rural hinterland and contains a large population, Tesco Superstore, along with a parade of supporting retail shops, large car parking area and petrol filling station. The retail area of Bar Hill is not dispersed across the settlement and could easily be identified on the Policy Map. It is therefore questioned whether Bar Hill is appropriately categorised within the hierarchy of centres and could instead be a Local or District Centre.	207892 (McDonald’s Restaurants Ltd)
Support. It is recognised that it is important that the policy includes support for a new town centre at Cambourne North.	211562 (Martin Grant Land Limited)

Policy J/SA: Cambridge City's Primary Shopping Area

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The Pioneer Group objected to the proposed policy approach incorporates a restriction on use which results in fundamental conflicts with the NPPF and Town and Country Planning (Use Classes) Order which render the proposed policy to be unsound. It is well established that clear intention of Class E is to allow flexibility for businesses to adapt and diversify to meet changing demands. The current policy wording is inconsistent with this approach and without sufficient evidence to support. To achieve our understanding of the Councils' aims in respect of Policy J/SA, it could choose to adopt a requirement for active frontage and a requirement to consider the well-established principle of 'Agent of Change'.

Comments from the Cambridge City Council Liberal Democrat Group cited concerns about the harm caused by gambling and betting outlets. They requested restrictions on such outlets to avoid large concentrations in one area.

Comments made by Girton Parish Council raised concerns about the application of the policy and requested clarification on the matter. Girton PC also stated their support for dispersed local retail rather than centralised city-focused provision.

Comments were received about the function and role of Cambridge East as a secondary shopping area / urban centre for the specific purposes of residential needs both within the city and the surrounding new towns and villages, along with other support functions.

Response to the main issues raised in representations:

The Pioneer Group objected to the proposed policy approach incorporates a restriction on use which results in fundamental conflicts with the NPPF and Town and Country Planning (Use Classes) Order which render the proposed policy to be unsound. The draft policy has been written with full regard to the NPPF and makes no mention of applying restrictions that result in fundamental conflicts with the NPPF or Town and Country Planning (Use Classes) Order. The supporting text explains how, in order to support the Primary Shopping Area's (PSA) retail, leisure and town centres services, all new retail, leisure and mixed-use town centre development within the designated PSA will be controlled using appropriate planning measures, including conditions, to ensure ground-floor occupancy is restricted to specific land uses identified as generally acceptable in the PSA, as set out in the policy. Planning controls may also be used to restrict the use of permitted development rights to change the use of existing units or control movement between different uses that fall within the same planning use class.

Changes to the Town and Country Planning (General Permitted Development) Order have resulted in various planning uses that were previously distinct being categorised under Use Class E (commercial, business and service). Change of use between the different types of planning uses listed under Class E does not constitute development and subsequently does not normally require planning permission. Whilst recognising the benefits and flexibility that Class E can bring, it also increases the risk of main town centre uses in the PSA changing without consideration for the role and function of the PSA which it is intended to provide. The NPPF defines PSAs as an area where retail development is concentrated. Paragraph 90(b) also states planning policies should make clear the range of uses permitted in such Primary Shopping Areas.

In Cambridge City Centre, in recent years several useful retail shops and services have converted to fast-food outlets. Opticians and other types of retail shops have been replaced by fast food 'restaurants'; they include minimal seating to distinguish themselves from fast food/takeaway. It is therefore important that the PSA is allowed to perform its role and

function by ensuring units within its boundary are retained to meet consumers' retail needs. As such, the Councils are keen to protect and, where possible, enhance the Primary Shopping Area's important retail functions and frontages. To achieve this, retail along with other leisure and town centre services will be promoted on ground floor level spaces with retail use taking precedence, whilst other leisure (arts, culture and entertainment) uses will be supported on basement levels or upper floors provided they do not undermine the PSA's retail functions.

In response to the concerns raised by the Cambridge City Council Liberal Democrat Group about gambling and betting uses on the high street, policy WS/HD: Creating healthy new developments has been amended. This policy now includes measures to direct these uses to designated centres where their number will be restricted.

For clarification, Girton is not part of Cambridge's Primary Shopping Area and therefore not applicable to any part of Girton. The policy is only applicable to Cambridge's Primary Shopping Area, as designated on the draft Policies Map.

In response to the comments received regarding Cambridge East, the urban extension is intended to form part of a large urban extension. It is expected to have a district centre with a few smaller local centres. It is important that people can easily access shops and services using sustainable forms of development, to meet their day-to-day needs. This will reduce the need for travel extensively for their daily needs and support viable and vibrancy district and local centres. It is important that these centres complement other centres including the city centre and nearby town centres (both planned and emerging) including those beyond Greater Cambridge. If Cambridge East were to provide services for people beyond its catchment area, this would encourage people to travel further from their own centres and cause 'trade-diversion' undermining other city/town centres. Town centre uses in Cambridge East will need to be carefully planned to ensure they complement rather than undermines other centres.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
As we commented earlier for the policy Creating Healthy New Developments we would like to add on something around gambling and betting harm and restrictions on such outlets to avoid large concentrations in one area. We would support further evidence being gathered on this now so it could be included at Regulation 19.	203067 (Cambridge City Council Liberal Democrat Group)
Given that the Council now proposes to split policy in respect of the Primary Shopping Area from draft Policy J/RC, the objections in relation to J/RC follow into the wording proposed for J/SA	207453 (Pioneer Group)
Girton is not part of Cambridge's Primary Shopping Area; retail needs are local and community-scaled. Key Points: PCA policies must not be applied to Girton. Girton requires small, rural-appropriate retail. Avoid policies that centralise retail activity away from villages. GPC Requests to the Local Plan: Clarify that PCA policies do not apply to Girton. Support dispersed local retail rather than centralised city-focused provision.	202252 (Girton PC)
Consider designating Cambridge East as a secondary shopping area / urban centre for the specific purposes of residential needs both within the city and the surrounding new towns and villages. These could be as support functions for the anchor institutions I've suggested in other submissions. (City hall for unitary council, large concert hall, lifelong learning college, railway station/transport interchange). Provision could also be made for a nighttime economy neighbourhood where venues can stay open late without disturbing residential neighbourhoods or colleges.	203812 (A Carpen)

Policy J/VA: Visitor accommodation, attractions and facilities

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Members of the Cambridge Hoteliers Association (CHA) highlighted the importance of visitor accommodation to the Greater Cambridge economy but also the rising costs, lower occupancy levels and a shift towards operating models with lower costs being faced by the sector. As a result, they state they are facing serious viability challenges. The requests for the plan are that given the current oversupply in the market, including from short term lets, it should not support additional hotel provision until a significant clear, evidence-led increase in underlying overnight demand can be demonstrated and the existing oversupply is cleared; to avoid exacerbating the overall supply, it should not support further hotel provision unless it can be clearly demonstrated that underlying demand, rather than accommodation supply, is increasing; that short-term lets are fully integrated into its evidence base and policy framework, rather than treated as a peripheral or secondary issue; for compulsory registration linked to clear planning control to be explicitly embedded within policy; it acknowledges the commercial realities for hotels wishing to complete a change to more economically viable use classes and greater consistency in the application of affordable housing policy across accommodation types is introduced to support housing delivery and reduce unintended incentives.

Elsewhere, whilst some aspects of the plan were welcomed, there were objections to the policy from some other respondents. Concerns included the stringency of the proposed test for assessing the loss of visitor accommodation given the housing pressures in Greater Cambridge and the capacity of key Cambridge city centre areas to accommodate visitors safely and pleasantly. A more

proportionate and economically grounded approach to the conversion of visitor accommodation to housing was requested, as was an assessment of the capacity of city centre areas to accommodate predicted visitors to feed into the Plan's assessment of the quantum of tourism to plan for and the hard and soft infrastructure to provide. A strategy to direct visitors to suitable (less conflictual) parts of the centre would help manage impacts. The potential of tourist tax(es) funding was highlighted.

Further concerns were expressed around the conversion of smaller dwellings to visitor accommodation and, in particular short-term lets. The impacts cited included cumulative impacts of these conversions on disruption from increased visitor traffic and negative effects on local workers seeking rental properties. Additional work was requested to establish an evidence base on these impacts and to ensure the policy remains robust against potential national policy changes. There was a request for the policy to acknowledge IWM Duxford's designation as an Area of Major Change and one for the policy to express support for visitor accommodation within new / expanded settlements. A parish council request was to resist large-scale visitor accommodation, support only low impact village-appropriate accommodation and protect the rural edges of villages and countryside that provides a barrier between village and urban development. Hotels, potentially with large conferencing facilities, were supported on science/technology parks and close to a train station, although not to the point where it compromised the space available for science-based development. It was requested that an additional criteria be added to proposals for new or extended tourist facilities and visitor attractions in the countryside – that the site should be accessible by public or active transport. The value of the equestrian sector to the visitor economy was also highlighted.

Response to the main issues raised in representations:

Representations are noted. The visitor economy continues to be an important economic sector for Greater Cambridge, helping to generate a range of jobs for local residents and to support a large number of local businesses. It's importance locally has been

balanced with the need for affordable new homes and with the ability of owners to respond to market signals and it is considered that the continuation and extension of the protections for existing visitor accommodation from the 2018 Cambridge Local Plan is reasonable. It is the role of the plan to ensure that there is sufficient visitor accommodation for the demand for bedspaces generated by visitors to Greater Cambridge. As a land use plan, it is not appropriate for the plan to seek to control the numbers or destinations of visitors to different parts of the area. Agencies such as Visit Cambridge and Visit South Cambs, including as part of the newly announced Cambridgeshire and Peterborough Local Visitor Economy Partnership (LVIP), have a key role in ensuring that there is the knowledge, infrastructure and funding to ensure that the impacts of Greater Cambridge as a visitor destination are positive for residents, businesses and visitors. By supporting new visitor attractions that complement the existing cultural heritage of the city, are limited in scale and assist the diversification of the attractions on offer, especially to better support the needs of families, the Local Plan recognises the need to diversity and enhance the visitor experience in Cambridge whilst recognising the potential negative impacts that large scale developments could bring.

The prevalence and impacts of short term lettings are considered in our Greater Cambridge Future Hotel Need Study (2025) which has provided the evidence base for the policy and in the First Proposals topic paper which considered the impacts of concentrations of short term letting in areas. The Government have indicated that they are introducing a mandatory national registration scheme for short-term lettings in England which is expected to begin in 2026. The introduction of a licensing scheme will provide an accurate picture of the number and location of premises within Greater Cambridge which can then be used to support the implementation of future Government policy. Were Government to introduce a new use class for short term lettings in line with a previous Government consultation, any new lettings would require planning permission. The proposed Local Plan policy states that where planning permission is required, it allows the conversion of residential properties to visitor accommodation use only in exceptional circumstances. The policy would therefore be complementary to such a national policy change.

The supporting information for J/VA sets out that where proposals for apart-hotels or serviced apartments are considered to fall within Use Class C3 or comprise sui generis uses which have the characteristics of a C3 use, such proposals will be assessed via relevant housing policies in the Local Plan including requirements for affordable housing. It also sets out that where apart-hotels and serviced apartment units fall under C1 or Sui Generis uses, the councils will take steps to ensure they will not be used for any other purpose.

It is considered that the importance of Imperial War Museum Duxford is reflected in policy S/AMC/IWM: Imperial War Museum, Duxford. The Local Plan should be read as a whole and it is not therefore considered appropriate to cross reference to policy S/AMC/IWM within policy J/VA. The policy recognises that science and business parks are suitable locations for new visitor accommodation and whilst other policies in the plan seek to ensure that non-employment uses are ancillary or complementary to the primary employment uses. It is considered that the policy will ensure that any new visitor accommodation or attractions will be appropriately scaled to their location, including any new towns or settlements. Other policies in the plan address the need for opportunities for active travel to/from new developments.

The Draft Policy was informed by our Greater Cambridge Future Hotel Need Study (2025). We therefore asked the consultants who carried out the study to review the representations which we received where there was reference the findings of the Study. The response can be found below.

A focus on hotels

The study does present both hotel and short let supply and performance information. The balance of information presented is significantly determined by the data available but both sectors are presented. The focus on hotel projections is fundamentally driven by the scope of work. It is also appropriate since hotel and hotel-style serviced apartment accommodation is the dominant form of

accommodation, includes providers of accommodation at scale per site (10 to 230+ rooms); and as regulated and planned providers of accommodation, it is this sector that should be the driving component of planning future overnight accommodation.

Short let accommodation has grown significantly nationally and in the Cambridge area. In parallel, hotel room night supply and demand has grown enormously in Cambridge city in the last 10 years. This growth has been despite the growth in short lets, and strong occupancies are still maintained. This shows that there is a growth market to address in hotel provision that is not being absorbed by short let supply increases. There is a need to focus on future hotel supply because hotels have a significant role in city brand, international recognition, and business tourism significantly, as well as leisure. Hotel room provision is not interchangeable with short lets provision; it is a larger and significantly growing market in itself and one that is appropriate to forecast for.

The extent of short let accommodation is noted in the study. This market segment runs alongside hotels. As explained, demand for future hotel rooms should not be considered to be met by short let supply as a direct and equal equivalent to being met by hotel room supply. There is some interplay in the guest markets using hotels and short let accommodation, but it is not appropriate for future hotel provision and planning to be determined by the relatively uncontrolled sector of short lets. Rather, it is important to plan for potential future hotel need (and its evolution in types as determined by market desire) in order to create a destination with accommodation supply that is planned, controlled and fitting to the brand positioning of Greater Cambridge now and in the future as an international business and tourism hub, as well as growing residential area.

A prioritising of hotels enables suitable provision in locations that fit wider planning objectives. It is important to not limit future hotel provision as the response to growth in short lets. Rather, the market determines whether planned-for hotel permissions are pursued and the matter to be addressed is the control of provision and regulation of short let accommodation such that it becomes a type of planned provision that is operating and taxed on a level playing field with hotels.

Extent of hotel supply

For clarification, the study supports the principle that overnight accommodation need is a response to demand drivers. As such, expected growth in these drivers is the determinant of expected future hotel need, and growth in tourism support and generators of tourism demand are key in the future success of hotels.

A net increase of new supply is not expected within a context of no additional demand. Indeed the study did not forecast a need for additional supply in the immediate term. The forecast was presented for additional supply need from 2027 based on assumed market growth and supply openings.

Additional supply need was determined due to projected growth in demand, which in turn is a function of other projections such as business growth and leisure demand. If such growth does not occur then this will have an onward impact on hotel demand. It is the market that will determine the viability of future hotels. Supply projections are made in order to plan for potential future need rather than to limit the behaviour of the market.

An annual occupancy of 78% has been used to determine future supply. This is a level that we consider appropriate for this area as a stabilised market based on its weekly and monthly seasonality. It is important to note though that this does not mean that all hotels will be currently at this level, some will be above and some below, and different subsectors of the supply will perform in different ways. It is a suitable average for modelling this market however and is above the national average. In 2024, the national average for regional UK was 76.3% occupancy and £93 ADR [STR]. In relation to Cambridge performance at 77.2% occupancy and £110 ADR [STR] at that time it is not unreasonable to consider 78% occupancy as a position for when additional supply could be absorbed.

It is additionally of note that Cambridge enjoys a level of occupancy and ADR superior to many other locations where the hotel market remains competitive and healthy. A future scenario of hotel provision may alter the current premium occupancy and ADR achieved but this does not warrant limitation of hotel permissions by the council. It is a markets matter. The overall objective of a council is assumed to be to have a healthy hotel market and the wider benefits and facilitations thereof, and does not include a remit to protect individual hotels.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Object selected	202503 (M Parsons, University of Cambridge), 204225 (S Nicholas, Cambridge Past, Present and Future), 203532 (Cambridge Ahead), 205117 (W Davies)
Support selected	203073 (K Porrer, Cambridge City Council Liberal Democrat Group)

Summary of issues raised in comments	Comments highlighting this issue
Visitor accommodation is not a primary need. If proposed, it must respect rural character, avoid traffic impacts, and support the local economy and avoid undermining landscape or community facilities. Small-scale, low-impact models are acceptable if locally beneficial. The policy should resist large-scale visitor accommodation; only support small, low-impact, village-appropriate proposals and protect the Girton Gap and rural edges from tourism-driven development.	202253 (Y Murray, Girton PC)
Welcome that the Plan supports the conversion of non-residential premises to residential use and seeks to restrict the loss of housing to visitor accommodation in order to safeguard housing supply.	203532 (E Pritchard, Cambridge Ahead)
Concern regarding the proposed test for assessing the loss of visitor accommodation, which may benefit from reconsideration in light of current housing pressures. Given Greater Cambridge's sustained and exceptional growth trajectory, there is a strong case for facilitating the conversion of visitor accommodation to residential use or student accommodation through planning policy where appropriate. A more proportionate and economically grounded approach, rather than the stringent economic test currently proposed, would better reflect present conditions and support the delivery of much-needed homes and/or student accommodation.	202503 (M Parsons, University of Cambridge), 203532 (E Pritchard, Cambridge Ahead)
Permitted Development regulations limit the Local Planning Authority's ability to regulate conversions of smaller dwellings to visitor accommodation, affecting housing availability. The cumulative impacts of these conversions in Cambridge cause disruption from increased visitor traffic and the negative effects on local workers seeking rental properties. There should be further work on the policy before Regulation	203073 (K Porrer, Cambridge City Council Liberal Democrat Group)

Summary of issues raised in comments	Comments highlighting this issue
19 to establish an evidence base on the impact of converting smaller dwellings and to ensure the policy remains robust against potential national policy changes.	
As an additional point under “11. Proposals for new or extended tourist facilities and visitor attractions (excluding accommodation) in the countryside will be supported where it can be demonstrated that:”, we recommend adding “f. The site should be accessible by public or active transport.”	203736 (R Comins, Cambridge Green Party)
The importance of hotels to the local economy and social infrastructure is highlighted including through their spending in local businesses, the year round employment opportunities they offer, their role in the Cambridge Cluster eco-system supporting inward investment, international collaboration and major employment hubs by providing accommodation, and meeting and networking space as well as their role in place-making including reinforcing city centre vitality, providing consistent day and evening footfall and supporting Cambridge’s global brand as a centre of excellence. Constraining or destabilising the hotel sector risks not only the loss of discretionary visitor spend but also weakening the wider ecosystem that supports employment, business growth, innovation and long-term economic resilience. The CHA considers that protecting the viability of the hotel sector is integral to delivering the Local Plan’s wider economic, employment and placemaking objectives. Cambridge’s hotel sector is operating in an increasingly high-cost environment alongside weakened demand, lower occupancy levels and an accelerating shift in visitor accommodation towards aparthotels, serviced apartments, B&Bs and home-stay style models, which can operate with materially	204169, 207773, 211860, 211861, 211862, 211863, 211864, 211866, 211867, 207772 and 211876 (R Finn, Hilton Cambridge City Centre), 204256 (S Andreou, Centennial Hotel), 204322 (K Bentley), 204606 (S Papon, The Lensfield Hotel), 204966 and 204987 (R Norfolk), 205034 (S Garwood, Holiday Inn Express Cambridge West Cambourne), 205117 (W Davies), 205130 (R

Summary of issues raised in comments	Comments highlighting this issue
lower operating costs and fewer staffing requirements. The market is also becoming increasingly saturated, with new bedspaces coming forward in a relatively small geographic area and continued pipeline supply expected. Hotels are therefore responding to serious viability challenges by diversify their offers to protect occupancy and footfall, for example by expanding bar and food-led propositions. In addition, the cost base for hotels is expected to rise sharply through business rates changes: UK Hospitality estimates the average hotel will face an overall increase of 115% over the next three years While plan-led provision is essential, there is concern that the scale of additional bedspaces envisaged risks materially overshooting realistic demand when set against current trading conditions and recent delivery including the growth in short term lets leading to provision of double the upper growth projection set out in the 2012 Hotel study. Evidence of the effect this oversupply is having on the market can be found in occupancy rates. The 2025 hotels study states that a hotel occupancy rate of 78% is needed to achieve a stabilised hotel market across Greater Cambridge. CHA members consider that the market is therefore not stabilised with such occupancy levels seldom achieved under current market conditions. Encouraging further hotel growth risks embedding structural oversupply, undermining viability, investment confidence and employment across an established sector. Given existing and consented supply and the scale of short-term lets already operating, the Local Plan should not support additional hotel provision until a	Hutton, Holiday Inn), 205207, 206931,206932, 206933, 206934, 206935 and 206936 (D Rowson, Concilio Communication), 205305 (D Chaplin, Gonville Hotels Limited), 205479 (P Greer, CUA Hotel Limited)

Summary of issues raised in comments	Comments highlighting this issue
significant clear, evidence-led increase in underlying overnight demand can be demonstrated; and the existing oversupply is cleared. The draft Local Plan places significant emphasis on the provision of additional visitor accommodation as a means of increasing overnight visitors. This approach is overly supply-led and insufficiently focused on the underlying drivers of demand. These drivers are the presence of attractions, employment uses, events, conferences, cultural institutions and visitor experiences that require people to stay overnight. The CHA's position is that the Local Plan should prioritise demand-driving uses that increase overnight stays and economic activity and should not support further hotel provision unless it can be clearly demonstrated that underlying demand, rather than accommodation supply, is increasing. In Cambridge there remains significant scope to strengthen and diversify demand-driving uses that increase dwell time, extend stays and convert day visits into overnight visits e.g. strategy for improved transport infrastructure, conference and exhibition facilities, academic and research-related events, cultural and performance venues, festivals, major sporting and recreational events, and publicly accessible attractions that operate year-round. The Local Plan should place greater emphasis on supporting such demand-driving uses, particularly where they help to reduce seasonality, smooth weekly and annual occupancy patterns and reinforce Cambridge's position as an international destination. It should not support further hotel provision unless it can be clearly demonstrated that	

Summary of issues raised in comments	Comments highlighting this issue
underlying demand, rather than accommodation supply, is increasing to avoid exacerbating the structural oversupply highlighted above. A fundamental concern with the draft Local Plan is that its approach to visitor accommodation need does not adequately reflect the scale and impact of short-term lets. While these uses now form a substantial part of Cambridge's accommodation offer, they are not fully integrated into the Plan's evidence base or policy framework. While the 2025 Hotels Study recognises the importance of maintaining an adequate supply of accommodation to support economic growth, this evidence demonstrates that the baseline position already reflects a material level of provision once all accommodation types are considered. It is essential that short-term lets are fully integrated into the Local Plan's evidence base and policy framework, with a more cautious, fully integrated assessment of hotel need that explicitly accounts for the scale and impact of short-term lets, rather than treated as a peripheral or secondary issue before encouraging additional hotel bedroom growth. The level of bedroom growth predicted in the 2012 Hotels Study has been substantially exceeded. When short-term lets are incorporated into the analysis, this indicates a combined supply of almost 3,600 visitor accommodation bedrooms, more than double the number of bedrooms in the upper growth scenario envisaged in the 2012 study. The Local Plan risks planning for further growth against an already oversupplied market, reinforcing the need for a more cautious, fully integrated assessment of	

Summary of issues raised in comments	Comments highlighting this issue
hotel need that explicitly accounts for the scale and impact of short-term lets before encouraging additional hotel bedroom growth. Hotels operate within a comprehensive and highly regulated and high-cost environment whilst short-term lets operate at scale under a materially lighter-touch regime, frequently without equivalent planning scrutiny or effective enforcement. This creates an uneven playing field and distorts market behaviour. Failure to deal with unauthorised short-term letting has contributed to nuisance impacts in residential areas and undermined amenity and community cohesion. It also places pressure on the housing market, particularly affordability including for key workers, by reducing the supply of homes. The CHA considers that, without compulsory registration linked to clear planning control, the Local Plan will fail to address regulatory imbalance, housing loss and market distortion caused by short-term letting, and therefore calls for these measures to be explicitly embedded within policy. Without registration, the Council cannot easily identify which properties are operating as short-term rentals, distinguish genuine home-sharing from commercial activity, or ensure compliance with basic requirements. Registration should be linked to an explicit policy framework confirming when short-term letting amounts to a material change of use and requiring planning permission. The Plan should also enable the designation of controlled zones (such as the city centre and other high-pressure areas) where planning permission for short-term letting is compulsory. Where hosts operate multiple short-term	

Summary of issues raised in comments	Comments highlighting this issue
lets, these should be treated as aggregated commercial activity for VAT and business rates compliance purposes to ensure parity with regulated visitor accommodation. The draft Local Plan adopts a restrictive approach to changes of use involving visitor accommodation, particularly where this would result in the loss of existing hotels. At the same time, the Plan states that the conversion of existing residential properties to hotels will only be supported in exceptional circumstances, in order to maintain housing supply and protect residential amenity. While this objective is understood, the policy position is internally inconsistent and undermined in practice by the widespread growth of short-term lets. Introducing a registration requirement, supported by the designation of controlled zones in areas of highest housing pressure, would allow the Local Plan to draw a clear and enforceable distinction between genuine residential use, incidental home-sharing, and commercial short-term accommodation. This would significantly strengthen the Plan's ability to protect housing stock, while restoring parity between informal accommodation and professionally managed hotels. Residential properties are already being converted into commercial visitor accommodation through short-term letting, generally without planning consent. Effective enforcement is not economically practical and therefore despite widespread acknowledgement of the issues, the Council is hard pressed to get on top of this. The result is a situation where informal, lightly regulated accommodation can	

Summary of issues raised in comments	Comments highlighting this issue
displace housing with relative ease, while formal hotel operation is correctly constrained and tightly controlled. This inconsistency weakens the credibility of the policy framework and highlights the need for a more coherent and enforceable approach to use change. The Plan's approach to changing existing hotel use to alternative uses is slow, resource-intensive and poorly aligned with real-world market conditions. It prevents buildings from responding efficiently to economic signals, locks in underperforming uses, and delays the delivery of potentially more beneficial outcomes, including housing. The CHA therefore calls for the Local Plan to acknowledge commercial realities for hotels wishing to complete a change to more economically viable use classes. The draft Local Plan's approach to affordable housing has the potential to influence development outcomes through the application of different requirements to residential development and certain forms of visitor accommodation. Evidence suggests that variations in affordable housing thresholds can play a role in shaping development proposals and land-use choices. A revised affordable housing requirement of 25% could help to support housing delivery and scheme viability across a broader range of sites. Plus, greater consistency in the application of affordable housing requirements across residential and other uses would help to reduce unintended incentives and ensure that development decisions are guided by the most appropriate and policy-aligned use of land.	

Summary of issues raised in comments	Comments highlighting this issue
These issues point to the need for a more integrated, proportionate and enforceable approach to visitor accommodation within the Local Plan – one that recognises the full spectrum of accommodation provision, aligns regulatory requirements more closely across uses, and allows market forces to operate within a clear and consistent planning framework. The Local Plan offers a timely opportunity to begin addressing the impacts of short-term lets through the planning system, including through compulsory registration, clearer change-of-use triggers and the removal of exemptions that undermine housing protection. While planning policy alone cannot resolve all aspects of short-term let regulation, these measures would represent an important first step in establishing greater oversight, fairness and consistency.	
Given the quantum of visitors, particularly day visitors, and their impact on central areas of the City (impacted by both visitors and their vehicles and already unpleasantly congested), especially with projected population growth which will increase current pressures, the Plan should assess the capacity of key city centre areas to accommodate visitors safely and pleasantly, considering costs and benefits to determine the quantum of tourism for which the Plan should plan and make provision for. Unrestrained numbers of tourist visitors (we did not find a forecast of day visitor numbers in the documentation) will further exacerbate the problem.	204225 (S Nicholas. Cambridge Past, Present and Future)

Summary of issues raised in comments	Comments highlighting this issue
Tourism should be viewed through lens of the area's global reputation for education, research and innovation, maintaining this reputation requires the city to be an attractive place for residents, including internationally mobile workers.	
The Plan should provide hard and soft infrastructure for the estimated desired numbers of both day visitors and longer-staying tourists, along with a strategy to direct them to suitable (less conflictual) parts of the centre. The funding for this and for curating the city centre (information, signage, street cleaning, pavement maintenance etc.) might be sought from a form of tourist tax(es), which should include a modest charge on group tours if possible.	204225 (S Nicholas, Cambridge Past, Present and Future)
Support policies that encourage visitor accommodation in mixed-use developments, such as science parks, as it helps prevent the conversion of houses into short-term lets in surrounding neighbourhoods ((some of which are negatively affecting the appearance and character of those neighbourhoods).	204225 (S Nicholas, Cambridge Past, Present and Future)
Visitor accommodation on science parks should minimise land use for this purpose to ensure sufficient space for science-based development. This should be reflected in the policy or supporting text.	204225 (S Nicholas, Cambridge Past, Present and Future)
The policy refers to visitor attractions outside the defined development of Cambridge will be permitted only where they utilise and enhance existing assets, are appropriate for their location and acceptable in terms of need, environmental and traffic impacts. To acknowledge and establish support in principle for appropriate development at IWM Duxford, the text should be changed to recognise that IWM Duxford has a specific designation as an Area of Major Change under policy S/AMC/IWM as follows:	208282 (Imperial War Museum)

Summary of issues raised in comments	Comments highlighting this issue
“In South Cambridgeshire there are a number of assets which have become major tourist visitor attractions, such as the World War II airfield at Duxford which is now home to the Imperial War Museum, and Wimpole Hall which is owned by the National Trust. Facilities such as these can only be developed where the assets exist. Imperial War Museum Duxford is treated as a special case as a museum which is a major tourist / visitor attraction, educational, commercial and aviation facility and is designated as an Area of Major Change under policy S/AMC/IWM which provides scope for further development focused on aviation and other uses which are complementary and support the future of the museum site. The policy is intended to support the districts existing attractions and assets. It is not the intention of the policy to encourage new major tourist attractions.”	
Pleased to see references to Wimpole Hall as a major tourist visitor attraction, and support policy J/VA which seeks to support existing attractions and new associated infrastructure where appropriate.	211084 (MEE Planning Team, The National Trust)
One or two of the sci-tech park developments should be encouraged to build a large 4-star hotel with very large conferencing facilities. (A main conferencing hall with capacity for at least 1,000 seated). It should also be located close to an existing or proposed railway station.	203813 (A Carpen)
Rural Active Travel and PROW network should be bridleway to include horseriders. Horseriding is good economic activity - horseriding holidays, contributing to local jobs, pubs, etc.	204051 (S Rogers)

Summary of issues raised in comments	Comments highlighting this issue
MGL consider that the proposed policy wording does not provide express support for visitor accommodation within new / expanded settlements, and it is important that it does provide support for this as part of a demand-led, mixed and balanced economy.	211563 (Martin Grant Land Limited)

Policy J/FD: Faculty development and specialist/language school

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was support for the policy approach from the University of Cambridge, highlighting its alignment with their Strategic Estate Framework, which aims for effective land use, mixed uses on larger sites, improved public realm, active frontages, and reduced car parking. The University of Cambridge suggested further clarity regarding the inclusion of sites outside the City Centre that are not listed as strategic University Sites.

Comments were made by ARU indicated the benefits of their university campus to Greater Cambridge should be explored further in the supporting text. ARU commented on their strong support for university development within the Eastern Gate and Grafton Area of Major Change. However, parts of the East Road campus may well deliver student accommodation, as well as faculty teaching/administrative facilities. On this basis, ARU requested that the extent of the ARU ‘campus’ be defined within this policy and associated proposals map so that it can suitably inter-relate with the reading of other policies such as draft Affordable Housing (H/AH) policy. Such an approach would provide greater clarity when interpreting the Development Plan as a whole.

Cambridge Past Present & Future expresses concern over the differing terminology used in the policy, noting that Faculty Development and language schools are 'supported' while University developments are merely 'permitted', questioning the rationale behind this distinction. The respondent also requested clarification on point (b) regarding language schools, specifically whether the policy applies only to non-local students, as the current wording lacks clarity on this aspect. The

respondent highlights the absence of location considerations for language schools, suggesting that large language schools near residential areas could lead to conflicts due to noise from hostels accommodating students, recommending that the policy should address this potential issue.

Concerns from Girton PC were raised about the impact existing education facilities have on local infrastructure. New faculty proposals must be evaluated against impacts on Active Travel, safety, and rural character. The PC requested the new Local Plan require safe Active Travel routes for any new faculty or education-related proposal, impact assessments on landscape and character; and avoid institutional expansion that urbanises Girton.

Further responses received included comments about the approach taken towards campus expansion, supporting new campuses such as Eddington and not the intensification of existing campus locations. Other comments related to the utility of specialist/language schools providing new students with some practical wayfaring guidance or even bespoke transport on their initial arrival, often with luggage to facilitate their welcome and avoid inconvenience to local residents also trying to use the same local public transport.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

Paragraph 6 of the policy has been amended to clarify the approach taken for other university sites beyond the city centre that are not specifically listed elsewhere in the policy. The policy wording is intended to allow sufficient flexibility for applicable sites from either university.

To address specific concerns raised by Cambridge Past Present & Future, paragraph 7(a) has been amended with an additional requirement that addresses concerns over local residents' amenity, and paragraph 7(b) clarifying that paragraph

7(b) applies to non-local students.

Following proposed changes to the Affordable Housing (H/AH) policy, there is no longer a requirement to define the extent of the ARU ‘campus’ within this policy or associated proposals map.

Other transport related matters would normally been treated by Policy I/ST: Sustainable Transport and Connectivity. The reference to the continued support for development of Eddington (Site C/NWC) has not changed in Policy J/FD: Faculty development and specialist/language school.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
It would be helpful if specialist language schools could provide their students with a guide to the local area before arrival. Large numbers of students with no change for bus fare when they arrive at the station, all with luggage and excitedly shouting in their own language, can be off putting to residents and can seem intimidating. Maybe language schools could be required to provide their own transport for the students to avoid embarrassment and delays when trying to board the bus?	201042 (P Spowart)
Girton already experiences infrastructure pressure from proximity to education facilities (e.g., Eddington). New faculty proposals must be evaluated against impacts on Active Travel, safety, and rural character. Key Points: Significant traffic and severance concerns near Eddington. Additional education-related development must ensure safe routes. Village identity must not be overshadowed by adjacent	202254 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
institutional uses. GPC Requests to the Local Plan: Require safe Active Travel routes for any new faculty or education-related proposal. Assess impacts on landscape and character. Avoid institutional expansion that urbanises Girton.	
The respondent supports the proposed policy, highlighting its alignment with their Strategic Estate Framework, which aims for effective land use, mixed uses on larger sites, improved public realm, active frontages, and reduced car parking. The respondent suggests that clarity is needed regarding the inclusion of sites outside the City Centre that are not listed as strategic University Sites, such as the Centre for Mathematical Sciences and Homerton, for the uses mentioned in paragraph 1. It is recommended that if paragraph 6 is intended to address these additional sites, this should be explicitly stated in the policy	202505 (University of Cambridge)
The respondent expresses concern over the differing terminology used in the policy, noting that Faculty Development and language schools are 'supported' while University developments are merely 'permitted', questioning the rationale behind this distinction. The respondent requests clarification on point (b) regarding language schools, specifically whether the policy applies only to non-local students, as the current wording lacks clarity on this aspect. The respondent highlights the absence of location considerations for language schools, suggesting that large language schools near residential areas could lead to conflicts due to noise from hostels accommodating students, recommending that the policy should address this potential issue.	204237 (Cambridge Past, Present and Future)

Summary of issues raised in comments	Comments highlighting this issue
It is vital that university departments and colleges continue to engage with the expanded geography of Greater Cambridge. I welcome the two new college campuses at Eddington, testimony such forward thinking. Elsewhere this is some inertia, and a sustained wish to cram expansion into familiar spaces, for example creating new college facilities close to existing dining facilities. This has nothing to do with 'demonstrable educational need' and rather more to do with a lack of imagination.	205255 (M Jones)
The value of ARU to Greater Cambridge should be explored further in the supporting text. ARU strongly supports University development within the Eastern Gate and Grafton Area of Major Change. However, parts of the East Road campus may well deliver student accommodation, as well as faculty teaching/administrative facilities. On this basis, ARU considers that the extent of the ARU 'campus' should be defined within this policy and associated proposals map so that it can suitably inter-relate with the reading of other policies such as draft H/AH. Such an approach provides greater clarity when interpreting the Development Plan as a whole.	203952 (Anglian Ruskin University)

Consultation Statement

Appendix 13: Response to Representations - Homes



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: Homes

Homes Introduction

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is support for the homes policies, particularly the commitment to delivering an appropriate mix of housing types and tenures. However, there are concerns that homes should not be used as short-term rentals or purchased by international investors, when they are needed to provide affordable housing.

Specific comments have been made relating to:

- securing genuinely affordable housing, including for young families, older people and for NHS staff and healthcare providers,
- delivering smaller homes (rather than family homes) and accessible homes for older people such as bungalows,
- designing homes to ensure health and wellbeing for residents, whilst ensuring they remain affordable and viable,
- understanding the market for self and custom build homes,
- balancing the different types of accommodation, for example there is a request for student accommodation to be capped and a suggestion that co-living developments will be provided at the expense of other forms of housing,

- the relationship between policies and the draft NPPF,
- need for a co-housing policy and greater support for community-led housing, and
- ensuring proportion requirements for information and evidence to be provided with planning applications.

Other comments have been made relating to housing density, car parking requirements, sustainable design and construction, housing requirements for neighbourhood areas, defined development extents, the development strategy, site allocations, additional sites and cultural infrastructure.

Response to main issues raised in representations:

The support for the homes policies is noted, and the polices set out within this chapter aim to secure the delivery of a mix of sizes, types and tenures of homes across Greater Cambridge, including affordable housing, homes to rent and buy, homes for a range of groups in the community from students to older people to travellers, and homes that are designed with internal and external spaces that are functional, comfortable and accessible.

In earlier stages of the plan-making process the Councils did suggest that a policy relating to community-led housing, including co-housing, would be included in the Local Plan. However, as set out in the Homes Topic Paper (2025), community led housing can best be seen as a way of delivering housing rather than a specific type of housing, and therefore it was not considered necessary to include a specific policy when the considerations for community-led housing developments (including co-housing) are no different to any other residential developments. The Councils continue to support community led housing as a means to provide homes for local people through public support and community ownership, and the housing policies in the Local Plan do not prevent community-led housing from being brought forward.

The requirements set out within the homes policies relating to the submission of information and evidence as part of the planning application process are proportionate and reasonable, and have been included to ensure that decisions can be made.

Responses to comments relating to specific homes policies are included within the responses to the individual policies, and our responses to comments relating to policies within other chapters of the Local Plan are included within the responses to those policies or chapters, including comments on proposed allocations.

Comments on the development strategy and approach to defined development extents villages are addressed under those policies. The development strategy was developed following consideration of a range of options, and evidence regarding their relative sustainability. This included alternatives such as release of land from the green belt, further village development, or development near to existing railway stations.

Housing density has been considered in the Great Places theme. Polices support higher densities in accessible areas, where parking can be reduced. The approach to car parking in the Infrastructure theme acknowledges that in less accessible areas there will still be a need for appropriate provision.

Comments advocating the importance of cultural provision have been made under a number of the plans themes. The plan addresses these issues through the Wellbeing and Great Places themes, in addition to supporting the plan with further evidence on this issue.

Table of representations:

Topic	Summary of issues raised in comments	Comments highlighting this issue
Homes	Support for the homes policies.	203410 (Cambridge City Council Liberal Democrat Group)
Homes	Welcome commitment to delivering an appropriate mix of housing types and tenures, and the acknowledgement of important role of employer led housing.	204918 (Innovate Cambridge)
Homes	Regulate short-term rentals (e.g. Airbnb) to enable local people to find affordable homes. Ensure that homes are not used for tourists, and are retained for residents.	202669 (R Page), 203280 (J Palmer)
Homes	More emphasis on ensuring that homes are not purchased by international investors.	203280 (J Palmer)
Affordable housing	Support requirement for 40% affordable housing.	205568 (Cambridge Living Streets)
Affordable housing	Support Cambridge City Councils commitment to council house building.	205568 (Cambridge Living Streets)
Affordable housing	Developers must be held to affordable housing targets.	201043 (P Spowart)
Affordable housing	How many of the thousands of new homes will be genuine social rent? The number of houses planned far exceeds the social housing waiting list, but how likely is it that this list will be reduced to zero?	203255 (Cambridge Friends of the Earth)
Affordable housing	Affordability of house prices and rents is a problem.	201043 (P Spowart), 203276 (J Palmer)

Topic	Summary of issues raised in comments	Comments highlighting this issue
Affordable housing	Need to consider provision of affordable housing specifically for NHS staff and health care providers to support recruitment and retention. Affordable housing needs for NHS staff should be included in housing needs assessments.	205169 (NHS Cambridgeshire and Peterborough Integrated Care Board)
Affordable housing	Need to prioritise increasing the supply of social housing, and should require 25% affordable housing and 25% social housing on all development schemes.	203738 (Cambridge Green Party)
Affordable housing	Specific split of affordable housing tenures does not allow flexibility to respond to changing circumstances over the lifetime of a development, and no wording that allows for exceptions that have been secured on other strategic sites.	209035 (Marshall Group Properties)
Rural exception sites	Support for Rural Exception Sites and First Homes sites to provide housing for young families and specialist homes for an ageing population.	203064 (Little Wilbraham and Six Mile Bottom PC)
Housing mix	Do not need more family houses, instead need affordable homes of 1-3 beds for singles, couples, downsizers, and those looking for first home to rent or buy.	201043 (P Spowart)
Housing design	If houses are designed to last 25 years, who will buy with a mortgage if the house is worthless at the end.	205504 (D Brown)

Topic	Summary of issues raised in comments	Comments highlighting this issue
Internal space standards	Need to consider residents mental health, provide additional space for working at home, and communal workspaces to mitigate loneliness.	208873 (R Lambert)
External space standards	Concern that requirement for balconies as integral element of building design may impact on the viability of affordable housing.	202665 (Mole Architects)
Accessible and adaptable homes	Question feasibility of M4(3) lift requirements for small apartment buildings – suggest exceptions should be allowed based on site specific circumstances where justified by viability and / or practicality.	202665 (Mole Architects)
Specialist housing for older people	Need for bungalows/housing that is accessible for older people other those with disabilities and in turn these developments need to be the most accessible - close to hospitals, regular public transport, communal social spaces, and access to physical activities.	210598 (Cambridgeshire County Council)
Self and custom build homes	Need better enforcement of self and custom build homes. Is there a genuine market for them?	202665 (Mole Architects)
Co-living	Co-living policy may lead to sub-standard accommodation. Concern that support for co-living will increase the cost of	202665 (Mole Architects)

Topic	Summary of issues raised in comments	Comments highlighting this issue
	land, and that will be provided at expense of other forms of housing.	
Student accommodation	Ensure that homes are not purchased for use by students, which is distorting the property market against the interests of residents. Student numbers are capped in Oxford because of concerns the University is becoming too dominant.	203280 (J Palmer)
Dwellings in the countryside	Concern that Policy H/DC includes requirements that are not consistent with draft NPPF.	202665 (Mole Architects)
Co-housing	Need a specific policy encouraging co-housing (not co-living) as there are environmental and community benefits to this approach, but it remains a rare form of housing.	202679 (C Pointon)
Community-led housing	Justification for providing greater support to community-led housing, and substantial weight should be given to exception sites which are led by legitimate local community groups provided that: they have general community support, will be well managed and viable over the long term, and any benefits from the scheme are retained by the local community in perpetuity.	202803 (Histon and Impington Community Land Trust)

Topic	Summary of issues raised in comments	Comments highlighting this issue
Planning application requirements	Should emphasise that reports and initial information requirements must be proportionate to the scale of development. Requiring excessive technical reports at an early stage can be costly and high risk for SME developers, potentially discouraging the delivery of small sites. Where detailed information is necessary, it should be limited to what is reasonable and, where possible, secured through planning conditions rather than required at the point of submission.	209705 (NP Architects)
Housing density	Housing developments need to be denser – achieved by reducing car parking. Many people in Cambridge have no need for a car. Separate out housing and parking, and apply a fair cost to parking spaces for those that want one.	201739 (T Burford)
Housing density	Design homes using the Pinehurst Model, not Eddington accommodation blocks. "Pinehurst" refers to the 3-4 storey blocks of apartments off Grange Road. Built in the 1930s they are surrounded by lawns and mature trees.	210673 (Newnham Labour)
Car parking	Concerned about potential reductions in parking provision, and need to ensure net zero objectives do not unfairly impact on parking provision in rural communities. Policies	203064 (Little Wilbraham and Six Mile Bottom PC)

Topic	Summary of issues raised in comments	Comments highlighting this issue
	aimed at reducing car usage should include reassessment of transport options in underserved villages.	
Sustainable design and construction	There is no mention of sustainability – what about high level insulation, solar panels, community heating, air source heat pumps, sustainable building methods and materials?	202436 (A Fisher)
Housing requirement for Neighbourhood Areas	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.	206161 (Girton Neighbourhood Plan Team)
Defined development extents	Development extents limit meaningful expansion opportunities for villages.	203064 (Little Wilbraham and Six Mile Bottom PC)
Development strategy	Historical core, conservation areas and open spaces within Cambridge should not be further built on.	202669 (R Page)
Development strategy	Without an increase in housing, Six Mile Bottom risks further decline as it currently lacks amenities to sustain its population.	203064 (Little Wilbraham and Six Mile Bottom PC)
Development strategy	Support for housing proposals in Great Wilbraham that would allow for local residents to remain within the parish.	203064 (Little Wilbraham and Six Mile Bottom PC), 206562 (Great Wilbraham PC)

Topic	Summary of issues raised in comments	Comments highlighting this issue
Development strategy	Need to: restrict development where water or sewage capacity is insufficient, prioritise the reuse of empty buildings, support mixed use developments, improve and maintain the evidence base on housing needs, and strengthen compliance with policies on major developments.	203738 (Cambridge Green Party)
Development strategy	Need to ensure that active travel is considered from the start, so that connections can be made to employment and leisure uses. Homes and jobs should be located in close proximity to encourage the shift to active travel.	205168 (B Nicolson)
Development strategy	Homes and jobs being located close to each other is especially important for those working unsocial hours – need adequate street lighting, good pavement quality, and pedestrian focussed crossings at desire lines.	205568 (Cambridge Living Streets)
Development strategy	Do not need more new settlements, that are very different places to villages. Need to ensure separation between new settlements and existing villages.	201175 (K Smith)
Development strategy	Planning for significant numbers of new homes and a new settlement adjacent to key employment sites and ambition to optimise East West Rail is supported.	204918 (Innovate Cambridge)

Topic	Summary of issues raised in comments	Comments highlighting this issue
Development strategy	No housing has been allocated near the seven rural stations despite their ability to accommodate higher footfall – the GCLP should support higher density housing around these stations and work with the railway to improve services.	208033 (Railfuture East Anglia)
Development strategy	The conclusions of the updated Green Belt study, including grey belt land, will need to be considered. Green Belt boundaries should be re-examined in response to clear need for development.	208214 (Pigeon Land & LIH)
Development strategy	Object to non-residential development that is in excess of annual house building, as this would make existing environmental and transport problems worse.	208487 (C Johnson)
Site allocations	GCLP should ensure that smaller communities benefit from new developments, rather than being disadvantaged. Concerned will miss out on improvements to public transport and infrastructure due to being outside the new development, and about increased traffic from new developments.	203064 (Little Wilbraham and Six Mile Bottom PC)

Topic	Summary of issues raised in comments	Comments highlighting this issue
Site allocations	Allocation policies should consider the need for affordable housing for NHS staff, especially near large healthcare employers.	205169 (NHS Cambridgeshire and Peterborough Integrated Care Board)
Site allocations	Cambridge East – the requirements for 10% specialist accommodation, and two travellers sites should be removed. For specialist accommodation, need flexibility in requirements to allow for changes over time in demographic change, market demand, and placemaking. For traveller sites, there is no evidence provided as to why strategic sites should deliver traveller sites (last in list of options from Arc4), and inappropriate use of land (would result in loss of 80-200 dwellings).	209035 (Marshall Group Properties)
Site allocations	Concerned about inadequate public transport connections from surrounding villages to proposed new railway station at Cambridge East.	203064 (Little Wilbraham and Six Mile Bottom PC)
Site allocations	Cambourne North – clear delivery targets should be established, with ambition to deliver individual parcels within 6 months (rather than 18 months as at West Cambourne). Alternative construction methods such as modular or	207073 (Cambourne TC)

Topic	Summary of issues raised in comments	Comments highlighting this issue
	modern methods of construction should be actively encouraged to accelerate delivery.	
Site allocations	Cambourne North – opportunity should be taken to provide bungalows and smaller homes for older people. Shortfall of bungalows in Cambourne, and there is a lack of options for older residents who are capable of living independently but require smaller more manageable homes.	207076 (Cambourne TC)
Site allocations	Cambourne North – need to incorporate design features in homes that allow for future adaptations as residents needs change over time e.g. roofs ready for loft conversions, and double skinned garages for conversion to living accommodation.	207078 (Cambourne TC)
Site allocations	Cambourne North – would welcome further engagement on impacts of Cambourne expansion.	208226 (Bedford BC)
Site allocations	Grange Farm – object due to: • size • location • negative impact on surrounding villages • inadequate infrastructure e.g. capacity of medical services, capacity of education services, significant	202076 (S Tiplady), 204729 (G Huskisson), 202080 (M Barry)

Topic	Summary of issues raised in comments	Comments highlighting this issue
	water shortage, and capacity of transport infrastructure, • building on prime agricultural land, and • proximity to M11 and rail services will attract commuters – will become a dormitory town.	
Site allocations	Cambourne's perimeter bridleway provides an excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably.	204053 (S Rogers)
Additional sites	Cambridge Science Park North – support the inclusion of this site as an allocation in the GCLP, but acknowledge that the development may increase local property prices so urge high affordable housing provision.	205965 (Histon and Impington Community Land Trust)
Additional sites	Land to the east of Fulbourn Road, Teversham – a Housing Needs Survey Report for Teversham has been undertaken.	211480 (G Robinson and Partners)
Cultural infrastructure	Support Cambridge Junction and Create Cambridge in ensuring that: cultural infrastructure is embedded throughout the GCLP, culture is treated with parity alongside other infrastructure, and Create Cambridge is engaged as an advisor / consultee on the Local Plan.	205230 (J Walsh)

Policy H/AH: Affordable Housing

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is support for requiring 40% affordable housing (and 50% affordable housing on land within the Green Belt) and that this requirement relates to both C2 and C3 housing. However, there are also requests for a higher or lower proportion of affordable housing to be secured overall and/or on greenfield vs brownfield sites, and calls for developers to be required to meet these targets. There is also an objection to the requirement for 40% affordable housing on Build to Rent and Co-living developments on the basis that it does not conform to national planning legislation and guidance. Histon & Impington PC request that the re-sale of affordable homes should be restricted, so that affordable homes cannot be re-sold at market value.

Cambridge Green Party calls for the policy to be renamed “affordable and social housing”, as the reference to only affordable housing obscures the need for social housing. There are also comments that the policy should refer to a broader range of affordable tenures, including discounted market homes and key worker housing. Cambridge Green Party also request that that exceptions are allowed when empty buildings are being re-used.

There are concerns that new affordable homes are not genuinely affordable, and comments highlight that affordability of house prices and rents is a problem in Greater Cambridge. Cambridge Green Party requests that the proportion of social rented homes is increased, however there are comments from developers and landowners that the specific split of tenures does not allow for: flexibility to respond to changing circumstances over the lifetime of a development, strategic sites to secure

exceptions to this tenure mix, or older persons housing to take a more flexible approach where mixed tenure buildings can create challenges. There are comments that the policy should explain why the affordable housing tenures change between developments of 10-14 dwellings and 15+ dwellings, and for the policy to remove or amend the tenure requirement for shared ownership properties as some providers do not have the ability to deliver this form of tenure.

The NHS Cambridgeshire and Peterborough Integrated Care Board request that the provision of affordable housing is specifically considered, and that their affordable housing needs are included in housing needs assessments. There are also calls for non-residential developments (including visitor accommodation) to make a financial contribution towards the provision of affordable housing. An almshouse charity has suggested that they should be exempt from the obligations in the policy.

Great Shelford and Stapleford PCs request that First Homes are not precluded from coming forwards, and that the relationship between Neighbourhood Plans and this policy is clarified.

The University of Cambridge and some Colleges have requested that the affordable housing requirement within student accommodation developments is made more flexible, and that exceptions should also be made for sites beyond their campuses. It has also been suggested that it is unclear how the 40% affordable housing contribution on student accommodation aligns with Policy H/SA, which proactively supports the provision of student accommodation and requires a formal legal agreement be entered into with at least one educational institution and to ensure the accommodation is retained for student occupation. Anglia Ruskin University contests the 40% affordable housing contribution on student accommodation developments on the basis of viability and requests that university-led student accommodation developments should be exempt.

Churchill Retirement Living with McCarthy and Stone have highlighted that the viability assessment is unclear as to what specialist housing models have been tested.

There are comments from housebuilders and Northstowe TC relating to the grouping or clustering of affordable homes, and the need to consider their management and location within the development (including adjoining parcels), as well as requests for greater clarity on what constitutes “small groups or clusters”. There are also calls for the references to the nationally described space standards to be removed as they fail to recognise what is allowed and does not allow for meeting the most up to date needs.

Response to main issues raised in representations:

National planning policy requires local authorities to assess the size, type and tenure of housing needed for different groups in the community, including those who require affordable housing, and reflect the results of this assessment in their planning policies. The Councils have evidence that there is high level of need for affordable housing in Greater Cambridge, and it is important we seek a significant contribution from developments to respond to this need. Seeking high levels of affordable housing by securing at least 40% affordable homes on major development sites and at least 50% affordable homes on land within the Green Belt, and by enabling the provision of affordable housing on rural exception sites (see Policy H/ES), will make a significant contribution towards responding to our identified affordable housing needs. Our viability assessment demonstrates it is viable to seek 40% affordable homes on major development sites and 50% affordable homes on land within the Green Belt, but that a higher percentage will impact on the viability and delivery of sites.

All major developments for housing must provide on-site affordable housing or in specific circumstances either a financial contribution to enable delivery of affordable housing elsewhere or linked off-site provision. National planning guidance states that 20% is generally a suitable benchmark for the level of Affordable Private Rent homes to be provided in any Build to Rent scheme, but that local authorities can set a different requirement if justified by evidence. Our viability assessment shows that

the strong Greater Cambridge housing market will support 40% Affordable Private Rent in Build to Rent schemes, and therefore this is the requirement set out in Policy H/AH for affordable housing on Build to Rent schemes. Our viability assessment also demonstrates that it is viable for any major developments for housing (irrespective of their use class of C2, C3, C4 or sui generis) to provide affordable housing or a financial contribution.

Section 5b of the policy requires new affordable homes to be available in perpetuity (wherever possible), and therefore through the planning process provisions will be secured to ensure that affordable homes are retained in perpetuity where it is possible to do this.

Affordable housing is defined in the glossary of the National Planning Policy Framework (2024), and this same definition is included in the Local Plan glossary. Affordable housing covers everything from social rented housing to discounted market sales housing, and therefore the policy already covers a wide range of affordable housing tenures and does not need to be renamed. National planning policy and guidance also already sets out requirements in relation to the reuse or redevelopment of vacant buildings, and how the affordable housing contribution should be calculated on these types of development. It is therefore not necessary to include exceptions within the policy for the re-use of empty buildings as this is already covered by national planning policy.

The Councils are aware that there is a high level of need for affordable housing in Greater Cambridge, and that a variety of tenures of affordable housing are needed to meet this need. The Councils are also aware that homes need to be genuinely affordable for residents, and therefore alongside securing the delivery of a wide variety of affordable homes to meet different types of households and household incomes, the Local Plan also contributes towards other factors that that have an impact on affordability of housing such as energy efficient homes and reducing costs associated with commuting by locating homes close to places of work with opportunities for active travel or access to public transport.

The policy seeks to provide an affordable housing tenure mix that will meet a wide range of housing needs and create mixed and balanced communities. The proportions of different tenures of affordable homes also recognises that affordable homes that provide a route to home ownership (such as shared ownership homes) may be required to support the delivery of affordable housing for rent through cross subsidy, and therefore enable developments to be viable and deliverable. Taking account of comments received and the need to prioritise social and affordable rented homes, amendments have been made to the policy to allow exceptions where developments provide a higher overall proportion of social and affordable rented homes, with no or a smaller proportion of shared ownership homes. Amendments have also been made to the supporting text to explain why there are different tenure mixes for developments of 10-14 dwellings and 15 or more dwellings. Deviations from the tenure mix set out in the policy will be considered, however evidence will need to be provided to justify the deviation proposed, and this is now set out in the supporting information.

The Housing Needs of Specific Groups study (2025) calculates the need for affordable housing from households unable to buy or rent privately, and also, from households able to rent privately but not buy, by considering local house prices and rents, income levels and affordability, need from homeless, overcrowded, concealed or new households, and existing supply and relets. Our assessment will therefore already include the consideration of NHS workers where they fall within the income levels and sources of need. Affordable homes delivered will also be available to NHS workers where they meet the relevant eligibility criteria for the specific affordable housing tenure being provided.

The supporting information for J/VA sets out that where proposals for apart-hotels or serviced apartments are considered to fall within Use Class C3 or comprise sui generis uses which have the characteristics of a C3 use, such proposals will be assessed via relevant housing policies in the Local Plan. It also sets out that where apart-hotels and serviced apartment units fall under C1 or Sui Generis uses, the councils will take steps to ensure they will not be used for any other purpose. With regard to other non-residential developments, they are required to make planning contributions on a range of issues, including

transport (via the proposed CIL), affordable employment space and skills.

Exemptions from the policy for specific providers, such as charities or particular developers, are not appropriate and are also not necessary due to the ability for proposals to provide evidence as part of the planning application process to demonstrate that a material consideration(s) exists to deviate from the policy.

Made Neighbourhood Plans and adopted Local Plans have the same weight in decision making, however, if there is any conflict between the policies in the two plans, the most recently adopted/made plan takes precedence in decision making.

Taking account of comments received relating to affordable housing on student accommodation developments, the policy requirement and supporting information have been amended to clarify that where student accommodation is delivered on buildings or land owned by the University of Cambridge, Anglia Ruskin University or a University of Cambridge College, the policy exempts such development from contributing towards affordable housing, as other types of housing would not normally be delivered in these locations. However, where student accommodation is brought forward on other sites, these could equally be suitable for other types of housing, and therefore it is important that such developments are required to contribute towards meeting our affordable housing need.

Within developments, the new affordable homes must be dispersed in small groups or clusters that: create an even distribution of affordable housing throughout the development as a whole, and when considered in combination with neighbouring developments; contain a mix of affordable housing tenures and a mix in the number of bedrooms; and are proportionate in size to the overall size of the development, having regard to the type and location of the housing being provided. An amendment to the supporting information has been made to set out that the Greater Cambridge Housing Strategy 2024-2029 includes specific requirements relating to the clustering and distribution of affordable housing.

In response to the comment from Churchill Retirement Living with McCarthy and Stone, the Viability Assessment (2026) has

considered the viability of seeking affordable housing within schemes for two types of older peoples accommodation – extra care and sheltered housing. The Viability Assessment (2026) concludes that it is viable to seek affordable housing within both these types of older peoples accommodation. The Viability Assessment (2026) provides details on the assumptions made for each of these two types of accommodation.

Section 5e of the policy sets out that social and affordable rent homes should be designed to accommodate different family compositions by requiring a minimum number of bedspaces for the number of bedrooms provided. This does not conflict with the nationally described space standards (see Policy H/SS) or prevent developments from meeting the most up-to-date needs, but instead is seeking to ensure that occupancy of social and affordable rented homes can be maximised by ensuring that new affordable and social rented homes align with the Councils' Lettings Policies and Local Housing Allowance criteria.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support requirement for 40% affordable housing, and increased requirement on land within the Green Belt.	207749 (Whittlesford PC), 209036 (Marshall Group Properties), 209211 (Urban & Civic), 211223 (Terra Strategic), 211241 (Living Space Housing), 211466 (Hayfield Homes Construction Ltd)
Support for affordable homes policy - it is very important that these come forward as part of every relevant development. Developers should be expected to assess viability as part of the purchase of the site and at least 40% affordable is a key part of this.	203418 (Cambridge City Council Liberal Democrat Group)

Summary of issues raised in comments	Comments highlighting this issue
Generally supportive of Policy H/AH. Council's assessment of affordable housing need points to a need to increase the housing requirement figure and identify further housing land to help reduce the level of acute need in Greater Cambridge.	208910 (Nightingale Land and Hill Residential Ltd)
More affordable housing should be provided.	205700 (Newnham Labour)
Developers must be held to these affordable housing targets: • enforcement is vital and not always achieved in the past, • viability and other arguments shouldn't be used to reduce affordable levels after permission granted.	201044 (P Spowart), 201465 (S Smalley), 201019 (M Colville)
Affordable housing is not very affordable.	201351 (D Wood), 202867 (H Cook)
Fully applaud the strategic priority of including significant quantities of housing that is affordable to rent and to buy.	201779 (H Jackson)
The GCLP does not clearly explain: how affordability will be secured over time, what proportion will be social or genuinely affordable rent, or how local need will be prioritised. Undermines confidence that developments will support a balanced community.	208980 (J Williams)
First Homes are not precluded from coming forwards, and therefore the affordable housing policy should allow for them.	208103 (Great Shelford PC)
Although First Homes may not be suitable for most new developments in Greater Cambridge, the policy should not discourage their inclusion where appropriate.	201640 (Stapleford PC)
Support requirement for both C2 and C3 developments to contribute towards the delivery of affordable housing.	208103 (Great Shelford PC)

Summary of issues raised in comments	Comments highlighting this issue
Commitment to delivering a balanced mix of housing types and tenures is welcome, particularly its focus on affordable housing to address Cambridge's long-standing challenges.	203533 (Cambridge Ahead)
Affordable housing supported but only within villages, respecting Green Belt and settlement character. Affordable housing must reflect rural context and realistic delivery.	202255, 207163, 207164 (Girton PC)
Support the policy and request additional requirements: • Clause 5a should also require the re-sale of affordable homes be restricted such that it cannot be resold at market value, • When an application is received which does not meet the requirements, these must go to a public planning committee meeting and any justification for a site not meeting the requirement is to be made public where permission is granted, • Where an application does not provide affordable homes due to viability, a reassessment should be made if the build time exceeds 5 years from permission granted.	201436 (Histon & Impington PC)
This policy should be renamed "Affordable and Social Housing" and every mention of "affordable housing" in the policy's introduction should be amended to "affordable and social housing." A blanket focus on "affordable housing" obscures the acute needs of those who can only afford social rent, including low-income households and families facing homelessness.	203739 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
Housing should be a requirement on non-residential or employment sites to encourage mixed use developments, and where not appropriate, a commuted sum should be sought.	201506 (B Greig), 201869 (J Hurst), 205666 (D Storey), 207647 (Duxford PC), 207660 (K Holland), 201461 (J Neal), 205332 (T Neal)
Affordable housing requirements can influence development outcomes – consider applying affordable housing requirements to non-residential uses such as visitor accommodation to ensure most appropriate use of land.	207775 (Hilton Cambridge City Centre), 206937 (Concilio Communication)
Affordable housing should not be allowed in the Green Belt whether 40% or 50% applied	201019 (M Colville)
Policy should be flexed to require more affordable housing on greenfield sites than brownfield sites	201463 (K Mak)
Unclear whether this policy applies to charitable almshouse associations providing exclusively affordable housing. It could act as a strong deterrent to developing more homes and, therefore, charitable almshouse associations should be exempt from obligations set out in this policy.	202096 (Great Shelford Village Charity)
Supportive of the policy but concerned about how to manage affordable housing requirements from adopted neighbourhood plans when they differ from the policy.	201640 (Stapleford PC)
Unclear how affordable housing requirements set out in adopted neighbourhood plans will be considered when they differ from this policy. Clarity should be added.	208103 (Great Shelford PC)
The requirement for affordable housing within student accommodation developments should be more flexible. The exception for developments within an existing university or	202508 (University of Cambridge), 202048 (Trinity Hall), 204006 (Jesus College),

Summary of issues raised in comments	Comments highlighting this issue
college campus site should be extended to cover developments nearby to campus sites. It can be difficult to define the boundary of some University of Cambridge college sites.	204751, 210715, 210716 (St John's College Cambridge)
ARU contests that the 40% affordable housing contribution will be viable for student accommodation. The policy approach appears to directly inhibit good equality, inclusion and diversity principles, specific to the student demographic. The policy implications will be starkly different between ARU and the University of Cambridge. Should consider either removing the 40% requirement for student accommodation altogether or consider an alternative approach that would have direct benefits to student affordability. No affordable housing requirement should apply for University-led PBSA.	203976 (Anglia Ruskin University)
Object to 40% affordable housing provision being sought on purpose built student accommodation (PBSA). This will stop demand being met for this type of accommodation. There should be no requirement for affordable housing on PBSA.	208484 (Carter Jonas)
Unclear what 'within an existing university or college campus site' means, when a college has dispersed sites. Unreasonable to seek an affordable housing contribution from student accommodation developments on a site currently within college ownership. Amend policy to not seek affordable housing contribution where the proposed development is within an existing university or college campus site, for the redevelopment of sites within the ownership of university or college at date of adoption of the GCLP, or which will continue to be owned by a university or college after the redevelopment to provide student accommodation to meet its needs.	210978 (Kings College), 211074 (Girton College), 211528,211529 (Trinity College)

Summary of issues raised in comments	Comments highlighting this issue
Object to developments of student bedrooms being required to make an off-site contribution for affordable housing. Unclear how this aligns with policy on student accommodation, which proactively supports delivery of student accommodation to meet needs. Financial burden will discourage the provision of purpose built student accommodation.	208248 (Kings College), 208292 (Trinity College), 208297 (Girton College)
A more flexible approach to affordable housing mix is taken for older persons' housing. Mixed tenure buildings (e.g. combining social rent with affordable rent or sale) can create market challenges and affect viability. Flexibility in tenure is therefore essential to ensure the viability and successful delivery of older persons' housing developments to meet needs.	201942 (A Hanover)
Confusion in the Viability Assessment as to what specialist housing models have been tested – extra care, sheltered housing and / or retirement villages? Viability testing needs to be re-considered for different specialist housing types.	208318 (Churchill Retirement Living with McCarthy and Stone)
Object to the requirement for affordable housing at 40% to be delivered on Build to Rent and Co-living developments. This will stop demand being met for this type of accommodation and does not conform with the requirements of National legislation. In line with National Guidance, any affordable housing on BtR or Co-living should be capped at 20%.	208484 (Carter Jonas)
General support for policy but requested that the requirement to provide 25% of all affordable homes as shared ownership is removed or amended. Cambridge City Council	204418 (Cambridge Investment Partnership (CIP))

Summary of issues raised in comments	Comments highlighting this issue
only retains legacy shared ownership stock and does not have the capacity to administer a new shared ownership programme. Policy approach does acknowledge the importance of a mix of affordable housing.	
The policy needs to ensure it is sufficiently flexible in order to respond to changing needs and opportunities. On-site provision should also be subject to site-specific viability constraints. Furthermore, the ability to include cascade mechanisms is requested to be included in the policy.	203106 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
The policy does not include any wording on how the delivery of affordable housing can be altered should there be material viability considerations. This should be addressed through an amendment or standalone policy.	208684 (Guilden Morden Developments Ltd)
The policy should explain why the affordable housing tenures change depending on whether the quanta are 10-14 or 15+ units.	208684 (Guilden Morden Developments Ltd)
Consider applying lower affordable housing requirement of 25% to support housing delivery and scheme viability	207775 (Hilton Cambridge City Centre)
The proposed affordable housing policy has evolved to introduce more prescriptive requirements, particularly in relation to tenure mix on developments of more than 15 dwellings. The policy provides no flexibility to depart from the specified tenure split where an alternative mix could be robustly evidenced and justified. In practice, it is common for tenure mixes on larger, more complex/strategic sites to evolve as proposals are refined, often through the preparation of a bespoke, site-wide housing strategy submitted	204880 (Hill)

Summary of issues raised in comments	Comments highlighting this issue
alongside a planning application. Such an approach provides a more effective and responsive mechanism for determining an appropriate affordable housing mix, reflecting site-specific circumstances and identified needs.	
The criteria raised in relation to clustering should acknowledge the need to consider the efficient management of affordable homes in clusters, cost effective maintenance and reduced service charge burden.	204880 (Hill)
Object to grouping or clustering of affordable homes – given that new affordable homes should be tenure blind and indistinguishable from other housing. Equivalent proportion of affordable homes (to market homes) should be in prime locations within the development.	208055 (Northstowe TC)
Clustering requirements should be considered for the whole site, and not just individual parcels.	208056 (Northstowe TC)
The policy requires greater flexibility to reflect site specific constraints and the changing viability landscape. The policy needs to incorporate explicit flexibility to allow for cascade mechanisms within S106 agreements.	204601 (Redrow South Midlands)
Criterion 5(e) sets out the precise number of bedspaces to be provided in affordable homes, this would not allow for the meeting of the most up-to-date evidenced local needs.	204601 (Redrow South Midlands)
Greater flexibility is needed within the policy to allow for more bespoke proposals to be favourably considered.	208610 (Pigeon Land & LIH)

Summary of issues raised in comments	Comments highlighting this issue
The policy is supported in principle but it is important the Councils continue to review viability as the plan progresses and allocate a sufficient number of sites of varying sizes, types and locations.	210262 (Vistry Group), 204884 (Vistry Group)
Paragraph 6 of the policy should further clarify as to what constitutes “small groups or clusters” in practice.	210263 (Vistry Group), 204884 (Vistry Group)
The appropriateness of the viability tested route should be explicitly mentioned within the policy wording, rather than the supporting text (point 9.15). This will carry greater weight in decision making rather than being perceived as guidance or an aspiration, and will provide greater clarity for developers, especially in light of the increased requirements for medium scale sites.	204098 (Brookgate Land and Network Rail Infrastructure Ltd), 204291 (Bellway Strategic Land), 204519 (Bellway Strategic Land)
A fixed 40% requirement is often unviable for small and medium-sized schemes delivered by SME developers. While suitable for large strategic sites, it creates a delivery gap for schemes of 10 to 30 dwellings, leading to stalled sites or protracted viability negotiations. A scaled approach is recommended as this would improve viability, certainty and housing delivery while still securing affordable homes.	204569 (NP Architects)
Policy should be amended to introduce greater flexibility in prescribed affordable housing tenure mix, with clearer recognition of viability considerations.	205460 (Mac Mic Land), 211564 (Martin Grant Land Limited)
Specific split of affordable housing tenures does not allow flexibility to respond to changing circumstances over the lifetime of a development, and no wording that allows for exceptions that have been secured on other strategic sites.	209037 (Marshall Group Properties)

Summary of issues raised in comments	Comments highlighting this issue
The Policy should include a broader range of affordable tenures, as it currently lacks reference to other intermediate housing options, such as discount to market provision.	209706 (Endurance Estates), 209707 (Endurance Estates), 211564 (Martin Grant Land Limited)
There is ambiguity regarding the application of the policy to keyworker provision, as there is no reference to keyworker housing within the policy and therefore whether keyworker accommodation qualifies as affordable housing.	211564 (Martin Grant Land Limited), 205069 (Endurance Estates)
Whilst the EEAST understands affordable rented housing should be prioritised, we think identifying NHS and emergency services staff (both clinical and administrative) as key workers is a very important part of staff retention in and around NHS properties.	210336 (East of England Ambulance Service NHS Trust)
Policy should be amended to seek 50% affordable housing, with a greater proportion of social rent homes required. For land within the Green Belt, the policy should seek 55% affordable housing.	203739 (Cambridge Green Party)
After point 1, a new sentence should state “This requirement applies only to new builds. Where a development includes the re-use of long-term empty buildings (for example through conversion, refurbishment or subdivision of existing buildings), any units brought back into use in this way will be disregarded for the purpose of calculating the development’s affordable and social housing requirement. However, if re-used units within a development are provided as affordable or social homes, they can still count towards meeting the requirement.” This incentivises the creative re-use of empty buildings, which is more efficient and sustainable than building new homes.	203739 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
At the end of the first paragraph in the supporting information, the following sentence should be added: “The combination of apartment housing and denser forms of development with self-contained dwellings is also an important strategy for increasing affordable and social housing production.” This reflects the fact that denser, apartment-led development makes the delivery of affordable housing more viable, efficient and sustainable, directly supporting the policy’s stated aim of maximising supply.	203739 (Cambridge Green Party)
Specific provision should be for council housing and key-worker housing close to places of employment, especially hospitals.	203815 (A Carpen)
The Policy should seek to retain flexibility on the tenure to allow developments to reflect localised need for affordable housing.	208342 (Thakeham Homes Ltd)
The table in 5e duplicates the Nationally Described Space Standards (NDSS) requirements. The table also fails to recognise some of the minimum number of bedrooms allowed under NDSS. To avoid duplication and confusion, it is recommended that paragraph 5e is removed.	208342 (Thakeham Homes Ltd)
The policy identifies that all schemes are required to deliver affordable housing onsite, which fails to recognise that there may be circumstances in which provision of affordable housing off-site may be preferable. Recommended that the policy is revised to identify a preference for onsite affordable housing delivery, however that off-site affordable housing provision will be accepted where robust justification for this approach is provided.	211288 (Woolsington One Ltd)

Summary of issues raised in comments	Comments highlighting this issue
The option for off-site provision or a financial contribution as an alternative to on-site affordable housing provision if it is not suitable or viable is supported.	211466 (Hayfield Homes Construction Ltd)
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.	204055 (S Rogers)

Policy H/ES: Exception sites for affordable housing

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was recognition that rural exception sites could support specific types of households such as young families and older people in need of specialist or more affordable housing options. However, there were calls for strong controls to be applied to exception sites to avoid negative impacts on village character and the green belt. It was suggested that market housing on exception sites should be capped at 20% and that rural exception schemes should originate and be directed by the local community rather than a developer.

It was suggested that the policy should be amended to specifically cater for, and prioritise, community led housing on exception sites. Some of the costs associated with progressing an exception scheme were considered unreasonable for a charity and exemptions should apply. Some clauses in the draft policy were considered not to address the specific circumstances of charitable almshouse associations.

It was proposed that viability of rural exception schemes could be supported by allowing additional affordable homes to be built in excess of the need identified for the village concerned. This would be as an alternative to delivering market housing in recognition that not all Registered Providers deliver market housing.

A developer argued that rural and First Homes exception sites should be addressed through two separate policies. They also

proposed loosening the requirements around undertaking a housing needs assessment by deleting reference to ‘independent’ and ‘long term needs’ and that there should be no requirement to name a Registered Provider in the s106 agreement as they wanted the option to engage with Registered Providers throughout the planning application process or the sale of the site post planning.

Response to main issues raised in representations:

Previously, the draft policy, in line with the NPPF, allowed schemes to include some market housing to support viability. However, not all Registered Providers deliver market housing so allowing them to include additional affordable housing in excess of the identified needs of the village provides an alternative option to improve viability. Therefore, an additional section has been added to the policy which enables rural exception schemes to include additional affordable housing in excess of the identified need of the village in order to support viability.

It is considered that the controls proposed are adequate to ensure rural exception schemes are developed and located appropriately. The NPPF already requires that rural exception sites in the Green Belt must include a sequential test to demonstrate there are no alternative non-Green Belt sites. Whilst it is not practical to require that all rural exception sites are led by the local community, good practice dictates that such schemes should be brought forward through a partnership approach including strong engagement with the local community.

Whilst the policy makes no special allowances for community led housing approaches it does explicitly state that rural exception sites must be delivered by, or in partnership with, Registered Providers or community-led housing groups and these must be named in the relevant s106 agreement. The impact of the housing scheme on the adjoining village will be no different regardless of

whether led by a Registered Provider or community led housing group and therefore there is no logic in applying different criteria. Similarly, a key criterion for granting planning permission for a rural exception scheme outside of a Defined Development Extent is that there is an identified local housing need and there is no rationale for waiving the requirement for a housing needs assessment for a specific provider. However, it is recognised that community led housing groups could have alternative sources of information that could add to the evidence base. It is not accepted that clauses in the policy are inconsistent with a community led housing approach to rural exception sites. For example, where a local almshouse charity has a catchment which spans beyond a single parish there is no reason why this wider geography could not be applied to the cascade mechanism in the s106 agreement.

Rural exception sites and First Homes exceptions sites have been kept under the same policy. It is important that these alternative approaches to delivering affordable housing are complementary and that First Homes exceptions sites do not crowd out rural exception sites. An integrated policy approach is considered the best way to achieve this. The requirement for an independent housing needs assessment has been retained as this is an important part of the process of delivering a rural exception scheme and provides reassurance to partners, including the local community, that the scheme is addressing a demonstrable local need. The requirement that the need ‘can reasonably be expected to persist in the long term’ simply ensures that a scheme is not developed to address a need caused by a one-off event or seasonal activity where the need is likely to dissipate in a reasonably short period of time. Requiring a Registered Provider or community led housing group to be named in the s106 agreement ensures that the scheme is workable and does not include conditions that would make it difficult for the organisation that will ultimately manage the homes to operate the scheme. Exception sites achieve viability through low plot values and it is not appropriate to inflate these through bidding processes.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Exception sites must not undermine Green Belt, village identity, or the Girton Gap.	202256 (Girton PC)
The threshold for allowing exception sites for affordable housing on Green Belt land should be significantly raised to prioritise protection of the Green Belt. Alternative sites in other locations (villages, urban centres and new settlements) should be considered instead of encroaching on Green Belt land.	201020 (M Colville)
Proposals must be truly exceptional and locally justified. Require strong tests of local need and landscape fit.	202256 (Girton PC)
Rural exception schemes should originate and be directed by the local community, not a developer.	201897 (R Pargeter)
Clauses in Policy H/ES do not take into account the specific circumstances of charitable almshouse associations in providing affordable housing.	201641 (Stapleford PC), 210953 (Great Shelford Parish Council)
Some clauses do not consider the specific circumstances of charitable almshouse associations in providing affordable housing. For example: • clause 1b – almshouse residents are not tenants but occupants who pay a monthly maintenance charge which, is not specifically related to affordable housing rents, • clause 4a – an almshouse charity constitution determines the 'local area' for the charity which can extend beyond a parish (the usual definition of 'local' for an exception scheme), • clause 4b – an almshouse charity constitution can require that local connection criteria are retained throughout the lifetime of a property.	202101 (Great Shelford Village Charity)

Summary of issues raised in comments	Comments highlighting this issue
GCLP makes no express provision for housing provided by charities, and in particular almshouse charities. Requirement to provide professional reports of 'need' demands the use of charity funds to demonstrate something already known, as this will decrease the amount of charity funds remaining available for the provision of affordable housing in the long term.	202101 (Great Shelford Village Charity)
Recommend strengthening the policy's wording to prioritise community-led housing initiatives for exception sites where feasible.	203740 (Cambridge Green Party)
A new clause should limit market housing to a maximum of 20% of total dwellings on exception sites to ensure they remain primarily for affordable and social housing.	203740 (Cambridge Green Party)
Support for rural exception sites is positive, but rural delivery challenges are not fully addressed: • Small village schemes often face viability constraints, infrastructure limits and fewer Registered Provider partners, • There is little reference to retaining younger households in villages or providing homes linked to local employment, • Stronger rural proofing would include more flexibility for small rural sites, clearer support for community led housing and better alignment between housing growth, rural transport and access to services.	203179 (Cambridgeshire ACRE)
Rural and First Homes exception sites should be addressed through two separate policies to allow for more convenient interpretation by applicants in order to meet the overall needs for housing and other development types.	208686 (Guilden Morden Developments Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Clause 1a should be altered to ‘demonstrable need for affordable housing for those with a connection to the settlement and which is evidenced by a local housing needs assessment’ as current wording requiring ‘independent’ needs assessment and ‘long term’ needs is overly stringent.	208687 (Guilden Morden Developments Ltd)
Whilst it is appreciated that evidence of the social or economic need for affordable housing is required, that the need identified should be expected to persist in the long term is objected to. The NPPF simply requires that such schemes demonstrate that they will contribute towards meeting identified local needs. The Councils should be seeking to support rural exception schemes which address identified local needs for affordable housing at the time of submission, regardless of whether such needs are envisaged to persist in the longer term.	211289 (Woolsington One Ltd)
Requiring Registered Providers to be named in S106 agreements hampers the delivery of the site and prevents the applicant from engaging with multiple RPs throughout a planning application process or the sale of the site post planning in order to meet both parties' needs for adaptation to circumstances at the time of land disposal.	208688 (Guilden Morden Developments Ltd)

Policy H/HM: Housing Mix

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was a call for a higher proportion of smaller and/or affordable dwellings. They also suggested that deviations from the proposed policy mix should be justified at the local level and, where available, supported by evidence from Neighbourhood Plans, local housing needs surveys and the housing register.

Developers considered the policy overly prescriptive and sought a more flexible approach allowing schemes to take account of settlement type, tenure, housing market areas, urban/rural differences, site constraints and context and changing market demand. It was suggested that the policy would work better if percentages were expressed as a range rather than fixed figures. One respondent made a similar point specifically about older peoples' housing developments. Another sought clarity as to whether charitable almshouse associations would have flexibility to deviate from the policy requirements in order to address their specific target market.

There was a proposal that the policy should incentivise the delivery of social rent affordable homes and mixed use developments by allowing higher densities in these cases. It was argued that this will encourage a more efficient use of land and reduce car dependence.

A comment has been made relating to introducing controls on short-term lets.

Response to main issues raised in representations:

There is a concern that many housing schemes deliver smaller market dwellings as houses while delivering the equivalent smaller affordable dwellings as flats. This causes problems in South Cambridgeshire where flats can be more challenging to let and typically have higher turnover rates. The policy has been amended to ensure affordable dwellings are delivered in similar proportions, in terms of housing types (houses, flats and bungalows), to market dwellings.

The policy already requires that over half of new affordable housing on schemes of 10 or more dwellings are built as 1 or 2 bedroom dwellings. A significant proportion of market housing will also be required to be built as 1 or 2 bedroom dwellings in both Cambridge and South Cambridgeshire. Where variations from the proposed housing mix are put forward these will need to be justified by evidence that relates to the specific site and local housing market. Evidence from Neighbourhood Plans, local housing needs surveys and the housing register are all likely to be very relevant. Made Neighbourhood Plans and adopted Local Plans have the same weight in decision making, however, if there is any conflict between the policies in the two plans, the most recently adopted/made plan takes precedence in decision making.

The proposed housing mix is based on robust evidence of housing need including projections of population and household types and aims to satisfy a diverse range of housing needs and create sustainable, inclusive and mixed communities. However, it is recognised that demand can change over time and that every site has its own unique set of characteristics. The policy strikes a balance by setting out an ideal mix and recognising that there is scope for deviation where developers can provide robust evidence for an alternative housing mix. The policy also recognises that alternative housing mixes will often be appropriate for specific housing proposals such as student accommodation, housing for older people and community led housing developments targeting particular groups within the community. Given the scope for justified deviations from the proposed housing mix it is not considered necessary to present the housing mix in the format of ranges.

The appropriateness of developing at higher density or with a higher proportion of affordable housing is a matter for other policies. Comments on short-term lets have been addressed under the visitor accommodation policy (Policy J/VA). The matter suggested in the comment sits outside the remit of the Local Plan.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for approach to securing a varied housing mix within new residential developments and welcome the flexibility within the policy to allow for alternative mixes where this can be robustly justified. Important that the inclusion of “Unless an alternative mix has been justified as part of a planning application…” is retained in the policy.	211224 (Terra Strategic), 211242 (Living Housing Space), 211467 (Hayfield Homes Construction Ltd), 211565 (Martin Grant Land Limited)
Need more one bed properties including co-housing to address needs of 20-30 year olds.	204021 (Histon & Impington PC)
Girton needs a housing mix more focused on smaller properties, not large family homes or high density flats.	202257 (Girton PC), 205577 (Girton PC), 205578 (Girton PC)
Need increased provision of ‘affordable’ one and two bed market homes to tackle housing unaffordability due to high price of market housing.	207750 (Whittlesford PC)

Summary of issues raised in comments	Comments highlighting this issue
Social and affordable housing should be prioritised over market housing.	205572 (G Briscoe)
Flexibility in tenure and housing mix is essential to ensure the viability and successful delivery of older persons' housing developments to meet needs.	201939 (Anchor Hanover)
Seek clarification that charitable almshouse associations and similar organisations would be encompassed by exceptions set out in clause 2 and permitted to deviate from the type and mix of housing set out in clauses 1, 3 and 4. Requiring evidence to justify deviations would erode charity funds and reduce funds available for provision of affordable housing.	202106 (Great Shelford Village Charity)
Justification for changes to the prescribed housing mix should be made at the local level.	201437 (Histon & Impington PC)
It is unclear how affordable housing mixes as set out in adopted neighbourhood plans would be dealt with under the policy, particularly where they differ from requirements set out in the policy	201642 (Stapleford PC), 210954 (Great Shelford PC)
The percentage of one-bedroom units being required in South Cambridgeshire is too high. The GCLP should recognise that providing larger units (i.e. two bedrooms - still relatively small homes), will allow families to grow without the need to move.	203395 (ESCO Prospect)
A generalised housing mix to be provided across the plan area regardless of settlement type, tenure, or different housing market areas, is overly prescriptive.	204603 (Redrow South Midlands)
Policy should be refined to ensure appropriate mixes are provided across urban and rural areas and across different forms of home tenure.	203395 (ESCO Prospect), 204603 (Redrow South Midlands)

Summary of issues raised in comments	Comments highlighting this issue
Housing needs assessments not always a robust way of assessing need as they may not reflect demand for extra bedrooms to serve other purposes such as a home office.	204603 (Redrow South Midlands)
Support for this policy, which sets out housing mix as a series of recommendations expressed as a range, rather than as fixed requirements. This provides an appropriate level of flexibility, allowing development proposals to respond to changing market conditions and housing needs over the plan period, while still supporting the delivery of a balanced mix of homes.	204887, 210264(Vistry Group)
Clarification sought on how applicants should have regards to 'location and character of the area, the built form of the new development, the nature or type of development being proposed, the viability of delivery given site-specific constraints or requirements, changes in affordable and market housing demand in the local area, and the existing housing mix in the surrounding area', when justifying deviations.	208689 (Guilden Morden Developments Ltd)
The policy does not enable the ability to respond to market demands. In particular, there is insufficient evidence demonstrating that the specific percentages set out are justified across: • different market areas, • settlement types (urban, edge-of-Cambridge, new settlements, villages), • tenure types, or • varying site constraints.	203108 (Barratt David Wilson Homes & NW Cambridge Consortium of Landowners)
It is important that the policy allows for sufficient flexibility so that it can respond to housing mix over the lifetime of the plan period and that the proposed housing mix is not strictly adhered to as an overall	208911 (Nightingale Land and Residential)

Summary of issues raised in comments	Comments highlighting this issue
approach and is instead treated on a case by case basis through the development management process.	
The Policy should include more flexibility in relation to the required housing mix to reflect the circumstances of each site and its context as well as market demand and evidence of local needs in accordance with Government policy.	205071 (Endurance Estates)
Use of fixed percentages could undermine scheme design and undermine deliverability. Welcome supporting text which confirms that deviations will be permitted where justified. This should be within the policy wording to ensure consistent and pragmatic decision making.	207026 (Mac Mic Land)
Support overarching objective of the policy to secure a balanced housing mix that responds to identified needs.	207026 (Mac Mic Land)
Policy is overly prescriptive, lacks flexibility and does not reflect the practicalities of delivery on large sites. Rigid requirements risk constraining delivery and undermines ability to respond to market conditions.	208992 (Barratt Homes Northampton)
Evidence base does not sufficiently justify the detailed mixes proposed – SHMA provides useful strategic guidance, but does not support precise percentages being applies across all sites.	208992 (Barratt Homes Northampton)
Policy fails to explain how its requirements will interact with other policy burdens which influence housing typologies and layouts.	208992 (Barratt Homes Northampton)
Policy would be more workable if percentages were expressed as ranges rather than fixed figures.	208334 (Gladman Developments)

Summary of issues raised in comments	Comments highlighting this issue
Recommend adding a clause requiring special justification for predominantly low-density, market-rate housing proposals, while supporting higher-density schemes that deliver social rent above minimum requirements. This will incentivise the development of new social rent housing and more efficient land use.	203746 (Cambridge Green Party)
Recommend amending point 4 to read “Development proposals will be supported where (a) a mix of housing types (e.g. houses, flats and bungalows) are provided proportionally across all market and affordable tenures, taking account of local character, built form and up-to-date evidence of housing need; and (b) where feasible, the proposals have prioritised higher-density and mixed-use forms that integrate housing with employment, services and facilities.” This will help to encourage more efficient use of land in high-demand areas and reduce car dependence.	203746 (Cambridge Green Party)
Add reference to any relevant adopted Neighbourhood Plans, recent local Housing Needs Surveys, and Housing Register as evidence for the housing needs of the local area.	201387 (Gamlingay PC)
Commitment to delivering a balanced mix of housing types and tenures is welcome, particularly its focus on affordable housing to address Cambridge’s long-standing challenges.	203534 (Cambridge Ahead)
It is important that the implementation of the housing mix policy is supported by the allocation of a sufficient number of sites across a range of sizes, locations and settlement types.	210265 (Vistry Group)
A key barrier to effective regulation is the absence of a compulsory registration system for short-term lets. Without registration, the Council cannot easily identify which properties are operating as short-term rentals, distinguish genuine home-sharing from commercial activity, or ensure compliance with basic	211865 (Hilton Cambridge City Centre)

Summary of issues raised in comments	Comments highlighting this issue
requirements. Crucially, registration must be linked to clear planning control. The Local Plan should provide an explicit policy framework confirming when short-term letting amounts to a material change of use and requiring planning permission. Without compulsory registration linked to clear planning control, the Local Plan will fail to address regulatory imbalance, housing loss and market distortion caused by short-term letting, and therefore calls for these measures to be explicitly embedded within policy	

Policy H/GL: Garden land and subdivision of existing plots

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was general support for the policy, although there were calls for stronger controls to prevent detrimental impact on village character, green spaces and settlement patterns, and due to the importance of gardens and green spaces in reducing localised flooding, for community well-being, and for urban wildlife. The importance of residential annexes in supporting multi-generational living was recognised and there was concern that these should not be allowed to be converted to short term lets or new dwellings.

Those calling for a more flexible approach argued that garden land provided an important source of housing supply from small sites, particularly in rural areas. Local architectural practices argued that the proposed approach would risk constraining sustainable, well-designed housing opportunities and was in conflict with national planning policy which promotes efficient use of land, optimisation of site capacity and the role of small sites. It was also suggested a more flexible approach should be adopted for edge of settlement sites which could provide more opportunities for small residential schemes and self build housing.

Response to main issues raised in representations:

There were comments in favour of protecting gardens with some urging an even more robust approach. This policy responds

to these concerns by setting criteria to guide development on garden land to ensure that new development is appropriate and, alongside consideration of other policies in the Local Plan, mitigates negative impacts on ecology, biodiversity, heritage, surface water flooding and other local considerations. The detailed requirements set out in the policy enable proposals to be considered on a case by case basis. The case for a more flexible approach is not supported. The policy, as proposed, does support the development of garden land sites where appropriate but needs to work with Policy S/DE: Defined development extents to avoid encroachment into the countryside.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Strong controls needed to ensure sub-division does not erode village character, green space, or settlement pattern.	202258 (Girton PC)
Given the importance of gardens and green spaces to deal with rainwater, stronger controls are needed to reduce the chances of localised flooding.	205186 (B Nicolson)
Support the Councils' recognition that well-designed development on residential gardens and infill plots can be a "valuable additional source of housing supply", particularly in rural communities where other development opportunities are limited. There can be a conflict with Defined Development Extent policy where boundaries are drawn too tightly. Boundaries should be reviewed to allow more small sites to come forward making effective use of land.	202050 (M Asplin), 202069 (M Asplin)

Summary of issues raised in comments	Comments highlighting this issue
We are supportive of this policy.	201643 (Stapleford PC), 210955 (Great Shelford PC)
Support a policy of no sub-division of existing gardens in Cambridge. These spaces are vital for community well-being and the wildlife ecosystem, and they define the character of our neighbourhoods.	201988 (M Page)
Strengthen the section about residential annexes to ensure these remain as ancillary uses and are not subsequently converted to short term lets or new dwellings	203422 (Cambridge City Council Liberal Democrat Group)
Policy is overly restrictive and not aligned with national planning policy which promotes efficient use of land. The policy places undue weight on historic patterns rather than planning merits and should instead support garden land development where proposals are well designed and acceptable in terms of character, amenity and access.	204014 (KWA Architects)
A more flexible approach is urged, allowing subdivision where land has been in garden use for at least ten years, enabling sustainable edge-of-framework development while still complying with the wider policy.	204594 (NP Architects)

Policy H/SS: Residential space standards and accessible homes

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was broad support for the policy in principle, in particular its aim to secure high standards of amenity and accessibility in new homes. Respondents recognised the importance accessible and adaptable housing plays in supporting enabling independent living and ageing in place, and including space within new homes for working from home.

Regarding the internal residential space standards section of the policy several respondents raised an issue with the duplication of the Nationally Described Space Standards (NDSS) in full and that instead a cross-reference to the standards would enhance clarity. Developers also raised concern around the application of the NDSS as a blanket standard for all new homes and suggested that it was overly prescriptive, lacks flexibility and is not supported by evidence. Developers set out the importance of the policy being responsive to site-specific circumstances and market needs where the delivery of smaller homes could be justified and deemed viable, and highlighted that the requirement would place additional financial burdens on developments. One housebuilder was particularly concerned with the fixed NDSS not allowing for things such as Flats Over Garages.

Concern was raised by respondents to the lack of evidence to justify applying a fixed minimum private external amenity space standard of 30sqm, as this would be impractical when delivering housing in higher density locations and risks undermining design quality, local character and optimising housing delivery. Several respondents called for the Councils to consider a more design-led approach that would be responsive to various contexts. Concern was also raised around the requirement for

apartments having set balcony standards and therefore forcing identikit development. The requirement for all dwellings to have direct private amenity space was questioned and that where flatted developments are being delivered communal outdoor space should be able to be provided.

Several respondents support all new homes being required to meet building regulations M4(2) and in principle the introduction of set standards for the delivery of building regulations M4(3) compliant homes. However, comments around the M4(3) standard were varied, with some developers challenging the proposed requirements based on the Housing Needs of Specific Groups study and others suggesting that the requirements when applied to all new allocations would result in an oversupply of these homes which would be difficult to for developers to sell, and questioning the feasibility of M4(3) standards in smaller developments and seeking exceptions. The Councils have therefore been asked to reconsider their set M4(3) standards to ensure that they are robustly justified and viability tested. In contrast, some respondents called for greater ambitions for the delivery of M4(3) homes, as is set out in the Greater Cambridge Housing Strategy. The savings made by delivering a greater number of new homes as M4(3) compliant significantly outweighs the additional construction costs over time.

Comments also identified the concerns around the focus on the policy only building to M4(3)(a) (wheelchair adaptable) due to the challenges and costs in converting these to M4(3)(b) (wheelchair accessible). It was highlighted that the requirements for M4(3) homes are inconsistent with national policy as wheelchair accessible homes can only be required where the local authority is responsible for allocating / nominating the occupant. Developers also called for a maximum cap to be applied to the total number of affordable M4(3) units to be delivered on certain schemes.

Some respondents questioned whether the cumulative impact of various policy requirements, including nationally described space standards and accessibility standards, had been tested for viability, and called for the Councils to ensure that the requirements of this policy are fully reflected in viability and site capacity assessments that underpin site allocations.

Response to main issues raised in representations:

Whilst there is concern that the NDSS are replicated within this policy, the Councils have continued to include this as it provides developers/housebuilders and development management officers with a clear reference to the standards when considering planning applications.

The Councils evidence, as set out in the Housing Needs of Specific Groups study (2025), highlights that the Councils should require all new homes to meet the M4(2) standards on the basis of its increasing ageing population and the projected increase in the number of people with disabilities. It is important that new homes across Greater Cambridge provide high-quality internal and external spaces so they are inclusive, accessible, adaptable and flexible to meet the needs of existing and future users, and therefore enable and support healthy lives. There may be specific developments where meeting the required internal space standards, amenity space requirements, and / or accessible and adaptable homes standards, would not be appropriate for the identified occupants, however, any exceptions would need to be clearly justified with evidence provided to demonstrate that the proposed development still delivers suitable and appropriate homes for the anticipated occupants. The evidence set out in Appendix 1 of the Homes Topic Paper (2025) supports requiring all homes to meet the M4(2) standard by showing that the majority of developments for new residential dwellings in recent years are meeting the requirements, and any exceptions are generally developments for specialist accommodation meeting a specific need.

Having considered the representations received regarding the fixed minimum private external amenity space of 30sqm and concern around its application in certain development contexts, the Councils have decided to remove the set external amenity space standard and implement a more design-led, qualitative approach to securing appropriate external amenity space. The implementation of this approach will ensure that schemes provide sufficient amenity space that is appropriate to the typology

and size of the units provided. Applicants will be required to evidence in their Design and Access Statement how the size of the amenity space provided is sufficient for the intended occupants. The Councils have continued to include a specific requirement for apartments to provide direct private amenity space as well as set width and depth requirements as these have been more standardly applied across all contexts in Greater Cambridge and align with national guidance. As set out in the supporting information, where these set balcony standards are not appropriate for the identified occupants and justification can be provided that alternative standards are more appropriate, then exceptions can apply. The policy has been amended to provide clarification that in exceptional circumstances the provision of shared external amenity space will be allowed on schemes delivering aspects of communal living such as specialist housing, purpose-built student accommodation, co-living or co-housing. The amount of external amenity space required will be determined on a design and context led basis and this does not mean that private amenity space will also not be required as part of the scheme.

The policy continues to set the same requirements in relation to M4(2) and M4(3) standards as set out in the Draft Greater Cambridge Local Plan. The Councils have considered the comments received and consider that the current requirements are justified. The Housing Needs of Specific Groups study (2025) sets out that there is an estimated need for an additional 968 wheelchair user homes by 2045. The study highlights that there is likely to be a need for a greater proportion of affordable housing to rent for wheelchair users. The study recommends that up to 5% of all new market homes and up to 10% of all new affordable homes should be wheelchair user dwellings (Building Regulations M4(3) standard). The Housing Strategy sets out a direction of travel for accessible and adaptable homes, based on an earlier version of the Housing Needs of Specific Groups Study. National planning guidance sets out that Local Plan policies for wheelchair accessible homes (M4(3b) standard) should only be applied to those dwellings where the local authority is responsible for allocating or nominating the occupant. This does not prevent Local Plan policies from requiring market homes to be wheelchair adaptable homes (M4(3a) standard).

Although over 52,000 homes are anticipated to be delivered within the plan period (2024-2045), of these 74% are part of the

existing supply, and therefore most of these new homes already have planning permission and therefore will not be subject to the new requirements for M4(2) and M4(3) as set out in this policy. It is therefore important that new developments of 20 dwellings or more are required to deliver wheelchair user dwellings to contribute towards meeting the identified need. The policy already allows for exceptions to meeting the M4(2) and M4(3) requirements, if robust justification is provided. It is therefore not considered necessary to apply a maximum cap on the number of wheelchair user dwellings that can be provided in any one development.

The Local Plan has been subject to a whole plan viability assessment, which includes taking account of the requirements of this policy alongside other policy requirements. It has concluded that it is viable to seek all the requirements set out in this policy for residential space standards and accessible and adaptable homes.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The mention of boilers in new build homes is out of date. After 2025, boilers are banned so that space standards must allow for a hot water tank/heat store.	201003 (N Upstone)
It is important that residential space standards and accessible homes requirements are clearly set out in the policy.	211566 (Martin Grant Limited Ltd)
Support for the policy and its principle of high standards for amenity and accessibility in new homes.	201644 (Stapleford PC), 202259 (Girton PC), 203431 (Cambridge City Liberal

Summary of issues raised in comments	Comments highlighting this issue
	Democrat Group), 204437 (Cambridge Investment Partnership (CIP)), 204886 (Hill), 210956 (Great Shelford PC), 210957 (Great Shelford PC)
To enable people to live in their own homes for longer, consideration should be given to those who maybe already be disabled or have difficulty climbing stairs. Ensuring new builds have some ground floor bedrooms as standard or have sufficient space to retro fit an internal lift (rather than a stair lift) so upper floors can be accessed would support residents remaining in their home for longer.	210334 (East of England Ambulance Service NHS Trust)
Concerns that this allows for one person one bedroom homes, when in fact these inevitably have a double bedroom and once built cannot enforce a single person/single bed arrangement on which it was constructed at the smaller 37sqm size. Can the one person/one bed option be reviewed?	203431 (Cambridge City Liberal Democrat Group)
Support the principle of the policy, however the policy must be applied with sufficient flexibility to respond to site-specific circumstances, particularly as the rigid application of minimum internal and external space standards may not be achievable without undermining deliverability or viability in certain locations.	204888, 210266 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
Object to blanket application of nationally described space standards across Greater Cambridge – need to be justified by need. Flexibility needed to enable homes to reflect market needs, and there may be market demand for homes that are smaller than nationally described space standards.	208343 (Thakenham Homes Ltd)
The policy unnecessarily duplicates the Nationally Described Space Standards (NDSS). A cross-reference would suffice and enhance clarity.	204616 (Redrow South Midlands), 204886 (Hill), 205345 (Home Builders Federation), 208690 (Guilden Morden Developments Ltd), 211290 (Woolsington One Ltd)
The requirement for all new residential developments to meet and wherever possible exceed the residential standards set out in Nationally Described Space Standards is not supported, as it is overly prescriptive, lacks flexibility, is not supported by local evidence, and would place additional financial burdens on developments which could affect viability of developments.	211225 (Terra Strategic), 211243 (Living Space Housing), 211468 (Hayfield Homes Construction Ltd), 211268 (Terra Strategic)
Policy is unduly rigid and imposes fixed minimum private amenity space requirements for all dwellings, including a blanket 30sqm provision for every house and prescribed balcony dimensions for apartments.	203116 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)

Summary of issues raised in comments	Comments highlighting this issue
A blanket requirement for all homes to meet the nationally described space standards and M4(2) standard does not allow for things such as Flats Over Garages (FOGs) due to accessibility requirements. This can impact place making and will increase the size of units which can price first time buyers out the market.	203116 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
The minimum requirement for external amenity space seems arbitrary. For some cases, it wastes space that could be better allocated to other purposes, while not being large enough to be any use. The provision of communal space should be applied to all properties.	203177 (P Tribble)
Requiring all apartments to have a balcony creates identikit developments and forces space to be wasted where it may not be wanted.	203177 (P Tribble)
For apartments, need large balconies or terraces to be provided, with pleasant views.	208733 (Cllr M Morgan)
Older people's housing schemes should be exempt from minimum external amenity space standards, and instead should consider the quality and function of the amenity space instead. With respect to flats and maisonettes it should be noted that there are often other planning issues that restrict the incorporation of a balcony such as overlooking and this should also be noted with the policy.	208319 (Churchill Retirement Living with McCarthy and Stone)
Concerns about the set external amenity space standards, when balanced with requirements from other policies as this may constrain site opportunities. Particularly relevant for allocations with specific housing numbers and densities.	204437 (Cambridge Investment Partnership (CIP)), 204886 (Hill)

Summary of issues raised in comments	Comments highlighting this issue
Concerns around the rigid external amenity space standards, particularly the fixed 30sqm private amenity space requirement. Evidence is lacking to justify this standard and applying it uniformly across all houses could hinder density and conflict with site allocation and character policies.	204616 (Redrow South Midlands)
The narrow exception that only allows for communal amenity space to be provided for co-housing and community-led schemes is insufficient. The policy should allow for flexibility in design.	204616 (Redrow South Midlands)
Uniform minimum private amenity space standards do not reflect the diversity of development contexts across Greater Cambridge. Likely to be impractical to deliver in higher density locations and risk undermining design quality, compromising local character, and optimising housing delivery. No justification for requirement of 30 sqm. Need a more design led and context sensitive approach.	208993 (Barratt Homes Northampton)
Question the requirement for all dwellings to have private outdoor space, as not always practically possible. Where flatted development is provided communal outdoor space should be able to be provided.	208344 (Thakenham Homes Ltd)
Current external space standards lack sufficient flexibility and need to take account of broader considerations such as viability and site-specific circumstances.	205345 (Home Builders Federation)
Supports all homes meeting M4(2) standard, and suggests that requirement for M4(3) standard should be increased from 5% to 10%. Planning for only M4(3a) (wheelchair adaptable) and not M4(3b) (wheelchair accessible) creates problems. Better to make housing fully accessible from the outset, rather than relying on adaptation.	201152 (K Gaunt)

Summary of issues raised in comments	Comments highlighting this issue
Local Plan should follow the advice set out in the Housing Strategy of 10% of new market homes and up to 25% of affordable homes meeting the M4(3) standard.	207575, 207578, 202851 (R Pargeter)
Provision of 10% M4(3) is supported.	203116 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
The requirement for all homes to meet M4(2) standard should be based on evidenced need and where Building Regulations are to change, this will supersede planning policy.	208346 (Thakeham Homes Ltd)
The requirements for M4(3) homes will have implications for the cost of development and as such could be a challenge for SME's delivering small to medium size developments. This should be an optional requirement, if viability allows. The policy should be drafted to include reference specifically to considerations of viability.	211588 (Terra Strategic)
The requirements for M4(3) homes will have implications for the cost of development and should be reflected within viability assessments. Further flexibility should be included to respond to viability and deliverability concerns.	211468 (Hayfield Homes Construction Ltd), 211581 (Living Space Housing Ltd)
The Local Plan presents a major opportunity to reduce long-term costs. Homes should accommodate visitors, including elderly or disabled relatives who need ground-floor facilities, and ideally wheelchair users, reducing isolation and enabling short stays. Accessible housing can also help families support	207576, 207577 (R Pargeter)

Summary of issues raised in comments	Comments highlighting this issue
temporarily incapacitated members, and families with pushchairs. Though slightly more expensive to build, costs are modest, recoverable, and likely offset by long-term savings.	
A wide range of accessible and adaptable M4(3) dwellings is essential, with proportions and sizes based on present and future local need ensuring effective long-term provision. Buyers should be able to arrange bespoke adaptations, sometimes negotiating savings.	207577 (R Pargeter)
Wheelchair users should be actively informed about suitable new M4(3) homes, but provided there is a large supply of M4(3) properties, developers should not be restricted to sell to only households in immediate need.	207578 (R Pargeter)
Requirements for M4(3) are inconsistent with national policy as: wheelchair accessible homes can only be required where the local authority is responsible for allocating / nominating the occupant, and no viability evidence has been provided to demonstrate these units can be viably delivered (especially when considered alongside other requirements).	208993 (Barratt Homes Northampton)
More dwellings should be allocated for wheelchair users as the changes required by M4(3) are minimal and provide benefits to all not just people in wheelchairs.	202885 (H Cook)
Requirements for the delivery of M4(3) units may risk site viability in order to accommodate these units. There should be a maximum cap on the number of M4(3) units to be delivered within a development, particularly developments providing 100% affordable housing.	204437 (Cambridge Investment Partnership (CIP)), 204886 (Hill)

Summary of issues raised in comments	Comments highlighting this issue
The requirement for 10% of affordable and 5% of market dwellings to meet M4(3) wheelchair user standards conflicts with national guidance, lacks evidence and exceeds demonstrated needs.	204616 (Redrow South Midlands), 205345 (Home Builders Federation), 208319 (Churchill Retirement Living with McCarthy and Stone)
Requirements for M4(3) are not supported by the Councils own evidence, which only requires around 970 dwellings and there would be a surplus against this if applied to all proposed new allocations. Will impact on density of developments as these homes are more land hungry – especially flatted developments requiring lifts. Added costs of providing these homes.	208345, 208347 (Thakenham Homes Ltd)
The approach set out in the policy is strongly supported, as accessible and adaptable housing plays a key role in supporting healthy ageing, enabling independent living, and reducing the risk of falls, injury, and avoidable hospital admissions. However, have concerns with the fact that the policy allows exceptions to the M4(2) and M4(3) standards where viability or site-specific constraints are demonstrated. Recommended that the policy be strengthened to clarify that exceptions are expected to be robustly justified, and subject to transparent scrutiny. Consideration could also be given to requiring partial compliance where full compliance is evidenced to be unviable.	210632 (Transport 2000 Cambs & W Suffolk)
The cumulative impact of various policy requirements, including nationally described space standards and accessibility standards, has not been tested for viability, risking housing deliverability.	204616 (Redrow South Midlands)

Summary of issues raised in comments	Comments highlighting this issue
Essential that the requirements of this policy are fully reflected in viability and site capacity assessments that underpin site allocations.	210266, 210267 (Vistry Group)
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.	204058 (S Rogers)

Policy H/SH: Specialist housing

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was support for the overarching objective of addressing specialist housing needs, particularly related to older people. However, there were differing opinions on how this should be achieved. There was support from individuals and community groups for specialist housing to be well integrated with local communities and be within walking distance of facilities. The Cambridge Green Party and Cambridgeshire County Council wanted the threshold at which specialist housing was required reduced from 1,000 dwellings, and Great Shelford PC have asked that planning decisions for older peoples accommodation takes into consideration the number of units already provided via such facilities/institutions within an area to ensure that healthcare infrastructure is not overwhelmed.

Developers were concerned that the specific criteria such as the requirement to be near local facilities combined with the requirements to provide 10% of dwellings as specialist housing on schemes of 1,000 or more dwellings were unreasonable and could affect viability. It was argued that some planning application related requirements were not necessary: the shortage of specialist housing for older people is well documented and further evidence is not needed, whilst the requirement to assess impact on healthcare services and/or make contributions should be removed given that specialist housing reduces the costs to social care and health systems. It was argued that the plan should include specific allocations in sustainable locations to meet the needs of older people and where need was not being met the policy should require that a presumption in favour of development be applied.

There were calls for the Councils to set out an indicative figure, or a range, for the number of units of specialist housing for older people needed and to commit to publishing a regularly updated assessment of specialist housing needs, including analysis of current and projected need by type of specialist housing to avoid the evidence base underlying the Local Plan becoming outdated over time. Cambridgeshire County Council asked for an additional paragraph to be included within the supporting information to describe specialist housing.

Response to main issues raised in representations:

Policy H/SH must be seen as an integral part of a suite of policies that collectively will deliver a range of housing options for specific needs across a range of scales in a range of locations. Creating more independent living opportunities for older people and people with disabilities will be achieved by delivering more dwellings to meet their needs through both specialist housing schemes and more appropriate mainstream housing. Hence Policy H/SH will be complemented by policies to adapt mainstream housing (facilitated through accessibility standards) and ensure market housing is generally more spacious (through residential space standards).

The Local Plan includes specific requirements within Policy S/JH relating to the identified accommodation needs of travellers, older and disabled people, and students. Estimating the precise level of the full range of specialist housing required is dependent on many variables. Considering our latest evidence of the accommodation needs of older and disabled people as set out in Housing Needs of Specific Groups Update for Greater Cambridge (HNSG, 2025), strategic sites play an essential role in the strategy for meeting such needs. The Local Plan therefore includes a series of options for meeting the identified accommodation needs of older and disabled people, as it requires the provision of specialist housing within the strategic site allocations (as set out in the individual site allocation policies), includes a requirement for 10% of dwellings on unallocated strategic sites of 1,000 dwellings or more to be

delivered as specialist housing (as set out within Policy H/SH), and supports the delivery of specific proposals for specialist housing that are brought forward as windfall sites (and not part of larger schemes) provided they meet the criteria within Policy H/SH. Specialist housing needs will be kept under review with partners.

Our Housing Needs of Specific Groups Update for Greater Cambridge (HNSG, 2025) calculates the accommodation needs for older people and disabled people in the form of housing with support, housing with care, and nursing and residential care bedspaces. However, it is also important that a mix of specialist accommodation is provided for older people and people with disabilities from housing with support through to care homes, and that there is not an over-provision of one type of housing within an area, therefore any proposals for new specialist accommodation for older people or disabled people must be supported by evidence of a need in Greater Cambridge, and within the particular location of the proposed development, for the specific proposed specialist accommodation and its tenure. This evidence can take account of any evidence already published by the Councils. The view that health impacts and contributions should not be considered due to their overall net positive contribution to the costs of social care and health systems is not accepted. The local impacts could be very significant.

The supporting information has been amended to include a paragraph outlining the variety of groups that the specialist housing accommodation in this policy relates to, and makes use of the suggested wording from Cambridgeshire County Council.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for policy as: • appropriate housing can enable older people to stay in the local community longer, • need creative and innovative approaches to housing mix for different generations, so that older people have suitable housing and meeting places at the heart of communities, • these developments should contribute towards the delivery of affordable housing, • developers should be incentivised to provide this type of housing, • important that specialist housing requirements are clearly set out in policy.	201045 (P Spowart), 201645 (Stapleford PC), 202185 (M MacGinley), 201822 (St Andrews Church), 203747 (Cambridge Green Party), 211269 (Terra Strategic), 211567 (Martin Grant Land Ltd)
Specialist housing should be in sustainable sites with access to services and facilities. Request that planning decisions relating to large retirement living facilities or institutions take into consideration the number of units already provided via such facilities/institutions within an area to ensure that healthcare facilities are not overwhelmed and that neighbourhoods do not become dormitory communities with a top-heavy population pyramid.	210893 (Great Shelford PC)
Concerned the policy applies stricter criteria to older persons' housing than to general needs housing, which risks limiting delivery despite evidence of need. The requirement that specialist housing should be in walking distance of local centres or facilities is unreasonable and access to public transport should be sufficient.	201937 (Anchor Hanover)

Summary of issues raised in comments	Comments highlighting this issue
Becoming more common for family homes to be occupied by elderly residents, who face practical impediments to down-sizing or re-locating, as well as very limited supply of high-quality and desirable seniors accommodation. Need more high quality, compact homes including sheltered housing for older people.	203281 (J Palmer)
Support for policy objective but concern that requirement for provision on strategic sites alongside the additional criteria set out within the policy could impact on viability and deliverability.	204889, 210268 (Vistry Group)
Need clarity on the application of the policy to minor development.	208691 (Guilden Morden Developments Ltd)
Clarification is sought on the meaning of “unallocated strategic sites” as given the well documented and growing demand for all forms of specialist housing, it is considered that this policy requirement should apply to all strategic sites, rather than being limited solely to unallocated sites.	210540 (Cambridgeshire County Council)
This policy should be deleted as will be superseded by new NPPF requirements.	208320 (Churchill Retirement Living with McCarthy and Stone)
Policy requires applications to provide evidence of need, however it is well evidenced that the UK has an ageing population, and the Housing Needs of Specific Groups study identifies a large need in Greater Cambridge. Should not be required to demonstrate need.	208320 (Churchill Retirement Living with McCarthy and Stone)

Summary of issues raised in comments	Comments highlighting this issue
Specialist housing developments help reduce costs to social care and health systems, therefore requirements to assess impact on healthcare services and/or make contributions should be removed.	208320 (Churchill Retirement Living with McCarthy and Stone)
Must be walkable to facilities and have no adverse impact on character of surrounding area.	202260 (Girton PC)
The threshold requiring specialist housing provision should be reduced from 1,000 dwellings.	203747 (Cambridge Green Party), 210540 (Cambridgeshire County Council)
Policy should be amended to stop developers avoiding specialist housing requirements by building out schemes in smaller packages	203747 (Cambridge Green Party)
Councils should commit to publishing a regularly updated assessment of specialist housing needs, including analysis of current and projected need by type of specialist housing and the overlap between specialist housing need and social housing need to avoid the evidence base underlying the Local Plan becoming outdated over time.	203747 (Cambridge Green Party)
The plan should include specific allocations in sustainable locations to meet the needs of older people.	205363 (Home Builders Federation)
The policy could go further and allocate suitable sites for specialist housing.	211269 (Terra Strategic)
The plan should set out an indicative figure, or a range, for the number of units of specialist housing for older people needed across the plan area throughout the plan period.	205363 (Home Builders Federation)

Summary of issues raised in comments	Comments highlighting this issue
Where needs are not being met the policy should also state that the Council will apply a presumption in favour of development.	205363 (Home Builders Federation)
The text should include a summary paragraph describing specialist housing.	210540 (Cambridgeshire County Council)
Fully support policy and would seek further strengthening of the policy to ensure accommodation is designed with ergonomics in mind and garages/storage facilities meets principles for that can support a wide variety of wheelchairs and mobility scooters. Lifts should be fire insulated to enable effective entry and egress.	210332 (East of England Ambulance Service NHS Trust)
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.	204060 (S Rogers)

Policy H/CB: Self and custom build homes

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Most comments on this policy were from developers and focused on the 5% requirement for self and custom build homes on schemes of 20 or more dwellings, with a general theme that the policy approach needed to be more flexible to respond to demand as measured by the Greater Cambridge Self and Custom Build Homes Register. More specific comments included:

- Need a flexible, case-by-case approach to self-build and custom-build provision, working with developers, the self-build register and local groups to meet identified need.
- There is limited demand for self and custom build on large sites.
- The threshold for requiring self and custom build should be raised, or a sliding scale introduced, as the requirement is more burdensome on smaller schemes.
- Delivering self and custom build on larger sites can reduce the ability to design optimised layouts with standardised unit widths, depths and typologies resulting in lower densities, and reduced overall yield and increased costs.
- Self and custom build plots typically deliver more slowly than developer built units, causing delays in build out rates, sales receipts and s106/CIL trigger points.
- Self and custom build plots create difficulties around logistics, with self-builders developing alongside main contractors.

- Custom finish type approaches are already incorporated by developers into their standard delivery models so the policy requirement is placing an unnecessary and disproportionate burden on developers for no meaningful benefit.

There were also several comments that the policy should focus on addressing demand as expressed by the register and not on quotas. It was argued that the number of new applicants to the register has fallen in recent years and, therefore, the need for further permissions would fall over time. It was also argued that the demand on the register was focused on self build rather than custom build with a preference for smaller sites, which implies that the focus should be on smaller self and custom build specific sites rather than large, multi-tenure sites that are more likely to deliver through custom build or custom finish approaches. There was a suggestion that the policy should be expanded to capture the ability for sole self and custom-build proposals to be brought forward within or on the edge of settlements.

There was disagreement that self and custom build plots should be transferred to a Register Provider if they could not be sold for self and custom build development. It was argued this would affect viability, delay deliverability and result in an over-supply of affordable housing on the site. However, there was a contrary opinion that developers may discourage the take up of self and custom build plots or their transfer to Register Providers through artificially high prices.

It was suggested that the policy should integrate a condition and monitoring process to ensure that the initial occupants who were involved in the design do live there for a minimum period. If there was a breach any exempted biodiversity net gain requirements should be re-imposed.

There was a request that the exemption for affordable housing schemes be reduced to schemes of 50% affordable housing from 80% affordable housing due to the particular viability challenges and funding regimes facing these schemes.

Response to main issues raised in representations:

The recent fall in the number of applicants joining the Greater Cambridge Self and Custom Build Register is recognised. However, there remains a significant deficit in the number of permissions: 440 plots at the end of base period 7 allowing for permissions up to 30 October 2025. The supporting text to the policy states that “the 5% requirement may be reduced where at least a 1 year oversupply of custom and self-build housing permissions exists and subject to agreement with the local planning authority”. The scale of the deficit could reduce quite quickly if the number of new applicants to the register remains low. However, proposals for self and custom build developments continue to be allowed on appeal outside of defined development extents because South Cambridgeshire District Council cannot demonstrate that it is meeting its statutory requirement to match demand (as measured by the register) with permissions. The proposed policy approach of requiring 5% custom or self build plots on developments of 20 dwellings or more offers the best chance of reducing the deficit as quickly as possible, whilst taking a more flexible approach to the 5% requirement later in the plan period once there is no longer a deficit. The requirement that custom or self build plots which do not sell to continue to be marketed as such for a further period or transferred to a Registered Provider is considered to be an important control to ensure potential custom and self build dwellings are not lost to mainstream market housing.

Demand as measured by the Greater Cambridge Self and Custom Build Register does favour larger plots for detached houses with 4 or more bedrooms either as single plot sites or as part of a small development with a limited number of plots, where there is an opportunity to build closer to the traditional self build model rather than a customised approach. However, although the register does not apply a viability test, a review of data provided by applicants suggests that many would be unable to afford their aspirations given current plot values. It is also considered that meeting most of the current demand through small sites in the countryside would: have significant landscape impacts, undermine the sustainable development strategy for new homes proposed by the Local Plan, and have consequences for delivering rural exception sites. The

proposed approach offers a realistic compromise. Windfall sites will continue to come forward for those that can afford the plot values that small rural sites will command. However, these will be balanced with other sites, as part of larger developments, which can offer a mix of self and custom build opportunities at a range of price points. There were no suitable sites proposed specifically for custom and self build through the call for sites process.

It is important that biodiversity net gain requirements are applied where appropriate but there are practical limits to the extent of conditions and monitoring that can be applied. Section 106 agreements and/or planning conditions are already used to ensure custom and self build developments meet the legal definition of custom and self build. It is noteworthy that 49% of households on the Greater Cambridge Self and Custom Build Register suggested that higher environmental performance was a motivator for them wanting to build their own home.

The proposed policy sets out a range of housing schemes that will be excluded from the requirement to include custom and self build homes. Criteria 1aii specifically excludes schemes where at least 80% of homes are affordable. This is designed to exclude rural exception schemes. However, it is recognised that there may be other schemes that are delivering higher than policy compliant levels of affordable housing which may create viability challenges when combined with custom and self build requirements. Supporting information has been added to highlight that custom and self build requirements may be lowered or waived, subject to viability evidence, where schemes are delivering affordable housing numbers that are at least 10% above policy requirements. Viability is likely to be affected by the types of affordable housing proposed with higher levels of the most affordable options, such as Social Rent, strengthening the case for a relaxation of custom and self build requirements.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
The policy is too restrictive and conflicts with PPG by focusing too much on delivery options with lower levels of input from the occupant on large sites whereas the custom and self build register shows demand is stronger for smaller sites offering more design input from the occupant.	202100 (M Asplin)
Policy criteria H/CB(3) is unsound because it unreasonably applies to all custom and self build developments placing unreasonable procedural and financial requirements on single plot developments.	202097, 202102 (M Asplin)
Custom and self build requirements should be increased to 10% on all master planned developments.	201001 (N Upstone)
Self-Build Plots should remain self-build plot designations and not be a means to provide market housing where it would otherwise be inappropriate.	211916 (C. Newell)
Marmalade Lane on Orchard Park demonstrates what is possible by allowing groups to go further than developers.	201001 (N Upstone)
Policy focuses too much on sites of 20+ dwellings: • policy discriminates against individuals seeking to build small individual or collective plots, • Clauses 3a and 3b may reduce availability of self build plots if Councils valuation expertise insufficient,	201516 (D Brock)

Summary of issues raised in comments	Comments highlighting this issue
• Plots may not be taken up due to pricing issues rather than a lack of demand.	
Greater provision should be made on large sites. Large plots should be broken into smaller plots for small building firms and small architectural firms to build on.	203816 (A Carpen)
Self-build in villages should be small scale, fit with the character of the area and not breach the Green Belt.	202261 (Girton PC)
Support for policy but concern that plots could be converted to market housing after 12 months through inflated plot values stopping purchase by self-builders or transfer to Registered Providers.	201388 (Gamlingay PC)
Support for policy but seek a condition and a monitoring process to ensure that the initial occupants who were involved in the design do live there for a minimum period. BNG requirement should be re-imposed if condition breached.	203441 (Cambridge City Council Liberal Democrat Group)
Support for policy but clarification required on how policy applies to minor development.	208692 (Guilden Morden Developments Ltd)
Policy should have more flexibility than blanket 5% approach where it can be demonstrated that there is limited demand and/or it would not support good placemaking. The threshold of 20 dwellings should be increased as:	204897 (Hill)

Summary of issues raised in comments	Comments highlighting this issue
• Self/custom buildings reduce the ability to design optimised layouts with standardised unit widths, depths and typologies resulting in lower densities and reduced overall yield and increased costs, • There is no evidence of large demand for custom and self build on large housebuilder led schemes, • self/custom build plots typically deliver more slowly than developer built units, causing delays in build out rates, sales receipts and s106/CIL trigger points, • create difficulties around logistics, with self-builders developing alongside main contractors.	
Object to the mandatory requirement for 5% self-build homes as part of any development – this is inconsistent with the Act which focuses on demand registers not quotas. Self-build provision should only be sought on sites where there is a demonstrable need. A flexible approach should be taken to respond to the demand on the register.	204771 (Vistry), 204295 (Bellway Strategic Land), 204534 (Bellway Strategic Land), 203120 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners), 204116 (Brookgate Land Ltd and Network Rail Infrastructure), 204127 (E W Pepper Ltd)
It is considered that the requirement for at least 5% of homes on schemes of 20 or more dwellings to be provided for self or custom build housing is excessive, and the delivery of these plots is likely to be onerous for small	211291 (Woolsington One Ltd)

Summary of issues raised in comments	Comments highlighting this issue
and medium sized sites and influence the viability of such schemes. This could have a knock-on effect on the delivery of windfall dwelling delivery, to the detriment of overall housing provision.	
Requirement for 5% on sites of 20 or more dwellings is unduly prescriptive and does not reflect practicalities of delivery (sequencing, logistics, health and safety). The Councils have a shortfall that the adopted policy has been unable to address, therefore need an alternative solution. Suggest dedicated self and custom build sites, as this would also reflect market preferences.	208994 (Barratt Homes Northampton)
Impractical to deliver 5% on strategic sites, and there is not evidence of this level of demand. Developers need opportunity to provide lower proportion if there is not sufficient demand, not practical for placemaking or not viable.	209038 (Marshall Group Properties), 211568 (Martin Grant Land Limited)
Custom finish type approaches are already incorporated by developers into their standard delivery models so the policy requirement is placing an unnecessary and disproportionate burden on developers for no meaningful benefit.	204771 (Vistry), 204295 (Bellway Strategic Land), 204534 (Bellway Strategic Land), 203120 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners), 204116 (Brookgate Land Ltd and Network Rail Infrastructure), 204127 (EW Pepper Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Policy seems to prohibit custom finish or custom build in houses, which is contrary to national policy. Amendments sought to provide clarity that custom finish proposals can apply to both houses and flats where external design is fixed, whereas external customisation is generally not appropriate for flatted schemes.	208972 (Persimmon Homes East Midlands)
Need a flexible, case-by-case approach to self-build and custom-build provision, working with developers, the self-build register and local groups to meet identified need.	203120 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
A fall in new entries to the custom and self build register following the introduction of an administrative charge suggests the register over states demand and should be reviewed.	205376 (Home Builders Federation)
Requirements in the policy do not reflect the Councils evidence base. Significant decrease in entries being added to the register. Requirement for 5% on developments of 20 or more dwellings would significantly over supply against current evidenced demand.	208348 (Thakenham Homes Ltd)
Need to consider desires of those on the register – likely to be seeking plots on small scale developments rather than as part of larger schemes. Mismatch between supply and demand.	208349 (Thakenham Homes Ltd)
The 20 dwelling threshold is too low. The impact of difficulties and delays in deliverable self build is far greater on smaller than larger schemes where	205376 (Home Builders Federation), 204295 (Bellway Strategic Land)

Summary of issues raised in comments	Comments highlighting this issue
there is more scope for separation. The complexity and logistics of developing such sites alongside self-builders could also create significant difficulties: • The development of single plots by individuals operating alongside multiple contractors and large machinery operating on-site raises both practical and health & safety concerns, • Unsold plots should not be left empty to the detriment of neighbouring dwellings or the whole development, • Any differential between the lead-in times/build out rates of self & custom build plots and the wider site may lead to construction work outside of specified working hours, building materials stored outside of designated compound areas and unfinished plots next to completed/occupied dwellings resulting in customer dissatisfaction.	
Suggested that this policy is amended to have a 'sliding scale' for the percentage of self/custom build dwellings needed per site (i.e. a lower percentage on much larger scheme, as this will still provide a larger number of self/custom build dwellings). Alternatively raise the threshold from 20 dwellings to 70 dwellings.	208335 (Gladman Developments)
Threshold is too low, as requirement for 1 self/custom build plot on a development of 20 dwellings is an unnecessary burden for SME builders.	208361 (T Elbourn)

Summary of issues raised in comments	Comments highlighting this issue
Threshold should be raised to 100 dwellings or more, or if needed to meet demand specific allocations should be included.	
Policy should be expanded to capture the ability for sole self/custom-build proposals to be brought forward within or on the edge of settlements within the Settlement Hierarchy. Given the demand for self/custom-build homes in Cambridgeshire, it is considered a more flexible policy that encourages the delivery of such schemes would make an important contribution to housing land supply.	204387 (LVA)
Support in principle but exemption for affordable housing schemes should be reduced to schemes of 50% affordable housing from 80% affordable housing. These schemes can be particularly affected by viability and funding regimes.	204443 (Cambridge Investment Partnership (CIP))
The requirement that unsold plots should either be marketed for a further period or sold to a Registered Provider could make schemes unviable. It should be replaced with the option of the developer building these plots out after the initial marketing period if unsold.	208912 (Nightingale Land and Hil Residential)
The minimum 12 month marketing period before unused plots can revert to developer delivery is a significant delay on build programmes for sites needing timely delivery. This includes the need for bespoke legal agreements, plot passports, boundary definitions and management	204897 (Hill)

Summary of issues raised in comments	Comments highlighting this issue
arrangements for self/custom build plots, causing higher legal and administrative overheads.	
Agree with 12 months marketing requirement, but if not sold should be able to be sold as open market plots. Already significant number of affordable homes being provided on major developments, and a change in tenure of a plot will require revised legal agreements that could cause unnecessary delays.	208335, 210712 (Gladman Developments)
Policy needs to include flexibility for developer to build out any plots not taken up after 12 months marketing.	208994 (Barratt Homes Northampton)
Policy artificially inflates affordable housing on schemes above policy compliant levels and potentially conflicts with Regulation 122(2) of the Community Infrastructure Levy Regulations (2010). Developer should be able to build out as market housing after initial marketing period.	208913 (Nightingale Land and Hil Residential)
The proposed requirement for further, undefined marketing beyond an initial 12 month marketing period before plots can revert to market housing also requires clarity and justification from the Councils.	211568 (Martin Grant Land Limited)
Support the use of design codes and plot passports, but mandating both for outline planning permissions is inflexible, and an either/or approach should be adopted.	208972 (Persimmon Homes East Midlands)

Summary of issues raised in comments	Comments highlighting this issue
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.	204062 (S Rogers)

Policy H/BR: Build to rent homes

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was recognition from some individuals and community groups that Build To Rent could play a role in some circumstances, particularly in contributing to a more varied housing mix. However, there were calls for management fees to be constrained to ensure it remained an affordable option and for sites to be focused on urban areas where the higher densities associated with Build to Rent were considered more appropriate. Two agencies concerned with promoting local growth, Cambridge Ahead and Cambridge Growth Company, were also supportive due to the potential for Build to Rent to contribute to the local housing stock. The latter called for a strengthening of the policy in relation to strategic sites, accessible locations and sites close to employment centres such as the Cambridge Biomedical Campus.

Developers were generally more wary of the policy. They wanted clarification of how Build to Rent related to mixed and balanced communities, what is meant by ‘dominate’ and whether the need to reflect the scale and location of surrounding uses rules out using Build to Rent to introduce an intentionally differentiated product to the market. Some called for the policy to be deleted as they were concerned the term ‘dominate’ could be used to restrict the quantum of development within schemes and unnecessarily restrict well designed development.

The view that the Cambridge housing market can potentially support 40% affordable units within Build to Rent schemes was challenged with the respondent arguing schemes should seek to deliver 20% affordable in line with national planning guidance.

There were also comments about the operation of Build to Rent schemes with suggestions that 3 year rental agreements were often inappropriate, 15 year covenants should be capable of being reviewed where viability was an issue, and that there should be no requirement for a single management operator, particularly on larger schemes.

Response to main issues raised in representations:

Build to Rent homes can respond to a need, by providing quality homes for those who wish to rent, which adds to the flexibility of the local housing market to respond to demand. Build to Rent homes can be provided within any residential developments (allocations or windfalls) provided that the proposed homes meet the requirements for residential developments as set out within various policies within the Local Plan, and the specific criteria within this policy.

The requirements within this policy seek to ensure that developments of Build to Rent homes support the development of mixed and balanced communities, whilst also responding to local demand.

Amendments have been made to the policy and supporting information to clarify that the assessment of the design quality and effect on local character of any proposed Build to Rent development will be considered against other policies in the Local Plan, but that the policy seeks to prevent harmful concentrations of Build to Rent and privately rented homes within an area or new development. Large concentrations of privately rented homes can result in the homes within an area being focussed on specific groups within the community, rather than a mix of groups, therefore limiting the ability to create mixed and inclusive neighbourhoods that meet a range of needs. Additionally concentrations of privately rented homes may limit residents' long term commitment to or integration within the wider community. However, it is recognised that Build to Rent developments need to be able to be of a size that enables them to be delivered and managed viably.

National planning guidance states that 20% is generally a suitable benchmark for the level of Affordable Private Rent homes to

be provided in any Build to Rent scheme, but that local authorities can set a different requirement if justified by evidence. Our viability evidence shows that the strong Greater Cambridge housing market will support 40% Affordable Private Rent in Build to Rent schemes.

The definition of Build to Rent within the NPPF 2024 states that “Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control”. However, in light of changes introduced in May 2026 through phase 1 of the Renters Right Act 2025, the reference to the length of a tenancy agreement has been removed from the policy as it is no longer possible to specify the length of a tenancy. A single management operator is preferred, and is consistent with the definition of Build to Rent in the NPPF 2024, however, the policy wording has been amended to allow some flexibility.

The Councils recognise that Build to Rent investors will most likely want to retain schemes for the long term in order to get a good long-term return on their investment. Our research has identified that covenant periods may be as short as 7 years, but are typically 10-15 years. Including a requirement for a covenant period of at least 15 years reflects the high priority that both Councils give to the issue of community sustainability and place-shaping.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Build to Rent schemes should deliver 40% affordable rather than 20% wherever possible. Concern that policy will allow developer to avoid providing 40% affordable on new sites.	205456 (R Robertson), 201389 (Gamlingay PC)

Summary of issues raised in comments	Comments highlighting this issue
Support for policy: • as helps delivery of rental properties, • but management fees should remain reasonable, • particular support for commitment to deliver balanced mix of housing types and tenures.	202186 (M MacGinley), 203445 (Cambridge City Council Liberal Democrat Group), 203535 (Cambridge Ahead)
Affordable Private Rent is an oxymoron.	201046 (P Spowart)
Build to Rent often implies higher density and urban form and is not suitable for Minor Rural Centres such as Girton.	202262 (Girton PC)
Support for policy but the overall approach to Build to Rent should be strengthened in relation to allocations for strategic sites and in relation to promoting Build to Rent in accessible locations and close to key employment centres such as CBC.	203915 (Cambridge Growth Company), 208941 (Cambridge Growth Company)
Part (a) does not provide sufficient clarity and appears to be general design advice. If the intention is to monitor the mix of tenures in a wider area (rather than large new developments) then this should be made clearer, justified and clarity provided on how this will be assessed and implemented in practice. Need to explain how mixed and balanced communities applies to the Cambridge context.	203011 (Watkin Jones Group PLC)
Part 1a wording is vague. The term ‘dominate’ should be specifically identified so as to ensure consistent application of the policy to development proposals. Similarly, wording to encourage flexibility if there is a demand for the development type (i.e. C3) exists.	208693 (Guilden Morden Developments Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Support policy for Build to Rent, but needs clarification: assumed that 'scale and location' in part a relates to the spatial/physical characteristic, but some build to rent developments offer scope to introduce a differentiated product, and therefore potential for missed opportunities if build to rent developments need to reflect scale and location of surrounding uses. Need to allow for build to rent developments that are deliberately differentiated from the surrounding context.	209203 (Urban & Civic)
Object to the conclusion that the Greater Cambridge Housing Market can support 40% private rent homes. The maximum requirement should be 20% in line with National Guidance.	208485 (Carter Jonas)
The imposition of rigid restrictions on development quantum as outlined in point (a) of the policy is not supported as risks unnecessarily constraining appropriate and well-designed development and fails to reflect the varied context and characteristics of individual sites. Reference to 'dominate' within the policy is not deemed appropriate as this inherently subjective and open to inconsistent interpretation.	203117 (Barrett David Wilson Homes & NW Cambridge Consortium of Landowners), 204133 (Brookgate Land & Network Rail Infrastructure)
The proposed approach of not prescribing a proportion of Build to Rent, but instead setting a criteria against which an application will be assessed is supported.	211569 (Martin Grant Land Limited)
Minimum 3 year rental agreements inappropriate. Target groups such as students and young professionals want shorter agreements.	208611 (Land Investment Holdings & Pigeon Land)
The policy requirements for a 15-year covenant and the availability of tenancies of up to 3 years are consistent with national guidance and industry practice. However, to ensure the policy is effective and	208973 (Persimmon Homes East Midlands)

Summary of issues raised in comments	Comments highlighting this issue
does not inadvertently constrain delivery, suggest clarify that the 3 year tenancy is an option available to residents rather than a minimum term that must be taken, and that the covenant period can be reviewed where the scheme is demonstrated to be unviable or no longer capable of delivering Build to Rent use.	
Remove requirement for single management operator as impractical and/or undesirable for all build to rent units on large schemes.	208611 (Land Investment Holdings & Pigeon Land)
Support policy for Build to Rent, but needs clarification: part d requires developments to be managed by one operator, however, may be different operators for housing component and supporting uses, outdoor spaces or associated public realm. Non-housing component might beneficially be managed by a site wide estate management company.	209204 (Urban & Civic)
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.	204064 (S Rogers)

Policy H/CO: Co-living

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

The Cambridge City Council Liberal Democrat Group were supportive of the policy but wanted to see the role of space standards strengthened to improve the quality of developments. The Cambridge Green Party wanted to see a broader housing mix with less focus on single person studios and a clearer steer that community-led housing models would be supported for this type of housing to promote greater community control. Cambridge Ahead were supportive of co-living as part of a wider mix of tenures. An architects practice were concerned that the co-living policy may lead to sub-standard accommodation, and that co-living developments will be provided at the expense of other forms of housing.

A parish council argued that this type of development was not suitable for rural communities due to its urban high density typology. However, a developer counter-argued that co-living was a suitable housing type for many parts of rural Greater Cambridge provided adequate car parking was provided.

Developers and landowners wanted to see some of the policy criteria removed. It was argued that the upper limit of 200 units was too restrictive and that investors and operators often sought 250+ units. They asked for evidence to justify the proposed range of 50-200 units. There was a request for the minimum 3 month tenancy agreement to be eased and for the requirement to provide evidence of need to be deleted on the grounds that the Local Plan evidence base has already identified a need for single person units. It was suggested that the policy should be explicit that affordable housing requirements could also be provided through a commuted sum as well as a discounted rent option on some of the units.

Response to main issues raised in representations:

Co-living developments are purpose built and managed residential accommodation for rent that include a mixture of individual spaces and shared facilities. The likely residents of Co-living developments are single professionals or key workers aged 20-40, and / or are single person households that are new to an area. Co-living developments provide an alternative to Houses in Multiple Occupation or self-contained private rented accommodation, with the benefits of a wide range of services and facilities and all-inclusive bills. Co-living developments are therefore different to Co-housing developments, which are community-led developments where each household has a self-contained dwelling as well as access to shared community spaces. Co-living developments are not considered to be child or family suitable accommodation due to the units not being self-contained, and to prevent units being used as a sub-standard self-contained dwellings tenancies will be limited to single person occupancy.

The policy sets out that that developments of Co-living units will be directed to the most sustainable areas of Greater Cambridge, well connected to active travel routes, public transport links and services. This reflects the likely residents of Co-living developments. The policy allows for Co-living developments to be brought forward outside of Cambridge, if the proposed Co-living development meets the requirement set out in the policy as well as the requirements of other policies in the Local Plan relating to residential developments.

Given there is a substantial overall housing need in Greater Cambridge, Co-living developments should not compromise the delivery of self-contained homes, and therefore the number of units within a Co-living development must be evidenced by need for this form of development in Greater Cambridge. Amendments to the policy have been made in relation to comments on scale, over concentration, dominate, and mixed and inclusive neighbourhoods to provide clarity.

Developments must be of good quality, well designed and contribute towards mixed and inclusive neighbourhoods. Proposals for Co-living developments should not result in a harmful concentration of Co-living units within an area or place undue pressure on local infrastructure. Where there are larger concentrations of Co-living developments or similar accommodation (such as purpose built student accommodation and / or Houses in Multiple Occupation) relative to conventional housing, these types of accommodation may be considered to be 'crowding out' conventional housing schemes, and it can also result in the homes within an area being focussed on specific groups within the community, rather than a mix of groups, therefore limiting the ability to create mixed and inclusive neighbourhoods that meet a range of needs.

There are no set space standards for Co-living developments, however, changes have been made to the policy and supporting information following further research and consideration by officers of the design of Co-living developments, and how comfortable, functional and accessible units can be provided whilst also ensuring that units are not capable of being used as self-contained homes. Additional detail has been added to the supporting text to refer to the existing standards for residential accommodation that should be considered in the design of Co-living units.

The affordable housing policy requires Co-living developments to contribute towards the delivery of affordable housing, as although these developments are not providing self-contained dwellings, they are contributing towards meeting our overall housing requirement and it is therefore important that they also contribute towards meeting Greater Cambridge's affordable housing need. Recognising that the provision of affordable housing on-site within a Co-living development is unlikely to be practical and off-site provision will deliver affordable housing that will meet a wider variety of local needs, the affordable housing policy (Policy H/AH) has been amended to set out that a financial contribution will be sought from Co-living developments that is comparable to the on-site delivery of affordable housing within other residential schemes.

In light of changes introduced in May 2026 through phase 1 of the Renters Right Act 2025, the reference to the length of a tenancy agreement has been removed from the policy as it is no longer possible to specify the length of a tenancy.

However, it is still important that safeguards are put in place through management arrangements so that Co-living developments do not effectively operate as a hotel or a hostel.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for policy, however, needs minimum space standards to avoid poor quality developments coming forward. Paragraph 9.85 should be amended to require co-living developments to meet the HMO bedroom standards rather than just to consider them.	203448 (Cambridge City Council Liberal Democrat Group)
The Local Plan's commitment to delivering a balanced mix of housing types and tenures is welcome.	203537 (Cambridge Ahead)
Co□living is not suitable for Girton's rural environment as it is an urban high density typology.	202263 (Girton PC)
Amend the first sentence of clause 1d to require a mix of private living space layouts, broadening the policy beyond single-person studios.	203748 (Cambridge Green Party)
Amend clause 1h to explicitly allow co-living developments to be managed by resident-led bodies, Community Land Trusts, co-operatives or other non-profit models, not just commercial operators. This will make the policy more explicitly supportive of resident-owned and democratically governed co-living models, promoting greater community control.	203748 (Cambridge Green Party)
Clause 1c is too restrictive as it focuses on 50-200 units whereas investors/operators usually seek 250+ units. Justification required for scale of 50 to 200 units.	203591 (The Crown Estate), 208694 (Guilden Morden Developments Ltd)

Summary of issues raised in comments	Comments highlighting this issue
The proposed approach of not prescribing a proportion of co-living units, but instead setting a criteria against which an application will be assessed is supported.	211570 (Martin Grant Land Limited)
Clause 1i is too restrictive as many operators offer monthly tenancies. The policy should instead include a clause requiring the developer to provide evidence of the need for the intended minimum tenancy period.	203591 (The Crown Estate)
Part b should be deleted. The housing needs assessment accepts a need for single person households. There is no clear planning-based need to manage housing unit sizes across an urban area.	203035 (Watkins Jones Group)
Part c should remove the upper cap. The housing needs assessment accepts a need for significant single person households. These developments meet that need and should not have caps.	203035 (Watkins Jones Group)
The policy should state that either financial contribution in lieu of affordable housing, or onsite discounted market rent co-living units, would also be acceptable. The application of 20% affordable housing should be promoted in the Local Plan for this specialist housing tenure.	203035 (Watkins Jones Group)
There is a contradiction in part 1a between ‘where the development does not contribute to car dependency’ and ‘parking can be minimised reflecting the high level of accessibility’.	208694 (Guilden Morden Developments Ltd)
Co-living is suitable for many parts of rural Greater Cambridge but sufficient car parking will be required.	208694 (Guilden Morden Developments Ltd)
Opportunities for Co-Living developments like Marmalade Lane in Orchard Park should be included in master plans of greater than 250 dwellings.	201002 (N Upstone)

Summary of issues raised in comments	Comments highlighting this issue
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.	204066 (S Rogers)

Policy H/MO: Houses in multiple occupation (HMOs)

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Many comments focused on how ‘over concentration’ should be defined. Some comments argue specific limits or thresholds should be placed on an area. Other comments, including by some of the University Colleges, raised concerns about impacts and whether the proposed policy approaches were justified. Concerns raised included parking, noise and antisocial behaviour. One comment highlighted these matters should be addressed through licencing. The need for diverse housing products was highlighted. Some comments requested that Article 4 Directions be issued so that planning permission would be required for small HMOs as well as large.

Response to main issues raised in representations:

Representations received are noted, including the diversity of views.

According to the Housing Act a House in Multiple Occupation (HMO) is a property that is rented by at least 3 unrelated people forming 2 or more households and sharing amenities including kitchens and bathrooms. HMOs for 5 or more people must be licensed, and the Councils publish a register of these HMOs. Cambridge City Council also hold details of known non-licensable HMOs. Licensed HMOs are required to meet specific standards – relating to the size of bedrooms and other rooms, and number of kitchens and bathrooms – depending on the number of occupants.

For planning, a small HMO (use class C4) is for 3 to 6 unrelated people, and a large HMO (use class sui generis) is for more than 6 unrelated people. A large HMO always requires planning permission. The change of use from a dwelling (use class C3) to a small HMO is 'permitted development' and therefore does not require planning permission.

To support the new Local Plan we commissioned a study to explore the number and distribution of HMOs within Greater Cambridge, the role of HMOs in meeting the housing needs of Greater Cambridge, the impacts of HMOs, and the potential solutions. This study shows that:

- HMOs form a key part of the housing supply in Cambridge, providing accommodation at a comparatively affordable rent for professionals, students and healthcare workers, especially in central Cambridge locations.
- HMOs also represent the most viable market-based housing option for those unable to access social housing.
- Evidence of concentrations in some areas, particularly around Mill Road and Anglia Ruskin University, strongly linked to the prevalence of older terraced housing and proximity to employment centres and universities.
- Areas with more HMOs are also locations likely to have wider amenity issues due to inner City and main road locations, and housing types (e.g. terraced homes). However, there appears to be no correlation between HMOs and crime or antisocial behaviour, and some correlation between HMOs and residential amenity (e.g. noise, rubbish). Correlation is not causation.
- Limited evidence of loss of family dwellings.
- Evidence base recommends policy approach that avoids sandwiching, minimises cumulative impacts and seeks appropriate design to ensure good quality HMOs are approved.

The adopted Cambridge Local Plan 2018 includes a policy for HMOs, that is used when any planning applications are submitted for HMOs. The new Greater Cambridge Local Plan carries forward this policy, with amendments, and applies it to the whole of Greater Cambridge.

The policy in the new Local Plan reflects the findings of the study and focuses on:

- avoiding ‘sandwiching’ i.e. there being a HMO either side of a non-HMO dwelling,
- ensuring HMOs are of a suitable quality,
- ensuring amenity impacts from HMOs are reduced,
- requiring appropriate management arrangements to be demonstrated.

Whilst some local planning authorities have planning policies restricting HMOs where the concentration goes above a certain threshold, this would restrict HMOs from areas where they may be suitable, and could have unintended consequences regarding knock on impacts for other areas, and on the affordability of accommodation.

The new Local Plan policy seeks to control any potential negative impacts, by setting out criteria to be considered on a case-by-case basis.

Whilst outside the plan making process, there is a strong case for developing an Article 4 Direction, so that small HMOs would also require planning permission. The policy is therefore drafted to enable it to be applied to all HMOs that require a planning application i.e. large HMOs, but also small HMOs if an Article 4 Direction issued.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Request that the policy includes a clear 10% concentration threshold within a defined radius.	206584 (Guest Road Residents Association), 203787 (The Guest Road Area Residents Association)
Definition of 'over-concentration' is not provided, and unclear why additional requirements regarding sandwiching and adjacent properties have been added. Further consideration needed in relation to finding the right approach to address the matter of potential harm to residential amenity. Need to allow for site specific circumstances.	208249 (Kings College), 208298 (Girton College)
Request an Article 4 Direction for Petersfield and central Cambridge to remove permitted development rights for small HMOs and short-term lets. In Petersfield about a third of dwellings are HMOs, causing noise, anti□social behaviour, parking pressure, litter and waste□collection strain. The position that there is insufficient evidence is no longer valid given high HMO concentrations.	206587 (Guest Road Residents Association), 203787 (The Guest Road Area Residents Association)
HMOs are providing an affordable accommodation option, but are often a sub-optimal form of housing. HMOs are not a long term solution for young professionals and there needs to be greater consideration of this group – alternative models should be considered such as co-housing.	208009, 211009 (Cambridgeshire County Council)
Strict limits on the density of HMOs within an area should be imposed. Concentrations already too high in places, such as Orchard Park. High concentrations of HMOs can have a	208009, 211010 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
negative impact on neighbourhood quality - undermine placemaking, contribute to a transient population, and are associated with poor property maintenance.	
HMOs increase parking stress, undermine character, and create intensification. Strong limits on HMOs are needed, and require management plans and parking controls.	202264 (Girton PC)
Proposed policy H/MO 1(b) includes a prohibition on “three or more adjacent properties as HMOs”. This is unduly restrictive in the context of College accommodation in Cambridge City Centre, where there are many examples of high-quality rows of College owned HMOs. In certain roads in the City, this may be a better solution than “pepper potting” College HMOs across the City: better for residents as college can have better management and for students in term of community. Recommended that the restriction in 1(b) be removed from the policy and that a more nuanced approach to defining over-concentration be included in the Supplementary Planning Document referenced in paragraph 9.97. Part 1a. is considered to be sufficient to avoid over concentration.	201746 (Christ’s College, Cambridge), 202051 (Trinity Hall), 204781 (St John’s College), 204020 (Jesus College)
Support for policy but request for policy qualification to be strengthened as HMOs are detrimental to community cohesion and quickly erode any sense of neighbourhood or neighbourliness because of their transitory nature. There should be a presumption against the conversion of c3 housing into HMO and new HMOs should not be part of the Local Plan. Instead build to rent apartment complexes with affordable offerings (and communal spaces) should be prioritised.	201824 (St Andrew’s Church)

Summary of issues raised in comments	Comments highlighting this issue
Comment made to specific planning application (25/03323/FUL) for proposed development of 23 double bedrooms. Comment notes that application does not mention demographic of residents or what management arrangement will be in place. The requirement to license HMOs that house 5 or more people, which is outside the planning system, is noted as seemingly unhelpful.	201888 (T Jewell)
Support policy but request made for the removal of references to C4 and Sui Generis to allow for automatic inclusion of smaller HMOs if Permitted Development regulations change or an Article 4 directive is implemented. Advocate for further work on this policy to establish an evidence base regarding the impact of converting smaller dwellings, ensuring the policy remains robust against potential national policy changes.	203454 (Cambridge City Liberal Democrat Group)
The Local Plan's commitment to delivering a balanced mix of housing types and tenures is welcome, particularly its focus on affordable housing to address Cambridge's long-standing challenges. The recognition of diverse housing options to meet differing needs, as highlighted by Cambridge Ahead's Young Advisory Committee, is positive.	203539 (Cambridge Ahead)
Support for policy covering Greater Cambridge and not just Cambridge City. Orchard Park specifically given as example which is over dense with HMOs and creating community tension. Do not want issues in Orchard Park replicated in Darwin Green or potentially Histon & Impington. Need to make sure the people who live in HMOs have access to good quality housing alternatives. Too high density of HMOs makes community universally less attractive.	204035 (Histon and Impington PC)

Summary of issues raised in comments	Comments highlighting this issue
Policy needs specific detail about what 'over concentration' of HMOs means. Undefined ‘over-concentration’ is insufficient and makes refusals subjective.	204035 (Histon and Impington PC), 208695 (Guilden Morden Developments), 206586 (Guest Road Residents Association)
Suggestion that the ‘over concentration’ definition is applied to tiers within the Settlement Hierarchy in order for a proportionate approach to be taken. Similarly, 1.b. should be justified: the policy places an inherent negative stance on the ‘sandwiching’ of a C3 property by C4/Sui Generis HMO; however, compliance amenity matters in 1.a. would negate the need for 1.b. Part 2 of the policy is also presumptive, with the prevention of antisocial behaviour a requirement for retention of an HMO license; this is not a planning policy.	208695 (Guilden Morden Developments)

Policy H/SA: Student accommodation

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

A number of colleges expressed concern about the impact of the policy on providing accommodation for part-time students. Girton PC considered there should not be further student accommodation in Girton and an individual highlighted that student accommodation is distorting the property market against the interests of residents. The Cambridge Green Party highlighted the need to clarify the position regarding need, and a potential inconsistency in how this is explained in the supporting information. There was one objection to restricting student accommodation on sites allocated for housing, including related to development viability. A query was also raised regarding how the loss of dwellings would be considered in light of the in lieu affordable housing contribution requirement. The Cambridge City Council Liberal Democrat Group sought a distinction between student and staff accommodation, and that any staff accommodation should adhere to residential space standards. One comment sought greater opportunities for local young people to benefit from institutional development.

Response to main issues raised in representations:

The Councils are aware that the University of Cambridge Colleges are increasing the availability and range of their part-time and flexible degree courses – these changes are being made in the context of Government policy proposals and also due to market dynamics. This means there is likely to be an increasing expectation on the Colleges to house more part-time students, as the Colleges are the principal providers of accommodation and related services for their student members on

degree level courses, including part-time degree courses with residential requirements. Amendments have been made to the policy and supporting information to exceptionally consider the provision of accommodation for part-time students on a case-by-case basis, where this meets the identified needs of an existing higher educational institution within Greater Cambridge. The policy continues to restrict occupancy to students attending full-time courses of at least one academic year, but this has been broadened to include “or part-time courses where permitted’’ as an exception in line with the associated changes made to other parts of the policy. Without the ability for the local planning authority to flexibly consider applications for accommodation for part-time undergraduate and / or postgraduate students (which is evidenced to meet the identified needs of an existing higher educational institution within Greater Cambridge) an inadequate amount and level of student accommodation may be able to be offered by the University of Cambridge Colleges for this student group. Without this flexibility in the policy, this need may have to be met by other housing sectors (principally the private rented housing sector), and this would likely increase demand for such housing, which will risk taking up accommodation potentially more suited to the general housing market needs in Greater Cambridge.

The provision of student accommodation to meet the identified needs of an existing higher educational institution within Greater Cambridge is supported, subject to the requirements within the policy being met, including that proposals have considered the scale and impact of the development on local residential amenity and on the character of residential areas. This ensures that where accommodation is to be provided, that any potential for conflict or negative impacts of the proposal on the surrounding areas is considered when making the decision on the planning application being considered.

The Councils have identified the accommodation needs of students and academic staff, and this is set out in Policy S/JH. The Councils have also considered the existing supply for accommodation for students and academic staff, and existing permissions and allocations (including strategic sites) are anticipated to deliver an over provision against the identified need. However, new proposals for accommodation for students and academic staff will continue to come forwards during the plan

period, and these proposals will be considered against this policy.

Given that there is an overall substantial need for housing in Greater Cambridge, the provision of student accommodation should not compromise the delivery of homes on sites allocated for housing or result in the net loss of market and affordable housing. An exception on a case-by-case basis for this restriction is not considered necessary due to the ability for proposals to provide evidence as part of the planning application process to demonstrate that a material consideration(s) exists to deviate from the policy.

Any self-contained dwellings, irrespective of their use class, are required to meet the residential space standards set out in Policy H/SS. However, there may be specific developments where meeting the required internal and external amenity space standards, and / or accessible and adaptable homes standards, would not be appropriate for the identified occupants. Any exceptions would need to be clearly justified with evidence provided to demonstrate that the proposed development still delivers suitable and appropriate homes for the anticipated occupants.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Additional student accommodation is not appropriate within Girton village. Eddington already contributes significant student/education pressure that increases traffic and conflicts with rural character. Avoid student accommodation allocations in Girton. Focus student housing on university-adjacent locations outside Green Belt.	207165, 207166, 202265 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
The policy constrains expansion of part-time student provision. Cambridge University is expanding part-time courses and accommodating part-time students in line with Government policy. Students on part-time degree courses are members of Colleges, and because Colleges are the principal providers of accommodation and related services, there is an expectation on Colleges to house more part-time students. Some part-time courses require intensive teaching blocks and mandatory residence in Cambridge, particularly for students from overseas. Clauses 1a and 8 should permit part-time student accommodation for those with a residential requirement exceeding two days per week.	202049 (Trinity Hall), 202512 (University of Cambridge), 204016 (Jesus College Cambridge), 204787 (St John's College, Cambridge)
Objection to policy. Policy elements 1a-c are replicated by 4a-b and are therefore unnecessary. If 4a is satisfied, but then 4b is not possible for the educational establishment, and it would not be justified nor lawful to restrict occupation of the property. Suggestion to delete 1a-c and 4b.	203114 (Watkin Jones Group PLC)
The limitation of PBSA on sites allocated for housing, or with an extant planning permission for residential is not justified. There will be cases where traditional residential accommodation is not viable. Exceptional circumstances should also include an applicant being able to demonstrate that traditional forms of residential development is unviable in that instance.	203114 (Watkin Jones Group PLC)
Support for policy but request for distinction between student and staff accommodation. Staff accommodation should adhere to housing standards, including meeting space standards and access to private amenity space. Allowing 25% of the development for staff housing with smaller room sizes and limited amenities may lead to poor living conditions.	203457 (Cambridge City Council Liberal Democrat Group)

Summary of issues raised in comments	Comments highlighting this issue
We welcome the commitment to affordable housing.	203457 (Cambridge City Council Liberal Democrat Group)
A definition of acceptable use for staff accommodation during term breaks is needed, as some universities have extended breaks. If staff accommodation is rented out as short-term visitor accommodation unrelated to the university, it should comply with policy J/VA.	203457 (Cambridge City Council Liberal Democrat Group)
Need to clarify the timing, type and location of the identified need for student housing. The statement “Our evidence demonstrates that there is a continued identified need for the development of new student accommodation and staff accommodation” implies that more student and staff housing is needed. On the other hand, the statement “For student accommodation, existing permissions and allocations (including strategic sites) are anticipated to deliver an over provision against the identified need” implies that the need is already being met or even exceeded. Editing and rewording is needed to resolve this apparent contradiction.	203749 (Cambridge Green Party)
Provision should be made for new facilities in larger developments that not only benefit the students but also residents. Provision should be made for developers and institutions to contribute towards a fund that pays for joint activities that bring visiting students together with local schools so that local young people benefit from the opportunities that might otherwise be restricted to visiting groups.	203818 (A Carpen)

Summary of issues raised in comments	Comments highlighting this issue
Welcomes policy but seeks further information on 1d. The Council is invited to accommodate the role of contributions to affordable housing in lieu of, and how this is taken into account in determining whether development would lead to permanent net loss of C3.	208696 (JMS Planning and Development ltd)

Policy H/DC: Dwellings in the countryside

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was some support for the policy from Parish Councils with requests for various aspects of the policy to be strengthened. There were calls for a formal standard of what defines the required marketing to ensure adequate marketing is made and concern that the policy could be weakened by conversion of mobile home temporary permissions to permanent dwellings in the open countryside. There was also concern that the policy could erode the rural edges of villages.

There was a specific comment about the shortage of livery yards in South Cambridgeshire which was associated with a request that where stables are being converted to other uses, alternative provision must be made to rehouse the horses. Another specific point concerned windmills. It was argued that tall structures near to a working windmill are likely to have a detrimental effect and therefore consideration should be made where a site is within 400m of a working windmill. Reference is made to a relevant policy in the Histon and Impington Neighbourhood Plan as an example of good practice.

A couple of architects practices were concerned that the policy was in conflict with national policy although one of these referred to the latest draft NPPF. The other considered that both the current South Cambridgeshire Local Plan policy and the proposed draft were in conflict with the provisions of Class Q of the General Permitted Development Order (2015). They cited the example of large portal-frame barns that are poorly suited to residential use but still fall within Class Q. They argue that better schemes, including redevelopment rather than reuse, have been negotiated by securing a Class Q permission as a fallback position with the resulting permission being treated as a departure from policy.

A developer argued that the marketing requirements necessary for a change of use of redundant buildings to uses other than employment were unreasonable.

The Environment Agency recommend that the ‘Reuse of buildings in the countryside for residential use’ refers to the need to place restrictions on changes of use within flood risk areas.

Response to main issues raised in representations:

The criteria set out in the policy are considered to be sufficiently robust to stop unsustainable or inappropriate development. This includes any changes of use from a livery yard, where planning permission is required, as evidence would be required to demonstrate the benefits of this change.

The reference to a windmill is a very specific issue. It is unlikely to be affected by this policy as most dwellings and other buildings considered against the policy are unlikely to be particularly tall. The issue would also be considered against other policies including Policy GP/ST: Skyline and tall buildings. There is also scope for a Neighbourhood Plan to introduce a bespoke policy if it is considered to be an important local issue such as in Histon and Impington.

A final version of the NPPF has not yet been published therefore the policies in the Local Plan will not, at this stage, reflect the proposed NPPF 2025 changes. The proposed draft policy is not considered to be in conflict with the current NPPF or Class Q provisions. However, it is recognised that there could be situations where a building could secure permitted development under the Class Q provisions and that this will act as a fallback position. The supporting information has been amended to highlight the relationship between this policy and permitted development under the Class Q provisions.

The marketing requirements for a change of use of building in the countryside to residential use are considered to be reasonable and proportionate, and Appendix G of the Local Plan sets out expectations on what is required. The policy has an overarching aim to reduce unsustainable living patterns and minimise the carbon impacts of new housing.

The suggested amendments to refer to national flood risk guidance have not been included as this is considered a duplication of national planning policy and guidance and would not be appropriate.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Broadly supportive of policy.	201646 (Stapleford PC), 210958 (Great Shelford PC)
A formal standard of what defines the required marketing is needed to ensure adequate marketing is made.	201438 (Histon & Impington PC)
It is an unreasonable requirement to have to market a property for 12 months and not take the existing state of the property into account. The requirement for marketing information should be restricted to properties that are vacant but capable of accommodating employment uses, and which are not in poor condition.	208697 (Guilden Morden Developments Ltd)
Tall structures near to a working windmill are likely to have a detrimental effect therefore consideration should be made where a site is within 400m of a working windmill. The Histon and Impington Neighbourhood Plan HIM04 is an example of a policy regarding working windmills.	201438 (Histon & Impington PC)

Summary of issues raised in comments	Comments highlighting this issue
Concern that this policy is weakened by conversion of mobile home temporary permissions to permanent dwellings in the open countryside. Request consideration of tightening of this policy to reduce incidences of increased permissions in the open countryside.	201390 (Gamlingay PC)
Dwellings in the countryside risk eroding rural edges and should be prohibited in the Girton gap.	202266 (Girton PC)
There is a shortage of livery yards in South Cambridgeshire. Where stables are being converted to other use, alternative provision must be made to rehouse the horses.	201721 (S Jeggo)
The existing policy is out of date and conflicts with the provisions of Class Q. The proposed policy appears to replicate this issue and therefore requires reconsideration.	204613 (NP Architects)
Recommend that the 'Reuse of buildings in the countryside for residential use' refers to the need to place restrictions on changes of use within flood risk areas. The following bullet point could be added to this section: "The buildings are located outside of Flood Zones 2 and 3 and outside areas of high surface water flood risk, or a site-specific Flood Risk Assessment demonstrates that the development will be safe for its lifetime, taking into account the effects of climate change."	211171 (Environment Agency)
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably.	204067 (S Rogers)

Policy H/RM: Residential moorings

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was only one comment on this policy. However, the comment was actually focused on a residential mooring allocation from the adopted Local Plans rather than Policy H/RM: Residential moorings

Response to main issues raised in representations:

The residential moorings allocation from the adopted Local Plans was not carried forwards into the Draft Greater Cambridge Local Plan (2025) and this continues to be the case in the Proposed Submission Local Plan (2026). The reasons, as set out in the Sites Topic Paper 2025, are that the landowner stated that residential development is required to enable the marina / moorings, and this proposed development is unsuitable for the site, and our evidence found no specific need for more residential moorings. The criteria based policy will be used to assess any sites for residential moorings that do come forward.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Fen Road marina development (allocated in the Local Plans 2018) should not proceed as: • need mains sewage in the Fen Road area,	203000 (Fen House Property Ltd)

Summary of issues raised in comments	Comments highlighting this issue
• properly maintained footways are needed, and towpath from Chesterton Abbey bridge to Water Lane requires maintenance, widening, and paving, and • the level crossing is near capacity for road traffic, leading to delays and congestion - the local authority should advocate for improved signalling to reduce downtimes.	

Policy H/GT: Gypsy and Traveller and Travelling Showpeople sites

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

The Cambridge Green Party called for Gypsy and Traveller families to have the opportunity to live close to family members and for proposals to be considered on a similar basis to other proposals for residential development. Cambridgeshire County Council has highlighted that there is a need to ensure there are no inequalities for these communities when providing permanent pitches, and have provided a list of specific criteria to be considered.

They also suggested that strategic sites should, in addition to providing permanent Gypsy and Traveller pitches, provide for both negotiated stopping places and transit sites. It has been highlighted that the Local Plan does not mention transit or temporary stopping places despite their being a need identified for them in the Accommodation Needs Assessment, and it was commented that any transit sites or temporary stopping places need to respond to the gap in provision and be well managed and maintained.

An individual felt that the policy requirements were too strict and would limit the number of sites coming forward. In contrast, a PC was clear that proposals must respect Green Belt, flood risk and rural landscape considerations. The Environment Agency have requested that ‘essential utilities’ specifically refers to ‘mains foul drainage’ as this should be provided where possible, and that the policy clarifies that any proposals for new Gypsy and Traveller pitches must not be located within Flood Zone 3.

The need for further sites was challenged on the grounds that current pitches are being advertised as homes for rent and that

many pitches are occupied by non Gypsy and Traveller families despite planning conditions requiring this being attached to the planning permission. There was criticism that current planning breaches were not being enforced and that this resulted in over-development which was breaking fire regulations, and that the policy does not contain mechanisms or safeguards to ensure that the first and subsequent occupiers are Gypsies and Travellers.

It was also argued that there is a spatial imbalance in the provision of pitches with most being in the north of the area and relatively few being in the south of the area, and that a better geographical spread would support community cohesion.

A housebuilder objects to the requirement for strategic sites to include Gypsy and Traveller sites. They argue that the need is in rural areas and is not generated by new settlements, and that the policy requirement goes beyond what is suggested in the evidence base. They also point to practical delivery issues with providing pitches within strategic sites and argue that the Local Plan viability assessment does not take into account the delivery of pitches within strategic sites. An individual has requested details on the potential locations of new traveller sites.

Response to main issues raised in representations:

Our evidence shows that there is a need for additional Gypsy and Traveller pitches and Travelling Showpeople plots within Greater Cambridge, but that there are also existing vacant pitches and pitches that are not being occupied by those meeting the definition of a Gypsy and Traveller. It is therefore important that any new pitches or plots that are proposed demonstrate a clear need for the new pitches or plots and provide details on how the proposed residents meet the definition of a Gypsy and Traveller or Travelling Showperson.

Reflecting national planning policy, the criteria based policy in the Local Plan aims to ensure fair and equal treatment for travellers, facilitate the travellers way of life, and respect the interests of the settled community, whilst also limiting the

development of traveller sites in the open countryside. The policy sets out a series of requirements to be considered when any new pitches or plots are proposed in Greater Cambridge, which includes that any pitches or plots are located in a sustainable location, with the design and layout of any new sites or yards providing healthy, safe and secure living conditions for their occupants. Additionally, the policy provides the opportunity for proposed occupants to set out why the proposed new pitch or site is necessary, including why their needs cannot be met on existing sites.

Gypsy and Traveller pitches and Travelling Showpeople plots can be located in the countryside provided that the requirements within the policy are met, and this therefore provides greater flexibility for these residential uses compared to other residential developments. Where there is already national planning policy, such as Green Belt and flood risk, the supporting information highlights that this will be used when considering planning applications.

The Councils are reviewing the occupation of traveller sites within Greater Cambridge, and will be taking relevant action where occupation of sites is not in line with the conditions set out in the approved planning permission. Planning permissions for traveller sites include conditions relating to the number of pitches/plots and caravans that must not be exceeded on the site and also relating to the occupants. These conditions relate to the first and any subsequent occupants.

Licensing of caravan and park home sites is required by separate legislation – the Caravan Sites and Control of Development Act 1960 and the Mobile Homes Act 2013 – and the site licence will include specific conditions relating to model standards, such as safety and welfare requirements.

The approach to meeting the identified needs of travellers is covered within the Strategy Topic Paper. The Accommodation Needs Assessment 2024 (ANA 2024) sets out a series of options for meeting the identified accommodation needs of travellers, and the Councils have considered each of these options. Delivering traveller sites as part of strategic sites is part of the approach to meeting the identified needs, alongside windfall developments and optimisation of existing sites.

Strategic sites provide an opportunity to deliver Gypsy and Traveller pitches, alongside other types and tenures of housing, to ensure that new communities meet the needs of different groups in sustainable locations with access to services and facilities. As the Councils have an identified need for traveller sites, it is important that strategic sites contribute towards their delivery. Traveller sites within / on the edge of strategic sites is akin to there being traveller sites on the edge of existing villages. The proposed percentage of traveller pitches within the overall number of dwellings on a strategic site is similar to the relationship between existing settlements and traveller pitches.

The policy allows for traveller sites to be provided both within strategic sites, but also on other land in close proximity to the strategic site. By including requirements for strategic sites to deliver traveller sites within the policy, this allows them to be considered from the outset and planned into the development. The existing strategic sites with planning permission all have conditions within the outline planning permission that refer to the delivery of housing to meet the needs of a variety of groups in the community, and this includes the needs of travellers.

The Viability Assessment 2026 has considered the delivery of traveller sites within strategic sites, and finds that it is viable to do that alongside the other plan requirements.

The ANA 2024 considered the need for transit sites and temporary stopping places, and concluded that there is a need to provide temporary places for travellers to stop but that there was only a limited need for transit site provision. The ANA 2024 also highlights that in general councils are moving towards providing temporary stop over areas and negotiated stopping to help meet short-term transit need rather than developing transit sites. A temporary stop over area is known land which can be used on a temporary basis, and where temporary facilities can be provided when the temporary stop over is in use, but which would not require planning permission. Similarly, negotiated stopping involves councils coming to an agreement with Gypsies and Travellers to allow them to use a piece of land as a temporary stopping place. As temporary stop over areas and

negotiated stopping do not require planning permission, there is no need to refer to them in the Local Plan.

In response to the Environment Agency, the suggested amendments to note that Gypsy and Traveller pitches should not be located within Flood Zone 3 are considered to be a duplication of national policy and therefore not considered appropriate. However, the supporting text has been revised to reflect that Gypsy and Traveller pitches are a vulnerable user, as this a particularly specific point. Policy CC/IW addresses mains sewerage connections and therefore a change to this policy has not been made.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Challenge case that there is unmet demand for Gypsy & traveller plots. Holiday mobile homes are advertised for rent on Smithy Fen and Moor Drove in Histon on Facebook and Rightmove.	202063 (I Grimshaw)
Current planning breaches should be enforced. Of current pitches that are occupied on Smithy Fen many are not occupied by those from the traveller community, they are privately rented. The closeness of caravans breaks fire safety regulations.	202063 (I Grimshaw)
Any such proposals must respect Green Belt, flood risk, and rural landscape.	202267 (Girton PC)
Recommend adding to the end of Point 1a “taking into account the needs and preferences of the proposed residents” so that a site is not refused simply because an alternative exists elsewhere in the Local Plan area, particularly where proximity to family members is important.	203752 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
Recommend adding to Point 1g that proposals are to be considered against the same thresholds as standard settled accommodation, preventing refusal on grounds such as traffic where comparable built development would be permitted.	203752 (Cambridge Green Party)
Should require strategic sites to identify land for negotiated stopping and transit provision.	203752 (Cambridge Green Party)
Most Gypsy and Traveller sites in South Cambridgeshire are in the north of the district and there is an imbalance. A better geographical spread would support community cohesion.	208759 (E Diaz)
There is no mention of transit and temporary stopping place provision for Gypsies and Travellers despite the need for such being identified in the Traveller Accommodation Needs Assessment 2023-24.	203655 (R Robertson)
All Gypsy and Traveller pitches or Travelling Showpeople plots or transit or temporary stay sites on allocated or unallocated sites must be well designed, and any proposals for temporary or transit must: • Fill a gap in the provision of such facilities across the country or respond to a known need such as proximity to a hospital, • Be planned to be well managed and maintained, • Set, and require application of, maximum stay dates of appropriate lengths.	203655 (R Robertson)

Summary of issues raised in comments	Comments highlighting this issue
This policy sets quite a high bar for provision. The number of sites the travelling community actually get is small so there is a need to commit to providing more. The Gypsy & Traveller community have every right to their way of life, and to be treated without prejudice like the rest of us.	205082 (B Nicolson)
It is recognised that strategic sites can play a part in meeting traveller needs.	211571 (Martin Grant Land Limited)
The identified need is overwhelmingly rural and not generated by new settlements, and the ANA explicitly recommends a criteria based policy and only lists inclusion within strategic sites as an option, not an evidence-led requirement. Part 3 of the Policy goes beyond the evidence base, and should be deleted.	208974 (Persimmon Homes East Midlands)
There are practical delivery problems with providing pitches within strategic sites – issues with finding 1-2 hectares within tight masterplans, integrating the pitches in a way that works operationally, and willingness of traveller households to relocate.	208974 (Persimmon Homes East Midlands)
The Viability Assessment does not take account of providing pitches within strategic sites.	208974 (Persimmon Homes East Midlands)
We welcome criterion 1g.	210180 (Historic England)
Need to provide information on potential location of Traveller sites and from which roads these sites be accessed.	205902 (P Harradine)

Summary of issues raised in comments	Comments highlighting this issue
Two sites on the edge of the village are occupied as small travellers sites in breach of planning control. Planning applications were submitted for each of the sites. Neither application complied with planning policy.	209061 (Fowlmere PC)
The policy seeks to ensure that proposed occupiers of any site for which permission is sought will be members of the gypsy or traveller community, however the draft policy does not contain mechanisms or safeguards to ensure that subsequent occupiers are only members of the gypsy or traveller community.	209062 (Fowlmere PC)
In the provision of permanent pitches, need to ensure there are no inequalities for these communities and therefore that: • Sites are located within 1.5 miles of a primary school and 2 miles of a GP surgery, • Sites provide satisfactory amenity for neighbouring occupiers, • Pitch size facilitates good quality accommodation, • Sites include play provision, and that noise and disturbance are mitigated, • The health and safety of occupants are not put at risk from poor air quality, noise, contamination or flood risk.	210550 (Cambridgeshire County Council)
Have previously encountered issues in relation to foul sewage disposal at the permanent traveller sites in the area, as these sites are not connected to the mains foul sewage system, instead utilise multiple package treatment plants that produce inadequately treated final effluent. Pleased to see that section 2(f) includes the need for provision of essential utilities including drainage and	211172, 211173 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
sewerage, but unclear if the term ‘essential utilities’ refers to ‘mains’ sewerage as it is preferable that ‘mains foul drainage’ should be provided where possible. Would welcome establishing mains foul sewage system connection for pitches.	
Recommend that this policy clarifies that any proposals for new Gypsy and Traveller pitches must not be located within Flood Zone 3. Annex 3 of the NPPF classifies caravans, mobile homes and park homes intended for permanent residential use as ‘highly vulnerable’ and table 2 of the Planning Practice Guidance: Flood Risk and Coastal Change indicates that ‘highly vulnerable’ development should not be permitted within Flood Zones 3a or 3b.	211174 (Environment Agency)

Consultation Statement

Appendix 7: Response to Representations - Site Allocations



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 Representations: Site Allocations

Cambridge Urban Area

Cambridge Urban Area Introduction

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There were comments offering broad support for allocation of sites in the Cambridge Urban Area, abut also concern about the impact of growth, such as on traffic. Historic England made extensive comments on the plan, highlighting areas that they supported, but also areas for improvement. A number of comments provided support for Cambridge Science Park North, a development proposal submitted through the local plan process for an expansion of the Science Park north of the A14. Other comments highlighted wards and streets where there was potential for improvement or policy. This includes areas around Chesterton, and around the Elizabeth Way roundabout. There was reference to facilities and the need for improvements such as for arts, sports, youth, leisure. Health facilities were also highlighted. Proposals to deliver an eastern entrance at Cambridge Central Station were welcomed, and the opportunity to densify development in that area were highlighted. Anglian Water sough recognition of their assets in the areas proposed for development.

Response to the main issues raised in representations

Comments are noted. Through plan preparation the plan has sought to identify sites which are suitable for development, but also migration measures required in order to ensure that developments will be sustainable. Heritage issues have been addressed though policy, and a series of evidence studies considering heritage impact appraisal, and consideration of tall buildings for example. Relevant policies have been reviewed in light of comments received. The Science Park North proposal has been considered, there is not considered to be exceptional circumstances to release the land from the green belt, including taking account of the economic land supply available. A range of services facilities and needs were highlighted in comments. The Proposed Submission local plan will be supported by an updated Infrastructure Delivery plan and informed by specific studies looking at Cultural and community infrastructure needs. The area policies proposed around the eastern entrance of the station have been considered in light of proposals.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
I strongly believe that this plan should conform with the 2024 legislation regarding Grey Belt. I believe the Council should NOW either designate Grey Belt sites or invite proposals for sites which may be regarded as such. I am told that the plan is too far in its creation to take this on board. But if neither of the above is done then planning of this kind will be confused, resisted or stymied until 2045/47.	201025 (J Green)

St Matthews Centre, Sturton Street, Cambridge (HELAA Reference 59405) Would be a disaster for this community. Site 115524 was given an Overall Score of 'Red'. The exclusion of Site 115524 must be permanently enforced. It would destroy the only public park in North Petersfield and protected open-space, as demonstrated by five recent planning refusals	201269 (J Sanderson), 201427 (J Bradley) 205180 (C Dunbar) 205704 (J Neal) 201863 (J Brightman)
Cambridge Science Park North We support the creation of approximately 3,500 skilled jobs and at least 460 training and apprenticeship opportunities at Cambridge Science Park North, which will strengthen the city's innovation ecosystem and provide high-value careers for local people. We welcome the development's well-balanced environment that integrates work, learning, leisure and wellbeing, demonstrating a commitment to inclusive growth that benefits residents, employees and future generations. The construction and delivery of the development present opportunity to employ local people, support apprenticeships, and strengthen links between education providers, employers, and the local supply chain. This aligns closely with our aim at Constructed Pathways in supporting individuals into skilled employment and ensuring that major developments deliver lasting benefits for local communities and people.	201594, 201595, 201596 (Constructed Pathways)
Cambridge Science Park North We strongly support the Cambridge Science Park North development because it will create a wide range of employment, training, and education opportunities in the growing mid-tech and advanced manufacturing sectors. Cambridge Science Park North represents an ambitious and forward-thinking project that will strengthen education and skills development through meaningful	201597, 201598 (Cambridge Regional College)

partnerships with local schools and colleges. The inclusion of a dedicated STEM educational hub within the plans is especially exciting. This facility will provide learning and event space to inspire the next generation of innovators, offering practical experience and engagement with emerging technologies. Such opportunities are vital to ensuring that young people across the city and region are equipped for the jobs of the future.	
Cambridge Science Park North As an organisation that works closely with employers, education providers, and local partners, we see first-hand the importance of creating the right conditions for businesses to grow and for people to access meaningful, skilled employment. The proposals for Cambridge Science Park North respond directly by supporting mid-tech and advanced manufacturing activity, strengthening supply chains, and helping to retain talent, investment, and economic value within Greater Cambridge. Overall, we believe that the proposals for Cambridge Science Park North strike the right balance between innovation, sustainability, and inclusivity.	210710 (Cambridgeshire Chambers of Commerce)
Cambridge Science Park North Cambridge Science Park North represents an ambitious and forward-thinking project that will strengthen education and skills development through meaningful partnerships with local schools and colleges. The inclusion of a dedicated STEM educational hub within the plans is especially exciting. This facility will provide learning and event space to inspire the next generation of innovators, offering practical experience and engagement with emerging technologies. Such opportunities are vital to ensuring that young people across the city and region are equipped for the jobs of the future.	201598 (Cambridge Regional College)

Cambridge Science Park North Support for Cambridge Science Park North allocation.	201880, 205960, 205961, 205962, 205963, 205964 (Histon and Impington Community Land Trust), 210085 (Constructed Pathways), 210411 (Cambridge Regional College), 210710 (Cambridgeshire Chambers of Commerce)
I would like to begin by welcoming the ambition, evidence base and overall direction of the Draft Greater Cambridge Local Plan. The emphasis on sustainable growth, net zero commitments, and the integration of transport, housing and place-making is positive and necessary for a city under sustained pressure. This feedback is intended to be constructive and to highlight a strategically important inner-city area that currently feels under-recognised, despite its central location and imminent change. West Chesterton Ward is an overlooked neighbourhood but is highly strategic. Elizabeth Way is recognised but needs stronger ambition to improve this area. Chesterton Road has significant potential for increased footfall and activity.	201702 (A Rahman)
The strategic area between Elizabeth Way, Sandy Lane, Humberstone Road, Montague Road, St Andrew's Road and Chesterton Road has been omitted. New homes are planned in Sandy Lane	208021 (S Stickley)

CB4 1HZ, but do not appear on the local plan and this will impact the strategy for active travel and green space in the area.	
There should be a reference to the planning of a new roundabout at the junction of East Road/Newmarket Road and Elizabeth Way bridge to address congestion and potential conflicts between pedestrians, cyclists, and vehicles. If a new roundabout is implemented without current underpass access, it should utilise Walnut Tree Ave for cycle and pedestrian access, linking to riverside cycleways. Clarification is needed on how the new roundabout will connect to Newmarket Road and the new cycle/pedestrian link between East Road and Sun Street, which is part of Anglia Ruskin plans. There are currently no cycleway road markings near 73 Newmarket Road/Tyre Repair workshop at the roundabout, nor clear signage directing towards Walnut Tree Ave.	201843 (T Jewell)
Concerns raised around traffic pressure and over-reliance on reducing car usage with no clear alternatives.	202355 (E Tse)
Support for policies in the Cambridge Urban Area.	202827 (Cambridge City Council Liberal Democrat Group)
Support sites in Cambridge but more are needed.	203580 (H Thomas)
Arts, sports, youth, leisure and other community facilities need to be given more prominence in your plan including how these will be connected by walking/cycling routes and/or public transport.	203603 (S Berridge)
New buildings should be aesthetically pleasing in keeping with the city's architectural heritage and must adhere to existing height restrictions. There should be affordable housing in the city centre	203603 (S Berridge)

especially with particular consideration given to key workers and lower paid earners such as cleaners.	
Beautiful open spaces should be maintained and new green areas for recreation and wildlife created throughout. Everyone should be able to access nature easily.	203603 (S Berridge)
Support for the plan – but supports higher densities around stations.	204070 (J Shoemaker)
Planning policies must facilitate the delivery of essential healthcare infrastructure and involve consultation with the NHS to support estate transformation. Site allocations should consider future healthcare requirements while avoiding overly prescriptive approaches to ensure appropriate healthcare mitigation decisions.	205056 (NHS Cambridgeshire and Peterborough Integrated Care Board)
Site allocations lacking an explicit requirement for on-site health facilities should include wording that references the need for financial contributions for health and infrastructure mitigation, aligning with the IDP approach.	205066 (NHS Cambridgeshire and Peterborough Integrated Care Board)
Proposal that Petersfield is a Nature Recovery from the Ground Up ward.	205308 (J Neal)
Support for proposals to deliver an eastern entrance at Cambridge Central Station to unlock higher-density development to the east and south-east and support for further densification of research and employment development around Cambridge North, the Science Park, and the Business Park.	208034 (Railfuture East Anglia)
Concerns raised about cleanliness of the city, toilets not being open, and critical of expensive redevelopment of Guildhall, Market Square and Corn Exchange.	208761 (E Diaz)
We welcome the inclusion of proposals to deliver an eastern entrance at Cambridge Central Station to unlock higher-density development to the east and south-east. We support further densification of	208034 (Railfuture East Anglia)

research and employment development around Cambridge North, the Science Park, and the Business Park.	
We welcome the preparation of HIAs for many of the site allocations in the Plan. There are a few sites where there is no HIA. We appreciate that some of these are policy areas. In those cases, we would suggest that the policy should still include reference to nearby heritage assets and potential mitigation measures and enhancements that will be sought in the policy areas. There do not appear to be HIAs for two University Sites in Cambridge – Mill Lane and the Museums sites. We appreciate there may be a reason for this but would nonetheless recommend that an HIA should be prepared for each of these sites.	208921 (Historic England)
We welcome that many of the policies refer to heritage as well as potential mitigation and enhancement measures identified through the HIAs. However, as currently drafted, some of the policies are quite vague and generic, some of the policies do not currently include all of the recommendations including diagrams from the heritage impact assessments, some of the policies are imprecise about what further evidence may be needed, when and why. Therefore, the policy wording could usefully be further tightened and strengthened to ensure that robust policies are in place that will promote opportunities where these heritage assets can be used to support sustainable growth (including heritage-led regeneration) and secure the benefits of positive placemaking within the historic city and wider sub region;	208922,208924, 210186 (Historic England)
We welcome the preparation of HIAs for many of the site allocations in the Plan. There are a few sites where there is no HIA. We appreciate that some of these are policy areas. In those cases, we would suggest that the policy should still include reference to nearby heritage assets and potential	208921 (Historic England)

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In terms of heritage policy wording for sites, we recommend: i.use the phrase 'Conserve or where appropriate enhance…' ii.mention specific heritage assets. iii.specify appropriate mitigation and enhancements as identified through the HIA. iv.refer to the HIA (with hyperlink). v.use Concept diagrams to illustrate key site considerations/ recommendations For larger sites, or where there are very complex heritage issues, we would expect to see a policy requirement for masterplanning informed by both the Council's HIA and also a further, more detailed, heritage impact assessment as well as Historic Landscape Characterisation and Landscape Character Assessment. We welcome the inclusion of a criterion relating to archaeology where needed.	208924 (Historic England)
Matters including asset encroachment (Policy WS/HS) and utilities infrastructure (see our comments relating to Policy GP/QD) should be a consideration for any site allocation where we	209164 (Anglian Water Services Ltd)

have existing assets, or where the site is in close proximity to our operational sites and should therefore avoid the need to introduce separate clauses within any of the affected site allocation policies. Anglian Water can provide a list of assets within the proposed site boundaries, if this would be helpful to the Councils. The following sites have sewer pumping stations located within or adjacent to the site and as 'above ground' assets this will be land within Anglian Water's ownership, and may have implications for site layout and design:• S/C/CLT: Clifton Road Area; • S/CE: Cambridge East; • S/CBC: Cambridge Biomedical Campus; • S/CB: Cambourne Town Centre; • S/ED: Eddington; • S/NEC: North East Cambridge	
HE welcomes the ambition in paragraph 3.1.2 to 'enable Cambridge to accommodate growth of the highest quality whilst protecting and enhancing the historic environment and the key public spaces which are an important part of what makes the city so special to local people'.	210186 (Historic England)

Policy S/AMC/NEC: North East Cambridge

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was general acknowledgement that the policy context for the NEC area would need to change as a result of the removal of Housing Investment Funding for the relocation of the Cambridge Waste Water Treatment Plant (CWWTP), including its impact on the ability of the NEC area to support the quantum of homes previously allocated.

There was strong support for the recognition of the NEC as an important area for business innovation and employment, with a number of NEC landowners and developers noting that this position should be retained in any revised policy as it was not dependent on relocation of the CWWTP. Several landowners and developers raised issue with the proposed quantum of commercial floorspace for NEC, perceiving this as a potential “cap” on development, and the requirement for outline permissions if bringing forward an application for only part of a strategic site.

There was support for the requirement to improve public transport routes and active travel to and around site, prioritising walking and cycling. However, resident and community groups raised concerns with the practicality of using a trip budget to manage vehicle numbers, the ability to manage congestion and on-site parking, and rail capacity.

The comments of residents, community groups, and Historic England also highlight potential impacts of NEC growth on neighbouring areas. This included impacts on Fen Ditton and Milton Country Park; on the general cityscape, sensitive landscapes and heritage assets/features; on local social infrastructure and services; and on residential areas as a result of

parking displacement.

The same groups also highlighted what they considered were omissions from the policy, including provision for a cultural venue and an alternative to the Fen Road level crossing.

A number of landowners and statutory undertakers raised concerns that the policy did not go far enough to protect safeguarded uses.

Response to the main issues raised in representations:

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The revised policy continues to promote NEC as an innovation district through an "Area of Major Change" designation, responding positively to the general support for intensification and diversification of development in the area whilst reflecting the level of uncertainty around its precise development capacity and what constraints may apply. It acknowledges that the CWWTP is likely to remain on site during the plan period but highlights significant development opportunities within the wider NEC area for additional high-quality commercial floorspace and ancillary uses and, where conditions allow, housing, making efficient use of brownfield land within the City. The revised policy recognises the importance of NEC in contributing to Greater Cambridge's future economic growth through provision to intensify commercial floorspace within the existing science and business parks for research, innovation and knowledge-based industries.

The indicative commercial floorspace capacity has been removed, with the onus placed on applicants to demonstrate compliance with the trip budget and that their proposal will not have adverse impacts on the road network, taking into account cumulative

impacts arising from existing or planned development. A specific policy requirement has been added to ensure the effectiveness of transport mitigation measures will be monitored and can be enforced.

- A further requirement has been added to ensure that all development within NEC coordinates measures to prevent parking displacement.
- The representations regarding potential impacts on the wider area would appear to reflect the more significant housing quanta of 8,500 homes proposed for NEC in the Regulation 18 consultation. More modest housing provision (c.650 units) is now expected within the plan period and will likely take the form Build-to-Rent that generates a lesser need for supporting social infrastructure.
- The infrastructure needs of NEC, reflecting the revised development mix and quanta, will now be accounted for within the updated Infrastructure Delivery Plan for the Greater Cambridge Local Plan, and the policy retains explicit requirements to ensure that these needs are met on-site through development proposals or enhancing off-site capacity and accessibility.
- While there is no policy requirement for provision of a city scale cultural venue within NEC, there is still a policy expectation for community, cultural, retail and social spaces aligned with the vision for the innovation district and to ensure that the broader design ambitions for the area are realised, reflecting the desire to active ground floors and avoid the closed, campus-style layouts that have tended to dominate the area in the past.
- More explicit references to safeguarded uses have been added to the policy, reflecting that a range of uses highlighted already benefit from safeguarding in the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021. The need to apply the agents of change principle to ensure the operation of these uses are not prejudiced is also retained. In response to other comments made around safeguarding land, the policy should be read alongside all policies of the Local Plan as a whole, noting in particular that Policy I/SG sets out various infrastructure projects (including East West Rail) which are subject to safeguarding to prevent conflicts between development proposals and existing or planned infrastructure.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
General support for the vision for NEC as proposed in the policy	210230 (Vistry Group), 211500 (Trinity College Cambridge, DP9)
Concerns raised re feasibility of residential allocation and associated measures following the withdrawal of funding for the relocation of the CWWTP.	201179 (Save Honey Hill Group M Starkie), 202573, (Save Honey Hill Group M Starkie), 202582 (Save Honey Hill Group M Starkie), 202597 (Save Honey Hill Group), 202967 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust, M Baker), 201481 (L Woolfenden), 201485 (Fen Ditton Village Society),

	201847 (H Warnock), 202130 (M Asplin), 203581 (Horningsea PC, E A Williams), 205491 (J Pratt), 202739 (Cambridge Past, Present and Future, S Nicholas), 203584 (The Crown Estate, WSP), 204278 & 211502 (Trinity College Cambridge, DP9), 205471 (L Cotton), 208762 (Heatons, on behalf of Tarmac Trading Ltd), 209165 (Anglian Water), 209970 (Granta Land Ltd), 210231 (Vistry Group), 211591 (Places for People)
Please see our comments in relation to Policy S/JH and Policy S/DS. We note that paragraph 3.1.3 sets out the Councils' intention to continue engagement with relevant partners to confirm a refined position for the site. Anglian Water recognises that our current position and strategy to invest in the existing Cambridge WRC, because of the withdrawal of funding for the CWWTPR, and in the absence of	209165 (Anglian Water Services)

alternative funding being secured, will have a significant bearing on the site allocation and future updates to the spatial framework. We will continue to liaise with the Councils as we progress our plans to increase dry weather flow capacity of the WRC and enable growth across the Cambridge WRC catchment to come forward	
Support for continuing to explore funding for the CWWTP relocation and retaining the residential allocation for NEC; include explicit support for co-living and build to rent; safeguard relocation site as least to end of DCO period.	203523 (Cambridge Ahead, E Pritchard), 204863 & 204873 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure), 210069 (Mrs Veronica Cox)
Concerns around the effective discounting of land within the CWWTP Consultation Area for residential purposes	203324 (Save Honey Hill Group, M Starkie), 204761 (Fen House Property Ltd, I Litterick)
Concerns around lack of feasibility evidence for dismissal of on-site consolidation option for CWWTP and lack of consideration of this option as an appropriate strategy; this is contradictory when the strategy justifies protection of the green belt on the grounds that these needs can be met elsewhere, yet delivery of this site is reliant on green belt development.	202589 (Save Honey Hill Group, M Starkie), 202591 (Save Honey Hill Group, M Starkie), 202593 (Save Honey Hill Group, M Starkie), 202594 (Save Honey Hill Group, M

	Starkie), 202598 (Save Honey Hill Group, M Starkie)
Investment in CWWTP will be required as it remains on site and other measures, e.g. Waterbeach pipeline.	209165 (Anglian Water)
Support for recognition of the NEC as an important area of business innovation and employment, not dependent on relocation of the CWWTP	204278 (Trinity College Cambridge, DP9); 204863 & 204873 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure), 205491 (J Pratt)
Concerns around business space quanta and potential cap on development	203391 (St John's College Cambridge, Savills), 203584 (The Crown Estate, WSP), 204278 & 211501 (Trinity College Cambridge, DP9), 204863 & 204873 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure), 210077 (The Crown Estate)

Support for flexible approach to development of Milton Road Garages site and that policy should take recent planning decisions into account	204718 & 210714 (Brockton Everlast Inc, Savills)
Concern that the policy does not do enough to safeguard all the existing mineral infrastructure within NEC in line with NPPF: Paragraph 223 (part e) of the NPPF (2024) and the Minerals and Waste Local Plan	208762 (Heatons, on behalf of Tarmac Trading Ltd); 210544 & 210599 (Cambridgeshire County Council)
Policy should refer to the requirement for the site specific FRA to include hydraulic modelling of the watercourses within the site to inform site layout and design levels, development should prioritise areas less vulnerable to flooding.	211184 (Environment Agency)
Specific reference to Agent of Change principle should be included re new development near any existing critical infrastructure	208762 (Heatons, on behalf of Tarmac Trading Ltd)
Concerns re intensive development of NEC area impacting local landscape and sense of place.	201179 (Save Honey Hill Group)
Land required for the relocation of the CWWTP is not identified on the policies map.	201179 (Save Honey Hill Group M Starkie), 202597 (Save Honey Hill Group M Starkie), 202109 (M Asplin), 203581 (Horningsea PC)
Comment re plans for a cultural venue as part of redevelopment; support for Create Cambridge's involvement.	202141(Cambridge Junction, M Ridler), 202308

	(Cambridge Junction, L Mills), 204170 (Cambridge Junction / Create Cambridge, M Burman), 202323 (Cambridge Junction / Create Cambridge, S Yusuf), 205403 (Cambridge Junction / Create Cambridge, E Hine), 202754, 202872 (Cambridge Junction, R Tinkler), 202874, (Cambridge Junction, B Groisman), 202424 (Kettle's Yard, S Biller); 204686 (NEUBAU Architecture, B Lenz); 204399 (New International Encounter, L Elmer); 203027 (The Arts Theatre Cambridge, V

	Beechey); 203631 (University of Cambridge, Z Svendsen), 203871 (University of Cambridge, J Fritsch), 205048 (University of Cambridge, L Sheerman); 205004 (Wysing Arts Centre, R Cooper); 202057 (H Chamberlain), 202199 (H Tam), 202387 (J Webber), 202412 (T Shaw), 202461 (K Jones), 202686 (T Altmann), 202716 (W Townsend), 202783 (S Lee), 202932 (R Tarry), 202973 (T Flinders), 203341 (N Ellis), 203437 (S Ashworth), 203485 (L Heap), 203536 (D Lever), 203851 (N Yeni), 204700 (A Giarlis), 205081 (H Paterson), 205137 (J

	Walsh), 205299 (AC de Azevedo Lamha), 205318 (N Oakley), 205331 (L Howse), 205393 (A Seiglow)
Support for improved and more cohesive active travel network to and around site, including upgraded river crossing; walking and cycling as routes to public transport	201809 (J Baumberg), 202003 (D Langley), 202304 (R MacDonald), 202646 (A Lawrence), 203707 (T Preud'homme), 204596 (D Potts), 205405 (A Williams), 205422 (S Nuttall), 205475 (P Colledge), 205481 (R De Beaux); 204278 (Trinity College Cambridge, DP9), 207601 (Natural England, C Duerden)
With or without the Hartree proposal, the Cambridge North development area represents a step change in intensity and movement demand. However, the current planning framework lacks a coherent transport-led spatial strategy. Movement through the Cambridge North station area is already compromised, with a loss of segregation and lack of coherent surfacing that risks bringing pedestrians	211769 (Camcycle)

and cyclists into unnecessary conflict. Beyond that there are bottlenecks such as the shared-use path at Moss Bank, which is three metres wide and already functioning as a critical failure point. This constraint is not adequately acknowledged in the Plan or in the previously issued North Cambridge Area Action Plan, despite the scale of growth proposed. More fundamentally, the river crossings are insufficient. Without a new or significantly improved bridge, high levels of cycling to and from Cambridge North will not be achieved. The Local Plan should treat a new or substantially upgraded river crossings as essential infrastructure.	
Need for alternative to the Fen Road level crossing, including safeguarding land for future infrastructure	202830 (Cambridge City Council Liberal Democrat Group, K Porrer), 203726 (W Clements), 204625 (R Robertson), 202646 (A Lawrence), 202739 (Cambridge Past, Present and Future, S Nicholas)
Concerns regarding traffic issues: volume & HGV traffic, parking provision, impact on surrounding areas and the practical applicability of the trip budget.	201225 (S Williams), 204625 (R Robertson), 202338 (H Brown), 202646 (A Lawrence), 203584 (The Crown Estate, WSP),

	204278 (Trinity College Cambridge, DP9), 204863 & 204873 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure), 203833 (A Chan)
Concerns re feasibility of car free zones, minimum cycle parking standards, EVCP requirement	204863 & 204873 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure)
Support for trip budget approach, noting the position is being reviewed and updated.	210579 (Cambridgeshire County Council)
Remove requirement for outline planning applications	204863 & 204873 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure)
Support for requirement for outline planning applications, but object to reference to outline covering the whole site misleading given the impracticalities of preparing this across multiple landowners and sites.	210083 (The Crown Estate), 211511 & 211512 (Trinity College Cambridge, DP9)

Concerns around rail capacity, especially given lack of proposed connection to East West Rail.	202739 (Cambridge Past, Present and Future, S Nicholas)
EWR Co has identified the requirement for land within the North East Cambridge site to construct and operate the new railway. This includes new railway infrastructure, a construction compound and a Maintenance Delivery Unit (MDU). Land required for EWR within the North East Cambridge site is included in the EWR safeguarded area. To avoid a conflict between the proposed North East Cambridge allocation and the EWR Safeguarding Directions, EWR Co requests that draft Policy S/NEC is amended.	211906 (East West Rail)
Proposal for enhanced bus service serving NEC area	203777 A Chan
Support for illustrative spatial framework, clarify that it is not prescriptive	204278, 211496, 211497, 211498, 211499 (Trinity College Cambridge, DP9), 204863 & 204873 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure)
Concern that design requirements should include landscape buffer to transition between NEC and river/fenland; site should reflect countryside rather than urban location.	202739 (Cambridge Past, Present and Future, S Nicholas); 210088 (Historic England)

Concern that roof terraces and cafes cannot always be opened up to the public – should not be a blanket requirement.	211505 (Trinity College Cambridge, DP9)
Concerns around surrounding open spaces - Fen Ditton, Milton CP at capacity; green spaces should be for year round use and not roof terraces/courtyards; concern re requirement for roof terraces to be public	202739 (Cambridge Past, Present and Future, S Nicholas), 204278 (Trinity College Cambridge, DP9)
Support for providing green and blue infrastructure and sustainable connections along the river Cam and into the Wicken Vision Area.	211076 (The National Trust MEE Planning Team)
Concern that development within NEC could impact neighbouring Conservation Areas: HIA should be included in evidence base and policy, along with reference to the nearby CAs and river.	210088 (Historic England)
Paragraph 3.1.2 - HE welcomes the ambition to 'enable Cambridge to accommodate growth of the highest quality whilst protecting and enhancing the historic environment and the key public spaces which are an important part of what makes the city so special to local people'.	211978 (Historic England)
Figure 17 - There are 4 heritage assets shown on this figure. These are not designated heritage assets. Are they non designated heritage assets? Review and amend accordingly.	211979 (Historic England)
Support for removal of some hedgerows/vegetation to facilitate crossing points over the First Public Drain	210081 (The Crown Estate)
Objection to 20% BNG on site requirement	204278 & 211507 (Trinity College Cambridge, DP9)
Concern around high demand for secondary schools; suggestion to safeguard land as contingency	201701 (J Skinner), 201356 (R McDonald), 202338 (H

	Brown), 205481 (R De Beaux), 210587 (Cambridgeshire County Council)
Support for investment in leisure facilities, for example a swimming pool, rowing channels, a new country park within walking distance	203590 (A Carpen), 202338 (H Brown), 201777 (Eastern Region Rowing Council, R Moseley), 205481 (R De Beaux), 207601 (Natural England (C Duerden)
Identifies inconsistencies in active travel and car parking provisions, as well as concerns regarding biodiversity gains and access to nature spaces, potential nuisance impacts and lack of secondary schooling and nursery provision, despite there being an acknowledged shortage of places in North Cambridge.	210840 (Hannah Brown)
Wording regarding healthcare facilities; contributions specified for emergency services.	205059 (NHS Cambridgeshire and Peterborough Integrated Care Board), 207507 (J Lawson on behalf of Cambridgeshire Fire and Rescue Service), 205072

	(NHS Property Services Ltd on behalf of NHS Cambridgeshire and Peterborough Integrated Care Board
Clarity required around potential to infill sites to rear of Lovell Road	201319 (N Upstone)
Water supply - no plan for filling proposed new reservoir	201847 (H Warnock)
We broadly welcome the allocation of this strategic brownfield site. It offers an exciting opportunity for regeneration in a highly accessible, sustainable location. It will be important that the policy ensures the protection and enhancement of the historic environment including the conservation areas, river corridor and wider city scape. We appreciate there are still some uncertainties about the site and the funding for the relocation of the Cambridge Waste Water Treatment Plant. However, we acknowledge the approach being taken to retaining the draft allocation whilst not relying on the housing numbers to meet the need. Whilst there are no designated heritage assets within the site, there are several Conservation Areas nearby including Riverside and Stourbridge Common, Fen Ditton, Baits Bite Lock and Horningsea as well as their associated listed buildings. The River Cam, the meadows and its setting are an important part of the wider setting of the City. Development within this area therefore has the potential to harm the significance of these assets through development within their settings. We recognise that a the HIA for North-East Cambridge has been prepared. However, this does not	210088 (Historic England)

appear to have been included as part of the evidence base for this Plan. It is important to include this as part of the evidence base. Furthermore, it is important to incorporate the recommendations of the HIA into the Policy. This includes recommendations such as increased landscaping along the eastern boundary. The HIA should also be referenced in the policy. We welcome criterion 7c. There is currently no reference to nearby conservation areas and the River. This should be included in the policy. There should also be a new criterion requiring careful consideration of impacts on the Conservation Areas and River as well as views into the City and an appropriate urban edge. We continue to have concerns about potential increases in heights in North-East Cambridge in both the existing Science Park and also the land to the east of Milton Road. We remain concerned about impacts on views from Ditton Meadows and the Conservation Areas as well as wider views approaching the City from the north-east and east. Heights must be carefully managed through appropriate criteria in the policy.	
Existing buildings near the station are incongruous with the surrounding countryside views and do not act currently as community spaces despite reliance in the policy on the space, highlighting a need for better integration. Additionally, the urban/rural fringe is not clearly defined, which could lead to planning inconsistencies.	210838 & 210839 (Hannah Brown)
Figure 17: There are 4 heritage assets shown on this figure. These are not designated heritage assets. Are they non-designated heritage assets? Review and amend accordingly; Paragraphs 3.1.6 and 3.1.24 seem to be the same. Delete duplicate paragraph	210187, 210188 (Historic England)

The University supports the general direction of the policy to densify the site and make the best use of the available land. There are a number of detailed comments in relation to the policy wording which are attached in a table with comments set against the relevant policy/paragraph numbers. There is inconsistency across the plan of naming the site. Eddington should be used for all references to the site.	202528 (University of Cambridge – M Parsons)
Reflect hybrid planning permission 22/02771/OUT. Retaining CWWTP should not prejudice other parcels. Should make explicit reference to build to rent and co-living tenures being acceptable. Removal of specified quantum of employment floorspace. Remove restriction to Class E(g) and defer to definition in policy J/NE. Remove requirement for car-free zones near to hubs or centres as this is incompatible with the allocation. Remove requirement to exceed minimum cycle parking standards. Replace existing trip budgets with information included within the North East Cambridge Transport Position Statement 2025 Add 650 parking spaces at Chesterton Sidings. Allow for the reprovision of 425 Network Rail Spaces Remove EVCP requirement as this doubles up on building regulations. Allow for development to progress without being halted by parking displacement. Remove requirement for outline planning applications. Condition design codes and Stewardship strategies. Spatial framework- should be clear this is not a prescriptive tool, remove heritage asset at Chesterton Sidings, remove local centres as this is not referred to in other retail policies.	Bidwells (204863)
National Highways will object to any structures placed within the highway boundary and recommend this is reflected within the policy moving forward. In principle, National Highways are supportive of upgrades or new crossings for the A14, such as Jane Coston Bridge and underpasses, to assist with	209005 (National Highways)

the wider connectivity requirements, subject to the correct structural and safety assessments completed and appropriate agreements ensuring ongoing maintenance and required funding are met. For the overall trip budget to be met, it is crucial individual sites do not exceed their trip budget, and breaches are controlled appropriately to reduce trips back in accordance with the agreed budgets. National Highways would need to understand the impact of this development and the cumulative impact on the A14 junction 33 should the trip budget not be met and ensure appropriate mitigation measures are secured as part of the plan making process.	
The current car dependency of Science Park is problematic due to long commuting distances and inadequate public transport coverage, particularly for those commuting from eastern settlements and outskirts of Cambridge.	203777 (A Chan)
A network of highway-running buses is needed, well connected with the local bus network, to create viable public transport alternatives to driving.	211023 (A Chan)
Proposal for two bus interchange on the A14, one at the busway crossing and another at the Milton crossing, utilising existing routes for better transfer options and potentially fostering express or orbital bus services.	211024 (A Chan)
Suggestion of bus gates in Milton to restrict through traffic while allowing bus access onto the new bus-only Milton crossing, aimed at reducing A10 congestion and improving local traffic flow. Suggestion of moving the Milton park and ride further out after implementing the above.	211025 (A Chan)
Concern at requirement for development to be within 5 minutes walk of high quality public transport and active travel routes, which may not always be achievable. Notes that people are generally willing to walk further than this.	211508 (Trinity College Cambridge, DP9)

Amend Policy S/NEC and the Policies Map to explicitly identify and justify the 34ha Green Belt land take required for the CWWTP relocation.	202577 (Save Honey Hill Group)
Amend Policy S/DS to resolve the internal contradiction with Policy S/NEC by clarifying whether development needs can, in fact, justify Green Belt harm in this instance. Relying on a project that requires VSC for Green Belt harm while the Local Plan claims such circumstances do not exist for general development is internally inconsistent and unsound under NPPF 36(d).	202582 (Save Honey Hill Group)
Policy S/NEC: North East Cambridge (8,350 dwellings/ 22,545 population) (p.103): Under the subheading 'Uses' Section 4 – add a new criterion g. as follows; "g. Contributions to fire & rescue, police and ambulance facilities provision/ funding"	207474 (James Lawson Planning on behalf of Cambridgeshire Constabulary)
Suggestion that policy amended to reflect that the proposed new district centre is contingent on relocation of the CWWTP.	210078 (The Crown Estate), 211503 (Trinity College Cambridge, DP9)
Suggestion that the policy should be less prescriptive around location of medium to higher density development and tall buildings.	210079 (The Crown Estate)
Concern that the trip budget specified is out of date, dating from preparation of the AAP in 2021 and do not reflect the latest plans for the area.	210080 & 210082 (The Crown Estate), 211506 & 211509 (Trinity College Cambridge, DP9)
Lack of detail on the vernacular and density of buildings, which is important for high-density development at an edge of city site. Lack of clear, quantifiable floor space allocation for community,	210837 (Hannah Brown)

retail, open space and active space (contrary to the defined floor spaces for commercial and industrial use).	
Reference to design character drawing on industrial heritage should be reviewed as this does not apply equally to the area west of Milton Road.	211504 (Trinity College Cambridge, DP9)
Objects to prescriptive limits on car parking spaces and restrictions on through traffic from Milton Road to Kings Hedges Road.	211510 (Trinity College Cambridge, DP9)

Policy S/LAC: Other site allocations in Cambridge

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Concerns were raised about Policy S/LAC, citing excessive reliance on large strategic allocations for meeting identified housing needs. The NHS requested that policies set out explicit requirement on-site health facilities and financial contributions. Concerns from Anglian Water were expressed about specific sites' impacts on sewer pumping stations. Concerns were raised from National Highways about not having a cumulative impact assessment to ensure the impact on the SRN is appropriately managed and mitigated. In particular, the impact on the SRN including junctions on the M11, A11 and A14.

Response to the main issues raised in representations

Since the Draft Plan stage Policy S/LAC has been removed to streamline the plan and ensure that each site stands on its own merits. Comments have been noted and amended on corresponding policies.

The development strategy has been informed by evidence which sets out that the impact of larger sites rather than incremental development has less carbon impacts and reduces impacts on villages across Greater Cambridge. This model also makes the delivery of infrastructure easier to deliver as it is supported by a sufficient critical mass. Therefore, justifying the allocation of larger strategic allocations to meet housing needs.

In response to Anglian Water, for these sites the sentence has been added to say that development should not preclude operation and maintenance of sewer pumping stations located within or adjacent to the site. In response to the NHS, the IDP will set out the contributions for healthcare on specific sites, this is not duplicated for every site, and financial contributions are required on all proposals depending on scale it is therefore not included in policy wording. In response to National Highways, a transport assessment will be undertaken on major planning applications to understand the impact on the local road network, and the wider transport strategy will identify and manage issues across the wider transport network. Additional transport modelling has also been carried out on the local plan to inform mitigation requirements.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Suggest amendment to Part 2a of the policy replacing "make the development acceptable" with "achieve an outstanding standard of development". Supporting information to be similarly amended.	202741 (Cambridge Past, Present and Future)
Matters including asset encroachment (Policy WS/HS) and utilities infrastructure (see our comments relating to Policy GP/QD) should be a consideration for any site allocation where we have existing assets, or where the site is in close proximity to our operational sites and should therefore avoid the need to introduce separate clauses within any of the affected site allocation policies. Anglian Water can provide a list of assets within the proposed site boundaries, if this would be helpful to the Councils. The following sites have sewer pumping stations located within or adjacent to the site and as ‘above ground’ assets this will be land within Anglian Water’s ownership, and may have implications for site layout and	209164 (Anglian Water)

design: • S/C/CLT: Clifton Road Area; • S/CE: Cambridge East; • S/CBC: Cambridge Biomedical Campus; • S/CB: Cambourne Town Centre; • S/ED: Eddington; • S/NEC: North East Cambridge.	
The College objects to Policy S/LAC, citing excessive reliance on large strategic allocations for housing needs, which risks timely delivery due to infrastructure dependencies. A more balanced approach is recommended, with additional housing land allocated across various sites to reduce delivery risks and ensure timely housing provision. The College requests reconsideration of land at Wilberforce Road for allocation. Concerns regarding the site's suitability include landscape impact and loss of protected open space, but the College argues that development can be designed to minimise harm.	203930 (Bidwells on behalf of Emmanuel College (Wilberforce Road))
The respondent notes that the current wording of the policy should be amended to correct the reference to Cambridge Retail Park from an allocation to a designation, as it is included as a designated Public Realm Improvement Area (PRIA).	204121 (Bidwells on behalf of Railpen)
The respondent highlights that the indicative dwelling or floorspace capacity for site allocations may vary and should be determined through a design-led approach.	204121 (Bidwells on behalf of Railpen)
The respondent objects to proposed Policy S/LAC, citing excessive reliance on a few large strategic allocations for housing needs, which poses risks to timely delivery due to complex infrastructure requirements. A recommendation is made for a more balanced approach that includes additional housing land across various sites, sizes, and locations to reduce delivery risks and ensure timely housing provision. Nomination of sites along Lond Road for intensification.	204134 (Bidwells on behalf of Emmanuel College (Long Road))
Site allocations lacking explicit requirements for on-site health facilities should include wording for financial contributions towards health and infrastructure mitigation, aligning with the IDP approach. Early engagement is essential to deliver the infrastructure in the IDP.	205078 (NHS Property Services)

This policy identifies site allocations within the city centre. Whilst National Highways do not offer specific comments on these sites due to the distance from the SRN, National Highways suggest these sites are included in a cumulative impact assessment to ensure the impact on the SRN is appropriately managed and mitigated. In particular, the impact on the SRN including junctions on the M11, A11 and A14.	209007 (National Highways)

Policy S/C/SMS: Garages between 20 St. Matthews Street and Blue Moon Public House, Cambridge (now Garages at St Matthews Street and Norfolk Street)

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Concerns were raised about density and impacts on trees. An objection was raised by Historic England to better reflect the heritage assets within and close to the site boundary. The requirements from the HIA should also be incorporated onto the site including requirement for archaeology assessment.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- The capacity for the site has been considered in the local content of two to three storeys. The surrounding terrace to the south of the site has a dwellings per hectare of 70 and the homes to the north of the site has a dwellings per hectare of 92. This would make 12 dwellings in this location acceptable in the local heights context.
- The protection of trees is set out in Policy B/TC to protect the retention of trees. Any future planning application will need to comply with this policy and provide an arboricultural assessment to assess the impacts on trees.
- The policy has been amended to mitigate impacts against heritage assets. The policy has been amended to include contextually appropriate materials, local context heights and also the addition of an archaeology assessment requirement to address comments made by Historic England.
- The name of the policy has been amended to more accurately reflect the location of the site.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Questions if the site has capacity for 12 homes.	202532 (J Neal)
Point 1A any future development must do much more than simply “retain and incorporate the existing mature tree”: it must ensure the tree’s RPA (Root Protection Area) is entirely undamaged, and that the space under and around that important tree remains fully available for future public enjoyment.	202532 (J Neal)
Whilst there are no designated heritage assets within the site boundary, the site lies adjacent to the boundary of the Mill Road Conservation Area and close to the grade II Listed Church of St Matthew. Development within this area therefore has the potential to harm the significance of these assets through development within their settings. We welcome the preparation of the HIA. While some of the recommendations of the HIA are included in the policy wording, reference should also be made to contextually appropriate materials, local context heights and also the addition of an archaeology criterion.	210089 (Historic England)

Policy S/C/HTR: 137 – 143 Histon Road

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

The Cambridge Investment Partnership (CIP) supports the allocation of this site and the site capacity. Comments were made by CIP to ensure the design is co-ordinated with development on the ATS part of the site. The protection of trees wording should be reviewed to ensure it does not inhibit the development of the site.

An objection was raised by Historic England to better reflect the heritage assets within and close to the site boundary. The requirements from the HIA should also be incorporated onto the site including requirement for archaeology assessment.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- Support noted from CIP.
- The policy has been amended to mitigate impacts against heritage assets. The policy has been amended to include contextually appropriate materials, local context heights and also the addition of an archaeology assessment requirement to address comments made by Historic England.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
CIP controls all of site bar ATS site, application should reflect planning application for 70 units.	204205 (Carter Jonas on behalf of the Cambridge Investment Partnership CIP)
It should be noted that the CIP application is not comprehensive development as ATS site has not come forward but the application has been designed in a way to combine the two sites.	204205 (Carter Jonas on behalf of the Cambridge Investment Partnership CIP)
Whilst there are no designated heritage assets within the site boundary, the Castle and Victoria Conservation Area lies adjacent to the site. Development of the site has the potential to impact upon the Conservation Area and its setting. We welcome the preparation of the HIA. While some of the recommendations of the HIA are included in the policy wording, reference should also be made to contextually appropriate materials, local context heights and also the addition of an archaeology criterion.	210090 (Historic England)

Policy S/C/HGH: Henry Giles House 73-79 Chesterton Road

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was broad support for the allocation.

Comments were made in relation to strengthening the wording around the retention of trees and the use of similar styles to the surrounding local architecture and improving active travel connections.

The site promoter commented that the capacity of the site should be reviewed.

Historic England commented that the site is an especially sensitive location and development should be contextually appropriate materials, local context heights and the addition of an archaeology criterion.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- Support noted.
- The approach to the design of the site has been set out to reflect the local character and massing. In response to the increase of capacity, there is potential for a higher capacity to be accommodated where further evidence can be developed to ensure impacts on neighbouring buildings / heritage assets are managed. This has included revisions to the policy to set out the need for development to respond to the local context including, contextually appropriate materials, local context heights and also the addition of an archaeology criterion.
- In response to Historic England, the suggested amendments have been made.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
It is proposed that the policy is strengthened in relation to design and character on Chesterton Road to reflect the style of those between Carlyle Road and Alpha Road; removing "where possible" to ensure full retention of the silver birch tree on Carlyle Road; and requiring, rather than encouraging, active travel links from Chesterton Road through to Grasmere Gardens.	203770 (Cambridge Green Party)
Formerly the site of Sir Horace Darwin's Cambridge Scientific Instrument Company, the architectural style should demonstrate clear historical links with early scientific instruments *or* take inspiration from The Tivoli / 1930s Art Deco era.	203772 (A Carpen)

Support for the site allocations. Request for review of capacity to be increased because the site is highly sustainable.	203929 (Twenty5Planning Limited on behalf of the TT Group)
The site lies within the Castle and Victoria Conservation Area, adjacent to the Central Conservation Area and fronting the river, the of the river opposite Jesus Green. Although we have no objection to the principle of redevelopment on this site, this is a sensitive location with the potential to impact on the historic environment. We welcome the preparation of the HIA. While some of the recommendations of the HIA are included in the policy wording, reference should also be made to contextually appropriate materials, local context heights and also the addition of an archaeology criterion.	210091 (Historic England)
TT Group support the continued proposed allocation of this site. The attached representations demonstrate that the quantum of development should be revised and uplifted to optimise the delivery of this highly sustainable site, in accordance with the NPPF and PPG.	203929 Telereal Trillium Investment Properties

Policy S/C/HRC: Horizon Resource Centre, 285 Coldham's Lane

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was broad support for the site allocation from all representators including Cambridgeshire County Council who own the site and Historic England. The policy was supported as is with no amendments.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- The policy is supported by those who commented on the policy and following a review no changes are required to this policy. A minor editorial change has been made for clarity of expression.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for site allocation.	202115 (Carter Jonas on behalf of Cambridgeshire County Council)
There are no designated heritage assets within the site or nearby. No comments	210092 (Historic England)

Policy S/C/PDC: Cambridge Professional Development Centre, Foster Road

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was broad support for the allocation of this site Cambridgeshire County Council with no amendments and Historic England, with some minor amends relating to heritage. Historic England confirmed that there are designated heritage assets within the site and have requested an amendment to the HIA.

Comments were made by a local resident to ensure that the walkability, access to local facilities, access to green space and management of surface water flooding were considered in the development. The respondent suggests focusing on larger open spaces further out for development instead of this site, which is bordered by established residents.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- In response to comments raised by a local resident about the density of the site and impact on existing buildings and character. The site allocation has been subject to further testing at the Regulation 18 stage which has informed a reduction of units onsite to reflect neighbouring densities around the site. This review has concluded that 40 dwellings is suitable in this location and achieves an appropriate density for its setting.
- In response to comments raised about concerns about flood risk, any development on the site will be required to comply with Policy CC/FM Managing Flood Risk. Surface water flooding implications will be managed through the development management process. As a site allocation, this allocation has been reviewed in the Local Plan's Strategic Flood Risk Assessment. The site is not within Flood Zone 2 or 3.

- In response to Cambridgeshire County Council comments made about an increase on capacity on this site back to the previously adopted version of this site allocation, a further review of the site has been undertaken and it is the view of the Council's that 40 dwellings is more suitable in this location and is reflective of the local character.
- In response to local resident's comments raised about protected open space, the boundary of the Protected Open Space has been reviewed to include the playing fields adjacent to the site only as it is a more accurate reflection of what constitutes open space. This will also allow for the design of the scheme to utilise the full site allocation.
- In response to Historic England, the HIA has been revised to reflect the removal of this site allocation from the historic core.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for site allocation.	202112 (Carter Jonas on behalf of Cambridgeshire County Council)
Suggestion to increase capacity to 67 dwellings.	202112 (Carter Jonas on behalf of Cambridgeshire County Council)
Concerns raised about allocation of site and impact on walking, access to local facilities and recreation including green spaces.	201022 (D Wilson)
Concerns raised about the density of the site and impact on existing buildings and character.	201022 (D Wilson)
Concerns raised about runoff and potential flooding issues.	201022 (D Wilson)
Respondents suggested that larger open spaces would be more suitable for development.	201022 (D Wilson)

Whilst there are no designated heritage assets within the site, the site lies very close to the Trumpington Conservation Area. Any development of the site has the potential to impact the significance of the conservation Area through development within its setting. We welcome the preparation of the HIA. We question paragraph 1.10 of the HIA – the site is not far removed from Cambridge but lies within the city limits. Maybe more accurate to say removed from the historic core. Criterion 1 reflects the recommendations of the HIA.	210093 (Historic England)

Policy S/C/PPS: Police Station Parkside

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was broad support for the site allocation.

Comments were made by the Police and Crime Commissioner as the site promoter about modifying wording around

Concerns were raised from Historic England about building heights and strategic viewpoints. The Cambridge Liberal Democrat Group commented on cycle provision and car free development onsite, as well as retention of existing buildings.

Further responses were made from a local resident about strategic viewpoints.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- In response to the Cambridge City Council Liberal Democrat Group, to provide flexibility for the re-design of the site to facilitate its redevelopment the wording has not been revised. The provision of cycling parking will apply to the planning application on this site and these standards are set out separately in development management policy
- In response to a local resident comment, Strategic Viewpoint E Limekiln Road has been included in Point D as well.
- In response to the Police and Crime Commissioner, the retention of trees onsite is a clear ambition for the Councils' therefore it has been left in the policy with no amends. The discussion of the removal of any trees will be assessed through

the development management process using development management Policy BG/TC: Improving tree canopy cover and the tree population. The wording of point d has remained unchanged as the impact on strategic views is important to protect and the degree to which these are unacceptable will be demonstrated by evidence provided at the development management stage and assessed by the Councils'.

- In response to Mothers CAN Cambridge, the suggestion that the site should be car free, the Policy I/EV: Parking and Electric Vehicles sets out standard for car parking for development, it will not be duplicated in the site allocation. Due to the City Centre location, the predominate means of travel for residents of this development is likely to be public and active travel.
- In response to Historic England, the policy has been reviewed to include other Strategic Viewpoints and Strategic Viewpoint E Limekiln Road has been included as well. The policy has been amended to include the HIA recommendation that development is limited to approximately 4 residential storeys.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for the site allocation.	202832 (Cambridge City Council Liberal Democrat Group)
Respondent has set out that the site coming forward should enhance and improve the current building and that this should be reflected in the policy wording.	202832 (Cambridge City Council Liberal Democrat Group)
Development should not impact on views from Lime Kiln in South East Cambridge.	203774 (A Carpen)

Provision of existing cycle parking should be retained and any new cycle requirements be in addition to what is existing.	204175 (Cambridge City Council Liberal Democrat Group)
Support for flexibility of uses defined in the policy.	204175 (Cambridge City Council Liberal Democrat Group)
The criteria set out as 1. a. to d. and 2. are generally supported.	204175 (Cambridge City Council Liberal Democrat Group)
The policy should consider whether there are circumstances where harm to a heritage asset might be outweighed by a public benefit.	204178 (Savills on behalf of Police and Crime Commissioner for Cambridgeshire)
Minor wording suggestions are needed for clarification of ask in the policy.	207777 (Savills on behalf of Police and Crime Commissioner for Cambridgeshire)
Site boundary should be revised to reflect land ownership.	204178 (Savills on behalf of Police and Crime Commissioner for Cambridgeshire)

Supportive of protection of existing trees.	204727 (Mothers CAN Cambridge)
The development should be car free with no parking permits for residents.	204727 (Mothers CAN Cambridge)
There are no designated heritage assets within the site or nearby. We welcome the preparation of the HIA. The HIA recommends that height is limited to 3-4 storeys. This should be specified in criterion g to add greater clarity regarding height.	210094 (Historic England)

Policy S/C/NCA: North Cambridge Academy, 108, Arbury Road

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was broad support for the site allocation including from Cambridgeshire County Council who supports the policy with no amendments. North Cambridge Academy were also supportive of teh principle of the allocation.

Comments were made in support of the Community User Agreement and for development of sports facilities by local residents.

Concerns were raised about impacts on local views and on parking by local residents. Concerns were also raised about open space designations within the site allocation and need for flexibility in policy wording to achieve the optimal layout by the Meridian Trust.

Further responses from Historic England raised concerns about building heights being reflected in the policy to respond to the SA.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- The site allocation has been reviewed in the context of the representations made. The protected open space is retained onsite as there will be sports pitches proposed onsite. The proportion of affordable housing will be set by development management policy H/AH Affordable Housing and policy H/HM Housing Mix. These policies will ensure that the development provides a mix of housing to meet the identified need.

- A Heritage Impact Assessment (HIA) has been prepared to support this site allocation to identify any potential impacts on the surrounding local character and heritage assets around the site. The mitigation measure proposed is a building height of 3-4 storeys and further Heritage Assessments to be undertaken to support any future planning applications.
- The number of units has been tested as suitable in this location. The HIA has suggested that the development has the potential for 3-4 storeys and therefore 40 dwellings can be delivered on this site.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The number of units proposed is too high and there is not sufficient local infrastructure to support them.	201287 (M Jordan)
The cumulative impact of development in the local area so should be looked at.	201287 (M Jordan)
Support for site allocation.	202211 (Carter Jonas on behalf of Cambridgeshire County Council)
Support, the development of new sport facilities at North Cambridge Academy will be good for the school, the area, and the city. The plan to make the facilities open to the public after school hours is excellent.	202165 (M MacGinley)
Concerns raised about the draft allocation proposals map showing protected open space over significant areas of the site allocation.	202147 (LSA Planning on behalf of Meridian Trust)
Concerns raised about the flexibility of the site allocation.	202147 (LSA Planning on behalf of Meridian Trust)
A proportion of the new housing should be identified as key worker (above and beyond the affordable housing requirements) and linked to North Cambridge Academy staff needs.	202744 (Cambridge Past, Present and Future)

Concerns raised about overlooking and impacts on historic views, specifically of the historic chimneys of the Museum of Technology.	202446 (G Dawes)
Support requirement for a Community Use Agreement for sports facilities.	205426 (A Williams)
There are no designated heritage assets within the site or nearby. We welcome the preparation of the HIA. The HIA recommends that height is limited to 3-4 storeys. This should be specified in criterion g to add greater clarity regarding height.	210095 (Historic England)
The respondent supports the principle of mixed-use development for approximately 150 dwellings and sports facilities but seeks clarity on the draft allocation proposals map. The outlined site boundary appears to coincide with the respondent's original submission, but the designation of Protected Open Space over a significant portion of the site raises concerns about flexibility for development. The design of sports facilities should consider safeguarding measures for pupils and ensure functionality for community use outside school hours. The respondent highlights the need for careful consideration of pedestrian and vehicle access related to the sports facilities and residential development. There is a request for flexibility in the overall site allocation to achieve an optimal layout for the mixed-use development, particularly concerning the northern part currently designated as open space. The respondent requests the removal of the open space designation from the northern part of the site to facilitate flexibility for the development.	202147 (Meridian Trust)
Sport England supports, in principle, the ambition for North Cambridge Academy to develop as a mixed-use sporting hub, providing enhanced sports facilities and adequate replacement playing field is provided alongside residential development. As the allocation involves the loss of playing field land, it	209215 (Sport England)

must clearly demonstrate compliance with paragraph 104 of the NPPF. Sport England supports the policy requirements for: • Expansion of the existing sports hall; • Provision of a new 3G pitch, four tennis courts and a MUGA; and • A Community Use Agreement securing public access outside school hours. For examination soundness, the policy should explicitly require that any loss of playing field is replaced by provision that is equivalent or better in quantity, quality, accessibility and management arrangements. Recommend that replacement facilities are delivered in a timely manner and secured through appropriate planning conditions or obligations.	
This representation has been prepared on behalf of the Meridian Trust and Cambridgeshire County Council, (hereafter referred to as 'The landowners"), in relation to their land interests with regard to the draft allocation S/C/NCA: North Cambridge Academy. The landowners are supportive of the principle of the new draft allocation that includes approximately 150 dwellings, sports and recreation. The overall site boundary that is outlined in black appears to coincide with our original submission that outlined the site in red. It would appear that the entire site within the black line as shown above, is shaded pink and then part of the overall site allocation is overlain with green hatching that designates this area as Protected Open Space. If correct, this latter designation forms the majority of the overall allocation.	202149 (LSA planning-North Cambridge Academy)
The sports facilities need to be designed in a manner that they will function with the existing school in respect of safeguarding and security measures for pupils and work effectively outside of school hours for the community. Care will be needed to ensure appropriate pedestrian and vehicle access can be provided along with other associated works for these facilities and the residential development. The	202505 (LSA planning-North Cambridge Academy)

policy clearly sets out what is expected to be delivered at points 1a and b in terms of sports facilities, but the current land use designations reduce the flexibility of where these facilities and the housing could be located.	

Policy S/C/ER:1-99 Ekin Road and 1-8 Ekin Walk

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made in relation to the need for Council housing including ensuring homes meet high energy efficiency standards.

Concerns from Historic England were raised in relation to reflecting the recommendations from the HIA regarding building height that is limited to 3-4 storeys and adding greater clarity around this expectation in policy.

Further responses were made by Cambridge Investment Partnership as the Site Promoter to support the approximate amount of homes onsite, impact on protected open space, to have flexible building heights to allow for Building Regulation changes, to remove unacceptable impacts on views and to protect and / or enhance the open space.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- The policy has been revised to set out that building heights should be limited to approximately 3-4 storeys to address Historic England comments about needing to specify a building heights to mitigate impact on skyline and representations made by Cambridge Investment Partnership for flexibility on building heights to allow for Building Regulation impacts.
- Cambridge Investment Partnership also asked for wording to protect and / or enhance the Protected Open Space. The wording has not been revised to protect the open space, however the assessment of impact on open space will be assessed through the planning application process using Policy BG/PO: Protecting open spaces.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for site allocation.	204206 (Carter Jonas on behalf of Cambridge Investment Partnership)
A planning application has recently been submitted for the site under 26/00039/FUL. There are some suggested policy amendments needed to reflect some more specific details of this application.	204206 (Carter Jonas on behalf of Cambridge Investment Partnership)
The respondent supports the requirement to protect and enhance the protected Open Space but suggests rewording to 'protected and/or enhanced' due to the land being highway.	204206 (Carter Jonas on behalf of Cambridge Investment Partnership)
The respondent supports the aspiration for appropriate building heights but recommends revising the wording to allow for necessary increases in height to meet modern construction standards. The wording around protection of skylines and conservation areas should be amended for clarity.	204206 (Carter Jonas on behalf of Cambridge Investment Partnership)
The wording around protection of open space should be amended to reflect that some of this land is adopted highway.	204206 (Carter Jonas on behalf of Cambridge Investment Partnership)
Land at Ekin Road, Cambridge, (CIP) submitted on 12 January 2026 - planning application (reference 26/00039/FUL): Most council homes exceed the "Cam Standard" for energy efficiency and climate resilience; the development will have green roofs, play areas, and social spaces. When combined with	201537 (G Kalombo)

nearby East Barnwell developments, there will be 254 new homes in Abbey ward (198 council homes total), a net gain of 97 council homes across both sites.	
There are no designated heritage assets within the site or nearby. We welcome the preparation of the HIA. The HIA recommends that height is limited to 3-4 storeys. This should be specified in criterion g to add greater clarity regarding height.	210096 (Historic England)

Policy S/C/DR: 2-28 Davy Road and Garage Blocks

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was broad support for the allocation of the site from Historic England.

Comments were made by a local residents on the need for more innovative design in proposals for the site.

Further responses were made by Cambridge Investment Partnership to reflect the capacity of the latest proposals for the site.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- The proposals for the site are designed to complement the existing character and have been designed in accordance with the HIA.
- The site allocation has been revised to reflect the most recent proposals onsite in terms of capacity. This is to reflect representations from Cambridge Investment Partnership.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The design should make provision for detailing and artistic imagination.	203775 (A Carpen)

Support for site allocation.	204209 (Carter Jonas on behalf of Cambridge Investment Partnership)
The site owner would like to increase the site capacity to 68 new homes, an increase of 36.	204209 (Carter Jonas on behalf of Cambridge Investment Partnership)
The respondent supports retaining mature trees but suggests that part (a) be amended to allow for justified tree removals through an Arboricultural Impact Assessment.	204209 (Carter Jonas on behalf of Cambridge Investment Partnership)
There are no designated heritage assets within the site or nearby. We welcome the preparation of the HIA. We welcome criterion c.	210097 (Historic England)

Policy S/C/HPC: 1-78 Hanover Court, 1-49 Princess Court and Garage at Newtown Garages

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is broad support for the site allocation from Cambridge Investment Partnership. Comments were made by Historic England who welcomed the preparation of the HIA, the criterion that reflected the findings of the HIA and the identification of heritage assets in the policy wording.

Further responses were made by Cambridge Investment Partnership to reflect the capacity of the latest proposals for the site. Cambridge Investment Partnership also supports the part a and part d of the policy. Part b should be modified to allow for tree removal, and part c should be removed.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- Support is noted from Historic England.
- In response to the Cambridge Investment Partnership, the retention of mature trees is retained as wording in the policy as the retention of trees is a key policy for the Local Plan to maintain and enhance urban greening. The removal of any trees will be negotiated through the planning application process, and development will be assessed against Policy BG/TC: Improving tree canopy cover and the tree population.
- In response to the Cambridge Investment Partnership, the capacity of the site allocation has been revised to reflect the latest planning application for 165 homes.

- In response to the Cambridge Investment Partnership, Point 1c has been retained in the policy, relating to the electricity substation, to reduce impacts on residential amenity and outlook.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for site allocation.	204211 (Carter Jonas on behalf of Cambridge Investment Partnership)
Support for flexibility on uses using the wording approximately and for the design considerations set out in policy.	204211 (Carter Jonas on behalf of Cambridge Investment Partnership)
Support for the retention of trees but suggests rewording to allow for justified removals through an Arboricultural Impact Assessment.	204211 (Carter Jonas on behalf of Cambridge Investment Partnership)
Reference to electrical substation should be removed.	204211 (Carter Jonas on behalf of Cambridge Investment Partnership)
Support is expressed for part (d) on archaeological investigation, with a request to amend it to include a desk-based assessment as the first step.	204211 (Carter Jonas on behalf of Cambridge Investment Partnership)

The site is located within the New Town and Glisson Conservation Area and close to a number of listed buildings including the grade I The Church of Our Lady of the Assumption and the English Martyrs and Grade II* Wanstead House and numerous GII listings. Any development of the site has the potential to impact upon the significance of these heritage assets through development within their settings. We welcome the preparation of the HIA. We welcome the criterion which reflect the HIA.	210098 (Historic England)

Policy S/C/GER: Former Garage Block, East Road

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made by Historic England who welcomed the preparation of the HIA, but felt that its recommendations should be brought out more clearly into the policy including the wording around the building heights limit of 3 storeys in point e.

Concerns were raised by a local resident about the development being in keeping with the local character, especially the adjacent residential area and streetscape along East Road.

Further responses were made by Cambridge Investment Partnership to include justification for tree removals through an Aboricultural assessment, and suggested addition to point g to require development proposals fronting East Road to respond to its existing and emerging context.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- To address comments relating to building heights from Historic England, Point e has been amended to include - Development heights must be a maximum of 3 storeys. This is in direct response to Historic England's comments to ensure the policy wording reflects the HIA and adds greater clarity on the acceptable heights in this location.
- In response to comments from local residents and Cambridge Investment Partnership, Point g - Development proposals fronting East Road to respond to its existing and emerging context. has been added in direct response to a local resident's comment and a comment from the Cambridge Investment Partnership to ensure the design of the

development fits in with the adjacent residential area and streetscape along East Road.

- In response to the Cambridge Investment Partnership, the retention of mature trees is retained as wording in the policy as the retention of trees is a key policy for the Local Plan to maintain and enhance urban greening. The removal of any trees will be negotiated through the planning application process and development will be assessed against Policy BG/TC: Improving tree canopy cover and the tree population.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Concerns raised about the design of the building and impact on residential area. The adjacent properties are only two storeys, and therefore there is a risk of overlooking and dominating the setting from any tall buildings.	204221 (R Robertson)
Support for site allocation.	204215 (Carter Jonas on behalf of Cambridge Investment Partnership)
The design of any building proposed for this site must primarily fit in with the adjacent residential area to the south and not the streetscape of East Rd. So much of the adjacent housing is only two storey there is a risk it would be badly overlooked and dominated if a tall building was allowed to be built on the garage site.	204221 (R Robertson)

Support for the retention of trees, but suggests rewording to allow for justified removals through an Arboricultural Impact Assessment.	204215 (Carter Jonas on behalf of Cambridge Investment Partnership)
It is suggested that the policy reflects the requirement for the development proposals fronting East Road to respond to its existing and emerging context.	204215 (Carter Jonas on behalf of Cambridge Investment Partnership)
Whilst there are no designated heritage assets within the site, the site lies close to the Mill Road Conservation Area and St Matthews Church (GII listed). Any development of the site has the potential to impact upon the significance of these heritage assets through development within their settings. We welcome the preparation of the HIA. The HIA recommends that height is limited to 3 storeys. This should be specified in criterion e to add greater clarity regarding height.	210099 (Historic England)

Policy S/C/SH: 1-33 Stanton House, Christchurch Street

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is broad support from the Cambridge Investment Partnership for the allocation of this site. Parts a and b of the policy are supported. It is suggested that the policy wording be amended to say that there is capacity for approximately 29 homes, resulting in a net loss of 5 units, including suitable replacement sheltered accommodation. This is due to a needed for general needs housing as well as replacement sheltered accommodation.

Comments were made by the Liberal Democrat Group to make it clearer that the impacts on the existing terraced housing and flats on Christchurch and Napier Streets should be considered.

Further responses were made by Historic England relating to the HIA. The HIA recommends that 'Development at a scale similar to the local prevailing building height and existing buildings on site should be appropriate. Site is not considered appropriate for tall landmark buildings' and this should be included in the policy. Historic England welcomed the preparation of the HIA and confirmed that there are no designated heritage assets within the site and the site lies adjacent to the Kite Conservation Area and Christ Church (grade II).

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- In response to the Liberal Democrat group, the supporting text has been revised to make it clearer that the impacts on the existing terraced housing and flats on Christchurch and Napier Streets should be considered.
- In response to Cambridge Investment Partnership, the support is noted and the capacity of the site has been reworded to

address the suitable replacement sheltered accommodation issue.

- In response to Historic England, the supported is noted and the recommendation from the HIA has been included in the policy wording.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The impacts on the existing terraced housing and flats on Christchurch and Napier Streets should be considered.	202834 (Cambridge City Council Liberal Democrat Group)
Support for policy.	204216 (Carter Jonas on behalf of Cambridge Investment Partnership)
Support for flexibility in wording but reference should be made to sheltered accommodation.	204216 (Carter Jonas on behalf of Cambridge Investment Partnership)
Whilst there are no designated heritage assets within the site, the site lies adjacent to the Kite Conservation Area and Christ Church (grade II). Any development of the site has the potential to impact upon the significance of these heritage assets through development within their settings. We welcome the preparation of the HIA. Criterion 1a is quite vague in relation to building heights. Given the heritage sensitivity of the site, greater clarity is needed regarding building heights. The HIA recommends that	210100 (Historic England)

‘Development at a scale similar to the local prevailing building height and existing buildings on site should be appropriate. Site is not considered appropriate for tall landmark buildings’. This should be included in the policy	

Policy S/C/SCL: Land South of Coldham's Lane, Cambridge

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is broad support from local residents to see the long awaited site come forward.

Comments were made on the site allocation in relation to building heights in this predominately residential location and the impact on local character.

Comments were made on the site in relation to the impact on Cherry Hinton brook chalk stream and the concerns raised by the Environment Agency.

Comments were made by residents to improve the cycle routes between David Lloyd and Brookside.

Comments were made by Stantec on behalf of Mission Street and BGO Propco Newton Ltd questioning the archaeological requirement as this was not an issue with the planning application.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- In response to local residents concerns about heights, the planning application for this site has now been approved and it was assessed for its impacts on local character and on balance the decision is that this site is suitable for this density and the proposal has been found acceptable.
- The impact of development of the chalk stream has been mitigated through the development management process with conditions, as recommended by the Environment Agency. This will mitigate the impacts on Cherry Hinton brook and other environmental concerns.
- The cycle route between David Lloyd and Brookside and surrounding cycle network improvements are beyond the

scope of this site allocation and planning application to be able to improve.

- In response to Stantec regarding archaeological impacts, point 1c has not been removed from the policy to ensure that the DBA is considered should another planning application come in.
- In response to Historic England, the latest version of the HIA has set out the revised viewpoints to be Viewpoint F, these are equivalent to the Viewpoint 7 and 10 mentioned in policy which have been rationalised. No changes are required to the policy wording.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The building height is too tall and should be more reflective of local context.	201226 (S Williams)
Concerns raised about impact on the Cherry Hinton Brook.	201245 (S Williams)
Objection to policy due to over congestion on the Tins Pathway.	202697) (M Downs)
Objection to the policy due to access and safety.	203771 (C Bone)
Significantly-improved developer-funded active travel routes should be designed in and built, and amenities should be expanded to enable local residential access. Provision should be made for a new rail/light rail stop on the railway line.	203829 (A Carpen)
The cycle paths around the site should be improved.	202634 (A Lawrence)
Support for the development of the site.	202634 (A Lawrence)
The requirement for a desk based archaeological assessment should be reviewed in the context of the EIA.	204039 (Stantec on behalf of Mission Street and BGO Propco Newton Ltd)

Policy S/AMC/SCL fails to take the following matters into account: The site proposed for the country park is severely constrained Opportunities for public access have not been addressed. The part of the site previously ear-marked for public access is subject to flooding. Local water courses and bodies are vulnerable to pollution from toxic land fill. There is insufficient emphasis on the protection of flora and fauna. Management issues have not been given sufficient attention.	204669 (J McGill)
Concerns raised about biodiversity, safety, access and drainage and contamination.	205152 (H Anderson)
Development within this area therefore has the potential to affect the significance of this asset including through development within its setting. We understand that there is no HIA for this as it is a Policy Area. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy. Criterion c refers to building heights of no taller than 6 storeys. In the absence of a Heritage Impact Assessment this is inappropriate and should be deleted. This needs to be explored through an HIA and masterplanning. Delete reference to 6 storeys.	210120 (Historic England)
here are no designated heritage assets within the site or nearby. We welcome the preparation of the HIA. We welcome reference to St Andrews church. Part of the HIA refers to viewpoint 7 and part refers to viewpoint 10. The policy itself criterion 1b refers to Viewpoint F. Please check and clarify which viewpoint it is.	210101 (Historic England)

Policy S/C/BRN: Land at Barnwell Road and Newmarket Road

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is broad support for this site allocation from Cambridge Investment Partnership. They suggest that the wording need to allow for justified tree removals with an Arboricultural Impact Assessment and replacement planting.

Comments were made by a local resident that there should be a larger community centre and community halls and that there should be shared provision of facilities.

Comments were made by Historic England to confirm that there are no designated heritage assets within the site or nearby and to welcome the preparation of the HIA. Historic England have asked for clarification of the correct naming of viewpoints.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- A Community Facilities Strategy and Cultural Strategy has been prepared to support the Regulation 19 Local Plan and this has identified where there is a need for these facilities based on existing provision and anticipated growth. These studies have concluded that this is not a priority in this location.
- In response to Cambridge Investment Partnership, their comments are noted and the retention of mature trees is retained as wording in the policy as the retention of trees is a key policy for the Local Plan to maintain and enhance urban greening. The removal of any trees will be negotiated through the planning application process, and development will be assessed against Policy BG/TC: Improving tree canopy cover and the tree population.
- In response to Historic England, their comments are noted and the Viewpoints are correctly labelled as per the latest evidence base. In response to heights, half of this site has permission and the heights will be tested for the remainder of the site for sensitivity through the development management process.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for site allocation.	204220 (Carter Jonas on behalf of Cambridge Investment Partnership)
CIP plans to develop remaining land in future applications, although detailed designs are not yet prepared.	204220 (Carter Jonas on behalf of Cambridge Investment Partnership)
The policy should be more flexible about the wording regarding tree retention and removal.	204220 (Carter Jonas on behalf of Cambridge Investment Partnership)
Provision should be made for a much larger community centre and community halls given the densification of the housing in the area.	203776 (A Carpen)
There are no designated heritage assets within the site or nearby. We welcome the preparation of the HIA. Part of the HIA refers to viewpoint 11. The policy itself refers to Viewpoint M. Please check and clarify which it is. Is it one in the same? What height is considered suitable for this site?	210102/ 210103 (Historic England)
Sport England notes that planning permission (23/04687/FUL) has been granted for the redevelopment of this site. The Local Plan should outline that sport facilities (bowls green and tennis court) as part of the planning permission will be replaced, in accordance with condition 59, as required by planning	209216 (Sport England)

permission 23/04849/FUL. Outlining this demonstrates that the loss of these sports facilities have been assessed against paragraph 104 of the NPPF and that replacement mitigation provision has been secured.	

Policy S/C/TRP: Travis Perkins, Devonshire Road

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made by Historic England to confirm that there are no designated heritage assets within the site and that the site lies adjacent to the Mill Road Conservation Area. Historic England welcomes the preparation of the HIA and policy criterion 1b and 1c.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- In response to Historic England, comments are noted and no policy changes have been made in response as the policy wording reflects the heritage assets in this location.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Whilst there are no designated heritage assets within the site, the site lies adjacent to the Mill Road Conservation Area. Any development of the site has the potential to impact upon the significance of the Conservation Area through development within its setting. We welcome the preparation of the HIA. We welcome criteria 1b and 1c.	210104 (Historic England)

Policy S/C/OPK: Parcel Com4 Orchard Park

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made by Historic England to confirm that there are no designated heritage assets within the site.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- In response to Historic England, comments are noted and no policy changes have been made in response as the policy wording reflects the heritage assets in this location.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
There are no designated heritage assets within the site or nearby.	210105 (Historic England)
Sport England objects to the part loss of playing field at this site. The Orchard Park SPD (2011) identified the playing field to remain as public open space. With this said, the planning permission referenced 22/01632/FUL resulted in the loss of the playing field. Sport England cannot find a record of being consulted on that planning application despite being a statutory consultee for development affecting playing fields. Furthermore, having reviewed the Officer's Report, there is no consideration	209217 (Sports England)

afforded to paragraph 104 of the NPPF. If a future planning application were submitted, the Local Planning Authority should accord with the statutory requirement to consult Sport England.	

Policy S/C/BFS: Brookfields

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is broad support from Historic England, who commented to confirm that there are no designated heritage assets within the site.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- In response to Historic England, comments are noted and no policy changes have been made in response as the policy wording reflects the heritage assets in this location.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Part of this site lies within the Mill Road Conservation Area. Any development of the site has the potential to impact upon the significance of the Conservation Area. We welcome criterion 1a, 1b and 1c.	210106 (Historic England)

Policy S/C/CJ: Cambridge Junction and Cambridge Leisure, Hills Road

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Respondents asked for Safeguard the Junction to be safeguarded into the future. It is essential that there is no deterioration in the nature and standard of facilities. Temporary provision for all cultural functions must be secured before any demolition or displacement reprovision is delivered as an early phase; no gap in provision. Any future Junction is at least equivalent in standard and capacity, including audience, back-of-house, technical capability, servicing. Need more meeting rooms. Long-term operational/financial viability should be assessed. Avoid creation of conflicts with sounding uses. Must ensure that these or equivalent leisure uses are re-provided at the same level within the development proposals.

One comment stated that the Cambridge junction site is very new and would have a high carbon footprint to replace.

Historic England advise that whilst there are no designated heritage assets within the site, the site lies close to the New Town and Glisson Road Conservation Area. Any development of the site has the potential to impact upon the significance of the Conservation Area through development within its setting.

Landsec said they were is continuing to explore development options for the Cambridge Leisure site, both in respect of its existing property assets and also the possibilities for the site, either as a standalone regeneration project (allowing future integration with

neighbouring sites for regeneration purposes) or as part of a broader regeneration scheme on the eastern side of Cambridge Station. They ask for the policy wording to be made more flexible.

Other comments included consider impact of building height on surrounding areas e.g. Rustat Avenue, and the need local retail provision.

Response to the main issues raised in representations

The policy and supporting text note the cultural importance of The Junction and that, where it is appropriate, temporary venue spaces and meanwhile uses should be provided during the construction phases. This is considered to be a reasonable approach in order to strike a balance between the retaining an important local and sub-regional facility and the practicality and feasibility of it remaining operational throughout the construction process of a comprehensive redevelopment. The policy contains a requirement that any reprovision of this use must support the enhancement of it as a live performance and cultural venue.

The policy identifies the importance of the commercial leisure offer at Cambridge Leisure and seeks to retain this as part of the redevelopment of the site.

The Local Plan contains policies regarding the reuse of existing buildings and materials and so this is not repeated in this site allocation policy.

The policy has been updated to provide further criteria in relation to building heights and the impacts of development on nearby heritage assets. Additionally, the policy and indicative spatial framework identify some support for retail provision in this area, particularly around the proposed railway station entrance.

The comment from one of the existing long leaseholders is noted. The policy seeks to strike a planning balance between providing flexibility and a clear expectation for future development proposals.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The Cambridge junction site is very new -- 20 to 30 years old. You cannot pretend you care about the climate crisis and at the same time wilfully knock down existing buildings just because you fancy it. The carbon footprint of concrete is huge. There will be huge opposition to this particular 'development', based on opinions I have already heard from people I have told about it. Why don't you practice designing/approving buildings that will have a long sustainable life -- you clearly didn’t do this the first time round, on this site?	201227 (S Williams)
Limit height of development next to Rustat Avenue developments. All have south-facing balconies to enjoy sunlight. Incentivise supermarkets (Aldi/Lidl/or something else) to take up retail space in Leisure Centre. Currently only expensive convenience stores, so have to drive to get food. For flats, incentivise developers offering residents their own management companies from the start. Go without Estate Management Companies from developments as much as possible to save flat owners the pain. Work to support public access from one side of train station to the other (EWR). Consider removing listing status Cambridge station. It's old, at capacity and of limited value.	201652 (T Foets)

We have suggested amendments to the policy wording for robustness and to more sufficiently safeguard the Junction in the future. It is essential that there is no deterioration in the nature and standard of facilities provided by the Junction. Policy wording should be amended to better recognise the Junction as "a locally and regionally important venue". We suggest the addition of 'that meet the needs of the venue' after 'a range of flexible spaces' within the second sentence. Design and layout requirements for this allocation must also avoid conflicts between the Junction and neighbouring uses in line with the NPPF's "agent of change" principle.	202013 (The Theatres Trust)
I support Cambridge Junction: • Temporary provision for all cultural functions must be secured before any demolition or displacement reprovision is delivered as an early phase; no gap in provision • any future Junction is at least equivalent in standard and capacity, including audience, back-of-house, technical capability, servicing • long-term operational/financial viability assessed alongside spatial design delivery governed through a structured process (CJ/Council governance, RIBA stages, shared brief before developer engagement) • Agent of Change applied so residential development doesn't restrict Junction operations • I cannot support this allocation unless continuity, equivalence and viable delivery mechanisms are secured.	202131, 202745 (Cambridge Junction), 202190 (H Tam), 202452 (K Jones), 202676 (T Altmann), 202709 (W Townsend), 202774 (S Lee), 205275 (N Oakley), 202857 (Cambridge Junction), 202981 (T Flinders), 202994 (Arts Theatre Cambridge) 204996 (H Paterson), 205263 (AC de Azevedo Lamha), 205339 (A Seiglow), 202286, 202291,

	205347 (Cambridge Junction), 202377 (Kettle's Yard), 202379 (J Webber), 202389 (T Shaw), 202918 (R Tarry), 204438 (A Neenan), 204660 (NEUBAU Architects), 204892 (Wysing Arts Centre), 203862, 203640, 202804 (University of Cambridge), 203843 (N Yeni), 203471 (D Lever), 203468 (L Heap), 203423 (S Asworth), 203316 (N Ellis), 204358 (New International Encounter), 204681 (A Giarlis), 205289 (L Howse), 204805 (L Matthews), 204150 (Cambridge Junction) , 202007 (H Chamberlain), 205012 (University of Cambridge),

	205090 (J Walsh), 204822 (G Shaw)
The Junction is an amazing venue providing a wide and varied menu of arts events. It should be supported to develop and grow, but without losing its unique ethos. The size of the concert space is great	202595 (M Salters), 203596 (P Tribble)
Could bullet 1c be revised to ensure that the same amount of equivalent leisure space be retained as follows: Redevelopment of the existing commercial leisure units (including cinema, bowling alley and food and beverage outlets) must ensure that these or equivalent leisure uses are re-provided at the same level within the development proposals;	202835 (Cambridge City Council Liberal Democrat Group)
Cambridge Junction is part of Arts Council's National Portfolio of organisations receiving regular, core funding from us. The organisation has strong impact both regionally and nationally. We see the redevelopment of this site as a fantastic opportunity to improve facilities and provision which would benefit both audiences and creatives alike. We would advocate strongly that new plans ensure that the organisation is able to thrive both artistically, financially and in terms of expanding reach.	205045 (Arts Council)
Re The Junction, could a revamped/replacement facility take architectural inspiration from the railway history of the railway sheds it was built on. Furthermore, the site needs to have a significantly greater number of meeting rooms and rehearsal spaces. Provision for The Junction could involve working with Hills Road Sixth Form College to help meet some of its needs for independent study spaces, which could help sustain the venue.	203825, 203769 (A Carpen)
Whilst there are no designated heritage assets within the site, the site lies close to the New Town and Glisson Road Conservation Area. Any development of the site has the potential to impact upon the	210107, 210108, 210109 Historic England)

significance of the Conservation Area through development within its setting. We welcome the preparation of the HIA. We welcome criteria m, n and p. The HIA recommends that height is limited to roughly 6 storeys. This should be specified in criterion n to add greater clarity regarding height.	
Landsec is continuing to explore development options for the Cambridge Leisure site, both in respect of its existing property assets and also the possibilities for the site, either as a standalone regeneration project (allowing future integration with neighbouring sites for regeneration purposes) or as part of a broader regeneration scheme on the eastern side of Cambridge Station. The emerging planning policy within the Draft Greater Cambridge Local Plan must flexibly and proactively facilitate these objectives in the interests of good plan-making. Landsec is generally content with the broad intent and direction of travel that the draft policy adopts, but some areas remain where alteration to the policy wording are requested. In particular, it is suggested that there needs to be more flexibility in certain areas of the policy wording to be more adaptable to the rapid nature of change in market and economic conditions, particularly in respect of historical main town centre uses. Detailed wording changes are provide din individual representations.	209176, 209177, 209178, 209179, 209180, 209181, 209182, 209183, 209184, 209185, 209186, 209187, 210304, 210305, 210306, 210307, 210308 (Landsec)

Policy S/C/CLT: Clifton Road Area

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Universities Superannuation Scheme Ltd support the aspiration for regeneration for a mix of uses but suggests modifications to the draft allocation to ensure it reflects a deliverable, commercially robust proposition. The allocation needs be flexible to accommodate market changes over a 10 15 year horizon, as development is unlikely before 2030. The uncertainty surrounding the scope, form and programme for the delivery of an eastern entrance to Cambridge Station and the implications of this for the Site. The site could likely deliver 150 build to rent homes.

Historic England advise there are no designated heritage assets within the site, the site lies adjacent to the New Town and Glisson Road Conservation Area. The site is also close to the GII listed Railway Station. Any development of the site has the potential to impact upon the significance of these heritage assets through development within their settings. The policy should be mor specific regarding building heights.

Cambridge Past Present and Future consider the eastern station entrance essential. Othe comments included the Junction is important for cultural life and should be supported. New buildings should reflect the area's old railway history, taking inspiration from the old railway sheds that were on the site. Another comment questioned the long term future of the area as an industrial site.

Rustat Neighbourhood Association fed back from a meeting where they discussed the site. The aske for more resident input on planned EWR entrance and other issues. Station drop offs could impact on area by pocket park entrance, research is needed. Another representor raised this point, and apart from disturbance to residents in Rustat Avenue whose flats overlook the Pocket Park, there will almost certainly be traffic issues at the Davy Road / Rustat Road junction which need to be anticipated and accommodated.

Response to the main issues raised in representations

The policy provides flexibility to enable a wide of suitable land uses to come forward through the comprehensive redevelopment of the site. Since the consultation on the draft Local Plan, East West Rail have consulted on their project and provided some further details on the likely timescales of the new station entrance being delivered.

The number of homes likely to be delivered on the USS land is noted.

The policy has been updated to better reflect local heritage assets and the likely impacts of tall buildings in this location. The NPPF is clear that Local Plans should not prescribe architectural forms for development, however, the policies in the Local Plan do outline a requirement for context led development.

The possible impacts of station drop off on local communities is noted and reflected in the policy wording.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
I'd like to voice support for the policy of retaining the existing retail outlets when/if the Clifton Road area is redeveloped	201935 (I Rudy)
Whilst there are no designated heritage assets within the site, the site lies adjacent to the New Town and Glisson Road Conservation Area. The site is also close to the GII listed Railway Station. Any development of the site has the potential to impact upon the significance of these heritage assets through development within their settings. We welcome the preparation of the HIA. We welcome criterion g. The HIA recommends that height is limited to 1-2 storeys. This should be specified the policy criteria to add greater clarity regarding height. We welcome the inclusion of a Spatial Framework at Figure 39. We welcome reference to the Holford Plan in the supporting text.	210109 (Historic England)
What are the functions that the city/tradespeople need that the site's firms currently provide? e.g. Builders' merchants and component suppliers? Can clear provision be made? See the recently built homes on the old Water Works? Please put in standards to prevent such lazy, poor quality architecture and building designs being used. Cambridge deserves better. New buildings should reflect the area's old railway history, taking inspiration from the old railway sheds that were on the site. They should be of a type that is considerably more aesthetically pleasing than what Brookgate has built in the Cambridge Station redevelopment - and visibly so.	203778 (A Carpen)
The Junction is essential for cultural life in Cambridge, providing a venue for diverse age groups to engage in arts and social activities. The respondent emphasises the importance of the Junction in	205330 (N Saad)

encouraging youth participation in arts and music, highlighting its role as a positive alternative to social media and street corners. The respondent advocates for continued funding and support for Create Cambridge, recognising its significance in the local cultural landscape.	
Rustat Neighbourhood Association met with c 30 residents on 17 January 2026. Agree need to retain retail and leisure facilities. Densification implies building up. Do not build up where blocks light for existing residents on Rustat Avenue/Road. Housing for residents/families required. Mixed use site has different needs: Many students and visitors as well as residents. How will site cater for all? Water scarcity and holding developers to environmental standards a key concern. Interface with planned EWR entrance on Clifton Road/Gloria Carpenter Park not well developed. Requires more resident input. How will Local Plan interface with other Plans/consultations. The plan for a new railway bridge coming into Clifton Road and accessible via the Gloria Carpenter parklet requires considerably more detailed thinking through to avoid detrimental impacts on existing and envisaged residents in the Rustat Road area. “Drop off” is problematic as people often need to wait in their cars for arrivals. Residents are concerned that people will drop passengers off in Rustat Road by the Pocket park entrance (opposite Davy Rd). There needs to be an impact study of projected outcomes in different scenarios. There are concerns about congestion and bike-safety at the Clifton Rd/Cherry Hinton Rd junction. There are concerns regarding the pollution and noise impacts that would arise from the proposed development of the site. Impact assessments required. Any bike parking at the Eastern entrance must be fully secure to prevent theft. he grade-II listed station building and new footbridge must be designed to protect heritage character.	201484, 205774, 205775, 205776, 205777, 205778, 205779, 205780, 205781, 205783, 205784, 205785, 210303 (Rustat Neighbourhood Association)

More regular consultation with residents is needed.	
I fully support the redevelopment of the Clifton Road area. There is considerable scope to make better use of the site by mixed-use and by intensification along the lines of the policy document. any building at the Cherry Hinton Road end should be no taller than two stories, probably rising to three stories as gardens get larger. Given the overall growth plan for Cambridge and South Cambridge and especially the proposed housing development of the Cambridge airport site to the east, the need for a new station entrance is compelling and will have real benefits for rail passengers. Will come with very substantial traffic and people flows in the area of the proposed new entrance. Needs to be a thorough traffic assessment on this, and the implications need to be incorporated into the site master plan. Apart from disturbance to residents in Rustat Avenue whose flats overlook the Pocket Park, there will almost certainly be traffic issues at the Davy Road / Rustat Road junction which need to be anticipated and accommodated.	201520, 205799, 205800, 205801, 205802, 205803 (R Crabtree)
Support the aspiration for regeneration for a mix of uses. Suggests modifications to the draft allocation to ensure it reflects a deliverable, commercially robust proposition. We recommend the allocation be flexible to accommodate market changes over a 10-15 year horizon, as development is unlikely before 2030. The relationship between existing, to be retained and proposed uses within the Site and wider area. The high likelihood of the Royal Mail depot remaining fully operational in its current location, which reduces the developable area of the Site and maintains physical, amenity and viability challenges for the remainder of the draft allocation. The uncertainty	209233, 209234 209235, 209236, 209237, 209238, 209239, 209240, 209241 (Universities Superannuation Scheme Ltd)

surrounding the scope, form and programme for the delivery of an eastern entrance to Cambridge Station and the implications of this for the Site. The initial Site review indicates the opportunity to deliver approximately 150 Build to Rent (BTR) residential homes. Support the principle of an active travel-based approach to the new station entrance. However, we consider that the broad parameters for a station entrance should be established at the Site Allocation stage so as not to place unnecessary constraints on the development of the wider site supportive of the future phases of the Chisholm Trail, but policy requirement currently unreasonable, needs flexibility. Requirement for reprovision of all existing floorspace unreasonable.	
Just wanted to question the long term existence of Clifton Road industrial estate, Royal Mail still makes sense but everything else a little less. Residential zones have already encroached which sometimes does cause noise pollution friction, and it seems like a good spot for future housing development. Since COVID commercial activity seems to have slowed a little since ARM left and I think ANSYS/Synopsis will follow suit soon. Otherwise, though pls carry on, very happy with more development. If you ever need a counter-protest for Davy Road let me know as I am extremely YIMBY on Coleridge.	202430 (S Potts Tamman)
This policy is tentative about an eastern access to the station (“any possible future new eastern entrance”). An eastern entrance is essential for the continued safe functioning of the station and to open up opportunities to reconfigure the main station forecourt. Figure 39 is inaccurate and too schematic to be helpful in shaping future development. This policy should set out principle and parameters for the components required for an eastern entrance to the station, including detail on pedestrian routes, cycle parking, a taxi rank, bus stops, and traffic management on Clifton Road, Rustat Road, Davy Road and Fanshawe Road.	202778 (Cambridge Past Present and Future)

Policy S/C/SRW: Station Road West

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is broad support for the site allocation from Brookgate Land Ltd and Network Rail Infrastructure Ltd

Comments were made by local residents in relation to the architectural design and considering the railway history of the site.

Comments were made by local residents and Cambridge Past, Present and Future in relation to improving pedestrian access, decluttering the public realm and reducing car dominance.

Comments were made by Historic England confirming that there are no designated heritage assets within the site and welcoming the preparation of the HIA and requiring the policy to consider wider Strategic Viewpoints.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- The connectivity of the site with the wider area for pedestrians to gain safe access to the station is an important ambition and wording has been included in the policy to reflect this and ensure that pedestrian access and experience is prioritised.
- The HIA has set out the key considerations for design to reflect the local character and designated heritage assets and the wording in the policy has been reviewed to reflect the recommendations of the HIA.
- In response to Historic England, comments are noted and the wording for not impacting negatively on Strategic Viewpoints has been included.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Concerns raised about impact of the Grade II Listed Railway Station.	201228 (S Williams)
A more detailed vision for the station is needed to manage the transport interchange, congestion and heavy flow of people including reducing the dominance of cars outside the station entrance.	202796 (Cambridge Paste, Present and Future)
The design of the station should be more imaginative and reflect character of railway history in the area.	203830 (A Carpen)
Support for the allocation of the final undeveloped parcel as part of wider CB1.	204832, 204839 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
The policy should reflect the relevant planning applications and be more flexible to respond to economic circumstances.	204832, 204839 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
The location is highly sustainable for build to rent and co-living.	204832, 204839 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
The quantum of development should be context led.	204832, 204839 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
Active travel access needs to be improved to the station.	207459 (A Carpen)

Whilst there are no designated heritage assets within the site, the site lies adjacent to the New Town and Glisson Road Conservation Area. The site is also close to the GII listed Railway Station. Any development of the site has the potential to impact upon the significance of these heritage assets through development within their settings. We welcome the preparation of the HIA. We welcome criterion1a, 1b and 1c. The HIA refers to several viewpoints. The policy only refers to Viewpoint E. We recommend including the following wording: '…should not negatively impact Strategic Viewpoints particularly Viewpoint E Limekiln Road.	210110 (Historic England)
Support for the allocation of the final undeveloped parcel as part of wider CB1. Need to consider 21/00264/FUL and 18/1678/FUL for development that has previously been considered acceptable on site. Inappropriate to outline a fixed quantum of floorspace. This should be context-led and be capable of responding to changing economic circumstances. Failure to acknowledge that a hotel was previously considered acceptable. Need to recognise the highly sustainable location for build to rent and co-living. Overall, the Site should be allocated for mixed use development. Conflicting requirements on height and massing. Point (b) prescribed height, whereas point (a) states it should be context-led. Therefore, suggest removing point (b). Subjectivity around 'negatively impact on strategic viewpoint E' should be amended to 'have regard for Strategic Viewpoint E'. Redline boundary should be amended to remove railway tracks.	204832 (Brookgate Land Ltd and Network Rail Infrastructure)

Policy S/C/BJH: Betjeman House, Hills Road

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is broad support for the site allocation from Pioneer Group Ltd. Pioneer Group Ltd also commented that the allocation should be modified to reflect the site allocation and be renamed Botanic Place.

There was broad support from Historic England who confirmed there were no designated heritage assets and that they welcomed the policy wording criterion under point 1a, b, c and d.

Comments were made by local residents in support of the demolition of Betjeman House.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- In response to Pioneer Group Ltd, the policy has been renamed Betjeman House, Hills Road (Botanic Place)
- In response to Historic England, comments are noted and no changes have been made in relation to this comment.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The policy should reflect the current live planning application.	207455 (Pioneer Group Ltd (Railpen))
Support for the site allocation.	207455 (Pioneer Group Ltd (Railpen))

The site is no longer residential and should be non-residential and reflect the planning permission for 54,000 sqm of floorspace for commercial class E.	207455 (Pioneer Group Ltd (Railpen))
Support for demolition of Betjeman House and replacement with lower density development.	201229 (S Williams)
This site is located in the Glisson Road and New Town Conservation Area, lies adjacent to the grade II* Botanic Gardens, a registered park and garden and close to the grade II listed War Memorial and milestone. Development within this area therefore has the potential to affect the significance of these assets through development within their settings. We welcome the preparation of the HIA. We welcome criterion1a, 1b,1c and 1d. We appreciate the site is under construction but welcome the reference to the scenario should the permission not be completed. We welcome the reference to the retention of the Flying Pig House.	210111 (Historic England)

Policy S/C/OPM: Old Press/ Mill Lane

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made by the University of Cambridge raising concerns about the conflicting policy wording around heritage assets.

Comments were made by Historic England to reflect the assets onsite and to complete an HIA for this site.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- In response to the University of Cambridge, the boundary has been amended to reflect the suggested change.
- In response to Cambridge Past, Present and Future, the support for criterion 1a and 1b is supported. The Pitt Building has been amended to be included in the boundary. The wording around heritage assets has been amended to address these comments.
- In response to Historic England, amendments have been made to the policy to reflect the amendments suggested. HIAs are not prepared for site allocations that existed in the Cambridge Coty Council or South Cambridgeshire District Council Local Plan. This is the same across the Local Plan and therefore the HIA has not been revised. Furthermore, the development on this site is underway and close to completion.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**

The University requests that the site allocation boundary (red line) is amended to remove the University Centre and other smaller properties to avoid confusion due to changes in land ownership.	202445 (University of Cambridge)
If the University Centre is removed from the allocation, the key principles relating to access, public realm and active frontages would continue to be adequately addressed through other policies.	202445 (University of Cambridge)
Concerns raised about treatment of heritage assets and their protection.	202797 (Cambridge, Past, Present and Future)
The University requests that the site allocation boundary (red line) is amended to remove the University Centre and other smaller properties. The inclusion of the University Centre adds unnecessary complexity to the allocation. Its removal would allow the policy to focus on providing greater clarity and deliverability for a site that is now in separate ownership.	202445 (University of Cambridge)
There are a number of designated heritage assets within the site boundary including part of the Central Conservation Area and a number of listed buildings including Cambridge University Centre, The Mill Public House, The Mill The Mill Bridge and Paved Surround, Mill Haven - West House and Mill Haven - East House, Cambridge University Press (Pitt Press), Telephone Kiosks, 1 Mill Lane, House Adjoining Number 74 on The North, 74 Trumpington Street, 8-11 Little St Marys Lane, Number 1 Little St Marys Lane including gas lamp and Emmanuel Church all listed at grade II. The site is adjacent to other listed buildings including Little St Mary's Church (grade II*), Pembroke College and Pembroke College Chapel both listed at grade I, St Botolph's Church also listed at grade I as well as numerous grade II listed	210112 (Historic England)

buildings. This is a highly sensitive location in terms of heritage. Development within this area therefore has the potential to affect the significance of these assets including through development within their settings. There does not appear to be a Heritage Impact Assessment for this site. An HIA should be completed for this site. Paragraph 3.1.103 states that there are no grade I, GII* or GII buildings within the site. However, there are a number of GII listed buildings within the site and there are highly graded assets nearby. Paragraph 3.1.103 therefore needs to be amended to correctly recognise the presence of designated heritage assets. Amend criterion a as the Pitt building is within the site. Also, there are other highly graded nearby assets (Pembroke, Little St Marys and St Botolph's) that need to be listed.	
The College welcomes the allocation for a student accommodation-led scheme. We are uncertain whether the Old Press/Mill Lane site qualifies as a "university or college campus site" under Affordable Housing policy H/AH and believe it should be treated as such.	208236 (Kings College)
It is also not clear why the site area includes Little St Mary's Lane etc when the southern portion of the site has already been developed by Pembroke College and so the impact of any development on this residential street has already occurred. The College suggests the plan is amended to exclude this. It is also not clear why the site plan is different from that for Policy S/PRIA/OPML (or indeed why separate policies are needed).	208237 (Kings College)
As the implication of S/C/OPM is that the room capacity will be determined by the acceptability of detailed proposals, it seems unnecessary to specify 256 rooms. If a number is considered desirable,	208238 (Kings College)

then ‘around 260 rooms’ would make more sense. The phrase ‘for university related sites’ seems unnecessary / unclear and should be deleted.	
Restricting uses to those in only subsections a), b) and c) of Class E is unnecessary. Other Class E uses may be equally suitable.	208239 (Kings College)
As a consequence, we would suggest the following revised wording for bullet point 2: Allocation to provide mixed use student accommodation (approximately 260 student rooms) and faculty buildings, commercial business and service in Class E and other ancillary facilities. Site capacity to be subject to detailed proposals. In point 1) limb b) is unnecessary as a Heritage Impact Assessment is required by Policy GP/HE and the Council’s validation requirements anyway. Our experience from other schemes is that the phrase ‘active frontages’ in limb c) can be taken by members of the public to mean retail units. As active frontages can also sensibly include building entrances / designs which ensure natural surveillance of the street, the expectation should be clarified by providing a definition of ‘active frontages’ (this would also relate to policy J/FD 2 where a similar aspiration appears).	208240 (Kings College)
We would also comment as follows on the supporting information to the policy: The last sentence in paragraph 3 appears incomplete and so the meaning is unclear. Although the aspirations are understood, there is duplication with the PRIA policy. However, to say that redevelopment must ensure that safer streets etc are created is unacceptably onerous when works will be carried out in the public highway etc over which the College has no control. Replacing the word ‘must’ with ‘should take reasonable opportunities’ would suffice. The landscape etc aspirations in paragraphs 5 and 6 are similarly understood but could be in conflict with the desire to retain aspects of	208241 (Kings College)

the site's formerly industrial character which was a feature of discussions during the development of the 2018 Masterplan.	
This policy should reference the requirement for a sequential approach to be taken to the site layout, with more vulnerable development located within areas at lowest risk of flooding where possible. A site-specific Flood Risk Assessment (FRA) will need to demonstrate that safe access and egress is available and there will be no displacement of water or loss of floodplain storage. The site assessment recommends that habitable floor levels are set above the maximum fluvial flood level with a suitable freeboard. There are likely to be opportunities to reduce flood risk as part of this development, such as by integrating water storage areas into the landscaping, use of SuDS and reducing the built footprint in the floodplain.	211177 (Environment Agency)

Policy S/C/NMD: New Museums, Downing Street

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made by the University of Cambridge raising concerns about the existing SPD and how it is outdated and what this means for future development.

Comments were made by Historic England to reflect grading of the heritage assets onsite and to produce an HIA for this site.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- The SPD will remain in place once this Local Plan is adopted until a new Local Plan comes in under the new system and is updated, which will be after 5 years. It will remain a material consideration in decision making. There are elements of this SPD that have been superseded by policies in the Local Plan. The Local Plan policies will take precedence and apply, this includes policies relating to environmental standards. The core principles of the SPD have been reflected in policy.
- In response to Historic England, amendments have been made to the policy to reflect the grading of the heritage assets. HIAs are not prepared for site allocations that existed in the Cambridge Coty Council or South Cambridgeshire District Council Local Plan. This is the same across the Local Plan and therefore the HIA has not been revised. Furthermore, the development on this site is underway and close to completion.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
The current policy approach relies on the NMS Site SPD, which is outdated and does not fully align with current or future site aspirations. Sustainability objectives in the SPD are outdated compared to more ambitious targets in the Local Plan. If the site remains in the Local Plan, a more flexible approach should be adopted, requiring a Development Framework with the first planning application.	202435 (University of Cambridge)
There are a number of designated heritage assets within the site boundary including part of the Central Conservation Area and a number of listed buildings including the Cavendish Laboratory of Experimental Physics, Mond Laboratory, The Arts School, The Laboratory of Physical Chemistry, and the Zoological Laboratory all listed at grade II. The site is also surrounded by numerous listed buildings including Corpus Christ (grade I), Pembroke (grade II* and grade II) and St Benet's Church (grade I) Development within this area therefore has the potential to affect the significance of these assets including through development within their settings. This is a highly sensitive location in terms of heritage. There does not appear to be a Heritage Impact Assessment for this site. An HIA should be completed. The recommendations of the HIA should be included in the policy wording. Include St Benet's Church in criterion 1b.	210113 (Historic England)

Policy S/PA/CC: Cambridge City Centre

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is broad support for the designation from Historic England, Pioneer Group Ltd,

Comments were made by local residents to manage impacts on and acknowledge the physical constraints of Cambridge's historic core.

Comments were made by Cambridgeshire County Council for a typo and to increase cycle parking provision.

Further responses were made by local residents to designate the Riverside areas.

Comments were by made by the NHS about healthcare provision.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- Support for the designation is noted.
- Eastern gate has not been added to point 4 because it has a more unique vision than a mixed use allocation.
- In response to Cambridgeshire County Council, the typo has been included. The provision of cycle parking is included under promotion of sustainable modes of transport.
- There are no current plans for the Lion Yard Central Car park to be redeveloped.
- The ARU campus does not have a specific designation as there is already development coming forward around this area and it is covered in part by the wider Eastern Gate designation.

- The Riverside does not have a policy designation because it is covered by policy BG/RC River Corridors which sets out policy to protect and enhance the river setting.
- Healthcare provision is dealt with by the IDP, and the requirements for healthcare provision set out in the relevant site allocations.
- The Historic Core of the City of Cambridge has been accounted for in the Skyline and Tall Buildings Strategy and the in HIAs developed for each site allocation to provide mitigation and design measures to manage the impact on the local designated and non-designated heritage assets.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
We support this policy but would like to see policy 1c revised to make specific mention of the historic skyline, our suggestion would be: “preserve or enhance heritage assets and their setting, the historic skyline, open spaces and the River Cam”. It could be argued that the historic skyline is ‘setting’ but this is not clear and therefore is open to interpretation.	202798 (Cambridge Past, Present and Future)
The draft policies map identities the City Centre designation as a ‘Policy Area’. However, it proves extremely difficult to review the boundaries using this tool, particularly given the number of designations in this central location. It is considered that any final policies map should provide clear distinctions and colour coding for the various ‘Policy Areas’ so it is easier to read the map, including an ARU campus designation.	203958 (Anglia Ruskin University)

Riverside should be designated a PRIA because: (i)It is a key link in the City's sustainable transport infrastructure, as the entry point to central Cambridge for three Greenways; (ii)It is a unique stretch of accessible urban riverfront that connects three green spaces and combines distinctive heritage assets with unspoilt river views; (iii)Work is underway with GCP to realise the area's potential as a vibrant destination with city-wide benefit; (iv)It sits alongside Eastern Gate Opportunity Area and close to four Areas of Major Change, surrounded by development proposals with major implications for the area.	204425 (Riverside Area Residents Association)
I believe that Riverside should be added to the list of areas for PRI for redevelopment or improvement. It is a beautiful city-wide asset, providing a riverfront promenade between 2 commons and a nature reserve and a number of important historic sites, some pre-dating the university itself. The improvement of this area should be captured in the Local Plan, so that plans which are taking place anyway by the GCP, and others, can be mindful /in accordance with the policies in the Local Plan. I have included a request for this under GP/QP	205006 (A Sheedy)
Site allocations lacking explicit on-site health facility requirements should reference the need for financial contributions for health and infrastructure mitigation, aligning with the IDP approach. Engagement with Council Officers during early plan preparation is welcomed, along with the opportunity to contribute to the Infrastructure Delivery Plan. An additional assessment by the ICB in Stage 2 of the IDP process will provide targeted evaluations of key site allocations and health infrastructure needs, offering more detail for each site allocation.	205086 (NHS Cambridgeshire and Peterborough Integrated Care Board)
The policy takes no account whatever of existing pressures on, and the physical constraints of, Cambridge's historic core. The policy also takes no account whatever of chaos caused within limited	205295 (J Preston)

public realm whenever major developments are proposed. Existing cycle parking cannot cope with current demand let alone that already in the pipeline, pavements are cluttered with Voi scooters, and the Council's idealist vision of cafes around the Market Square is belied by takeaways and delivery mopeds. The policy is totally premature and unjustified in the absence of thorough analysis of existing issues and of the capacity of the centre to absorb any more growth.	
The Lion Yard Central Car Park should be a key site for repurposing (if not full redevelopment). If 50,000 homes are planned for Greater Cambridge area, where will be the additional amenity space be for residents & visitors in the city centre? A paradigm shift is required to reduce vehicular traffic and associated health issues arising from pollution, plus road safety. A sustained modal shift away from private vehicles can be encouraged by reducing central parking to essential users only. Car Park floors can be repurposed as residences, offices, shops, eateries and even rooftop green spaces, improving the public realm.	205313 (North Newtown Residents Association)
Whilst we consider the policy to unnecessarily duplicate wider policy, the overall approach to encouraging development within the City Centre, and specifically at Fitzroy/Burleigh Street/Grafton Area, is supported.	207439 (Pioneer Group Ltd)
Support for policy.	210114 (Historic England)
We support the policy that is proposed. However, could an additional note be added to Supporting Information that the City Council is embarking on a placemaking project to develop a city centre vision which will be wider than planning policy but may suggest direction to achieving goals reflected in this	204190 (Cambridge City Council Liberal Democrat Group)

policy, and that city centre development coming forward should have regard to this project as it develops.	
I support this policy - I would add one point. In point 4 - add the Eastern Gate Public Realm Improvement Area. The Western end of Newmarket Road before the Elizabeth Way roundabout also presents an opportunity for mixed-use intensification.	202910 (M Cleminson)
Page 162, paragraph 3.1.117 Typo - The city centre has therefore had to evolved to ensure it remains a vibrant place to visit.	210521 (Cambridgeshire County Council)
An important issue for the city centre is the lack of public cycle parking. This policy should include the need to increase the amount of public cycle parking as part of new development wherever possible.	210585 (Cambridgeshire County Council)

Summaries of Representations: Sites Areas of Major Change

Policy S/AMC: Areas of Major Change

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Support from Historic England to the criteria requiring a new, strong landscape framework that is guided by and incorporates existing positive landscape and townscape features and heritage assets. Broad support from Anglian Water, but clarity was sought on what the reference to water management was referring to. Cambridgeshire County council suggested adding reference to Rights of Way Improvement Plan (ROWIP).

Pioneer Group are concerned rather than supporting development the policy places additional controls, conflicting with the aspiration for growth in these areas. Railpen also considered a number of the requirements disproportionate.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan policies.

The policy wording has been revised to be more positively prepared and has been streamlined to avoid duplication with other Local Plan policies. The policy name has also been amended to make it clear that this policy will only apply to Areas of Major Change within Cambridge and therefore not those within South Cambridgeshire. It is also clear that it will only apply to larger schemes, where a comprehensive and coordinated approach is often required to maximise positive planning outcomes. Whilst specific plots or sites within an Area of Major Change are likely to come forward at different points in time, the intention of the policy is to avoid piecemeal development and ensure that overall, these areas are supported by the necessary supporting infrastructure that may be more than what is expected to be delivered by an individual proposal. It also emphasises the need for a joined up approach with relevant public bodies, who may be responsible for the delivery of said infrastructure.

Reference to water management features has been added to the supporting text to provide greater clarity. Reference to the Rights of Way Improvement Plan (ROWIP) has been added to the Supporting Information.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Areas of Major Change should be considered as areas of opportunity in which development is actively supported and encouraged. As demonstrated by the wording "Excluding very minor development, development proposals within AMCs will only be permitted in the following circumstances..." it is considered that the policy seeks to negatively control development contrary to the presumption in favour. This will unnecessarily restrict the opportunity of the very change the AMCs are designed to facilitate. The policy seeks to establish controls which are not necessary and which increase the burden	207440 (Pioneer Group)

of planning policy upon development viability. This fundamentally conflicts with aspiration to see growth in these areas. Wider requirements of the AMC policy are picked up elsewhere within the emerging Plan and should therefore be deleted. See attached proposed revisions to the policy	
Anglian Water supports this strategic allocation policy which requires that the necessary infrastructure to support the development has been secured and a phasing strategy is in place where the phased provision of infrastructure is required - this is consistent with Policy I/ID. We agree with clause 4, that the redevelopment of these areas of major change, should protect existing assets including “water management”. However, the supporting text should qualify what this term encompasses. These sites also offer the opportunity to improve the public realm, achieving betterment through provision of SuDS and water reuse.	210190 (Anglian Water Services Ltd)
We welcome criterion 4b.	210115 (Historic England)
The respondent supports coordinated development but believes the criteria in Part 2 (a)-(c) impose unnecessary requirements that could hinder deliverability and flexibility of development sites. The policy does not consider that sites are at different stages of development, as exemplified by the Beehive Centre, which already has planning permission and extensive coordinating documents. The requirement for a site-wide masterplan and coordination documents is seen as disproportionate, especially for less complex sites where phased development is appropriate.	203196, 203909 (Railpen)
Page 165, paragraph 4a could refer to the Rights of Way Improvement Plan (ROWIP): https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-andpolicies/rights-of-way-improvement-plan. Rights of Way Improvement Plan should be referenced where connectivity/community & social inclusion is discussed. Often there is a reference to ensuring facilities	210512 (Cambridgeshire County Council)

and developments are connected better by active travel (walking, cycling, wheeling etc.) but there is already a network that can be built upon or improved for this.	

Policy S/AMC/AS: Abbey Stadium

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Cambridge United supports the designation of the Cledara Abbey Stadium as an Area of Major Change and is supportive of the Draft Policy's recognition that development on the site would be supported. There main concern was that the policy needs to be flexible in order to make the best use of the site. They recognise that the movement of people on match days can be disruptive and are committed to working with stakeholders through a through a Matchday Management and Travel Plan.

Comments were made by multiple representations to raise issues about congestion and traffic, and by local residents and about the environmental impacts of development. Further responses were made by Sport England about meeting standards for the Football Association. Historic England gave views about how the policy should consider local heritage impacts.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- In response to concerns about congestion, a requirement for a Transport Mitigation Assessment has been added into the policy area.
- The environmental impacts of the development will be managed by the development management policies which set out

requirements for biodiversity under BG/BG and urban greening under BG/UGF, as well as open space provision under BG/EO.

- In response to Historic England, the suggested changes have been made.
- A HIA has not been prepared for this site because it is a policy area, where the policy guides the form of development, but not proposing allocation of specific development.
- In response to Sport England, a sentence has been added to the supporting text to reflect the need for proposals to meet the standards of the Football Foundation and Cambridgeshire Football Association.
- Broad support from Cambridge United Football Club for the policy is noted. The policy supports potential non-match day uses at the stadium and does not preclude redevelopment of the stadium coming forwarded through a phased approach. Part 1 (a) of the policy notes that subsequent planning applications should support the delivery of the vision and it does not require a single application.
- Noting the existing active travel and public transport that serve the site and wider area, the policy requires, at the planning application stage, for a Transport Assessment to be prepared which would consider transport impacts and mitigation measures in more detail, depending on the scale and nature of the proposal. Therefore the policy does not prescribe specific transport interventions but does note that highways, active travel and public transport enhancements are likely to be necessary and will need to be taken into account as part of the preparation of the Transport Assessment.
- All development proposals should be context led and mitigation measures should be identified and implemented where necessary. This is supported by a suite of policies across the Local Plan including within the Great Places chapter. Given the relationship between the greenspaces in the City and the adjacent built form, it will be important that any redevelopment of the stadium is context led and supports the Plans aspirations for high quality design.
- Any development proposals that result in the loss of protected open space or any other designations are covered by other policies in the Local Plan and so are not repeated here.

- There has been no specific proposal identified by the football club for an alternative stadium location, nor confirmation that the club are actively seeking to relocate. The plan therefore does not identify a site allocation for a new stadium elsewhere. A future development proposal to relocate the stadium would need to be considered on its merits against the policies set out in the Plan, including those that relate to sports and culture. If the stadium was to relocate, then it is at this stage that the open space designation would be considered as part of future plan reviews. It would be premature to remove the protected open space designation at this stage.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Football stadium is a source of traffic and anti-social behaviour.	200985 (C Campos)
The sites impact on environmental regeneration, and open space should be considered and there are further opportunities for biodiversity.	202811 (Cambridge Past, Present and Future)
Objection to the absence of specific reference to the Grade I listed Leper Chapel in the policy.	202811 (Cambridge Past, Present and Future)
Impact on traffic on match days should be considered. Traffic solutions away from residential areas should be considered.	202914 (M Cleminson)
Concerns raised about lack of capacity for more access routes to the site.	204639 (S Schwitzer)
The site is located adjacent to the Riverside and Stourbridge Common Conservation Area, as well as a number of grade II listed buildings and close to the Grade I Leper Chapel. Development within this area therefore has the potential to affect the significance of these assets	210116 (Historic England)

including through development within their settings. We understand that there is no HIA for this as it is a Policy Area. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy. Criterion j should refer to a heritage impact assessment (not historic). It should also refer to the grade I listed Leper Chapel.	
Can we please ensure that developments to the Abbey Stadium are mindful of how clogged up parking can get in Riverside on match days. Please can they be sensitive to the pressures placed on neighbouring areas and find solutions to parking issues away from residential areas.	202914 (M Cleminson)
Sport England supports the principle of this policy. To ensure that the redevelopment of the stadium and the improvement of the sporting facilities are fit for purpose, we request that the supporting information includes a requirement for the design of the proposals to meet the standards of the Football Foundation and Cambridgeshire Football Association.	209218 (Sport England)
Pleased that civic leaders have given their public support to Cambridge United's vital role in Cambridge. However, Cambridge United is capacity constrained. At the moment we are able to meet fan demand but on current trends that will likely soon become a bigger challenge. Over the last 10 years there has been a 31% increase in attendance, and the occupancy has been over 90% in the last two seasons. In this context, the Club would like the Draft GCLP to provide planning policy support for the Club to improve the Cledara Abbey Stadium, potentially in phases, to increase the capacity and facilities on matchdays, but also to ensure that the stadium is used on non-matchdays as an	209104 (Cambridge United Football Club)

important facility for the local community. However, if, as seems likely, the Cledara Abbey Stadium cannot be improved in a way that is financially viable, to safeguard the Club's long-term future, the Club will work with the Council and others to identify potential alternative sites to ensure that its current capacity does not constrain both the Club's and the city's wider ambitions.	
The Club supports the designation of the Cledara Abbey Stadium as an Area of Major Change and is supportive of the Draft Policy's recognition that development on the site would be supported. However, to be effective and to facilitate the improvement of the stadium, the policy needs to be flexible. The Club is concerned about the restrictive nature of some elements of the draft Policy. There is a need to add more flexibility to the draft Policy to ensure that the Club can make the very best use of the site in a way that is viable and sustainable. See proposed wording for policy in Appendix A of the accompanying attachment. The key aim of any potential stadium redevelopment would be to increase the capacity and number of fans able to attend games, while also enhancing the matchday experience through an improved hospitality offer, and encourage wider non-matchday use by the local community. These aspirations should be explicitly referenced and supported in the wording of the draft Policy.	209105, 209106 (Cambridge United Football Club)
Comment on criterion a). While a masterplanned vision for future development on the site is appropriate, there needs to be recognition that a degree of flexibility is required, and that this masterplan may not be delivered all at once, owing to viability and time constraints. As such, while reference to a wider masterplanned vision of the site is understood, there should recognition and allowance for flexibility built into the criterion to allow a phased development.	209107 (Cambridge United Football Club)

Comments on criteria b) - e). Cledara Abbey Stadium is already well served by existing transport infrastructure, and the Stadium also has access to Park & Ride services and is well connected to the wider transport system via established pedestrian and cycle routes. It is recognised that the movement of people on matchdays can cause disruptions. The Club would, therefore, be committed to bring forward further measures as part of any planning application to address this issue. However, it should be recognised that there are wider factors that impact the highways network, and any impact associated with the Club is typically restricted to a limited period of time on matchdays (circa. 25 days per annum). Therefore, rather than a blanket policy requiring any redevelopment to solve issues that go beyond the Club, we believe a nuanced approach should be taken. The Club believes that improvements to matchday traffic can be made through soft interventions and would commit to delivering these through a Matchday Management and Travel Plan associated with a redeveloped stadium (and the associated capacity uplift). These interventions would focus on promoting active travel, encouraging behavioural change to reduce private vehicle use at peak times, and improving overall travel planning for supporters. The Club would also commit to working proactively with the local authority to manage and enforce appropriate parking controls in the surrounding area, ensuring that matchday operations minimise impacts on nearby residential streets and deliver a more sustainable and coordinated transport strategy.	209108 (Cambridge United Football Club)
Comment on criterion f). The Club want to protect all trees on the site, but that simply might not be possible were the stadium to be improved. This should be explicitly recognised. The reality is that the	209109 (Cambridge United Football Club)

stadium is adjacent to open space. Tree planting will not 'soften 'the impact. Seeing the stadium from the open space will not be a surprise to anyone as it has been there for nearly 100 years.	
There is also a greater need for flexibility in the policy wording in relation to where development can take place, and the policy boundaries. Draft Policy S/AMC/AS explicitly recognises that the Cledara Abbey Stadium site is constrained to the west and south (through ecological assets, open space and allotments). However, there is little flexibility in the policy wording that allow encroachment into these areas if, on planning balance, the benefit of ensuring delivery outweighs the harm (which would be mitigated or compensated wherever possible). If there is limited encroachment on land that is protected by other Plan policies, the encroachment must be justified in accordance with those policies, and this does not need to be re-stated in the Policy. However, it should be recognised in this allocation that improving the Abbey Stadium and safeguarding the long-term future of the Club and its role in Cambridge will be given significant weight in assessing the impact of development.	209110 (Cambridge United Football Club)
The design led approach should not seek to limit development, but to make the best use of the site and ensure operational requirements of the Club can be fulfilled.	209111 (Cambridge United Football Club)
The Club's stated preference to date is to remain at a redeveloped Cledara Abbey Stadium. However, given the many and obvious constraints, the Owners and Board recognise that this might be neither financially viable nor deliverable. The Club is open-minded about relocation to a site elsewhere. In this situation, the Club would like to work in partnership with the Council and others to help identify an appropriate alternative site that meets both the Club and the city's needs. The Abbey Stadium is the	211868 (Cambridge United Football Club)

only home Cambridge United has ever known and, whilst securing the Club's future and maximising the moment of opportunity the city is now in may require a move, we know this is a very sensitive and emotive issue. Should a defined allocation not be forthcoming, it would be helpful to include a broad statement of support for the Club's relocation (in the correct circumstances) either within draft Policy S/AMC/AS, or within a bespoke policy that explicitly deals with the Club's relocation within the Plan. This would be in line with Paragraph 98 of the NPPF, which requires Councils to plan positively for the provision of cultural facilities.	
Should the Club find an appropriate alternative site, and develop a new football stadium on it, it would be appropriate for the current site to be redeveloped for residential or commercial use. In such a scenario, the need to protect the pitch as open space would fall away. As such, to make best use of the land (which is brownfield) the draft policy should recognise the development potential of the site should the Club find an alternative site. This approach would be consistent with paragraphs 104 b) and 124 of the NPPF. It is recommended that the Policies Map is amended to remove the protected open space designation and ensure the site's future development potential is not compromised if the Club needs to relocate.	211869 (Cambridge United Football Club)
Page 116, paragraph 1e should refer to Newmarket Road Park & Ride rather than Newmarket Park & Ride.	210522 (Cambridgeshire County Council)

Policy S/AMC/BC: Beehive Centre

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made by local residents critiquing the allocation of the land for lab uses as the sector is in decline, and the development does not protect surrounding communities from loss of light. Comments were made by Historic England to make more specific reference to heritage assets. Cam Skate sought reference to community and leisure uses.

Further responses were made by local residents about overheating and urban heat island effects.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- The redevelopment of the Beehive Centre is not an allocation of the Local Plan, they have already gained planning permission. The implications of it will be reflected in this area of major change to ensure mitigations are enabled for the public realm, pedestrian experience and suggested uses.
- Suggested amendments have been made to address comments from Historic England and Cambridge Past, Present and Future with respect to heritage assets.
- Pedestrian and cyclist movements have been reflected in the policy wording to ensure there is connectivity and safety for local residents in this area. Active travel is a priority for this area due its central location.

- Reference to the Transport Strategy has been tidied up in the policy wording in response to Cambridge, Past, Present and Future.
- Point 4b has been amended to address comments made by Cam Skate.
- Suggested changes from Railpen have been made where it is considered these provide greater clarity on the Councils' vision for this area.
- The urban heat island effect is managed by policy C/SD and S/DC which set out requirements to demonstrate how overheating is managed through the Sustainability Statement and how overheating is managed in buildings and the public realm through the cooling hierarchy.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Whilst there are no designated heritage assets within the site, the site lies immediately adjacent to the Mill Road Conservation Area. Any development of this site has the potential to impact upon the heritage assets and their settings. We understand that there is no HIA for this as it is a Policy Area. We welcome criterion 4 but recommend the addition of the word 'height'. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy. We appreciate that the site has been granted planning permission by the SoS. However, the policy needs to be robust, should the permission not be implemented and alternative proposals come forward for the site.	210117 (Historic England)

The respondent expresses concern that the anti-car sentiment in planning policies has not been fully considered, particularly for car owners who commute and have independent children. They argue that restrictions on car use will lead to a less happy community, as cars enable 70% of residents to maintain their quality of life. The respondent believes that issues attributed to cars are symptoms of a larger problem, namely that the area is not a high-density city like London and cannot support a large population.	202705 (D Whant)
They suggest that if growth is necessary, it should occur in surrounding villages and towns, supported by a network of transport hubs. The respondent feels that Cambridge has lost its appeal due to development that has not considered long-term consequences.	202705 (D Whant)
The use of vitality and viability is unclear. The clarity of the policy needs to ensure the site's strategic role and planned evolution of the site.	203421, 203928 (Railpen)
The area is currently not very cyclist or public transport friendly. I would suggest better coordination between the retail park, beehive centre, and Tesco. Move shops to sites along Newmarket Road and parking to the back, so people could seamlessly access the shops from the bus stop instead of having to walk through an exposed parking lot. This is also a less historically sensitive area of Cambridge, so I support densification to provide much needed housing or office space.	203794 (A Chan)
More attention to urban heat islands and how areas of significant development work alongside existing housing must be a key factor here. The Beehive should never have been allowed to cause the impact that it did at outline planning and the Local Plan must protect homes especially those not in conservation area. The east especially shouldn't be taken advantage of - many communities use bikes but lack safe access due to urban sprawl and the retail park.	205340 (B Smith)

This is not a comprehensive statement that does enough to protect Silverwood Close from the loss of light and overwhelm by the planned buildings presented at the outline planning stage. I object most strongly to this, in part it's an enormous waste of land that would suit housing very well since lab-space is on the decline, and there is no protection to neighbouring residential buildings with clarity of height, noise and proximity to boundaries.	205388 (B Smith)
Frustration exists regarding the redevelopment of the Beehive, which lacks a residential component; a policy requiring mixed-use development for larger projects is suggested to address the city's housing needs.	207392 (Cambridge Past, Present and Future)
Whilst there are no designated heritage assets within the site, the site lies immediately adjacent to the Mill Road Conservation Area. Any development of this site has the potential to impact upon the heritage assets and their settings. We understand that there is no HIA for this as it is a Policy Area. We welcome criterion 4 but recommend the addition of the word 'height'. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy. We appreciate that the site has been granted planning permission by the SoS. However, the policy needs to be robust, should the permission not be implemented and alternative proposals come forward for the site.	210117 (Historic England)
No mention of community, sports, leisure, culture or creative hubs within the policy which we see as integral to supporting the vitality of this area given its city centre location.	210563 (Cam Skate)

Policy S/AMC/EB: East Barnwell

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is broad support for the policy area from the Cambridge Investment Partnership.

Historic England confirmed that there are no designated heritage assets near the site.

Comments were made by Sport England to set out that under the 23/04687/FUL sports provision was re-provided.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- Support noted.
- No comment noted from Historic England.
- In response to Sport England, the suggested amendments have been made.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
There are no designated heritage assets within the area or nearby. No comments.	210118 (Historic England)
Support the principles.	203403 (Cambridge Investment Partnership)

The East Barnwell area includes the site allocation S/C/BRN. For clarity, we advise you refer to the planning permission 23/04687/FUL and explain that the permission included the replacement of the sports provision to be lost as part of the planning permission 23/04849/FUL. This would demonstrate that the loss of these sports facilities has been assessed against paragraph 104 of the NPPF and that replacement mitigation provision has been secured.	209219 (Sport England)

Policy S/AMC/FBG: Fitzroy/ Burleigh Street/ Grafton Area

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is broad support for the designation from ARU.

Comments were made by the Cambridge Liberal Democrat Group to include more reference to leisure provision.

Comments were made being critical of the negative preparation of the policy area, providing a shopping list of requirements rather than positive proposals.

Further responses were made by local residents about concerns about the urban heat island effect.

Historic England made representations to reflect more of the heritage assets in the policy wording.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- The policy area is drafted in a way to establish which land uses support the vision for the area and what the constraints are and what is needed to support development in this area. It is not worded to prevent development but support sustainable development in this location.
- Leisure provision is covered by policy point 1A.
- The suggested amendments from Historic England have been made.
- The urban heat island effect is managed by policy C/SD and S/DC which set out requirements to demonstrate how

overheating is managed through the Sustainability Statement and how overheating is managed in buildings and the public realm through the cooling hierarchy.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The site contains several designated heritage assets including the Arts Theatre Workshop and Store listed at Grade II* and 17 Fitzroy Street and 38 Newmarket Road both listed at garde II listed. Part of the Kite Conservation Area is included in the Policy Area. There are also numerous listed buildings nearby. Development within this area therefore has the potential to affect the significance of these assets including through development within their settings. We understand that there is no HIA for this as it is a Policy Area. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy. We welcome criterion 1b, 7b and 8. The Policy should make more reference the role of heritage in the re-vitalisation of retail areas. See our Heritage Led Regeneration Toolkit | Historic England for further suggestions	210119 (Historic England)
Leisure use is missing from this policy so please add the following to Grafton Shopping Centre Point 4 “Retention of significant public leisure use".	202842 (Cambridge City Council Liberal Democrat Group)

Can this policy make reference to Fitzroy and Burleigh Streets' purpose as a focal point for local services to the immediately surrounding Kite community as well as an extension to the city centre. Please add that there should be priority given for retention of convenience shopping and larger anchor stores which serve both audiences	202842 (Cambridge City Council Liberal Democrat Group)
ARU supports this policy and development opportunities at the Grafton Centre. ARU particularly supports the specific reference to the site being suitable for uses associated with ARU's East Road campus. It would be an opportune area for further ARU based development, reinforcing the perception of an East Road campus and interconnectivity across the multiple hubs.	203991 (Anglia Ruskin University)
The policy is constructed in a negative manner. Rather than establishing a baseline that development within the AMC is acceptable, it establishes a shopping list of requirements, many of which conflict with the requirements of existing and emerging national policy.	207441 (Pioneer Group Ltd)
The policy fails to recognise the existing permission or flexibility in the use class order.	207441 (Bidwells on behalf of the Pioneer Group)
The site is at risk of heat island affect due to impact of labs proposed around the Grafton Centre. Concerns about the prevalence of science labs in the City Centre and impact on community and safety in the public realm.	208877 (R Lambert)
Can this policy make reference to Fitzroy and Burleigh Streets' purpose as a focal point for local services to the immediately surrounding Kite community as well as an extension to the city centre. Please add that there should be priority given for retention of convenience shopping and larger anchor stores which serve both audiences. Leisure use is missing from this policy so please add the following to Grafton Shopping Centre Point 4 “Retention of significant public leisure use".	202842 (Cambridge City Council Liberal Democrat Group)

Policy S/AMC/SCL: South of Coldham's Lane

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made by local residents on impact on green infrastructure, chalk streams, connectivity, parking and safety.

Comments were made by Historic England requiring an HIA and requesting further detail on the heritage asset within and adjoining the site.

Comments were made by Friends of Cherry Hinton Brook about active travel connections, enhancing biodiversity and water safety around the country park.

Further responses were made by Cambridgeshire County Council regarding the impact on local pits.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- A review of the policy structure and configuration to reflect the distinct four areas of the site allocation that are emerging through wider changes to the context of Cambridge East with the introduction of new Cambridge East Station, and setting out a clearer vision for where the biodiversity needs to be protected and enhanced on local wildlife sites and which parts of the site are suitable for redevelopment.
- In response to Historic England, amendments have been made to the supporting text to highlight the heritage assets adjoining the site
- In response to Cambridgeshire County Council, the policy wording has been revised to highlight the LNRS and show which areas have importance for green infrastructure and wider ecological enhancements and connection to wildlife corridors.

- In response to wider comments about restrictions to parking and selling food. Selling food is covered by licensing and is not the role of the Local Plan site allocation. The issues relating to parking will be picked up by a Transport Assessment supporting any future planning application and a policy I/EV: Parking and electric vehicles.
- In terms of comments relating to density, the building height has in this location has been informed by evidence in the HIA and also by the local character.
- In terms of concerns around impacts on chalk streams, policies in the wider plan include policies to require water supply and water quality consideration at the planning application stage.
- In terms of active travel and connections, wording has been added to the policy to improve connections between Tin's Lane and Coldham's Common and wider active travel connections.
- In response to Misson Street & BGO Newton Ltd, the policy has been restructured to better reflect the latest proposals.
- In response to concerns about site contamination including impacts on soils, wording has been added to the policy to ensure the mitigation of these issues.
- In response to Historic England, the wording has been amended to reflect the nearby heritage assets. A HIA has not been provided for this site as it is a site allocation from the Cambridge City Council Local Plan, and this is consistent across the Local Plan.
- The policy area has been restructured to make clear that there should not be impacts on the City Wildlife Site and protected open space. A separate section has been set out for this area to set out the requirements for ecological enhancement and recreation. Public access and safety has been added into the masterplanning section as well as flood mitigation to address representations from Friends of Cherry Hinton Brook. Active travel connection to Cherry Hinton, Coleridge and Romsey has been added to point 3g to address representations from Friends of Cherry Hinton Brook. In response to concerns raised about water safety, point 3f has been added to address concerns about public safety and water access in the Country Park.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**

Mill Road Conservation Area slightly overlaps this policy area along Burnside. Development within this area therefore has the potential to affect the significance of this asset including through development within its setting. We understand that there is no HIA for this as it is a Policy Area. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy. Criterion c refers to building heights of no taller than 6 storeys. In the absence of a Heritage Impact Assessment this is inappropriate and should be deleted. This needs to be explored through an HIA and masterplanning. Delete reference to 6 storeys.	210120 (Historic England)
I object, I live very close to the start of the Tins pathway. An entry point here would be very difficult because the path is already quite busy. It would be impossible for any more cars to be using Burnside which is single file traffic. The last thing this area needs is a kiosk selling snacks. Changes to plan: Absolutely no parking. and nowhere selling food.	202697 (M Downs)
These ?20 metre high buildings are going to be cheek by jowl with houses on Wolsey Way and our garden on Orchard Estate. We will only a few feet away. They are much too high to be so close to a residential area and will dwarf the rest of the built environment. Local residents are not being kept informed on the results of the drilling tests, to see if it is even safe for foundations to be drilled. You have a rare chalk stream several metres downhill from this site. It is obvious the leachate will end up in the water.	201230 (S Williams)

Significantly improved developer-funded active travel routes should be designed in and built, and amenities should be expanded to enable local residential access. Provision should be made for a new rail/light rail stop on the railway line.	203829 (A Carpen)
We object to the proposed development of the lakes area because we do not feel sufficient thought has been put into the following: - access - the busy corner of where The Tins meets Brookfields and Burnside is already dangerous at peak times with all manners of transport and is an inappropriate site for the main entrance. - safety - since the plans were originally submitted a young person has drowned in the lakes. 24 hour access to the area without monitoring / security does not seem sufficient to prevent further accidents.	203771 (C Bone)
The application of a maximum storey height on buildings is inflexible when assessed in the context of other emerging spatial strategies and projects including East West Rail. The draft policy is also inconsistent with other parts of the draft Plan, including Policy S/C/SCL, and also with planning permission 23/04590/OUT. We propose that S/AMC/SCL paragraph 2c) should be amended.	204031 (Mission Street &BGO Propco Newton Ltd)
Policy S/AMC/SCL fails to take the following matters into account: The site proposed for the country park is severely constrained. Opportunities for public access have not been addressed. The part of the site previously ear-marked for public access is subject to flooding. Local water courses and bodies are vulnerable to pollution from toxic land fill. There is insufficient emphasis on the protection of flora and fauna. Management issues have not been given sufficient attention.	204669 (J McGill)
I do not think that the new plans for S/AMC/SCL South of Coldhams Lane take into account the detailed comments and recommendations made by local groups and individuals regarding the previous 2018 Local Plan. There are still many aspects which are vague and not showing how concerns will be	205152 (H Anderson)

addressed. Maintaining biodiversity, safety (including site supervision), future management, access (including vehicle parking and road safety), pollution and drainage issues are not properly outlined and could therefore open to misinterpretation if these plans go ahead.	
FCHCB have significant concerns about the policy for this AMC, as outlined in our full statement. For the urban country park: 1. Any public access must be strictly supervised, to avoid repetition of the 2024 fatality. 2. Access to the country park should prioritise active travel, given constraints on vehicle access and parking. 3. Proposals for governance and management to date need full revision 4. The risk of pollution of Cherry Hinton brook and the lakes from leakage/run-off from the land-fill site (containing highly toxic materials), must be made clear, along with the need for protection of the wildlife, evidenced by the designation of the area as City Wildlife Sites.	204667 (Friends of Cherry Hinton Brook)
Point 1a. Add: retain as much biodiversity and green space as possible, since this parcel of land is designated as both City Wildlife Site and protected open space.	210441 (Friends of Cherry Hinton Brook)
Point 1c. Reword first sentence of this point as follows; "In the area to the south-west: deliver a new urban country park through enabling periodic, highly supervised public access that will ensure the safety of all visitors whilst maintaining the important biodiversity and ecosystems of this wetland area. "	210442 (Friends of Cherry Hinton Brook)
Point 2a. Add after 'public access' the following phrase "... (covering both safety of the public and protection of wildlife) ....".	210443 (Friends of Cherry Hinton Brook)

Point 2d. Add to last sentence: .... streams, "as well as the variability in rainfall and water table levels which are having a major impact on drainage and periodic flooding of associated residential areas (such as Burnside and Brookfields)". This is important as the current proposal for the main entrance to the country park is in an area prone to flooding and immediately adjacent to the brook.	210444 (Friends of Cherry Hinton Brook)
We propose an additional Point f, since the proposal does not address access from the south of the AMC: "Ensure a safeguarded active travel access route from Cherry Hinton, Coleridge and Romsey wards and the city centre, to help to eliminate traffic congestion and parking in associated residential areas to the south of the Area of Major Change".	210445 (Friends of Cherry Hinton Brook)
In relation to the Supporting Information section: This recognises that “Outline planning permission was granted in January 2025 for offices, research and development, along with delivery of a country park.” but fails to mention the numerous issues that have been raised since then, including (a) that 72 conditions have to be met before the application for the northern parcels of land can go further because the construction is proposed for a location that is a toxic land fill site, and (b) that the area proposed for public access and a country park is highly dangerous (evidenced by the 2024 fatality in the lakes). It is irresponsible of the Local Plan to imply that this area would be suitable for unlimited public access and what most people would consider a normal country park. We request that the Supporting Information section provides more information and appropriately flags up the constraints of this location. We have provided our objection to the 2024 planning application as an uploaded separate document.	210446 (Friends of Cherry Hinton Brook)

Recommend the wording of the policy be expanded to include strengthening of the important wildlife corridor and delivery of Local Nature Recovery Strategy priority habitat and to take note of local wildlife sites.	210610 (Cambridgeshire County Council)

Summaries of Representations: Sites Public Realm Improvement Areas (PRIA) in Cambridge

Policy S/PRIA: Public Realm Improvement Areas (PRIA) in Cambridge

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Two main areas were highlighted by comments seeking further policy development in the plan.

The Elizabeth Way Bridge and Underpass(es) cultural hub project was highlighted as an opportunity for public realm improvement, making the area more accessible for active travel but also opportunities for cultural provision.

The Riverside Residents Association and others highlighted the Riverside Area Vision, proposing that the area needs careful planning and investment to make it safe and attractive for both pedestrians and cyclists, especially given predicted traffic increases from converging Greenways. Development should be supported if it aligns with the Riverside Vision and emerging thinking on the area's future potential as a strategic asset for the City as a whole.

Another comment welcomed the Mill Road policy area.

Anglian Water and Cambridgeshire County Council considered the policy should reference sustainable drainage. Historic England welcomed the aims of the Policy. Cambridge Past Present and Future considered it needed to be supported by a heritage strategy. Cambridgeshire and Peterborough Combined Authority highlighted the need to consider impacts of the policy on the functioning of the transport network. There were also comments highlighting the need to support active travel.

Railpen suggested amendments of the policy, proposing that developers could prepare and submit steering documents to guide the development of an area that could be taken account of in planning applications.

Response to the main issues raised in representations

Comments regarding specific PRIAs have been addressed under these individual policy areas and therefore are not address here.

The supporting text of the policy now makes reference to the historic environment and should be read alongside the relevant policies in the Great Places chapter of the Local Plan.

The policy does not prioritise place making over vehicle movement, especially at junctions, as suggested by the representation. The policy is clear that a context led approach is required for development proposals in these locations, which reflect the needs of the area. This may include transport and movement as well as placemaking matters such as the quality of the public realm and the improvement of existing shop fronts.

SUDs and water management is not specifically referenced in the policy as this is covered by other policies within the Local Plan. However, the broad principle of the representation is noted and broadly supported elsewhere in the plan.

The policy has been amended to reflect that facilities and amenities should extend beyond the provision of shops and services. However, part 3 of the policy continues to require a policy framework to guide overall change in these areas as a ‘steering document’ is not a commonly recognised term.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
S/PRIA/EG and Elizabeth Way Bridge and Underpass(es) cultural hub Project: Support development within the designated PRIA of a Cultural Hub offering accessible programme. The area surrounding the bridge and underpasses is lacking a sense of place. Introduce community, sports and cultural programme and upgrades to the public realm to promote safety and identity. Strengthen active transport N/S and E/W connections around the infrastructure for better connectivity, prioritising residents and visitors. Encourage movement along desire lines to and across the river, for local wards Petersfield, Market, Abbey and Chesterton.	201990 (Skateboard Cambridge CIC) 204004 (L Cooke) 203880 (B Greig) 202564 (J Neal) 204049 (A Giarlis) 203135, 201833 (NEUBAU Architecture Ltd (B Lenz, Architect)

	204242 (Cambridge Junction / Create Cambridge) 205237 (University of Cambridge) 201800 (NEUBAU Architecture Ltd)
I support the development within the PRIA of a cultural hub offering an accessible programme. I oppose demolition of the underpass. RIBA guidance puts avoiding demolition as the number one way to improve sustainability of development. This is due to embodied energy and intensive energy and CO2 output required for demolition works. Therefore, I support the regeneration of the underpass into a cultural hub, using inventive architectural interventions. This would strengthen active travel and improve safety due to increased footfall. I would also improve place making and community.	204329 (K Fisher)
Riverside is a vibrant connected urban riverfront destination with city-wide benefit that celebrates Cambridge's relationship with water. Riverside unites Stourbridge Common and Midsummer Common through an elegant inclusive promenade that enhances community life, local heritage and ecological sustainability, and makes walking and cycling joyful experiences. We recommend that Riverside becomes its own Public Realm Improvement Area, focusing on Environment & biodiversity, Connectivity, Character, Heritage & identity, Safety & accessibility and Vehicular movement & parking.	203766 (Cambridge Green Party)
Riverside is a vibrant connected urban riverfront destination with city-wide benefit that celebrates Cambridge’s relationship with water. Riverside unites Stourbridge Common and Midsummer Common	204631 (M Cleminson)

through an elegant inclusive promenade that enhances community life, local heritage and ecological sustainability, and makes walking and cycling joyful experiences. It should become a PRIA focusing on Environment & biodiversity, Connectivity, Character, heritage & identity, Safety & accessibility and Vehicular movement & parking The existence of a Heritage Trail covering both Riverside and the Eastern Gate should be noted – highlighting the historical and cultural importance of both these areas. Please see attached information.	
The Riverside Area Vision sets out objectives for character, identity and heritage, connectivity, creating places that are safe, accessible and inclusive with three activation spaces and integrate the environment and enhance biodiversity. It needs careful planning and investment to make it safe and attractive for both pedestrians and cyclists, especially given predicted traffic increases from converging Greenways. We propose a community-driven review to shape a future Riverside Area Vision which highlights opportunities to make the area a vibrant attraction for Cambridge residents and visitors. Suggest - Proposals within the Riverside Area will be supported if they align with the Riverside Vision and emerging thinking on the area’s future potential as a strategic asset for the City as a whole.	211845, 211846, 211847, 211848, 211849, 211850, 211851, 211855, 211856, 211858 204440 (Riverside Residents Association)
I propose that Riverside should be designated PRIA for the following reasons: 1. It is a key link in the City's sustainable transport plans, as the entry point to Cambridge for three Greenways. 2. its unique stretch of urban riverfront that connects three green spaces and combines distinctive heritage assets with unspoilt river views. 3. Work is underway with GCP to realise the area's potential as a beautiful destination with city wide benefit.	204980 (A Sheedy)

The changes that are planned need to align with local plan policies and the only way to ensure this is to include it in the Local Plan.	
I welcome the draft policy for Mill Road and strongly support its focus on protecting independent shops and creating a safer, low-traffic, people-centred environment. These measures are essential to maintaining the area's distinctive character and supporting its long-term vitality. However, with the traffic filter now in place for several months and no accompanying public realm improvements yet delivered, I urge the Council to begin implementation promptly. Early action on pavements, crossings and streetscape upgrades would show commitment to the plan's aims and start bringing real benefits to residents and businesses.	200984 (F Sanchez Garcia)
I support The Cambridge Cycling Campaign submission. New developments must include adequate links to the surrounding area and links should be part of the Cambridge wide infrastructure without making longer journeys tortuous and complex. Provision should account for future growth in active traffic, climate change strategies and future developments	205009 (A Brown)
The public realm improvement areas should also offer the opportunity to achieve betterment through provision of SuDS and water reuse. Such measures are not implicit in the policy or subsequent site-specific policies, and we consider this should be positively expressed in this overarching policy.	210191 (Anglian Water Services Ltd)
We object that this policy does not include any reference to heritage (which is why we believe that a Historic Environment Strategy is required as part of the Local Plan).	202814 (Cambridge Past, Present and Future)
We welcome the general aims of this policy. Historic England focuses on using the power of heritage to secure vibrant and sustainable futures for places with historic character so that generations to come can continue to enjoy them. Our High Streets Heritage Action Zones have maintained, restored and brought	210121 (Historic England)

buildings back into use for local communities and businesses. See our Heritage Led Regeneration Toolkit | Historic England for further suggestions and case studies. We recommend that this policy should include provision for the re-instatement of historic shop fronts.	
I support The Cambridge Cycling Campaign submission. New developments must include adequate links to the surrounding area and links should be part of the Cambridge wide infrastructure without making longer journeys tortuous and complex. Provision should account for future growth in active traffic, climate change strategies and future developments	205009 (A Brown)
The Plan identifies specific locations as Public Realm Improvement Areas that would “benefit from a holistic approach to any future development that comes forward, to provide policy guidance for development that also improves public transport access and infrastructure delivery and seeks improvements to the public realm.” Those public realm improvements reference ‘place making’ over vehicle movement, especially at junctions.” That policy approach will need to be revisited in the light of the forthcoming Greater Cambridge Transport Strategy and any potential impacts the policy would have on the functions of the transport network.	205458 (Cambridgeshire and Peterborough Combined Authority)
There is strong support for embedding flood-alleviation principles into micro rain gardens and small parcels of land within new developments, such as spare or under-used corners. Their role in managing surface water and reducing flood risk should be made more explicit. There is also an opportunity to design small green spaces in ways that help residents understand and value their function in preventing flooding. A key question remains whether growth funding for this type of intervention will be distributed across Greater Cambridge as a whole or primarily targeted at areas experiencing new development.	211007 (Cambridgeshire County Council)

Part 1(c) of policy S/PRIA should be amended to clarify the reference to local shops, as it is currently not sufficiently defined and may not apply uniformly to all Public Realm Improvement Areas (PRIAs). Suggest: ‘help sustain or deliver facilities and amenities appropriate to function and character of the area’. The following would provide a more practical and flexible approach to guiding change while avoiding unnecessary additional policy layers: Part 3 should read “where proposals provide opportunities and potential challenges, site promoters should develop a steering document, approved by the planning authority as part of a planning application to promote and guide overall change during the life of the plan for the relevant area” Para 3.1.156 should read “it is recognised that while development can improve an area’s attractiveness it can also challenge the area’s character, in such circumstances site promoters are encouraged to develop a steering document to guide the area’s reconfiguration. Site specific policies requirements are also included, to highlight key local characteristics along with short and long-term opportunities and area aspirations that development should take account of as part of any planning application.”	204029 (Railpen)

Policy S/PRIA/CRP: Cambridge Retail Park

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were raised about protecting the strategic cycle route linking Riverside, the Beehive and Petersfield, and to safeguard land for a future bridge at Coldham's Common. Camcycle raised concerns about the lack of permeability.

Comments were made by local residents about specific improvements include a direct connection to Cambridge Railway Station, Chisholm Trail and bus services. Cam Skate requested to include leisure, and community uses in the policy wording.

Comments were made by local residents to improve design and heights and integrate with light rail network.

Further responses were made by Railpen on the alignment with nearby sites and the provision of infrastructure and a movement strategy.

Comments were made by Historic England about reflecting local heritage assets.

Response to the main issues raised in representations

The Councils' response to the issues raised in the draft Local Plan (Regulation 18) consultation includes:

- Suggested amendments have been in response to comments raised by Historic England.
- Wording has been added to the policy to protect the cycle route linking Rivers, the Beehive and Petersfield.
- Some of the Railpen suggestions have been incorporated into the policy wording where this aligns with the Council's approach to the site and the preparation of consistent policies.
- There are not currently plans for a future bridge at Coldham's Common and therefore the safeguarding wording has not been added to the policy wording.

- It is too premature to reflect any plans for a light rail network. The issue is currently being explored by the Cambridgeshire and Peterborough Combined Authority.
- Point 1a has been revised to include reference to leisure and community uses to address representations from Cam Skate.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Whilst there are no designated heritage assets within the site, there are two listed buildings on the other side of Newmarket Road – 247 Newmarket Road and Cambridge Gas Company War Memorial, both listed at grade II. Development within this area therefore has the potential to affect the significance of these assets including through development within their settings. We understand that there is no HIA for this as it is a Policy Area. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy.	210122 (Historic England)
It is essential we protect the strategic cycle route linking Riverside, the Beehive and Petersfield, as well as safeguarding land for a future bridge to Coldham's Common.	201999 (D Langley)
Development must protect the strategic cycle route linking Riverside, the Beehive and Petersfield.	202297 (R MacDonald), 202514 (H Brown), 202629 (A Lawrence), 202888 (J Williams), 203207 (G Orwell), 203322 (A Hoare),

	203344 (S Hughes), 203658 (V Ashton), 205150 (J Grantham), 205220 (K Brightwell), 205324 (R De Beaux), 205374 (S Nuttall), 205380 (A Williams),
The site should also safeguard land for a future cycle/pedestrian bridge to Coldham's Common.	202297 (R MacDonald), 205220 (K Brightwell), 205324 (R De Beaux), 205374 (S Nuttall), 205380 (A Williams),
Active travel needs to be prioritised from the outset, with provision for walking & cycling being mandatory.	203322 (A Hoare), 203684 (T Preud'homme)
Section 1.d and 1.e talk about active travel mostly within or around the site; it should also be a requirement for development to integrate with public transport for travel to and from the site. This is important as at present the area is poorly served by public transport. Specific improvements would be to ensure: Direct connection to Cambridge Railway Station; Direct connection to the Chisholm Trail; A wider range of Bus services, adding services perpendicular to Newmarket Road.	203585 (P Tribble)
Protect the strategic cycle route linking Riverside, the Beehive and Petersfield. Safeguard land for a future bridge to Coldham's Common. Requirement for the provision of trees along Newmarket Road and open space and amenity space. No/minimal parking provision.	202514 (H Brown) 20888 (J Williams) 203344 (S Hughes)

	203207 (G Orwell) 204562 (D Potts) 204590 (R Hoadley) 202629 (A Lawrence)
Expansion must unlock better walking, cycling and public transport for existing residents Limit car access between Cambourne and Cambourne North Set binding mode share targets Require early delivery of the main active travel network and crossings	202901 (J Williams)
Active travel needs to be prioritised from the outset, with provision for walking & cycling being mandatory. It should require provision of a protected, continuous and direct cycle route linking Riverside, the Beehive and Petersfield. It should also require safeguarding of land for a future pedestrian and cycle bridge across the railway to Coldham's Common	203322 (A Hoare)
Feel very positive with East gate ambitions and ideas. Will improve pedestrian and cycle access to Health and other facilities East/ West of roundabout. There is a need to ensure all current planning applications consider the ambition. Suggest cycle lanes and pathways should ensure they connect to current Newmarket road, (west side), ones which could be improved and greater use of Walnut Tree Ave made. If there is key development at Halfords site consideration needs to be given to impact on pedestrians and cyclists.	202289 (G Wrycroft)
Can this be part of a much wider masterplan that requires a significantly improved standard for building design (again incorporating the findings in neuroarchitecture) and also incorporating / making provision for a new rail/light rail stop at Coldham's Lane Bridge. A station at the bridge by the rail junction to the	203742 (A Carpen)

Cambridge-Newmarket Line would enable significant public transport access to the retail park, to the revamped Beehive sci-tech development, and to the Abbey Stadium, as well as for residents of NW Romsey. See https://cambridgetownowl.com/2023/07/15/why-the-beehive-redevelopment-plans-need-a-rail-station/ note it would enable closer rail access to the Grafton.	
Recommends amending part 1(b) of policy S/PRIA/CRP for clearer integration objectives with the Beehive Centre and the surrounding neighbourhoods; For part 2(a and c), Railpen suggests replacing 'policy framework' with 'steering document(s)' for practicality and clearer urban relationship guidance. In part 3(a and c), Railpen highlights the need to acknowledge the railway line in east-west connections and remove ambiguous references to the Greater Cambridge Partnership. Railpen requests clarity on the 'overarching development and environmental strategy framework' in para 3.1.159, proposing a reference to a 'steering document' instead. Provides detailed wording suggestions.	204083 (Railpen)
The land use should retain retail and ensure that cars can still access the site and not focus too much on active travel and public transport.	203801 (A Chan)
The Retail Park is presently of low quality as public realm, is dominated by car parking and is unattractive for pedestrians. I would support sensitive development (including retail, food, etc) to increase the amenity of the site; and efforts to make it safer and more pleasant as a through route for pedestrians.	205067 (N Spenley)
As with Beehive, the site at Coldham’s Lane, Newmarket Road and Henley Road are close to residential properties including Silverwood Close, New Street which are impacted by the Beehive.	205474 (B Smith)

Height Mers here as does overcrowding, which is not made sufficiently clear, nor is the reduction of traffic (pre-planning discussions showed two multi-storey car parks). Care must be given to traffic on Coldhams Lane which has increased since Mill Road bus gate was introduced. In summary the Local Plan must protect homes from the problems of obfuscation and height that have arisen during Beehive planning applications.	
No mention of community, sports, leisure, culture or creative hubs within the policy which we see as integral to supporting the vitality of this area given its city centre location.	210562 (Cam Skate)
Cambridge Retail Park is one of the most car-dominated sites in the city, yet it sits between dense residential areas and along key walking and cycling desire lines. Its redevelopment is a critical opportunity to reduce short car trips and address fragmented networks. The Plan refers to improving permeability through the site but does not explain how this will be achieved in a location defined by railway severance. Policy S/AMC/BC should be amended to include: ● A requirement for a protected, continuous and direct cycle route through the site that avoids conflict with turning vehicles and aligns with strategic desire lines; ● A requirement to safeguard land and secure delivery mechanisms for a future pedestrian and cycle bridge across the railway to Coldham's Common; and ● A requirement that permeability for walking and cycling is mandatory rather than encouraged, with multiple direct connections beyond the site boundary.	209082, 209083, 209084 (Camcycle)

Policy S/PRIA/EG: Eastern Gate

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments received focused on two main areas.

St Matthews Centre, Sturton Street, Cambridge was identified in previous HELAA assessments, causing concern for future impact on the community if it was to be considered. Comments requested not to allocate the site, siting the importance of the local amenity space, and previous planning refusals.

Ther were a large number of comments supporting the Elizabeth Way bridge and Underpass(es) cultural hub project. There were objections to the demolition of the roundabout and underpass, opportunities to create a cultural hub, with better connectivity for active travel, space for cultural activities, and an improved urban environment.

There was a suggestion to widen the boundaries, both north to Riverside and west to include the entire ARU Campus along both sides of East Road, and to include locations like Mercers Row, or to extend to the riverside.

Comments supported the re-establishment of the historical local centre and high street function of Newmarket Road, with a range of attractive shop fronts, cafes and restaurants.

Historic England highlighted the historic environment issues in the eastern gate area that would need to be considered. Other comments said that the neglected heritage of the area must be revived and become available for use by the community and wider public.
Railpen sought a change to the current policy wording of part F, as integrate positively with the adjacent areas is not sufficiently clear or measurable as a policy objective.

Response to the main issues raised in representations

St Matthews Centre, Sturton Street, Cambridge was not allocated in the Draft Local Plan but was identified in previous HELAA assessments. Whilst the HELAA sets out the reasons for assessing the site on the grounds of suitability, availability and achievability, the HELAA Red scores are noted, and the site has not been put forward in the Proposed Submission Local Plan.

Responses highlighted an opportunity to explore the extension of the policy area (PRIA/EG) to incorporate Elizabeth Way up to and beyond the river. The objectives would be consistent with the wider plan objectives and context of policies related to WS/CH: Cultural and creative hubs, Policy J/AW: Affordable workspace and creative industries, Policy BG/EO: Providing and enhancing open spaces, Policy GP/QP: Establishing high quality landscape & public realm, Policy CC/SD: Sustainable development and the climate emergency, Policy WS/CF: Community, sports and leisure facilities, and Policy I/ST: Sustainable transport and connectivity.

Proposals set out by The Underpass Project, including the Founding Principles are recognised as seeking to revitalise and improve the PRIA, and align with the proposed policy. Whilst the Local Planning Authorities are supportive of the objectives outlined for the project, the PRIA is currently the appropriate type of allocation to achieve the aspiration of the policy and enable opportunity to secure funding and other initiatives through community engagement and participation with stakeholders. The boundary of the policy

area has been amended to reflect the boundary identified as opportunity for improvement within The Under Pass Project, and wording has been amended to incorporate further benefits of the area including improving access to culture offers, providing spaces for creative arts, improving the public realm amenities and landscape, biodiversity and improving health and wellbeing.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
St Matthews Centre, Sturton Street, Cambridge (HELAA Reference 59405) Would be a disaster for this community. Site was given an Overall Score of 'Red'. The exclusion of the site must be permanently enforced. That will protect our vital, extremely limited and increasingly pressurised local amenity space - noting St Matthew's Piece as the only public park in North Petersfield. Unambiguous evidence of this need lies in the sequence of five Planning Refusals since 2021 (none appealed), each pertaining to this area: 25/0432/TTPO, 24/0413/TTPO, 23/0119/TTPO, 22/0271/TTPO, and (most significantly) 20/04514/FUL.	201191 (K Herron), 201192 (R Isaacs), 201193 (J Linney), 201194 (S Bjornson), 201195 (A Lindsay), 201196 (B Smith), 201198 (S Schofield), 201199 (L Kirsop), 201200 (N Adamson), 201201 (B Greig), 201202 (C Horne), 201204 (S Cracknell), 201205 (S Moss), 201206 (G Glover),

	201207 (G Archer), 201209 (B Sylvester-Bradley), 201210 (J Selby), 201211 (R Williams), 201212 (J Chapman), 201213 (P Salin), 201215 (U Stubbings), 201216 (E van Zwanenberg), 201217 (G Haraldsdottir), 201218 (D Schwarz), 201219 (H Schwarz), 201220 (S Salin), 201257 (A Erdil), 201259 (I Harvey), 201262 (L Tubb), 201263 (R Mills), 201264 (C Spooner), 201265 (F Lyall Grant), 201329 (L Franks),

	201401 (J Wright), 201423 (C Aman), 201427 (J Bradley), 201454 (T Neal), 201469 (Cllr R Robertson), 201513 (B Greig), 201741 (J Johnson), 201743 (J Johnson), 201816 (K Russull), 201879 (R Rozier) 203768 (Cambridge Green Party (R Comins, Research Officer)) 203600 (N Glegg) 202935 (Cambridge Glenys Self) 203420 (Federation of Cambridge Residents' Associations (W Blythe)) 201359 (JV Neal), 201187 (J Neal), 201188 (L Kelly),

	201189 (J Murphy), 201190 (B Cijffers), 201270 (D Storey), 201271 (C Carpenter), 201273 (J Ladlow), 201285 (C Douglas), 201289 (J Wickerson), 201290 (Cambridge glenys self), 201291 (Cambridge GRT Solidarity Network), 201292 (J Connett), 201320 (J Davey), 201328 (J Franks), 201553 (H Phillips), 201840 (G Kent), 201866 (J Hurst), 201960 (P Watson), 201965 (A Furlong), 205573 (J Ord), 205654 (S Buckingham), 207648 (Duxford PC)
Any planning should preserve the existing green space and prevent the felling or reduction of trees on St. Mathews Piece, with a defined exclusion zone to mitigate potential impacts on nearby buildings. The proposed density of developments appears incompatible with policies regarding green space,	202529 (A Brown)

biodiversity, and tree canopy. Developments in the Eastern Gate zone must not exacerbate traffic issues on New Street, which currently serves as a shortcut between Newmarket Road and East Road.	
Part of this site lies within the Riverside and Stourbridge Common Conservation Area. There are also several grade II listed buildings including the Church of St Andrew the Less, 247 Newmarket Road and Cambridge Gas Company War Memorial. There are numerous listed buildings nearby. Development within this area therefore has the potential to affect the significance of these assets including through development within their settings. We understand that there is no HIA for this as it is a Policy Area. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy. We welcome criterion 2c and paragraph 3.1.162.	210123 (Historic England)
The boundaries of the Eastern Gate area are inappropriate. They fail to recognise the integrity of the Riverside neighbourhood area, which includes all streets from Riverside south, such as Abbey Road, Riverside, Priory, Saxon and Beche Roads, River Lane, and the CHS estate. But even more strange, there is no discussion of the ARU campus. The recent acquisition of the Mackays site on East Road suggests that a Master Plan is needed, either within or separate from the Eastern Gate. Widen the boundaries significantly, both north to Riverside and west to include the entire ARU campus along both sides of East Road.	201794 (Cambridge Group of the Ramblers, J Tuffnell, Secretary)
Support S/PRIA/EG Elizabeth Way bridge and Underpass(es) cultural hub project: I support this project. I object to vehicle-led transport strategies and oppose the demolition of the roundabout. I support safer, better connectivity for pedestrians/cyclists and a multi-disciplinary urban	201991 (Skateboard Cambridge CIC (P Elbro, Director)

design strategy which: Creates a cultural hub in and around the infrastructures for cultural, recreational and commercial use, coordinates Transport and bus lanes with urban realm design, encouraging pedestrians/cyclists desire lines N/S towards the river, and promotes a sense of place with priority use for residents and visitors.	204228 (A Giarlis) 204229 (NEUBAU Architecture Ltd B Lenz, Architect) 204336 (K Fisher) 204009 (L Cooke) 204352 (K Fisher) 204388 (K Fisher) 204245 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204212 (L Cooke), 205243 (University of Cambridge)
S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I support proposals that seek to increase and intensify planting and biodiversity within the S/PRIA/Eastern Gate. This includes areas above and adjacent to the Elizabeth way bridge, landscaped areas within the East Road underpass, and improvements along the Newmarket Road, including new hedges and trees planted to separate pedestrians and cyclists and other active transport users, from cars. This is a very recent project (2025), and I support development within the designated S/PRIA/EG of a Cultural Hub offering	204321 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204431 (K Fisher), 205265 (University of Cambridge)

accessible Community-led Cultural, recreational and commercial uses, to promote a sense of place and identity for the Elizabeth Bridge, Underpass(es) and environs.	
Support regeneration of the bridge and adjacent underpasses within the S/PRIA/EG With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I support proposals that seek to regenerate and open for use, the empty storage facilities underneath the Elizabeth bridge and within the underpasses. This would enhance the area's vitality and use and benefit from the existing pedestrian and cyclist footfall along the river promenade.	204320 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204430 (K Fisher)
The St Andrew the Less Community Project supports plans for improvements to the Eastern Gate and encourages an addition: 1.g. celebrate and enhance the existing heritage, recognising that heritage can increase pride in place and connectedness for communities. The heretofore neglected heritage of the area must be revived and become available for use by the community and wider public. The development of a heritage trail will also contribute to the vibrancy of this area and Riverside.	204739 (NEUBAU Architecture Ltd (B Lenz, Architect) 204549 (The St Andrew the Less Community Project) 204825 (A Sheedy)
I strongly support the re-establishment of the historical local centre and high street function of Newmarket Road, with a range of attractive shop fronts, cafes and restaurants. Making the road a single carriageway and tree line promenade should be considered and linking previous historical north-south crossings.	204882 (A Sheedy)
The Eastern Gate area should be extended to Mercers Row, to include the historical streets of Oyster Row, Garlic Row and should do everything to return these streets to residential streets and eliminate the rat run from commercial vehicles.	207546 (A Sheedy)

Proposed site plan of S/PRIA/EG - extend the red line boundary I support the variation / extension of the red line boundary to include the East Road Roundabout ‘Underpass’ and also the whole of the Elizabeth Way bridge (above and below) incl adjacent public realm, landscaped areas and highways, North and South of the river Cam (Walnut Tree Avenue, Cutter Ferry Path, Cutter Ferry Close a.o.) (as submitted by the Elizabeth Way bridge and Underpass(es) project)	204426 (K Fisher)
Support Safer and more comfortable travel: I support any improvements to create a more comfortable and simplified pedestrian movement along the Newmarket road/East Road/Elizabeth Way and roundabout, prioritising pedestrians and cyclists, providing safer junctions and analysing desire lines for better connectivity between adjacent wards and the river.	204409 (K Fisher) 204303 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead))
I do not support the planned demolition of the underpass, and it was rejected by a majority of respondents (refer to GCP public consultation process) Demolition is not a viable or sustainable solution for the transport problems. I support alternative options brought forward which would regenerate the infrastructure and coordinate it with other as-found 70s leftover spaces, creating a public realm and cultural hub with better access and manoeuvrability for pedestrians and cyclists to move between the adjacent wards and the river.	204273 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204384 (K Fisher)

Oppose plans to demolish the Newmarket Road and East Road and underpass: I object to any plans proposing the demolition of the East Road Roundabout underpass, which would be an unsustainable loss of a public space. The underpass contains a thriving biodiverse landscape and also has great potential for adaptation as a public common, to include active landscaping, street furniture, skating, exhibitions, workshops and other cultural and public engagement.	204311 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204423 (K Fisher)
Oppose plans to demolish the Elizabeth Way Roundabout, which would be an unsustainable loss of a public space. The underpass contains a thriving biodiverse landscape and also has great potential for adaptation as a public common. We support the Underpass and the Elizabeth Way bridge cultural hub project, supporting proposals that seek to regenerate and open for use, the empty storage facilities underneath the Elizabeth bridge and within the underpasses. This would enhance the area's vitality and use and benefit from the existing pedestrian and cyclist footfall along the river promenade.	203767 (Cambridge Green Party (R Comins, Research Officer))
Support proposed extended site plan S/PRIA/EG I support a phased approach to planning, build and operations which seeks to address the imminent transport issues as a first priority. Following this, any plans should accommodate active modes of transport within the proposed multi-disciplinary urban plan, which seeks to re-imagine this area within the S/PRIA/Eastern Gate as a cultural hub. (as submitted by the Elizabeth Way bridge and Underpass(es) project)	204317 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204427 (K Fisher)
Support gateways / entry points to residential neighbourhoods: I support any improvements to create an urban gateway/sense of arrival in the city via the Elizabeth Way and the Newmarket Road. I support a	204308 (Cambridge Junction / Create Cambridge (M

change in perception of the hierarchy between cars and other transport users, contributing to lower speeds and improved safety and visibility for pedestrians and cyclists, elderly residents and children.	Burman, Artistic Director & CEO / Co-lead)) 204410 (K Fisher)
Comment 1c - public realm improvements: I strongly support public realm improvement that will generate a sense of place and safety including lighting, street furniture and new urban programme and uses for this neglected area.	204367 (K Fisher)
Comment 1e - better visual and physical connections: I strongly support better connectivity and signage/ wayfinding for residents and visitors. Active and landscaped transport networks linking adjacent wards with the river will help regenerate neglected pockets within the urban realm, making them accessible for public use.	204373 (K Fisher)
I support the development of a cultural Hub within the designated PRIA, offering a mix of accessible programmes and open access active space in the public realm, particularly on, in and around the Elizebeth Way Bridge. The area has its own identity and is well used, the architecture is of historic significance and many of the spaces are unique. I am in favour on introducing space for community sports and cultural programming alongside the development of some of the existing active transport link and better connections both East/Wast and North/South. I am in favour of keeping the underpass. Issue not raised previously. we are in desperate need of community, youth and arts spaces as well as workshops, storage and experimental space for supporting the city's cultural life. The Elizebeth Way Bridge and Underpass has a range of unique spaces within and around its structure that have the potential to transform access to arts and culture across the North and East of the city. Especially if these are run in conjunctions with existing arts events and organisations.	204294 (T Woodcock)

Vehicular Traffic along Newmarket Road and East Road and underpass: I support the redevelopment of Newmarket Road pedestrian and cycle paths, and the adaptation of Elizabeth Way underpass as a public common. I support the re-design of the car-dominated transport roundabout to include cycle lanes and four required pedestrian & cyclist crossings, which prioritise pedestrians and cyclists and integrate practical and desired lines for better N/S and E/W connectivity.	204300 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204407 (K Fisher)
Better connectivity: I strongly support better integration of pedestrian and other active transport modes with this car-dominated infrastructure, as well as prioritising pedestrian and cyclist desire lines	204255 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204364 (K Fisher)
support: Comment relating to an urban design led approach to S/PRIA/EG with reference to the Elizabeth Way bridge and Underpass(es) cultural hub project, I strongly support an urban, multi-disciplinary design led approach which seeks to resolve transport issues with a comprehensive strategy that integrates transport with urban disciplines. Any design proposals should respect the conservation character of adjacent wards and offer sustainable solutions to re-invent the neglected 70s infrastructure.	204297 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204403 (K Fisher)
On site provision of functional public spaces and nature: with reference to the Elizabeth Way bridge and Underpass(es) cultural hub project, development proposals should use S106 or other public funding opportunities to improve on the type and diversity of public realm spaces allocated for spontaneous and non-programmed outdoors recreation, regenerating leftover or neglected highways and public spaces and other opportunities for hard landscaping, as well as re-introducing nature, suds and raingardens.	204293 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead))

Shared highways surfaces should prioritise use for active modes of travel and encourage active engagement from a diverse local community, by increasing street furniture for seating, creating opportunities for urban sports and active landscapes, to encourage integration of young people and to promote an active, outdoors lifestyle. The needs addressed should reflect the demands of local residents and local businesses, in order to generate a local neighbourhood public realm strategy, reflecting a diverse resident demographic.	205260 (University of Cambridge Z Svendsen, associate professor) 204400 (K Fisher)
Support: public realm improvement area opportunity: with reference to the Elizabeth Way bridge and Underpass(es) cultural hub project, I support the regeneration and transformation of this neglected transport infrastructure, to realise the potential of underused spaces for sustainable redevelopment, and to provide much needed community, cultural and sports uses. This should include a range of ages and users including skate friendly seating, natural shelter, bicycle parking, increased street lighting and active landscapes, access to water as well as safe facilities particularly for women including toilets within F+B offerings.	204290 (Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead)) 204396 (K Fisher)
support: Comment point 3 - urban design led character appraisal: with reference to the Elizabeth Way bridge and Underpass(es) cultural hub project, I support the group's intent to adapt a multi-disciplinary approach to public realm improvements and place making. I strongly encourage the integration of pedestrian and cyclist desire	204287 Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead) 204391 (K Fisher)
support: Comment 2d - pedestrian comfort: From a transport perspective, there is currently no direct or safe way to cross N/S or E/W along the Elizabeth way bridge and roundabout, difficult to gain access to the river other than residential neighbourhoods. I strongly support development that seeks to integrate	204284 Cambridge Junction / Create Cambridge (M

and prioritise desire lines for pedestrians, cyclists and other active modes over vehicular transport, creating a safer transport hierarchy.	Burman, Artistic Director & CEO / Co-lead) 204390 (K Fisher)
support: Comment 2c - re-modelling access to the East Road underpass: The East Road underpass is large at approx. 1,450m2 in area and comprises one-third landscaped areas and mature trees. Designs for the underpass should intensify landscaping and biodiversity, make material improvements of hardscape areas, to allow for active urban sports and flexible-use street furniture, supporting future use as a public square/common.	204279 Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead), 205253 (University of Cambridge)
support: Comment point 1d - new public spaces: with reference to the EW bridge and Underpass(es) project, I support the group's intent to adapt the East Road Underpass pedestrian & cyclist infrastructure as a public common and cultural hub.	204257 Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead) 204370 (K Fisher), 205248 (University of Cambridge)
support: Comment 1f - business and retail parks adjacencies: I strongly support the regeneration of the Elizabeth Way bridge and Underpass(es) as they have potential to provide synergies and also alternatives to commercial programme in the neighbourhood retail parks. There is a strong case for a sustainably integrated, affordable community and cultural hub appropriately placed within the urban context of the riverside promenade and transport infrastructure.	204260 Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead) 204377 (K Fisher)
support: Comment 2a - restore the balance between people and vehicles: I strongly support better links and a transport strategy prioritising pedestrians and cyclists with the East Road/Elizabeth	204265 Cambridge Junction / Create Cambridge (M

Way/Newmarket Road approach routes and the Roundabout including under passages, there are currently no concessions made to prioritise local, active transport and negotiating the current vehicular traffic condition can be considered dangerous.	Burman, Artistic Director & CEO / Co-lead) 204381 (K Fisher)
support: Comment point 1a - - character of the area - East Road/Elizabeth Way roundabout: The East Road Roundabout, situated within the Eastern Gate area, is known to be a major high-traffic access node - it is well positioned to promote a ‘sense of arrival’ in the City (currently a neglected asset). I support efforts to mitigate the negative impact of vehicular transport, to prioritise access and connectivity for pedestrians, cyclists and other forms of active transport, and to activate the pedestrian underpass as a public space giving it a new identity.	204252 Cambridge Junction / Create Cambridge (M Burman, Artistic Director & CEO / Co-lead) 204359 (K Fisher)
With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, the project sits in catchment area of 5 adjacent wards, connected by a shared infrastructure link, the Elizabeth Way bridge and related underpasses. The area sits within a public realm improvement area with potential to adapt leftover indoors and outdoors spaces for cultural and sports programmes, which would work well in line with the Cambridge tradition of skating and urban skating, providing indoors and outdoors recreation and youth engagement.	205113 (M Cleminson)
Support: principles of sustainable development / retention of concrete infrastructures in a climate emergency: with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project. Object to proposals to demolish the Underpass, proposals were rejected during the 2023 consultation. It would cause unnecessary disturbance and high-carbon emissions to backfill and level the underpass drum 70’s transport infrastructure which contains existing biodiversity and has proven potential as an inviting public square. Support minimal environmental footprint / maximum impact	204269 (A Giarlis), 204393 (NEUBAU Architects),

redevelopment of the as-found underpasses and under crofts, greening of the public realm in and around the transport infrastructure.	
Reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project. I support the designation of this asset as a noteworthy architectural asset, albeit where the asset should be championed through regenerative and community-focused practices. The space is currently undervalued and transition experiments such as the 'Out of the dark' urban light show showcased an alternative, community-led and culturally advancing use for the space. Attention should be paid to how the cultural economy of such an asset can be utilised, with a designation and allocation for cultural use in the Local Plan being the first step.	204495 (T Ziromskas)
This is desperately needed but must develop the spaces in response to the developing needs of the growing community and particularly with the responsive development of cultural facilities for young people, creatives, families and actives travellers. Many of whom are already developing innovative ways of utilising existing spaces. It is important that a top down solution is not imposed by 'consultants'. There are organisations working around the Underpass/Under croft project that are far better suited to develop responsive and user led solutions. I object to vehicle-led transport strategies and oppose the demolition of the roundabout.	204678 (T Woodcock)
When considering the Elizabeth Way roundabout development as part of Eastern Gate please look at cycleway markings needed on Newmarket road/Sun Street (West approach) access points and improved signage for cyclists who want to use Walnut Tree Avenue to get to Riverside cycleway. Also, for cyclists joining this junction from Walnut Tree Ave. This access point should be improved to make it	202002 (T Jewell)

the attractive option for pedestrians and cyclists over what is poor condition paving by Halfords and poor signage. The underpass is currently a safer option to cross over.	
Railpen supports the policy and its reference in Part 1 to the Beehive Centre and Retail Park and how the Eastern Gate area and adjoining or nearby sites can collectively deliver a greater beneficial impact to the local area. Railpen requests an amendment to Part 1 (f) of policy S/PRIA/EG as currently worded below: f. integrate positively with the adjacent Cambridge Retail Park (Policy Ref. S/PRIA/CRP), Beehive Centre (Policy Ref. S/AMC/BC), Fitzroy/Burleigh Street/Grafton Area (Policy Ref. S/AMC/FBG) and surrounding neighbourhoods. References to ‘integration’ is not sufficiently clear or measurable as a policy objective.	204092 (Railpen)
The boundary of the Eastern Gate PRIA does not include Riverside. I suggest this should be designated as a PRIA for the following reasons: (i) It is a key link in the City’s sustainable transport infrastructure, as the entry point to central Cambridge for three Greenways; (ii) It is a stretch of accessible urban riverfront that connects three green spaces with distinctive heritage assets with unspoilt river views; (iii) GCP are working to create a vibrant destination with city-wide benefit; (iv)It is adjacent to Eastern Gate PRIA and Areas of Major Change, with development proposals with major implications	205173 (M Evans)
About points 2a and 2b. You just hate car drivers. Soon all cars will be electric, but you will still hate car drivers. It is your fault if we have congestion in Cambridge, as you want to greatly expand the population and the city can't cope with it. Sustainable development means very limited development, and you just can't get your heads around that. You have been completely captured by Camcycle -- their utopia is a paradise for able-bodied single people who live near to the centre and never have to carry bulky loads or multiple children with them.	201232 (S Williams)

The Draft Local Plan acknowledges issues of vehicular traffic dominance and accessibility around the Elizabeth Way roundabout but fails to address the condition of Elizabeth Way itself, a key corridor linking North and East Cambridge to the city centre. Residents report safety concerns on Elizabeth Way, including near-misses for parents with young children, speeding traffic, and cyclists being forced onto pavements due to disappearing cycle lanes. Speeding and red-light running are prevalent issues, exacerbated by the confusing multi-lane layout, which residents believe encourages aggressive driving. There is strong support among residents for reducing Elizabeth Way to two traffic lanes with narrower carriageways to help calm traffic and improve safety. Cycle provision is inconsistent and unsafe, leading to conflicts between cyclists, pedestrians, and fast-moving traffic, with pedestrians often forced off pavements. Residents view Elizabeth Way as one of the most dangerous roads in the city, a result of outdated design prioritising cars, and express a desire to engage in discussions to enhance safety and liveability.	201910 (A Rahman)
This policy is good as far as it goes, but should bring out the important foci for the area. - as a high street for Riverside - as a cultural hub project for the Elizabeth Way Bridge and Underpass - as a revived space for Heritage, particularly celebrating the 13th century church of St Andrew the Less I attach details on all of this.	203004 (M Cleminson)
Please include content on references to developments/discoveries in the field of neuroarchitecture, require Health Impact Assessments to cover the mental stress generated by certain building designs and styles.	203698 (A Carpen)

Please include something about outstanding/iconic buildings for the corner of East Road / Newmarket Road - a huge opportunity for something that is not a dull box.	
The benefits of redevelopment and opportunities to enhance the Eastern Gate are well established and supported. The policy should be more positively phrased in respect of the benefits of development opportunities. However, there is one point of concern within this policy, specifically 'Studies will also be required to justify proposed land uses floorspaces and their redevelopment on a proposal-by-proposal basis'. This is a somewhat 'anti-development' approach, albeit likely inadvertent. It would be constructive if the policy cross referenced that such justification is not required where there is separate policy support for stated uses (i.e. education development as set out in draft policy J/FD).	203996 (Anglia Ruskin University)
RARA seeks to re-establish the historical local centre and high street function of Newmarket Road for Riverside residents, with attractive shop fronts, cafes and restaurants. Making the road a single carriageway and tree-lined promenade should be considered for this currently run down and pedestrian-unfriendly stretch. Please rephrase point 2b to start: "prioritise a pedestrian-led movement hierarchy which emphasises." as in Policy GP/QP. We support point 2c to re-establish the historic route and visual links between Occupation Road and Abbey Road. Please also add to 2c "and the former pedestrian connectivity between Coldham's Lane and River Lane." (photo attached).	2034447 (Riverside Area Residents Association), 205182 (M Evans)
There is a risk of much of this area becoming a heat island. Priority should be given to increasing tree cover, public open space and wildlife corridors. Land currently built on or tarmaced over (for example	204824 (R Randall)

underused garages or little used buildings) should be designated for parks/open space/nature reserve areas. Permission should be refused for anything which might damage existing trees or open space.	
☑ non-designated heritage asset with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project, I support retention as a noteworthy 70's Heritage asset. In 1950 the architect / town planner Lord William Graham Holford produced a report for Cambridge County planning, proposing a comprehensive road framework the scale of which was unprecedented in the history of Cambridge transport planning, leading to construction of the infrastructure in 1969. This introduced environmental and social challenges to the local residential area. ☑ I support regeneration and re-use of the EW Bridge and underpasses as a pedestrian/cycle friendly, cultural hub.	205057 (M Cleminson)
With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, I support the re-design of neglected pockets of the public realm using a multi-disciplinary approach. The East Road underpass provides a benchmark opportunity for integrating public art and engagement events. It presents a microclimate with existing biodiverse planting and has potential to be more green and provide opportunities for temporary art installations. Development proposals should use S106 or other public funding opportunities to improve on the type and diversity of public realm spaces allocated for spontaneous and non-programmed outdoors recreation, as well as promoting biodiversity.	205188 (E Nowak)
I recommend that the Riverside area is (a) either added to the Eastern Gate Improvement Area, or preferably (b) becomes an Improvement Area of its own. Riverside presents many opportunities: making a pedestrian boulevard along the length of the river, providing an attractive and safe	205526 (D Spiegelhalter)

environment for cycling, enhancing the area underneath Elizabeth Way Bridge and outside the industrial history museum, encouraging biodiversity and wildlife both in and beside the river itself.	
support: Point 2i - support ‘local labour’ promoting and retaining local talent and skills: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I support local labour and the provision of workspaces for local SMEs to promote Cambridge local small to medium size businesses and start-ups through affordable space provisions including Artists workshops, makerspaces, exhibition spaces, shops a.o. as well as offering apprenticeships.	205276 (University of Cambridge)
Support for Policy S/PRIA/EG is expressed, with a request for it to explicitly recognise Elizabeth Way as a key strategic corridor requiring comprehensive planning beyond just the roundabout. The respondent highlights a critical gap in the Plan's analysis, noting that it focuses on the roundabout while neglecting the strategic importance of Elizabeth Way for connectivity. Concerns are raised regarding the historical context and transport issues affecting the entire Elizabeth Way corridor, which limits pedestrian and cyclist safety. The respondent suggests that the policy should extend its scope to address the scale, layout, and design of Elizabeth Way, promoting a comprehensive strategy for safety and community reconnection. A modification to Policy S/PRIA/EG is proposed to ensure it aligns with the Plan's sustainability, accessibility, and community cohesion objectives, providing clearer long-term direction.	205472 (Cambridge City Council (Cllr J Dalzell))
The introduction of new at-grade crossings along Newmarket Road conflicts with the need for bus priority, suggesting a need for either subways and bridges or a re-evaluation of the bus-based strategy.	207390 (Cambridge Past, Present and Future)

S/PRIA/HRRS: Hills Road and Regent Street Corridor

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made by Trinity Hall to include Bateman House as a site allocation. Comments were made by North Newton Residents Association about widening pavements. Further responses were made by a local resident to ask for a masterplan for the area and have consideration for children and the late night economy. Comments were made by Historic England about reflecting local heritage assets and preparing a HIA.

Response to the main issues raised in representations

The Councils' response to the issues raised in the draft Local Plan (Regulation 18) consultation includes:

- In response to Historic England, the suggested amends have been made to the policy. As this is a policy area a HIA has not been prepared for this area.
- Point 2 of the policy has been amended to include wider pavements in response to the North Newton Residents Association.
- Due to the scale of this site allocation a masterplan led approach is not appropriate across the whole policy area, this policy area sets out key principles to guide development in this area to improve the public realm for children and for the late time economy by improving the public realm and making it safer.
- Bateman House has not been allocated as a site allocation because it is next to the Botanic Gardens and a Conservation Area which are quite significant constraints for any redevelopment. A pre-application should be able to resolve these issues and suggest a way forward for this site.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
82-90 Hills Road Cambridge Trinity Hall supports policy S/PRIA/HRRS, which aligns with the objectives of Cambridge Local Plan 2018 Policy 25 that identifies 82-88 Hills Road as an allocated site for improvements. An updated version of 2018 local plan allocation M5 should be added to Chapter 3 of the draft Local Plan, crucial for enhancing the Hills Road/Regent Street Corridor.	202787 (Trinity Hall)
The quality of architecture in these area needs to be improved.	203696 (A Carpen)
6c - needs clear statement that wider pavements are required the length of Hills Road, from Station Road to Regent Street, in line with improvements proposed in 6a (Regent Street). Footfall from the railway station to the city centre is high; improvements proposed in the 2018 Local Plan have not been implemented. This key route into the city for residents & visitors requires a) reduction in traffic and the space given to it and b) focus on local businesses & public realm so that Hills Road returns as the 'high street' for Newtown & Glisson Road residents as it was.	205179 (North Newtown Residents Association)
The Policy Area lies within New Town and Glisson Road Conservation Area and the Central Conservation Area. There are numerous listed buildings along Regent Street and Hills Road, including the grade I listed Downing College and Church of Our Lady of the Assumption and the English Martyrs, the grade II* Wanstead House and grade II listed St Pauls Church and there are numerous grade II listings. The Botanic Gardens is a grade II* Registered Park and Garden. Development within this area therefore has the potential to affect the significance of these assets including through development	210124 (Historic England)

within their settings. There is no HIA for this as it is a Policy Area. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy. The Policy should make more reference the role of heritage in the re-vitalisation of retail areas.	

Policy S/PRIA/MC: Mitcham’s Corner

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made by local residents about the removal of the gyratory at Mitcham's Corner and use of this as public space. Further responses were made by Sport England to reflect the integration of active design principles. Comments were made by Historic England about reflecting local heritage assets. Comments were also made by local residents about the bias against cars.

Response to the main issues raised in representations

In response to comments received, Amendments have been made as per Historic England’s suggestions. In terms of the comments from Sports England, the reference has not been included because it is not specific to this public realm improvement area these active design principles. The policy area can set ambitions for the public realm improvement but not specific interventions in the transport network, this is the role of the highways authority.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
4a and 4b -- you just hate car drivers. Cars don't drive on the pavements and pedestrians don't walk on the road, so their needs are perfectly well-balanced already, thank you	201233 (S Williams)

We are keen to see the removal of the gyratory at Mitcham's Corner, for the traffic volumes to be kept to an absolute minimum and for as much promotion of walking and cycling as possible. There is great potential for this to become an excellent public space. The ugly gyratory is well beyond its "sell-by-date". Despite the gyratory's existence, there is already a burgeoning community. Removal of more traffic will further encourage this and could provide Cambridge with another place and neighbourhood that it is proud of	201304 (M Bleazard)
Mitchams corner needs a complete redesign, prioritising people over cars, and with as many homes, shops and restaurants etc as possible.	203583 (H Thomas)
The Policy Area lies within Castle and Victora Road, De Freville and the Central Conservation Area. Development within this area therefore has the potential to affect the significance of these assets including through development within their settings. We understand that there is no HIA for this as it is a Policy Area. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy.	210125 (Historic England)
Sport England encourages the integration of Active Design principles, or alternatively reference to our Active Desing Guidance, to maximise opportunities for physical activity.	209220 (Sport England)

Policy S/PRIA/MR: Mill Road

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was broad support for the policy from local residents, although concern was raised about bias against cars in the policy wording. Comments were raised about needing more bus routes. A comment suggested plans for pedestrianisation should go further. It was stated that there is no mention of trees, nature or greenery, and that more sustainable drainage and more green public space is needed. Historic England highlighted the importance of considering local heritage assets. Kings College considered the policy repeated other policy requirements.

Response to the main issues raised in representations

Amendments have been included to address representations from Historic England and local residents about heritage assets. It is the role of highways authority and wider transport strategy to manage bus routes. It is an important role of the local plan to support active travel. Point 3c of the policy has been added to reflect greening and sustainable urban drainage. The Transformation Project is noted, however it is not appropriate to include this in the policy wording. The principles of improving the public realm and the high street are reflected in the policy wording.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for the policy.	200981 (M Lucas-Smith), 201279 (F Samuel), 205267 (A Williams), 205466 (P Lythgoe)
Concerns raised about bias against cars in the policy wording.	201234 (S Williams)
Plans for pedestrianisation of Mill Road needs to go further.	201279 (F Samuel), 203808 A Chan)
Safety of pavements is an issue so support the policy.	201715 (K Mak)
A new public use should be found for the Old Library.	202824 (Cambridge Past, Present and Future), 205327 (J Preston)
Need to specifically mention preservation or enhancement of the Conservation Area.	205327 (J Preston)
Parts of the Policy Area lies within the Mill Road, Newtown and Glisson Road and Kite Conservation Areas. It includes part of the Mill Road Cemetery – a grade II Registered Park and Garden as well as the Cambridge City Branch Library and Gas Lamp both listed at grade II. Development within this area therefore has the potential to affect the significance of these assets including through development within their settings. We understand that there is no HIA for this as it is a Policy Area. The Policy currently makes little reference to the historic environment. Amend policy wording to include more	210126 (Historic England)

reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy. The Policy should make more reference the role of heritage in the re-vitalisation of retail areas. See our Heritage Led Regeneration Toolkit	
The policy should give guidance on securing a new public use for the Old Library.	202824 (Cambridge Past, Present and Future)
We would also comment as follows on the supporting information. It is not clear why the site plan differs from that in Policy S/C/OPM. The third paragraph is entirely unnecessary as Design and Access Statements are a requirement of the Councils' planning application validation requirements.	208243 (Kings College)

Policy S/PRIA/OPML: Old Press/Mill Lane

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made about the bias against car ownership.

Comments were made by Historic England, Cambridge Past, Present and Future, and a local resident to highlight the heritage assets in the policy. Historic England set out that a HIA is required. Further responses were made by Cambridge Past, Present and Future to raise concerns about point 1d allowing the demolition of potential heritage assets. Comments were made by Kings College critiquing the duplication of policy between S/C/OPML and raised concerns about the masterplan.

Response to the main issues raised in representations

The Councils' response to the Mers raised in the draft Local Plan (Regulation 18) consultation includes:

- This site is a Central Cambridge location and therefore in a sustainable location with public transport and active travel connections, and it is therefore the strategy to reduce car parking in this location to reduce congestion.
- In response to Kings College, point 1 of the policy has been revised to align with the site allocation and not the masterplan and design and access statements have been removed from the supporting text. The other policy criterion have been retained to shape any other future development coming forward on this site.
- The policy wording has been amended to reflect the heritage assets on and offsite including the Grade I Listed Leper Church.
- In response to concerns about demolition arising from point 1d, the assessment of the planning balance at the planning application stage will determine whether the value of retaining the building outweighs the delivery of open space.
- A HIA has not been completed for this site because it is a policy area.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Concerns raised about bias against cars in the policy wording.	201225 (S Williams)
Concerns raised about traffic and configuration of the roads around Mitcham's Corner.	201304 (M Bleazard), 203583 (H Thomas)
Concerns raised about Listed buildings and Buildings of local interest not shown.	205361 (J Preston)
There are a number of designated heritage assets within the site boundary including part of the Central Conservation Area and a number of listed buildings including Cambridge University Centre, The Mill Public House, The Mill The Mill Bridge and Paved Surround, Mill Haven - West House and Mill Haven - East House, Cambridge University Press (Pitt Press), Telephone Kiosks, 1 Mill Lane, House Adjoining Number 74 on The North, 74 Trumpington Street, 8-11 Little St Marys Lane, Number 1 Little St Marys Lane including gas lamp and Emmanuel Church all listed at grade II. The site is adjacent to other listed buildings including Little St Mary's Church (grade II*), Pembroke College and Pembroke College Chapel both listed at grade I, St Botolph's Church also listed at grade I as well as numerous grade II listed buildings. This is a highly sensitive location in terms of heritage. Development within this area therefore has the potential to affect the significance of these assets including through development within their settings. There does not appear to be a Heritage Impact Assessment for this site. An HIA should be completed. The recommendations of the HIA should be included in the policy wording. We welcome criterion 1 a and 1 c, but these should be expanded to better reference the historic environment.	210127 (Historic England)

The respondent supports the policy but raises a concern regarding a non-listed building of heritage value on the eastern side of the Mill Pond, which is significant to the area's historical context. The respondent opposes the potential demolition of the building by its owner for the creation of open space, advocating for its repurposing instead. While the respondent supports the wording of policies 1a and 1b, they express concern that policy 1d could be interpreted to justify the demolition of the mill building. The respondent requests that the conflict within the policies regarding the potential demolition of the mill building be resolved.	202840 (Cambridge Past, Present and Future)
The College would suggest that this policy is combined with S/C/OPM as there is both repetition and inconsistency between the two policies. It is not clear why this policy requires accordance with the 2018 Masterplan, when Policy (S/C/OPM), which is more fundamentally concerned with the redevelopment of the area not just the public realm, doesn't. The first sentence of the policy should therefore be deleted. Despite being concerned with public realm, this policy strays into more detailed design aspects which are covered in the redevelopment policy – consequently limbs a) b) and c) should be deleted from this policy.	208242 (Kings College)
We would also comment as follows on the supporting information. It is not clear why the site plan differs from that in Policy S/C/OPM. The third paragraph is entirely unnecessary as Design and Access Statements are a requirement of the Councils' planning application validation requirements.	208243 (Kings College)

Summaries of Representations: Sites Edge of Cambridge

Edge of Cambridge Introduction

Summary of issues arising from Draft Local Plan representations:

Cambridge City Council Liberal Democrat Group offered general support for the allocations approach. One comment supported the plan in that it did not allocate land at the west fields.

Most comments made on this chapter introduction focused on alternative sites being suggested for allocation. Comments supporting their allocation included issues around strategy choices, and the relative sustainability of the edge of Cambridge supporting green belt release.

One comment raises concern about the amount of development proposed. Historic England requested further consideration of building heights, particularly at North East Cambridge. Mixed comments were received about the Cambridge Biomedical Campus. One comment considered growth was not sufficient. Another comment sought greater protection for the surrounding area. One comment challenged the approach to the Cambridge South East transport scheme.

Response to main issues raised in representations:

Comments are noted, including those which supported the draft plan's approach. Comments proposing alternative sites, and providing information on alternative sites, have been assessed through the Housing and Employment Land Availability Assessment. Strategy choices have also been considered through wider evidence, including the Sustainability Appraisal, and document why it is not considered that exceptional circumstances exist to release additional land beyond that proposed for Cambridge Biomedical Campus. Land adjoining the campus outside the proposed development remains within the green belt. The South East Transport shame is the subject of a Transport and Works Act application, where a public inquiry will consider comments received.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
We support these policies to encourage vibrant and active communities with access to green spaces.	202845 (Cambridge City Council Liberal Democrat Group)
While I support the ambition to plan positively for Cambridge's future, I am deeply concerned that, without stronger protections, the city's growth could come at the expense of the very rural landscapes and communities that make this region so special.	209245 (D Hepworth)
Building Heights We have some ongoing concerns regarding the densities and heights on some of the edge of Cambridge sites. Development at very high densities/heights has the potential to impact on the overall	208929 (Historic England)

setting of this historic city. We appreciate that there will inevitably be a trade-off between height versus further urban expansion. We have particular concerns about heights in north-east Cambridge and remain so about impacts on views from Ditton Meadows and the Conservation Areas, as well as wider views approaching the City from the north-east and east.	
Cambridge South East Transport Scheme No need to pursue this route and destroy the landscape at such an astronomic cost when a perfectly good alternative has been proposed by Better Ways for Busways along the A1307 corridor from the A11 to the Cambridge Biomedical Campus. This could be done in sections to avoid disruption, much of the route already has bus lanes in place and the cost is a fraction of that proposed by the route across green belt which would ruin good agricultural land. The Gog Magog Hills have been included as a priority for enhancing green infrastructure and will be negatively impacted by CSET and therefore I strongly oppose this ill thought through strategy.	207646 (J Coppendale)
Green Belt Object, as set out extensively in our response to Policy S/GB, when there is a need to allocate so many more housing sites, the blunt application of Green Belt to any consideration of further allocation on the edge of Cambridge, which is shown to be one of the most sustainable locations for growth in the GCLP evidence base, is at best illogical. These representations are accompanied by the submission of the following land parcels for allocation in the Greater Cambridge Local Plan: 1) Southern extension to Peterhouse College (A southern expansion to previously released Green Belt sites GB3/GB4) (HEELA Site ID 200790); 2) An easterly expansion to	209699, 209700 (CEG Land Promotions)

the previously released Green Belt site GB1 (HEELA Site ID 40058b); and 3) Southern extension to Employment site E/3 (HEELA Site ID 200795).	
Cambridge Biomedical Campus With Life Sciences identified as the greatest area of growth, why is the area around the Cambridge Biomedical Campus restricted to that proposed in Policy S/CBC Cambridge Biomedical Campus (including Addenbrooke's Hospital) Figure 60. Releasing more Green Belt will meet all of the strategic priorities as set down in the Draft Greater Cambridge Local Plan.	200995 (P Wheeler)
Cambridge Biomedical Campus The area covering the campus should be extended to protect the area on the opposite side of the railway which provides a green pathway for flora and fauna extending from Trumpington Meadows via Trumpington Community Orchard Clay Farm Community Garden and Hobson Park and onward to Nine Wells. This area is also important for Wellbeing and social inclusion.	201016 (C Wright)
West Fields, Cambridge Pleased site has not been included in the sites for development because it is vital that the Green Belt around the City is maintained for future generations, despite our great need for more affordable housing.	201466 (S Smalley)
Land South of Shelford Road, Fulbourn (referenced as site 51610 / 115137 in the HELAA) Evidence submitted to address HELAA issues. Fulbourn's sustainable location warrants new site allocations due to its access to services, employment opportunities, and transport links. The site will provide improved green spaces accessible to all, supporting the aim for allocations on the edge of Cambridge.	205005 (Miller Homes)

Land at South West Cambridge (Site Ref. 52643) The promoted development providing a mix of uses including between 2,500 and 2,800 dwellings, supporting facilities, GI network and landscaping.	205161, 206827 (North Barton Road Landowners Group)
Land adjacent to A1303 and M11 at Rectory Farm Would make an ideal edge allocation for residential or commercial development. The Madingley Park and Ride site located between Eddington and West Cambridge is becoming increasingly under pressure. Site could serve as a Travel Hub that either alleviates pressure on Madingley P&R or replace it entirely, thus allowing the existing Madingley P&R site (a highly sustainable, brownfield site) to be freed up and used to accommodate much needed housing or employment growth at Eddington or West Cambridge.	206091, 206098 (Wimpole Associates Ltd)
Land East of Gazelle Way, Cherry Hinton Objects, fails to inset site from the Green Belt and does not propose allocation of the site for development. Allocate it for a residential-led mixed-use urban extension to the City to provide approximately 1,500 new homes, employment space, new Country Park and associated community and other infrastructure.	209756 (Endurance Estates)
Land at Fen Ditton (HELAA Ref. 47647 and HELAA Ref. 200770) As a medium-scale site, it can be brought forward without reliance on the provision of significant strategic infrastructure, unlike many of the larger allocations within the Plan. This is particularly relevant given the Plan's own acknowledgement, at paragraph 2.79, that delivery of its vision is dependent on infrastructure provision by a range of external partners, including water supply, waste water treatment, and transport bodies, over which the Councils have limited control.	210226 (Vistry Group)

The College has previously submitted a number of sites as part of the Local Plan. • Land South of Adams Road, Land south of Wilbraham Road, no longer need to be allocated as they are developed • Land north of Madingley Road, Cambridge (HELAA: 40393) is within the built-up area of the city and therefore is not reliant on an allocation to establish the principle of its redevelopment. • A number of other sites are promoted at Great Shelford, Girton, and Coton, are all considered suitable for allocation.	211065 (St.Johns College)

Policy S/CE: Cambridge East

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comment that capacity testing shows the Cambridge East site can accommodate more than the stated ~8 000 dwellings, noting in particular public transport connectivity provided by the proposed station near the site.

Comments were made regarding the proposed uses at the site, including support for and comments regarding the proposal for cultural infrastructure at this site, including proposals for a concert hall and other uses such as a lifelong learning centre; recommendations to include emergency services buildings on site within the policy. Requests for greater flexibility were made by the landowner with regard to specialist housing.

Limited comments raised concern regarding design, heritage and townscape impacts, including concerns regarding proposed architectural style, and impacts on local heritage assets including those arising from the potential height and massing of the proposed development. Comments from Historic England asked that that policy be strengthened to provide greater protection for heritage assets. The landowner requested less prescriptive policy wording relating to heritage assets.

A limited number of comments supported the approach to green spaces including for the green corridor. On the other hand, comments suggested that the development at Cambridge Airport will not protect Green Belt purposes in this area. The landowner

requested less prescriptive supporting text wording regarding potential future changes to the green corridor. The National Trust asked for further engagement to explore connections to the Wicken Fen Vision proposal.

A large number of comments raised concerns about transport impacts, including many concerned that the proposed low car approach was not realistic. The landowner supported the proposed monitor and manage approach to transport included in the policy for addressing Comments were raised that the site needed to review its transport strategy to account for the proposed new station at Cambridge East.

Comments raised concern that greater priority needs to be given in relation to infrastructure provision at this site including for medical needs, to meet the needs of the wider area. Comments were raised by neighbouring authorities seeking clarification about potential infrastructure impacts of this site on their area.

One comment raised concern regarding the potential socio-economic divide between areas of poverty in East Barnwell and newer developments.

Concern was raised over the availability and deliverability of the site, noting in particular that development is dependent on airport becoming available despite uncertainty around relocation of airport operations.

Response to the main issues raised in representations

Comments supporting a higher capacity than that set out in the policy have been considered. The capacity identified in the policy is based on consideration of site size and constraints, testing of a range of densities, and assumptions regarding the mix and land take of different uses. Based on available evidence the housing capacity set out at Draft Plan stage is considered to remain robust.

The housing capacity is expressed as “approximately” to allow for more detailed evidence to refine the eventual figure. A specific figure for office and R&D employment uses is not identified in the policy, to provide flexibility regarding the eventual capacity.

The uses set out in the policy are defined responding to the depth of evidence available. A consistent approach has been taken for strategic sites in this plan, both for meeting specialist housing and gypsy and traveller accommodation needs. The strategy approach to meeting such needs is explained in the Strategy Topic paper and is supported by further evidence. The Councils consider that strategic sites play an essential role in the strategy for meeting such needs. Support for cultural provision is noted. At Proposed Submission stage the requirements for cultural uses, as well as leisure uses, are set more precisely than at Draft Plan stage, as supported by Greater Cambridge Cultural Infrastructure Strategy - Stage 2 (2026) and Draft Greater Cambridge Retail and Leisure Study - Interim Study Findings (2026).

The policy wording seeks to balance protection of local townscape and heritage assets with enabling the significant opportunity that the site presents for sustainably located development. The Proposed Submission policy wording has been amended to reflect this balancing further and has also been amended to respond to further exploration of potential listing of heritage assets on the site, resulting in a more flexible policy that focuses on the listed assets. The reference to “contemporary” design has been removed in response to comments.

The Councils consider that the broad approach to green spaces included in the Draft Plan policy remains robust and retains strong protection for the Green Belt corridor whilst retaining flexibility acknowledging the uncertainty associated with a future master plan. Ahead of Proposed Submission the Councils engaged with all relevant local partners including the National Trust to refine the policy wording regarding off site green infrastructure provision.

The Councils recognise that this is a significant scale of development with likely substantial transport impacts, but also that the site will provide benefits to public and active travel connectivity for the whole of eastern Cambridge. The policy includes strong transport requirements to enable a low car living approach, including design requirements, specified transport schemes, and a trip budget approach enforced through monitoring. A new section has been added to the Plan to address the opportunity provided by Cambridge East station.

The Councils recognise the importance of infrastructure delivery supporting development. The Proposed Submission Plan is supported by an Infrastructure Delivery Plan which identifies the infrastructure requirements relevant specifically to Cambridge East, including identifying funding and delivery timings. The key transport infrastructure requirements relevant to the site are identified within the policy itself.

The Councils recognise the potential socio-economic divide between areas of poverty in East Barnwell and newer developments. The allocation seeks to mitigate this by requiring the development to integrate well with surrounding communities, including providing an exemplar approach to movement and transport within and through the site that would benefit existing neighbouring communities. The proposed cultural and leisure uses would also provide benefits to neighbouring communities. Other policies in the Plan require new development to provide benefits to local residents, including Policy WS/IO: Creating inclusive employment and business opportunities.

The position regarding the availability and delivery of the site has changed since the Draft Plan stage. In June 2026 Homes England and The Hill Group announced that they have completed the acquisition of the Cambridge airport site, and that Cambridge Growth Company will work in collaboration with Hill to deliver the site. The announcement includes that Marshall will relocate its operations by mid-2029, and that the partners will have a focus on accelerating housing delivery. This announcement provides

confidence that the site will be available and can be delivered in line with the timings set out in the housing trajectory included in the Proposed Submission Plan.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Vistry and The Quy Estate support the vision and objectives for Cambridge East (EC). Importantly, the delivery of CE would generate wider sustainability and infrastructure benefits that extend beyond the allocation itself. In particular, the proposed public transport, active travel improvements and the concentration of services and facilities would materially enhance the sustainability of surrounding areas, including locations such as Fen Ditton. The proximity of Fen Ditton to CE means that it would be well placed to benefit from, and contribute to, the critical mass of services, employment opportunities and sustainable movement networks introduced through the CE development, further strengthening the case for additional growth in this location.	210232 (Vistry Group)
Capacity Comment that capacity testing shows the Cambridge East site can accommodate more than the stated ~8 000 dwellings, especially with the new railway station and increased commercial floorspace.	(Marshall Group Properties)
CGC is supportive of this policy. CGC would welcome the opportunity to work jointly with GCSP on this allocation and in particular on further work which could support the potential for a higher development capacity than that currently identified in the draft Plan given the potential future transport accessibility and capacity related to the EWR station at Cambridge East. The provision of the station would open the	208939 (Cambridge Growth Company)

opportunity for additional employment and mixed use proposals and also on whether there is the potential for future expansion to the east of the allocation for Cambridge East identified in the draft Plan.	
Marshall strongly supports that the policy requires the delivery of a truly mixed-use development. The specific cultural and community uses identified in the policy should not be listed ahead of a masterplan being developed. The policy should allow for flexibility by removing the specialist housing percentage requirements. For the B2/B8 space requirement, additional wording is added to account for any changes in demand, e.g. “unless up-to-date evidence of need for industrial land suggests otherwise.” Support that the Policy does not specify an exact E(g) floorspace quantum but encourage the supporting documents to be consistent with the Policy to avoid confusion.	211778 (Marshall Group Properties)
Marshall objects strongly to the inclusion within Policy S/CE of the requirement for two sites of 12 pitches for Gypsies and Travellers and to Policy H/GT, which assumes the incorporation of sites for Gypsies and Travellers within strategic sites.	211779 (Marshall Group Properties)
Uses Support Create Cambridge in asking that: • delivery of a cultural anchor (venue, arts centre or artist studios) is required in Phase 1 • cultural provision is not deferred to later phases, where it is at risk of non-delivery • Create Cambridge is engaged as an advisor/consultee on plans and proposals for cultural infrastructure as part of new developments Early cultural infrastructure is essential to avoid dormitory development and support identity, cohesion and liveability	202058 (H Chamberlain), 202143 (Cambridge Junction), 202200 (Ms H Tam), 202311 (Cambridge Junction), 202324 (Cambridge Junction / Create Cambridge), 202413 (T Shaw), 202426 (Kettle's

	Yard), 202687 (T Altmann), 202717 (W Townsend), 202785 (S Lee), 202877 (Cambridge Junction), 203030 (The Arts Theatre Cambridge), 203852 (N Yeni), 203872 (University of Cambridge), 205089 (H Paterson), 205336 (N Oakley), 205341 (L Howse), 205402 (A Seiglow), 202388 (J Webber), 202933 (R Tarry), 202971 (T Flinders), 205157 (J Walsh), 205052 (Uni of Cambridge), 204842 (L Matthews), 205013 (Wysing Arts Centre), 203541 (D Lever), 203632 (University of Cambridge), 203484 (L Heap), 203439 (S Ashworth), 203345 (N Ellis),

	202462 (K Jones), 202879, 204172, 202755, 205407 (Cambridge Junction / Create Cambridge), 204402 (New International Ecounter), 204689 (NEUBAU Architects), 204702 (A Girarlis), 205309 (A Carolina)
Support provision of a concert hall, need for a modern hall that could seat 300-500 people. Currently we are restricted to churches (seat 200) or the university concert hall which is expensive and no parking.	203817 (Cambridge Wind Band), 203948 (S Hughes), 204794 (Cambridge Graduate Orchestra)
Concern there are major gaps: Proposals for Cambridge East/Airport need to incorporate *a second urban centre for Cambridge* that is sub-regional at scale. Provision for a new large lifelong learning college *must* be incorporated ideally as part of the Cambridge East site as an anchor institution - along with a music venue that has a capacity substantially larger than the Cambridge Corn Exchange, and capable of hosting top tier acts at an affordable price. Provision for a new city hall for the new council. A country park that has a 'nature bridge' over link to Coldham's Common. Ornate twin towers theme. Cambridge East Station	202360 (A Carpen), 203750 (A Carpen)

Under the subheading ‘Uses’ Section 4 – add a new criterion e. as follows; “e. Provision of a fire & rescue service drop down point & contributions to fire & rescue, police and ambulance facilities funding”	207475 (Cambridgeshire Constabulary), 207508 (Cambridge Fire and Rescue Service)
Sport England supports the inclusion of sports provision, including criterion 25(h) which requires the delivery of a sports pavilion (Use Class F2). The scale and type of provision should be informed by an up-to-date Playing Pitch Strategy (PPS), Built Facilities Strategy (BFS) and Facilities Planning Model (FPM) for swimming pools.	209221 (Sport England)
We have reviewed the other site allocations in the emerging Plan. Given our current location and history in the Abbey ward, an appropriate location could be within any major new urban extension at Cambridge East. This draft allocation allows for the provision for a wide range and scale of cultural, leisure, shops and community uses to meet the needs of the wider city and sub-region. The allocation notes that this may include civic uses, a conference centre, concert hall, arts centre or leisure facilities. Although this list would cover a new football stadium, it would be helpful to refer explicitly in the Plan to Cambridge East being a potential appropriate location for a new stadium for Cambridge United.	211873 (Cambridge United Football Club)
Townscape Comment that architectural style should not enable styles that have been built in existing large developments in Cambridge	203750 (A Carpen)
Built form paragraph 8, is not sound because it is neither effective nor fully consistent with national policy. By requiring a “contemporary approach” that "embraces modernity", the policy risks being applied as a presumption in favour of a particular architectural idiom rather than focusing on outcomes.	204638 (Cllr T Bygott)

This ambiguity may exclude high-quality development that delivers coherent streets, perimeter blocks and durable public realm through other approaches. Given the scale and permanence of Cambridge East, the policy should be amended to make clear that design quality is judged on urban form, sustainability and place-making outcomes, not architectural style.	
We have some ongoing concerns regarding the densities and heights on some of the edge of Cambridge sites. Development at very high densities/heights has the potential to impact on the overall setting of this historic city. We appreciate that there will inevitably be a trade-off between height versus further urban expansion. We have particular concerns about heights in north-east Cambridge and remain so about impacts on views from Ditton Meadows and the Conservation Areas, as well as wider views approaching the City from the north-east and east.	208929 (Historic England)
Development within this area therefore has the potential to affect the significance of heritage assets on site and nearby, including through development within their settings. We welcome the preparation of the HIA. Section 5.5 helpfully summarises the key heritage sensitivity and Section 6 makes a number of recommendations. Whilst we broadly welcome criterion 5 – 7, these do not sufficiently reflect the recommendations of the HIA. The HIA recommendations include some strategic landscaping and areas of open space at the north-eastern edge of the site as well as a heritage setting for the airport buildings. These must be included within the policy and the Spatial framework (figure 61). We recommend that you Amend policy and figure 61 to incorporate the HIA recommendations in relation to strategic landscaping, open space to	210128 (Historic England)

northeast of site and heritage setting for airport buildings. Criterion 10 should also refer to the strategic views and Skyline and Tall Buildings Strategy. Figure 61 Amend scheduled Ancient Monument to Scheduled Monument (NPPF Preferred terminology) Amend throughout the Plan.	
Marshall does not consider that any other buildings meet listing criteria beyond the listed Control and office building. In relation to the retention of Hangar 1, the draft policy promotes more definitive constraint which Marshall considers to be a level of detail not appropriate for the plan but a matter to be worked through as part of the design development process. Marshall considers that the draft wording should be reviewed to recognise the reality that, whilst the separate character of Teversham must be respected, development at Cambridge East will be visible from the village.	211781 (Marshall Group Properties)
Nature Supports the policy recognition given to biodiversity and green infrastructure issues. The policy represents a good framework to avoid adverse impacts on nearby high-value nature sites and to provide high quality green infrastructure including off-site strategic natural greenspace.	202972 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 202849 (Cambridge Past, Present and Future), 203209 (G Owell)
Concern that the alignment and width of the Green Belt corridor through Cambridge East should be preserved to maintain its function as a vital green link between Coldham's and Stourbridge Commons and Ditton Meadows.	202849 (Cambridge Past, Present and Future)

Many people, me included, regard Cambridge Airport as part of the Green Belt. I know you say it isn't that any longer. Cambridge East is going to be greatly degraded when that becomes developed. I have found very few details of how much green space will be left on the airport.	201224 (S Williams)
I think that the broad design of Marshall's Airport is adequate. I like the idea of green corridors spreading out of the city through Marshalls and I hope in the long term this can be supported with proper environmental infrastructure such as wildlife road crossings, or wildlife underpasses for Newmarket or Airport Road, although I recognise the likely prohibitive costs of these at present. I am strongly supportive of a Cambridge East Station.	208722 (Cambridgeshire County Council (Cllr M Morgan))
I don't think what you are going to allow on Cambridge Airport will contribute to 'protecting and enhancing the green corridors which extend into the city'. At least you are going to leave some green space, though. Initially I thought you were going to pave over the whole lot.	201253 (S Williams)
We note that the policy requires provision of a country park beyond the site to connect through to the Wicken Fen Vision area and encourage your authority to engage as soon as possible with the National Trust about this.	207602 (Natural England)
The National Trust strongly support the requirement to provide strategic scale green infrastructure beyond the site to connect Cambridge City Centre to the Wicken Vision area, reducing recreational pressure on designated sites. The policy requires provision of a country park beyond the site to connect to the Wicken Vision area. It is noted that the location, scale and character of this site is yet to be determined. Work needs to be undertaken to establish this, in order that it can be identified in the proposed Submission Plan. It also needs to be clear how and when the country park will be delivered, in order that it is available for use prior to the occupation of new dwellings at Cambridge East. The	211077 (The National Trust)

National Trust would welcome engagement in discussions about green infrastructure delivery and suggest that consideration is given as to whether our site at Northfield Farm could assist with this provision.	
Green Corridor protection is ambiguous and risks incremental erosion of landscape and heritage assets, particularly around Teversham. Townscape, landscape and heritage wording, particularly in relation to Teversham, needs greater precision	201181 (Save Honey Hill Group), 203619 (Horningsea PC)
The specific reference to compensatory widening is not appropriate or necessary and, as drafted in the supporting text, is misleading to the reader that this can be expected in response to instances where the green corridor is narrowed. Compensatory widening references should be removed to ensure the policy is compliant with national policy. Marshall also wishes to question whether it is appropriate that the Green Corridor is designated as Green Belt.	211782 (Marshall Group Properties)
Movement Comments about transport include: • The indicative “trip budget” and “monitor and manage” approach lacks binding limits, clear triggers, and enforceability • Development should be conditional on finding solutions to active transport constraints (including Fen Ditton Road underpass for Marleigh cycle route, widen Coldham’s Lane railway crossing) • Set ambitious mode share targets and secure walking and cycling links early • Trip budget is too high • The site must not promote car trips to the city centre, which is facilitated by restricting access to Barnwell Rd and Newmarket Rd.	201181 (Save Honey Hill Group), 202001 (D Langley), 201236 (S Williams), 202301 (R MacDonald), 202370 (C B), 202643 (A Lawrence), 203654 (V Ashton), 203695 (T Preud'homme), 203814 (A Chan), 204570 (D Potts),

• You are promoting a low car use approach -- that is not what residents want • People do not want to park their cars at off-site car barns as you suggest • People will NOT avoid using cars and Newmarket Road and Coldhams Lane will be absolute nightmares at rush hour • All homes need easy (walking) access to shops and jobs, and wider recreation • Ensure the layout is friendly to bus route planning, with rights of way access to bus stops, direct bus routing, utilise bus gates • Policy wording must be sufficiently robust to ensure any transport infrastructure which is critical to accommodating sustainable growth in this location is secured and adequately planned for. Concern that there could be potential impacts within East Cambridgeshire. • Need improved links to Addenbrookes and along Barnwell Rd to access secondary schools and station. • I would like to highlight the importance of walking and cycling connectivity across Marshall's to Marleigh and Teversham. I think that it should be thought that any benefits of Marshall's redevelopment can be shared with Teversham. How an adequate viable bus service to Teversham is provided should be considered as part of the transport design for Marleigh.	204593 (R Hoadley), 204659 (East Cambridgeshire DC), 205156 (J Grantham), 205391 (A Williams), 205406 (N Saad), 205436 (S Nuttall), 205343 (R de Beaux) 202849 (Cambridge Past, Present and Future), 208723 (Cambridgeshire County Council (Cllr M Morgan))
CCC Active Travel Strategy 'wheeling' refers to travel using a wheelchair, mobility scooter, pushing a pushchair etc. rather than cycling.	210527 (Cambridgeshire County Council)
The existing transport strategy needs to be reviewed in light of the recent announcement of a station within the site as part of EWR and the proposed provision of an eastern access to Cambridge station, both of which have the possibility to significantly impact the operation of the site in transport terms.	210580 (Cambridgeshire County Council)
Broadly supportive of this policy framework in relation to transport as it reflects its own ambitions and complements the transport strategies that we have developed. The proposed monitor and manage	211784 (Marshall Group Properties)

approach means that infrastructure delivery uncertainty can be managed and should not serve as a hinderance to Cambridge East moving forward. Supports the principle of an evidence driven approach to deriving a trip budget but clear that this does not need to be prescribed by the policy. The Policy should recognise that the extant trip making from the site can be used to support a first phase of development.	
The current capacity of the trip budget has been identified at approximately 1,500 trips in the AM peak and 1,800 trips in the PM peak. This level of trips is understood to have been tested with the regional model and is considered to be able to be accommodated within the local road network, including the local SRN junctions. National Highways would require as part of the local plan process to understand the impact of this development and the cumulative impact on the A14 junction 34 prior to agreeing the trip budget and agreement of appropriate mitigation measures should the trip budget not be met.	209008 (National Highways)
EWR Co is now considering including a new Cambridge East station within its plans for EWR. At this stage, the design of this station is still in its early, feasibility phase. EWR Co is aware of challenges around the site and will continue to explore how this opportunity could be realised to support economic and housing growth in the area. If third-party funding is not secured, the station will be removed from EWR Co's plans. The Councils' full support for a new station at Cambridge East is also welcomed, with EWR Co agreeing that this would provide a 'step change in public transport connectivity' for the Cambridge East development site and eastern Cambridge more widely. EWR Co recommends that land required for Cambridge East station is included in Policy S/CE: Cambridge East, rather than the AMC, as the new station is closely related to the former, with which it will need to be closely integrated with and will help to unlock. EWR Co would welcome consideration by	211885, 211904(East West Rail Company)

the Councils as to how to maximise the density of development of the Cambridge East site and amendments to Policy S/CE to achieve this, given the benefits in terms of sustainable travel that a new EWR Cambridge East station would bring.	
Given that the Station now has the same status as a station at Cambourne upon which a new community is being planned as part of the Local Plan, Marshall considers that the Policy should sensitively reflect the opportunity.	211785 (Marshall Group Properties)
Proposed trip budget risks normalising high levels of car use rather than driving mode shift. The framing of the trip budget also lacks spatial context. Trips into the city are extremely problematic, and must be discouraged. General vehicle access to Barnwell Road should therefore be removed as well as the numerous site accesses onto Newmarket Road. Plan underestimates the level of investment required in the surrounding active travel network. ● Review car trip budgets and introduce binding walking, cycling and public transport mode share targets ● Make delivery of key active travel links a planning condition and phasing trigger, supported by a co-delivery plan between the councils, highways authority and developers, including pooled funding where necessary. ● Explore and understand the need for connectivity across Coldham's Common with financial safeguarding to deliver a bridge from the Cambridge Retail Park to Coldham's Common.	211768 (Camcycle)
Aviation safeguarding, noise, and height constraints are insufficiently defined, creating uncertainty and risk of abortive development	201181 (Save Honey Hill Group), 203619 (Horningsea PC)

It is unclear how access to medical facilities will be provided; Addenbrookes A and E cannot cope, also dentists.	202370 (C B)
There should be greater priority for infrastructure to support the significant growth in east Cambridge. It has long suffered in comparison to most other parts of Greater Cambridge.	203785 (T Panter), 209123, 209124, 209125, 209126, 209127, 209128, 209129, 209130, 209131, 209132, 209133 (R Patel)
The overall level of growth planned for Greater Cambridge and two planned developments (Policy S/GF: Land Adjacent to A11 and A1307 at Grange Farm and Policy S/CE Cambridge East) are expected to impact upon West Suffolk given its proximity and the functioning of the surrounding towns of Newmarket and Haverhill. This will require collaborative working with West Suffolk and a full assessment through the preparation of the local plan evidence base.	204788 (West Suffolk Council)
Concern exist regarding the potential socio-economic divide between areas of poverty in East Barnwell and newer developments. There are reported anti-social behaviour issues in the new Marleigh development. The overstretching of NHS primary care services in the area is a major concern.	205406 (N Saad)
Marshall would welcome the opportunity to explore further what parameter plans would be required and the level of detail that these are expected to contain. The policy should make reference to viability and the unique circumstances that exist on the site.	211783 (Marshall Group Properties)
The concept plan is not representative of a masterplan for the site and so it should not be assumed that features on the concept plan are fixed. The concept plan and policy wording should be clear what is	211780 (Marshall Group Properties)

already consented and what it proposed. The red line should also be adjusted to include the green corridor.	
Concern over the availability and deliverability of the site: • The policy contains multiple interdependent risks relating to airport operations, transport capacity, green corridor protection, water/flooding, and safeguarding and development is pendant on airport becoming available despite uncertainty around relocation of airport operations • Comprehensive development of the airport site is dependent on a change in airport status, meaning the entire site is available for development. Uncertainty regarding relocation of the airport function must be resolved. • Questions whether the assumptions in the GCLP for Cambridge East are realistic given recent announcements that Marshalls has cancelled its planned move from Cambridge Airport to Cranfield. Note Marshall still aims to vacate site by 2030, predicated on identifying and relocating to a new premises. • The site at Cambridge East comprises land at Cambridge Airport that was safeguarded from the previous plan, which was also identified as a growth area as part of the Cambridge Local Plan (2003). Noting the significant amount of time that this allocation has been identified within previous Local Plans, we raise significant concerns over the delivery of this site within the timescales anticipated, particularly noting larger sites by their very nature can take longer to be delivered. • Marshall announced in October 2025 that the business will not be moving to Cranfield but that the company is still committed to moving its aerospace business from its Cambridge Airport base by 2030 (with development anticipated to start in 2032). Notwithstanding this aspiration, there is still no certainty that the airport will move within these predicted timescales, particularly given that an alternative site to relocate to has not yet been secured. As a result, development at Cambridge East could be significantly delayed which could result in limited or no housing delivery for a number of years, particularly within the first 15 years of the plan period.	201181 (Save Honey Hill Group), 203619 (Horningsea PC), 205234 (K Brightwell), 203340 (A Hoare), 202891 (J Williams), 202515 (H Brown), 209969 (Granta Land Ltd), 211042, 211055 (Wates Developments (and Landowners)), 211592 (Places for People)

There is a risk of overstating housing delivery by conflating consented schemes with contingent, policy-dependent capacity. The final Plan should include a clear phase-by-phase deliverability table identifying which homes are deliverable in the near term and which are contingent on airport availability, major infrastructure and other prerequisites	201181 (Save Honey Hill Group), 203619 (Horningsea PC)
Whilst CE is not reliant on the relocation of the CWWTP like NEC is, it is essential that the Local Plan does not rely disproportionately on CE to meet housing delivery requirements within the early and middle stages of the plan period. Medium-scale, well located sites such as Fen Ditton are capable of coming forward without reliance on strategic infrastructure and can therefore play a critical role in supporting the housing trajectory and ensuring delivery against the plan's timescales.	210233 (Vistry Group)
Land at South West Cambridge (Site Ref. 52643) Promotion of additional site on the edge of Cambridge at land at South West Cambridge (Site Ref. 52643)	205161 (Carter Jonas on behalf of North Barton Road Landowners Group)
Land East of Gazelle Way, Cherry Hinton Endurance Estates strongly objects to the proposed policy map for Cambridge on the basis that it fails to inset Land East of Gazelle Way, Cherry Hinton, from the Green Belt and does not propose allocation of the site for development.	209756 (Endurance Estates)
I think some development on Lakes, like in the Netherlands, such as close to the proposed Cambridge East Station, should be considered.	208723 (Cambridgeshire County Council (Cllr M Morgan))

Policy S/CBC: Cambridge Biomedical Campus

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Cambridge Biomedical Campus Ltd, Pemberton Family and Pemberton Family Trusts, Cambridgeshire County Council and Prologis and Cambridge University Hospitals NHS Foundation Trust all referenced the importance of the campus for UK life science sector, and the global significance of the site. They offered general support for the local plan approach, but also areas where they sought change. There was a general support for the need for a site wide masterplan. Flexibility was a theme in the comments, in terms of use classes and phasing, to ensure the area could be adaptable to future needs of the sectors present.

Opportunities within the Strategic Enhancement Area and the Landscape Improvement Area, but a desire for the policy not to be too prescriptive. Housing delivered on the Campus should primarily serve Cambridge University Hospital / NHS campus workers including medical students, but acknowledgement was also sought that market and build to rent maty be needed to make delivery viable, and the policy should also allow dwellings a spart of the expansion land. The goals of the transport requirements were supported, but plan should be flexible on how they are achieved. The ambition for an east-west street was supported, however, it is essential that the policy recognises that its delivery is likely to occur at a later stage in the overall development programme. CUH focused on the importance of their being an infrastructure delivery plan.

The University of Cambridge also highlighted the need for a more coordinated approach to infrastructure for the site.

Cambridge Growth Company supported the policy and the allocation for expansion through release of land from the Green Belt for future phases to support the future development of the Biomedical Campus.

Great Shelford PC, Great Shelford Village Charity, and Stapleford & Gt Shelford Neighbourhood Plan Steering Group expressed concern about the scale of development, and there needed to be consideration of the cumulative impacts on landscape and ecology.

A number of comments reference the need for a site wide masterplan. There was also support for additional health provision, including a new acute hospital.

Some developers promoting other developments highlighted that their sites could complement the CBC proposals.

Comments objected the green belt release in principle, questioning whether the need had been properly demonstrated, or the impacts properly understood, including on the green belt. A number of these comments included conditions that should be required if land is released, such as firm requirement for a new acute hospital, a focus on uses that need to be located there, and enforcement of transport issues.

Impacts on ecology and wildlife were raised, by Bedfordshire Cambridgeshire and Northamptonshire Wildlife Trust, and Cambridge Past Present and Future, and John Meed who has presented extensive information on farm land birds. Hobsons Conduit Trust

refence the importance of nine wells. They highlight the need for extensive mitigation. Historic England require consideration of heritage and landscape when considering building height and form, and the need for development to be linked with mitigation.

A number of comments focused on the impact of CBC on adjoining communities. Many reports were included of issues arising from parking and antisocial behaviour impacting adjoining areas. Proposals must include mitigating for the failures of previous growth.

A lot of comments highlighted transport concerns and suggested interventions. Personal experiences of accessing the site were highlighted. Cambridge South East Transport Scheme received a number of specific objections, siting alternative transport measures which could be applied.

Comments objected to a new vehicle access into CBC from Granham's Road, saying that there were better ways bus access could be achieved. There were concerns that it would simply move or worsen traffic problems

Response to the main issues raised in representations

Support from a range of stakeholders for the policy approach is, noted, but also local concern on a range of environmental issues.

The Cambridge Green Belt Study (2021) identified that the area adjoining Babraham Road and north of Granham's Road would have 'high' harm to Cambridge Green Belt Purposes, and the area beyond would have 'very high harm'. However, there are exceptional circumstances to justify release of land from the Green Belt. This site is only one of a number of life science sites in the Cambridge cluster, it offers the unique benefit of siting commercial research directly with the hospital. The Greater Cambridge Growth Sectors Study identifies that some businesses need to be in close proximity to clinical research. Submissions by the

Campus on ‘the Power of Proximity’ and the ‘CBC Economic Impact Study’ also provide evidence regarding those benefits. The expansion provides the opportunity to provide new facilities to enhance the site, but also support enhancement of the existing campus. The Written Ministerial Statement of 8 May 2024 emphasised the importance of the site.

A wide range of stakeholders emphasised the importance of a site wide masterplan, and infrastructure and amenity planning, to ensure the full benefits of the site are achieved and the impacts are mitigated. The local plan policy includes this requirement. This will also be of key interest to those living near to the campus who sited many concerns about impacts of living near to the site. Mitigation must include improvements to the surrounding area, and the approach to public realm and landscape has now been refined. Given the scale and long term construction of the Campus, placemaking is fundamental to achieving high quality and comments from local and neighbouring communities regarding community safety, and poor design is noted. A Place Book approach has been introduced to mitigate the impact of new development, and require policy to prepare design codes to respond positively to placemaking requirements. Policy reflects that a Masterplan is fundamental to delivering phases 3 and 4 of the Campus.

The Strategic Enhancement Area and Landscape Improvement Area wording has been amended to respond to request for clarity of what these areas may provide, including reference to habitats, farmland birds and other sensitive ecology. The policy has also been amended to clarify the importance of the key strategic views at Nine Wells LNR and the heritage asset at White Hill Farm, and other important green spaces such as the Magog Down and the Pocket Park. The importance of natural and ecological features is noted, and the policy includes reference to the Hobson Conduit Trust legal agreement for the chalk stream.

The spatial framework has been amended to make clearer the green edge and Local Nature Reserve colours. The landscape buffer to the south has been amended to show clearer boundary treatment. Other changes have been made to reflect comments on the key.

Many comments from the Campus owners and stakeholders sought flexibility in the policy, but is also important that the plan sets clear policy in terms of mitigation and infrastructure expectations, in order that a world class campus is achieved, and impacts on the wider area are addressed.

Transport infrastructure is going to be key to addressing future needs of the site. The opening of the Cambridge South Station is a huge step forward, but other infrastructure will be needed to support future growth, including enhanced South East Cambridge Transport. The realigned Granham's Road entrance is also considered necessary to serve the expanded campus. Concerns raised about the modal filter of Dame Mary Archer Way, have been noted and reference is now made to measures that need to be implemented to manage traffic across the Campus.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Cambridge Biomedical Campus Ltd • CBC Ltd works with landowners and local government / organisations to drive and inform how the Campus should evolve so that it both maintains and further builds upon its success. The UK	203327, 211012, 211013, 211014, 211626, 211627, 211628, 211629, 211630,

life science sector has grown significantly in recent years, with Cambridge playing a fundamental role in this. • Overall, CBC Ltd agrees with much that has been included in the draft Local Plan concerning the Campus. CBC Ltd's primary concern for the draft Local Plan is to ensure that the leading international importance of the Campus as a location for life science excellence is protected, enhanced and, importantly, not diluted. For the Campus to retain its leading reputation, it must be vibrant, desirable and offer best in class facilities to attract talent and key life science businesses. • CBC Ltd seeks a masterplan led policy approach that will provide clarity concerning the timing / trigger for its production, as well as a properly defined context and framework. The policy approach proposes clear triggers and parameters which would require a whole Campus masterplan include. The need for an IDP is also linked to the proposed Campus masterplan triggers. • Given the proximity of the Strategic Enhancement Area to the Campus and significant opportunity for place shaping and contribution to the Campus it offers, works on this land should take place before any works on the land within the Landscape Improvement Area take place. • Any housing delivered on the Campus should primarily serve Cambridge University Hospital / NHS campus workers including medical students. • Applications for other uses should need to provide an amenity strategy. • Need to secure developer funding to improve public space. • Other detailed amendments are proposed.	211631, 211632, 211633, 211634, 211635, 211636, 211637, 211638, 211639, 211640, 211641, 211642, 211643, 211644 (Cambridge Biomedical Campus)
Pemberton Family and Pemberton Family Trusts Support the overall approach to the policy but object to two parts (Part 7 and Part 17d) where the Pemberton Family requires a detailed amendment to the policy to ensure the effective use of land and to ensure a sound allocation that involves the release of Green Belt land. • Strong support to the overall policy and the continued recognition by the emerging Local Plan of the important role of CBC and its future growth	205286, 210481,210482, 211294, 211295, 211296, 211297,211298, 211299, 211300, 211301, 211302, 211303, 211304, 211305,

• object to the policy requirements for the LIA. policy should allow for flexibility in design and not limit the use of the entire area for linear or drainage features. • SEA should specific requirements for landscape buffers, green infrastructure protection, flood risk mitigation, and the use of Green Belt land to enhance biodiversity. • Policy, Spatial Framework and the Proposals Map all need to align and be consistent and accurate in how they represent the land and allocation. Important that all Local Plan plans or diagrams that present the site graphically show and designate these two areas (LIA and SEA) separately. • The term “future phase” should be replaced with “expansion” to avoid the potential inference that the development of the expansion land should only occur after the existing Campus has been regenerated. • Including an explicit reference to “life sciences” to ensure the full scope of work undertaken at the Campus is accurately reflected. This proposed amendment aligns with the uses outlined in paragraph 2 of the draft policy. Additionally, the suggested references to “an innovation hub” and “visitor accommodation” are important to highlight, given the significant benefits these elements will bring to the Campus and its wider community. • Describing CBC as ‘globally significant’ is an accurate reflection of its international standing. The unique mix of uses at the Campus make it a world-leading centre of research, development, and medical application. • Support the identification of land to the south of the Campus for green infrastructure enhancements, including open space and biodiversity. It may be difficult to achieve the necessary net gain in biodiversity and all amenity provision within the Campus’ expanded boundary. This may change, however, and if it does become possible, then the clear direction in legislation and policy is for those benefits to be provided onsite so far as possible. • Provision of higher education uses within the Campus is a key component of its offer and success.	211306, 211307, 211308, 211309, 211310, 211313, 211315, 211317, 211319, 211321, 211323 211325, 211327, 211329, 211331, 211333, 211335, 211337, 211338, 211340, 211341, 211343, 211345, 211347, 211349, 211351, 211353, 211355, 211357, 211359, 211361, 211363, 211365, 211367, 211369, 211371, 211373, 211375, 211377, 211379, 211381, 211383, 211385, 211387, 211389, 211391, 211393, 211395, (Pemberton Family and Pemberton Family Trusts)

• Paragraph 8(e), which states a floorspace figure for research and development and healthcare uses only (excluding higher education, leisure, hotels, and other supporting uses), be deleted and additional text be included at paragraph 8(b). • A reference to use classes is not necessary and may unduly limit the scope of potential uses. Flexibility is particularly important given the evolving nature of life sciences research, which is increasingly associated with AI and data-driven methodologies. As a result, there may be a shift from traditional wet lab facilities to dry lab environments. • Requirement for a Framework Amenity Strategy for the Campus is supported. However, we do not agree with describing the Campus as a “24-hour” community. • A well-designed masterplan for the Campus should intentionally promote interaction between people who live, work, and visit there. • The majority of housing delivered on the Campus will be located within the existing boundaries and will be provided by CUH to meet the needs of CUH and wider NHS campus staff. However, there is also an aspiration to enable the delivery of build-to-rent homes for Campus workers within the expansion land. • The policy wording should recognise that the proposals will bring about a substantial amount of change, and that some of these changes may adversely affect views or heritage assets. It is essential that the policy recognises that land optimisation will sometimes require development forms, scales, or configurations that do not enable the enhancement of all existing views into or across the site. • Recognise that in certain circumstances, proposals for demolition may deliver benefits that outweigh the carbon savings associated with retaining the existing building. • Support the ambition for an east-west street; however, it is essential that the policy recognises that its delivery is likely to occur at a later stage in the overall development programme • Policy should be flexible regarding for Transport strategy and trip budget, it should be sufficient for the policy to set out the ambition not exactly how it will be achieved at this stage. • Healthcare uses may not be suitable and viable for all water use, energy etc aspirations.	

• The benefit that a campus-wide masterplan can play in ensuring the best possible outcomes is understood and appreciated. The LCG has prepared a draft Spatial Framework supported by robust assessment and evidence. We support the requirement to be the output of a planning application rather than something that should necessarily precede one. • Acknowledge GCSP's desire to include a spatial framework (figure 63) but we are concerned that may appear more prescriptive/precise than the stage of the process we are at • Future strategies should apply to the area covered by the application. While coordination across the wider campus is encouraged where possible, it is unlikely that existing management strategies can be revised. • The policy is not contingent on identifying a single delivery body, nor should it be interpreted as such. • Proposals may need to come forward on an expedited timeframe. The draft policy should not prejudice this happening but be flexible enough to accommodate them in an appropriate way that does not prejudice the rest of the masterplan being built out in accordance with its terms. • A number of other detailed points are made and changes proposed. .	
Cambridgeshire County Council and Prologis Pleased to submit representations in support of the draft Local Plan, and in particular Policy S/CBC. Detailed wording changes are suggested. • Describing CBC as 'globally significant' is an accurate reflection of its international standing. The unique mix of uses at the Campus make it a world-leading centre of research, development, and medical application. The policy rightly recognises this position and sets an appropriately defined context for expansion of the Campus. • We recommend including an explicit reference to "life sciences" to ensure the full scope of work undertaken at the Campus is accurately reflected.	209136 209137, 209138, 209139, 209140, 209141, 209142, 209143, 209144, 209145, 209146, 209147, 209148, 209149, 209150) 211314, 211316 211318, 211320, 211322, 211324, 211326, 211328, 211320,

• The term “future phase” should be replaced with “expansion” to avoid the potential inference that the development of the expansion land should only occur after the existing Campus has been regenerated. • support the identification of land to the south of the Campus for green infrastructure enhancements, including open space and biodiversity. • The provision of higher education uses within the Campus is a key component of its offer and success. • Provide clarity on what floorspace figures are referring to in terms of uses, and that they are indicative. Also need flexibility between use classes given the evolving nature of life sciences research • Do not agree with describing the Campus as a “24-hour” community. While the hospitals operate around the clock, these activities do not generate a night-time economy • The term “comprehensive” should be deleted from Para 10 as it could be misinterpreted as implying a level of detail that is not intended at this stage. • A well-designed masterplan for the Campus should intentionally promote interaction between people who live, work, and visit there. • The majority of housing delivered on the Campus will be located within the existing boundaries and will be provided by CUH to meet the needs of CUH and wider NHS campus staff. However, there is also an aspiration to enable the delivery of build-to-rent homes for Campus workers within the expansion land.	211332, 222334, 211336, 211339, 211342, 311344, 211346, 211348, 211350, 211352, 211354, 211356, 211358, 211360, 211362, 211364, 211366, 211368, 211370, 211372, 211374, 211376, 211378, 211380, 211382, 211384, 211386, 211388, 211390, 211392, 211394, 211396, 211398, 211400, 211402, 211404 (Cambridgeshire County Council and Prologis)
CUH strongly supports the overall vision for CBC. • We recommend including an explicit reference to “life sciences” to ensure the full scope of work undertaken at the Campus is accurately reflected. CBC as globally significant is an accurate reflection of its international standing. The unique mix of uses at the Campus make it a world-leading centre of research, development, and medical application. A reference to use classes is not necessary and may unduly limit the scope of potential uses.	208764, 209276, 209277, 209278, 209279, 209280, 209281, 209282, 209286, 209289, 209290, 209291, 209292. 211788, 211789,

• The term “future phase” should be replaced with “expansion” to avoid the potential inference that the development of the expansion land should only occur after the existing Campus has been regenerated. • CUH supports the identification of land to the south of the Campus for green infrastructure enhancements, including open space and biodiversity. Our primary objective would be to ensure that the expansion land and associated enhancement land, provides an opportunity for enhanced recreational access for our staff, patients and visitors. • The provision of higher education uses within the Campus is a key component of its offer and success • The scale of development at the Campus should be determined by physical and infrastructure constraints such as building heights, the trip budget, and land availability. These constraints require further assessment, and current work does not support a defined minimum or maximum. • It is essential that the scale of new healthcare buildings be determined by the specific operational requirements of the Trust, the model of care to be delivered, and the clinical and spatial standards that apply at the time of design. • We are making the case for significant renewal of our wider hospital estate, and a case is being put forward to Government for funding to develop the business case for a new Acute Hospital. • We enjoy excellent partnership working across healthcare, academic and commercial research partners on campus, which should be encouraged. • LCG’s evidence base submitted to GCSP identifies an opportunity to deliver approximately 1,000 additional homes on the Campus. The Expansion Landowners are therefore very supportive of this element of the draft policy. However, we propose an amendment to increase the indicative number of units to allow greater flexibility for additional homes to be delivered on the expansion land. • CUH support the objective that the majority of housing delivered on the Campus will be located within the existing boundaries and will be provided by CUH to meet the needs of CUH and wider	211790, 211791, 211792, 211793, 211794, 211795, 211796, 211797. 211798, 211799, 211800, 211801, 211802, 211803, 211804, 211805, 211806, 211807, 211808, 211809, 211810, 211811, 211812, 211813, 211814, 211815, 211816, 211817, 211818, 211819, 211820, 211821, 211822, 211823, 211824, 211825, 211826, 211827, 211828, 211829, 211830, 211831, 211832, 211833, 211834, 211835, 211836, 211837, 211838, 211839, 211840, 211841, 211842, 211843, (Cambridge University Hospitals NHS Foundation Trust)

NHS campus staff. In order for staff housing to be viable, an element of market housing or build to rent may be necessary. • Requirement for a Framework Amenity Strategy for the Campus is supported. However, we do not agree with describing the Campus as a “24-hour” community. • The policy wording should recognise that the proposals will bring about a substantial amount of change, and that some of these changes may adversely affect views or heritage assets. It is essential that the policy recognises that land optimisation will sometimes require development forms, scales, or configurations that do not enable the enhancement of all existing views into or across the site. • Consider giving greater clarity on the respective roles of the SEA and LIA such that the balance between such objectives as biodiversity enhancement, recreational access, access and movement corridors, landscape buffering/screening and impact on views can be assessed in the round. • Policy should be flexible regarding for Transport strategy and trip budget, it should be sufficient for the policy to set out the ambition not exactly how it will be achieved at this stage. Patient parking is a priority for CUH. • The LCG remain committed to the long term ambition to deliver the east-west link, or High Street, as a public transport and active travel corridor. It is essential that the policy recognises that its delivery is likely to occur at a later stage in the overall development. • Healthcare uses may not be suitable and viable for all water use, energy etc aspirations. • We support the need for a campus-wide Framework Masterplan. • CUH encourage a focus on establishing the approach to Infrastructure Delivery to ensure the ambitions for the campus, and the expectations of each landowner / area of the masterplan are clearly defined. • Othe detailed wording changes are suggested.	

The University of Cambridge supports the policy in the Local Plan that promotes the expansion and enhancement of the Biomedical Campus, recognising its national and international significance for education and research in life sciences. The Vision and Objectives of the policy are endorsed, aiming to establish the campus as a leading centre for medical research and health science in Europe. While generally supportive of the allocation and wording, the University has provided detailed comments in an attached document to clarify aspects of the policy in alignment with other landowners. Concerns are raised regarding the 'Lifespan' section of the policy, particularly about the lack of clarity on phasing and delivery of expansion proposals. The Development Strategy indicates that development is contingent on appropriate infrastructure being in place to support the campus's needs, which the University believes requires a more coordinated approach. The University advocates for a detailed masterplan that includes infrastructure and delivery timing to ensure all developments align with the broader vision of the plan. The University expresses willingness to collaborate with partners and the Greater Cambridge Shared Planning Service to address these concerns and contribute to the Infrastructure Delivery Strategy.	204736 (University of Cambridge)
The Biomedical Campus is encroaching on the Green Belt south of Cambridge, and the proposed CSET busway will further impact this area. These must be considered together. Both the Biomedical Campus and the busway will have significant harmful effects on the Green Belt, with concerns about the cumulative impact on the surrounding countryside, regardless of landscaping efforts. While the proposal for a Landscape Improvement Area is welcomed, previous plans under Policy CSF/5 have not been implemented, raising doubts about future improvements. Clear plans and guaranteed funding for landscape improvements must be established before granting planning permission for any	204687 (Great Shelford PC)

development. Proposals for public access should align with the recommendations in the Stapleford and Great Shelford Neighbourhood Plan. There must be a firm and irrevocable commitment against any further development in the Green Belt should the construction of the busway proceed.	
• The respondent expresses broad support for Policy S/CBC clauses 14, 17, and 18, emphasising the need for new developments to integrate sensitively with surrounding areas and retain key views, particularly from strategic viewpoints like Nine Wells Local Nature Reserve and Magog Down. • Concerned about the cumulative impact of building height and density on the Cambridge Biomedical Campus, suggesting that it may create a 'concrete wall' that detracts from the landscape, particularly from high points on the Gog Magog Hills. This 'wall' could be broken up by fingers of vegetation penetrating into and through the southern fringe. • The respondent calls for greater specificity in Policy S/CBC 14a regarding transitions in height, scale, and landscaping, arguing that current guidelines may inadvertently support taller buildings that negatively impact long-distance views. • There is a concern that the lack of height restrictions in Policy S/CBC clause 16c may lead to increasingly taller buildings that overshadow City views, public spaces and the greenbelt, suggesting that medium-mature trees should be included in planting plans to mitigate the raw edge of the development. • Support is expressed for the vegetated landscape buffer proposed in Policy S/CBC clause 17d, with a recommendation to expand the Strategic Enhancement Area southwards to Magog Down to enhance nature and landscape character. • The respondent believes that improved landscaping policies from the 2008 Cambridge Southern Fringe Area Action Plan should be incorporated into the draft Greater Cambridge Local Plan to ensure community and environmental benefits are preserved.	202085 (Great Shelford Village Charity)

• The respondent argues for limited private car access on the new road and supports alternative transport solutions that would improve connectivity within the Cambridge Biomedical Campus, such as an on-road CSET route coupled with upgrades to existing roads.	
The respondent expresses broad support for Policy S/CBC clauses 14, 17, and 18, emphasising the need for new developments to integrate sensitively with surrounding areas and retain key views, particularly from strategic viewpoints like Nine Wells Local Nature Reserve and Magog Down. Concerns are raised about the cumulative impact of building height and density on the Cambridge Biomedical Campus, suggesting that it may create a 'concrete wall' that detracts from the landscape, particularly from high points on the Gog Magog Hills. This 'wall' could be broken up by fingers of vegetation penetrating into and through the southern fringe. The respondent calls for greater specificity in Policy S/CBC 14a regarding transitions in height, scale, and landscaping, arguing that current guidelines may inadvertently support taller buildings that negatively impact long-distance views. There is a concern that the lack of height restrictions in Policy S/CBC clause 16c may lead to increasingly taller buildings that overshadow City views, public spaces and the greenbelt, suggesting that medium-mature trees should be included in planting plans to mitigate the raw edge of the development. Support is expressed for the vegetated landscape buffer proposed in Policy S/CBC clause 17d, with a recommendation to expand the Strategic Enhancement Area southwards to Magog Down to enhance nature and landscape character.	201552 (J Flynn, Chair, Stapleford & Gt Shelford Neighbourhood Plan Steering Group)

Improved landscaping policies from the 2008 Cambridge Southern Fringe Area Action Plan should be incorporated into the draft Greater Cambridge Local Plan to ensure community and environmental benefits are preserved. The respondent argues for limited private car access on the new road and supports alternative transport solutions that would improve connectivity within the Cambridge Biomedical Campus, such as an on-road CSET route coupled with upgrades to existing roads.	
I am unable to find details of the Strategic Enhancement Area S/SEA/CBC which is referred to in 17d of Policy S/CBC.	201829 (F Goodwille)
We are disappointed that Site 40509 remains unallocated, which we consider unreasonable and inconsistent with the Local Plan's aims. HELAA review highlights clear discrepancies in site assessments. Compared to Site OS276, an allocated Green Belt site, Site 40509 performs significantly better, receiving five Green ratings and no Red ratings, whereas OS276 receives two Reds and only two Greens. Excluding Site 40509 on Green Belt grounds while allocating a less sustainable site is unjustified and demonstrates inconsistency in assessment and site selection, undermining the equitable application of the Local Plan's criteria.	204428 (Waterbeach Instruments Ltd)
Strong support is given to this policy. Cambridge Biomedical Campus is a globally significant hub of research and innovation that has led to tangible improvements to human health and wellbeing. Its expansion and regeneration deserves full support. The potential for Cambridge South to complement and support the expansion of CBC has long been evident, with housing delivered on Cambridge South intended to support the evolution of the Campus and to meet the needs of its diverse workforce. Whilst the two sites are now being promoted separately, that intrinsic relationship between the two sites remains obvious.	208216 (Pigeon Land and LIH)

CGC supports this policy and the allocation for expansion through release of land from the Green Belt for future phases to support the future development of the Biomedical Campus. The strategic importance of CBC has been stated in the Written Ministerial Statement 8th May 2024, including support for the accelerated delivery of any associated housing development and the provision of appropriate levels of affordable housing to meet the housing needs of those working at the campus. CGC recommends that further consideration is given to the boundary of this allocation in relation to the proposed access. The access as shown on the Spatial Framework plan figure 63 appears not to be deliverable due to the consented scheme to the north of Babraham Road. Therefore, an alternative redline for the proposal allocation should be considered to allow for alternative access arrangements.	203914, 208940 (Cambridge Growth Company)
This section needs to give priority to measures that will improve the mental as well as physical health of people. See the research in Neuroarchitecture and note how the existing building style ***increases levels of mental stress in the brain*** - achieving the opposite of what hospitals and health facilities are meant to do. The Frank Lee Centre should be made public and *massively expanded* to become a leisure centre. Provision for a new lifelong learning centre is essential.	203762 (A Carpen)
Provision for keyworker housing near the Cambridge Biomedical Campus should be made given the additional hospital construction happening. The distances staff have to travel involves crossing county boundaries for too many. This could be a requirement for developments at any existing or proposed railway stations, and possibly light rail stops should such a system get built.	203828 (A Carpen)
Urgent need for a masterplan prior to further development Need for a direct link in this policy between jobs and housing availability to ensure they come forward together.	202847 (Cambridge City Council Liberal Democrat Group)

EWR Co supports the principle of the development and expansion of the Campus, as it aligns with EWR Co's objective to facilitate economic growth within the Oxford–Cambridge Growth Corridor. EWR will contribute to the Councils' vision for the Campus.	211898 (East West Rail Company)
Support the expansion of the Cambridge Biomedical Campus, recognising its importance to healthcare and science. Concerns are raised about the safety and wellbeing of staff commuting to the site, highlighting current commuting experiences as lengthy and potentially dangerous. Many staff cannot work from home and must travel to campus, necessitating improvements in convenience and safety. Many staff cannot afford to live in Cambridge, limiting their commuting options to car. Improvements in parking and bus services are essential to accommodate the growth of the campus. The frequency of the guided bus service should be increased, particularly during peak times. A shuttle bus from Cambridge Train Station to the hospital is suggested to alleviate capacity issues on the guided bus for those travelling to St Ives.	201173 (A-J Denman)
The biomedical campus is a good location for as much development as possible. I has a new station, a number of bus routes and jobs and amenities. As much development as possible, as dense as possible should take place. If anything, it should go further than what the plan currently proposes.	203616 (H Thomas)
My 14-year ecological study shows that the fields adjoining the Biomedical Campus hold remarkable populations of farmland wildlife. Encroachment of CBC has already had an impact on threatened species and S/CBC will further increase the pressures. While the proposed mitigation is an improvement over the first proposals in 2021 there will be tensions in the way the mitigation fields may be managed. To help conserve threatened farmland species I recommend a combination of enhanced arable land with some grassland and wildflower plots secured under long-term agreements, with	202585 (J Meed) (206306, 206307, 206308 206309, 206310, 206311, 210870, 210871, 210872 210873, 210874, 210875, 210876, 210877, 210878,

species-specific conditions for farmland birds including appropriate management and annual monitoring.	210879, 210880, 210881, 210882, 210883, 210884, 210885)
Object, CPPF acknowledges the importance of the site and supports the release of Green Belt land for clinical and research investment but opposes further boundary expansion in future Local Plan reviews. The Cambridge Biomedical Campus SPD, adopted in April 2025, should be referenced in supporting documents. An updated master plan is necessary to identify redevelopment opportunities and strategic landscaping to mitigate impacts on the landscape. Policy needs to require the masterplan to be updated. Consider restricting development to those uses where it is essential to be onsite. Amend policy to direct housing development to sites not needed for biomedical purposes. Heavily scrutinise and sensitivity-test forecasts for modal shares for transport to/from the CBC. Test all routes onto and through the Campus for adequate capacity for all modes, recognising that there will be large cohorts of people walking and cycling to and from Cambridge South station. Revisit the options for providing bus priority between the Babraham P&R and the Biomedical Campus to also accommodate buses arriving on the A1307 from Haverhill via the Babraham Research Park.	202862 (Cambridge Past Present and Future)
CPPF is concerned that residential development may encroach on land needed for biomedical purposes, advocating for housing only on unsuitable land. High-rise residential developments should be located in areas appropriate for such buildings, and housing should be limited to key worker accommodation. Policy needs to require the masterplan to be updated. Consider restricting development to those uses where it is essential to be onsite.	209295 (Cambridge Past Present and Future)

CPPF suggests a different approach to development and green space on the south-east boundary to enhance outcomes for nature and people, referencing the Wildlife Trust BCN. Mitigation strategies for new habitats should consider the needs of red-listed farmland birds and may require off-site nature-friendly farming.	209296 (Cambridge Past Present and Future)
The Wildlife Trust supports point 14(b) of the policy and the principles in bullet 17(c). The Wildlife Trust fully supports effective buffering of both LNRs at Nine Wells and Beechwoods. The fields immediately to the east of Nine Wells are also essential to buffer this site and protect the chalk springs. The Biomedical Campus is known as a hotspot for farmland birds. The proposed landscape enhancement and accessible greenspace provision will not provide suitable compensation for the loss of farmland bird population. These will need off-site areas of nature friendly arable farming with a secure long-term future and not typical greenspaces. The policy doesn't adequately provide for this. We are extremely concerned overall that the proposed landscape buffer is the wrong solution in the wrong place in terms of delivering nature recovery and ecological enhancement in line with the Cambridge Nature Network and the Greater Cambridge Green Infrastructure Opportunity Mapping. It fails to deliver the strategic natural greenspace that the City requires and demonstrates a lack of long-term vision to deliver the Cambridge Nature Network. A corridor from Beechwoods LNR to Nine Wells LNR around the edge of the Babraham Park & Ride site is not the right solution.	202995 Bedfordshire Cambridgeshire and Northamptonshire Wildlife Trust)
Wildlife Trust believes that now is the time for a comprehensive approach to long-term planning for development on the south-east edge of Cambridge to create a one-off targeted Green Belt release in appropriate locations and to deliver a regionally significant sub regional greenspace of 500 Ha in size", comprising a large accessible area of chalk downland and associated habitats from Cherry Hinton to	202998 Bedfordshire Cambridgeshire and Northamptonshire Wildlife Trust)

Beechwoods and Wandlebury, and on towards Magog Down. Targeted release of green belt land in more than one location will facilitate the land assembly required to deliver the strategic green infrastructure in the best location	
Nine Wells remains the principal source of spring water feeding into our chalk stream system, and so it is axiomatic that the Trust is directly concerned with the health of the springs and the curation of Nine Wells LNR. The Trust have legal agreements with developers at CBC to cover surface water arriving into the Brook. Parameters have been established for flow rates of run off and many interventions have been successfully including at Clay Farm and CBC. We believe that these legal agreements should be recognised in S/CBC. It should be explicit the importance of water quality and natural habitats.	209014 (Hobsons Conduit Trust)

Other comments from stakeholders

There are no designated heritage assets however there is a scheduled monument known site revealed by aerial photography west of White Hill Farm. There is also a grade II listed monument at Nine Wells with inscriptions including Thomas Hobson, of Hobsons Conduit. There are also important views of the edge of the city from the higher land to the south and in particular from heritage assets including the scheduled monuments of Little Trees Hill (on Magog Down) and Wandlebury. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA. We welcome 14c, 16c.and 16d and 28. 14c should also specifically mention the scheduled monument west of White Hill Farm as well as the listed monument at Nine Wells. The policy should include the need for a Conservation Management Plan of the heritage assets in the Landscape Enhancement Area including their ongoing maintenance. Criterion 16 should be amended to reference	210129 (Historic England)

the need to scale down heights towards the edge of the development as recommended in the HIA. However, we have some serious on-going concerns about heights and the softening of the edge of the City as well as landscape enhancements in the wider area. Landscape Enhancement Areas have been part of the previous Local Plan and yet there has been little change to the wider setting of the city in this broad area. It is imperative that future development of the Addenbrookes site is linked to positive offside mitigation to help enhance the setting of the City and indeed views from heritage assets along the southern hills. This aspect of the Plan, and the link between development and mitigation must be strengthened to ensure that it is implement. This issue applies not only in relation to Addenbrookes but to other Landscape Enhancement Areas in the Plan.	
Unless the Strategic Enhancement Areas start to deliver a softening of the landscape e.g. around Addenbrookes, we will have ongoing concerns about heights of development in the proposed CBC extension to the south of Addenbrookes.	208930 (Historic England)
A new purpose-built ambulance hub is required for Cambridge and the surrounding areas, ideally in the area of green belt south of the Cambridge Biomedical campus. The right infrastructure would include 1 ha of land to build the ambulance hub with close access to nearby main roads. The new ambulance hub would be designed to enable expansion to allow for population growth for the next 30 years. A new Ambulance Hub would cost around £20-£22m (including land purchase, EV charging infrastructure requirements).	210320 (East England Ambulance Service NHS Trust)
Site area includes a safeguarded Waste Management Area for the partially implemented EIC as shown on the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) Policies Map. Developers should be made aware that the partial implementation of this EIC involved the construction	210604, 210611 (Cambridgeshire County Council)

of underground tunnels; and this should be considered in any design. It is requested that supporting text to this effect is included in the Plan for this allocation. we welcome that nature is included within the policy for the Cambridge Biomedical Campus (including Addenbrooke's Hospital), particularly the need to 'improving ecological links between Nine Wells LNR and GoG Magog Hills' and the allocation of 'Non-development areas adjacent to Cambridge Biomedical Campus Strategic Enhancement Area' (S/SEA/CBC)	
Anglian Water welcomes the policy requirements set out within the Resources section of these policies, which sets out important measures including innovative approaches to water management on site, including SuDS, water reuse and solutions to address flood risk, and sewage disposal.	210192 (Anglian Water)

Comments Related to Garnham's Road Access

Object to proposed new vehicle access into CBC from Granham's Road • Not be needed if the suggested alternative for a busway spur off the A1307 Hinton Way roundabout was adopted, because this would connect all the CBC with Cambridge South Station (CSET fails to achieve this) and it would significantly reduce traffic volumes near Addenbrooke's / Babraham Road /Hills Road and provide emergency vehicles a direct blue light route into Addenbrooke's. • A link from Granham's road into CBC would exacerbate congestion at junction with the A1301 High Green (at the Coop) and the queuing at the level crossing. • The Better Ways for Busways' alternative for a busway, as cheaper, faster to achieve and far, far less damaging to our environment and respectful of the Wandlebury landscape	202085 (Great Shelford Village Charity) 201552 (J Flynn, Chair, Stapleford & Gt Shelford Neighbourhood Plan Steering Group) 202664 (A Gannon) 202639 (S Newman) 204955 (O Arthurs) 207657 (K Foreman)

• Proposed route doesn't seem to take into account the destinations which travellers wish to access, i.e. Cambridge South Station, all part of CBC, proximity to Babraham P&R Previous plan committed not to build south of Granhams road • To facilitate the alternative CSET route, we support upgrades to Francis Crick Avenue and Dame Mary Archer Way, as per clause 20b • Granham's Road. This is across farmland, from a notoriously poorly maintained and difficult road • Proposed entrance to the expanded Cambridge Biomedical Campus from Granhams Road may worsen traffic and should restrict private vehicle access • It may shift traffic congestion to A1301/Granhams Rd junction and Graham's Rd level crossing rather than alleviate it, and questioning the necessity of the road given that CSET is intended to reduce traffic volumes.	208406 (M Cooper) 209023 (Hobsons Conduit Trust) 202664 (A Gannon) 202626 (I Smith) 203156 (J Jasiewicz) 204979 (C Arthurs) 203081 (T Lane) 205650 (A Sykes) 203189 (V Morgan) 204457 (N Pond) 208557 (J Robinson) 203100 (C Schofield) 204979 (C Arthurs) 203102 (N Campbell) 204107 (A Baker)
PC would like to raise concerns about the extra traffic that will be using Granhams Road as the relief road joins with it because his is a fast signal track road. Would also like to highlight the importance of Nine Wells as an environmental site for rare chalk streams. Figure 64 shows the area being both sides of Granhams Road (this is land being released from Greenbelt) but maybe some of this is to retain a green area.	202535: 205585: 205586 205587, 205588,205589 (Little Shelford Parish Council)

Object, why continue to pursue an access into CBC from Babraham Road at Granhams. This will increase congestion. It is too close to Addenbrookes and will require a roundabout or lights. The access should be near the Babraham Road roundabout where there is more space to allow a better flow of traffic into the CBC. The policy rightly emphasises the importance of the Gog Magog Hills, yet it has deemed approval of an ill-considered busway which will visually dominate the most attractive landscape close to Cambridge and seriously harm the Green Belt throughout its route. It is a tragic situation. The busway route is hugely flawed. Seven thousand residents have objected and how can the County deem approval at the same time as stating that it harms the Green Belt and is inappropriate development. Although the GCP have spent ten years considering CSET, the approved busway route should be abandoned. For years those who use the 1307 know that forming a good access into the CBC near to the Babraham Road roundabout would be the most effective solution allowing both bus and car access.	204119 (B Reeve)
The Transport Strategy needs thorough scrutiny, particularly regarding the realism of mode-shares for train and bus transport. The technical note on Granham's Road realignment lacks clarity on tested options, and some claims about integration benefits require further examination. Consideration should be given to bus services from the A1307, with potential advantages from a continuous inbound bus lane or separate busway.	209297 (Cambridge Past Present and Future)
Granhams Road	208744 (Trumpington residents Association)

Unless the CBC Landowners devise and implement a robust contemporary solution to ensure that the CBC's private roads are only used by authorized users – and no-one else – the proposal to realign Granham's must be a non-starter.	

Comments raising transport issues

Connectivity between the Biomedical Campus and West Cambridge is required. The Plan must identify and secure key off-site active travel improvements. On-site walking and cycling improvements should not be delayed further.	205245 (K Brightwell) 204600 (D Potts) 202516 (H Brown) 205163 (J Grantham) 205410 (A Williams) 207542 (R De Beauz) 202306 (R Macdonald)
Expansion of the Biomedical Campus is understandable given its regional and national importance. However, the Local Plan does not yet set out a sufficiently robust spatial strategy to accompany this growth. While Cambridge South station will significantly improve access, it primarily resolves an existing deficiency rather than enabling the scale of growth now proposed. Transport cannot be treated as a single intervention. Large-scale employment growth without corresponding housing or genuinely mixed-use development risks intensifying peak travel demand and increasing pressure on already constrained corridors. At present, the level of mixed-use development proposed around the campus is token. If the objective is to support healthcare, research and education, the Plan must enable	209066, 211771 (Camcycle)

people to live close to where they work. The policy should: ● Require genuinely mixed-use development at a meaningful scale within and adjacent to the Biomedical Campus, including high-density housing with low car ownership, to reduce the need for long-distance commuting ● Avoid token residential provision and explicitly link employment growth to housing delivery in a walking or cycling distance to the campus If land is released around the Biomedical Campus, the Plan should not embed physical and spatial constraints that prevent homes being built close to the campus. The Plan identifies cycle connections over the railway but does not acknowledge that these are already major failure points as well as a fragmented on-site network. The busway bridge requires significant intervention, either through cantilevered widening or a parallel structure, if it is to support the level of cycling demand associated with further Campus expansion. Connectivity between the Biomedical Campus and West Cambridge is critical if growth in these two areas is to be successful. This is discussed further in the following section. The policy should: ● Ensure that boundary treatments associated with Green Belt release do not create long-term physical or spatial barriers to movement, future connections or neighbouring communities ● Identify the active travel connections over the railway line as critical infrastructure and explicitly acknowledge the need for improvement ● Secure firm commitments to upgrade the key walking and cycling corridors serving the campus,	

including Trumpington Road, Long Road and the busway path with delivery tied to development phasing.	
With such a significant expansion proposed, including green space provision, I question whether it is wise to try and fit everything on this one site. It will be the size of a town, but it lacks the transport infrastructure to cope properly. For staff, visitors and patients (for some of whom this hospital is not local) it would make more sense to consider another location outside Cambridge. There is only such much that can be built here.	201197 (B Nicolson)
Priority access by bus from the Park&Ride/South Cambs along a new road would be very welcome. It would be great if the Plan and accompanying Transport Strategy brought about 20 minute journeys by any mode between Eddington/West Cambridge and the Biomedical Campus.	203213, 205600 (S Hughes)
The Biomedical Campus has a policy of preferring public transport over private car use. But Stagecoach can't match this, leaving people often waiting 30 minutes or more for a bus to the station and centre from 17:00 to 17:30. I leave my desk at 17:01, arrive at the bus terminus at 17:10, and then wait. And wait. Buses to the station and centre should be every 5 minutes. The RTPI needs to be reliable (currently broken again!) If I miss 18:00 connecting bus, I have a 30 minute wait for the next to Bar Hill.	201041 (P Spowart)
I work at Cambridge Research Park, can see it from the edge of the village but inaccessible by bike. How did they get permission for a site with no safe cycle accessibility.	202641 (C Amos)
Growth of the biomedical campus can only be sustainably achieved if: More housing is planned along it, with <1 parking space per housing provision; boundary treatments associated with the green belt does not hamper active travel movement in the future - more emphasis is put on active travel connections over the railway, in particular a widening of the busway bridge or new path parallel to it clear	203732 (T Preud'homme)

commitments made to upgrade the key walking and cycling corridors serving the campus, including Trumpington Road, Long Road and the busway path with delivery tied to development phasing.	
(1) The Babraham Road Park and Ride is placed too close to the city centre. Regardless of whether the new busway gets built, the P&R should be further out with dedicated bus lanes between the P&R and Addenbrookes. That way cars have an incentive to use the P&R (skip the traffic) rather than driving all the way in. (2) I would urge the council to consider adding a bus stop on the busway bridge across South Station, making the transfer between buses and trains seamless	203826 (A Chan)
Support plans to improve bus access to Cambridge Biomedical Campus (CBC) and links between the Babraham Park&Ride and CBC.	203239 Cambridge Area Bus Users)

Comments focused on the Cambridge South East Transport Scheme

I wish to comment against the proposed CSET bus route across green belt bordering the Gog Magog Hills which is due to cost 160 million pounds at current estimates. There is no need to pursue this route and destroy the landscape at such an astronomic cost when a perfectly good alternative has been proposed by Better Ways for Busways along the A1307 corridor from the A11 to the Cambridge Biomedical Campus. This could be done in sections to avoid disruption, much of the route already has bus lanes in place and the cost is a fraction of that proposed by the route across green belt which would ruin good agricultural land. The Gog Magog Hills have been included as a priority for enhancing green infrastructure and will be negatively impacted by CSET and therefore I strongly oppose this ill thought through strategy.	207646 (J Coppendale)

Object, CSET plan encroaches onto Green Belt land and does is not proposed to lie within the public transport corridor. The proposed Busway will urbanise the rural countryside of south east Cambridgeshire. The Gog Magog Hills will be negatively impacted, when this was a priority for enhanced strategic green infrastructure. The Gog Magog Hills have not been afforded the value and protection required when considering the environmental impacts of the proposed route of the CSET Busway. Construction of the proposed Busway is expensive, when a cheaper alternative is available.	205468 (J Macpherson)
Don't like the CSET plan to concrete over the fields to produce a busway to take commuters from Abington to Addenbrookes (bypassing the local villages). I believe buses should run down the existing roads and bus lanes should be added to existing roads. Nine Wells should be protected, along with the DNA path. Buses should run into the town centre not terminating at Addenbrookes. Train station, car parks at Foxton and Whittlesford need to be enhanced to run commuters to Cambridge stations such as Cambridge South. The CSET's destruction of Cambridge greenbelt is simply wrong, expensive and shameful.	207522 (C Ayling)
BC is continuing to expand along the A1307 and the alternative in road bus lane would include a new spur road that emergency vehicles could use to access A&E more quickly, potentially saving lives. CBC already has a new transport access for travellers coming from the South on the West side of the site with Cambridge South Station. So why build CSET that enters in the same location? Accessing the Eastern end of the site via the bus road provides a different alternative for anyone travelling from the Southeast, such as Linton and Haverhill where housing is less expensive and many of CBC's key employees live. Please do not approve the scheme as proposed by GCP.	208139 (M Harper)

Comments opposed to Green Belt Release

GSPC is opposed to any further expansion of CBC. CBC needs to focus on healthcare and R&D first and foremost, not commercial activities. • CBC should have a mix of uses ‘ together clinical care, clinical education and clinical research including medical research institutes which meet local, regional, and national health care needs – together with directly related biomedical and biotechnology research and development activities’. The Policy does not reflect the unique nature of the site. Policy should restrict uses to those that need the relevant proximity. • The need for the new acute hospital is not recognised either in the draft Plan or in this policy. Without the new acute hospital, we would suggest that the Local Plan is not viable. Policy also does not respond to various health care needs identified in the CBC demand report. Sufficient land is available within existing campus to meet healthcare needs. • The case for expansion has not been established because the underlying data used overestimate potential demand, by failing to identify and focus on those businesses which need to be co-located with anchor institutions, such as Addenbrooke’s and the LMB. • The case for the removal of further land from the Green Belt for expansion has not been made. The underlying data and plans for CBC submitted by landowners and Vision 2050 itself have not been subject to public consultation. Estimates of demand on which the draft Local Plan relies are fundamentally flawed. • Green Belt assessment misinterpreted, the site will cause very high harm to the green belt. • Gas main and landscape impact may limit granhams road realignment potential. Could realign and still leave land undeveloped around it or swap for phase 3 land near nine wells. Realignment may also simply shift pressure to A1301. Private car access should be limited. Question whether this multi-modal access road is needed at all if the Better Ways for Busways’ alternative for a	210897, 210898, 210899, 210900, 210901, 210902, 210903, 211934, 211935, 211936, 211937, 211938, 211939, 211940, 211941, 211942, 211943, 211944, 211945, 211946, 211947, 211948, 211949, 211950, 211951, 211952, 211953, 211954, 211955, 211956, 211957, 211958, 211959, 211960, 211961, 211962, 211963, 211964, 211965, 211966, 211967, 211968, 211969, 211970, 211971, 211972, 211973, 211974 (Great Shelford Parish Council)

busway spur off the A1307 Hinton Way roundabout was adopted. Proper enforcement of driving prohibition should be precondition.

- We support the proposals for a single integrated campus-wide masterplan for CBC and for the use of a single delivery body capable of managing the delivery of infrastructure and securing the long-term stewardship of shared facilities and public spaces. Should also be an energy masterplan.
- There has been no programme of landowner engagement with the community.
- We are concerned that the cumulative breadth, density and height of building on CBC will increasingly present a 'concrete wall' on the southern approach into Cambridge. Greater specificity should be given to the phrase "appropriate transitions in height, scale and landscaping". We are concerned that a lack of building height restriction.
- Policy needs to reference protection of nine wells. Affordable housing should be ahead of other development.
- we would like to see the Strategic Enhancement Area expanded: additional benefits to nature and landscape character would accrue if the Strategic Enhancement Area extended further south, along the SW side of Babraham Rd (i.e. that part of Babraham Rd which falls between Hinton Way and Haverhill Rd) all the way to Magog Down. Local Landscape policies have not been sufficiently responded to.

If, despite our opposition, the proposed release is included in the final Local Plan:

- It must be conditional on funds for the building of the new acute hospital being secured and building of the Cancer Research and Children's hospitals;
- It must be conditional on a solution to the continuing failure to enforce the prohibitions in The City of Cambridge Area G (Consolidation) Order 1993 (as amended) as they apply to the roads within CBC. The proposed southern access road from Granhams Road should not be multi-modal. Private cars should not be permitted to use it.

• Recognise CBC's unique and limited purpose - consideration should be given to including occupation use restrictions. Amenities should also be limited to those which need to be there. • Insufficient regard is paid in to the impact of CBC on the shrinking Green Belt that separates Cambridge from its necklace villages and on the neighbouring fragile Nine Wells Local Nature Reserve. Tall buildings are a particular issue, and we oppose a prominent entrance from Granhams Road.	
1. Object, I am opposed to any further expansion of the Cambridge Biomedical Campus ("CBC"). CBC needs to focus on healthcare and R&D first and foremost, not commercial activities. 2. The rebuilding of the acute hospital is crucial not only to the achievement of CBC's unique purpose, but also to the viability of the draft Local Plan. The healthcare needs of the current and growing population cannot be met without it, especially as the average age of that population is increasing. The need for the new acute hospital is not recognised either in the draft Plan or in this policy. 3. The case for expansion has not been established because the underlying data used overestimate potential demand, by failing to identify and focus on those businesses which need to be co-located with anchor institutions, such as Addenbrooke's and the LMB. This is a fundamental flaw. "Cambridge Biomedical Campus Vision 2050: Creating a life sciences quarter for Cambridge" ("Vision 2050") is not fit for purpose. Despite this, it underpins the supporting evidence submitted by landowners, which has been relied on by GCPS. In particular, the current plans propose disproportionately to expand the commercial activities at CBC. 4. As a result, the case for the removal of further land from the Green Belt for expansion has not been made out. This is compounded by a failure to recognise accurately the level of harm this removal will cause.	203820 (A Sykes)

5. The underlying data and plans for CBC submitted by landowners and Vision 2050 itself have not been subject to public consultation, yet the proposals in this policy (such as for 687,000 net additional sq m (GIA) of research and development floorspace (use class E(g)(ii)) specifically related to biomedical and biotechnology uses and clinical healthcare and hospital facilities) are derived from the relevant documents. 6. If, despite our opposition, the proposed release is included in the final Local Plan: (a) it must be conditional on funds for the building of the new acute hospital being secured and consideration should also be given to making it conditional on the building of the Cancer Research and Children's hospitals, each of which also appears important to the continuing success of CBC. (b) it must also be conditional on a solution to the continuing failure to enforce the prohibitions in The City of Cambridge Area G (Consolidation) Order 1993 (as amended) as they apply to the roads within CBC. Further, the proposed southern access road from Granhams Road should not be multi-modal. Private cars should not be permitted to use it. (c) the draft policy must properly recognise CBC's unique and limited purpose and consideration should be given to including occupation use restrictions. Amenities should also be limited to those which need to be there. (d) I support the proposals for a single integrated campus-wide masterplan for CBC and for the use of a single delivery body capable of managing the delivery of infrastructure and securing the long-term stewardship of shared facilities and public spaces.	
Object, the fields south of the CBC are a flood risk. Careful consideration needed: BIG collection ponds need to be in place close to Ninewells if this is to go ahead. Where are the workers for the new research	203790 (S Marelli)

institutes going to live? The housing market in Cambridge is saturated. More buildings will only mean more heat. Protect trees. There is currently no availability of shops at walking distance, a car is needed for everything.	
The loss of this green space for the community is psychological as well as physical - the sense of space when walking in these fields, when viewing the landscape from Addenbrookes bridge, Hobsons park, Nine Wells Nature Reserve and the DNA path. The proposed new buildings will close these spaces in, disconnecting us from the wider landscape of which we are currently part. The proposal is damaging and poorly considered, for both local people and nature.	203643 (H Donoghue)
Object to the loss of Green Belt for the proposed construction of 1,000 new homes at CBC, on the following grounds: i) The Employment & Housing Topic Paper Table 5.7 shows no need for additional office/R & D floorspace, above committed development, including 4 new schemes of 229,000 sq.m. Therefore, the loss of 22 hectares of Green Belt at CBC is not justified for office/R & D floorspace. ii) The need to redevelop Addenbrookes Hospital can be carried out on the existing site. proposed 1,000 homes is not justified under existing Green Belt policy as there is no need for homes for new employees at CBC. Legal Obligation/Planning Condition should restrict development to Specialised Housing for NHS/ Research workers on short contracts. The proposed 1,000 homes is not justified under existing Green Belt policy as there is no need for homes for new employees at CBC. The redevelopment of Addenbrookes will not result is major jobs increases requiring new homes. The Needs/Supply assessment Table 5.7 shows there is a surplus of supply.	204722 (R Turnbull) 210487 (R Turnbull)

If housing is considered necessary for CBC workers, a Legal Obligation/Planning Condition should restrict development to Specialised Housing for NHS/ Research workers on short contracts, for up to a one year tenancy, & the number of units reduced to 250 units of Specialised Housing, See Vale of White Horse Inspector's Report, pages 15-18, paragraph 56 onwards, on Issue 3: Exceptional Circumstances for housing at Harwell Campus not justified in AONB. This was due to loss of employment land & no need to housing next to employment land.	
Our opposition to the CBC's yet further expansion into our Green Belt does not result from purblind attachment to preservation of the Green Belt no matter what. It is the result of a rational and concerned view that neither the CBC in its submissions nor the two councils in this Draft Local Plan establish the "exceptional circumstances" which are the only grounds for further release – for the only incursion into the Cambridge edge of the Green Belt proposed in this Plan.	208743 (Trumpington residents Association)

Comments raising impact on adjoining communities

Red Cross Lane needs mitigation for the unintended consequences of the CBC/CUH growth to take off excessive no's never intended for a residential area. • CBC creates an environment conducive to innovation and knowledge creation, as evidenced by Cambridge's high number of patent applications per capita. The CBC serves as a hub for cutting-edge research and development, showcasing the positive economic impact of research funding in driving progress within the biomedical sector. Yet alongside rapid growth there can be unintended negative consequences, these can be felt by the neighbourhoods that the CBC site sits beside and on the established smaller residential areas. • A Neighbourhood Impact Report would be a valuable addition to the understanding of this effect locally, taking forward the" CBC commitment from its Vison 2050 to be a good neighbour.	207052 (207053, 207054, 207055, 207056, 207057, 207058, 207059. 207060, 207061, 207062, 207063, 207064, 207065, 210851, 210852, 210853, 210854, 210855, 210856210857, 210858,

• The disproportionate number of people travelling through the surrounding residential neighbourhood creates negative impacts. Active, continuing involvement with local governance bodies particularly the Greater Cambridge Partnership and Cambridgeshire County Council is needed to mitigate the impacts. Every effort including financial incentives, should be made to facilitate the maximum use of public transport and active travel. • Cambridge Biomedical Campus Vision 2050 rightly praises some of the public transport infrastructure, but has enough consideration been given to increases movement acres campus? Has the increased use of public transport by the surrounding neighbourhood been factored in? • Misuse of residential streets for Cambridge Biomedical Campus parking can be tackled. Misuse of residential streets by Private Hire Vehicle drivers can be tackled. CBC/CUH could support residents parking and double yellow lines so that the local streets are not used as an overspill car park for the campus. • Staffing targets are not being met, CUH have said 40 staff are lost a month due to not being able to offer accommodation. When new staff are recruited and then cannot find appropriate accommodation. Private accommodation is mistaken as being on the CBC/CUH site causing stresses for the area. Government guidelines recommend no more than 10% HMOs is any street/estate to maintain balanced neighbourhoods where there is a mixed tenure and no one need dominates and removes family housing. • Develop the Queen Edith's Employment and Skills Scheme. • Need toilets, taxi ranks, parking for private hire, patient drop off, blue badge spaces, better active travel routes, support for carers. • Recognise need for antisocial behaviour enforcement. Remove smoking sheeter near Red Cross Lane. Supporting residents prior to problems.	210859, 210860, 210861, 210862, 210863, 210864, 210866, 210867, 210868, (Red Cross Area Residents Association)
Red Cross Lane needs mitigation for the unintended consequences of the CBC/CUH growth to take off excessive no's never intended for a residential area. Red Cross Lane access needs closing as does the smoking shelter for safety of the residential area that CBC sits beside. Clearly demarcating boundaries	203294 203295 203296 203297, 210869 203298 (S Blackburn)

to CBC/hospitals site is required – to reduce crime, Anti-Social Behaviours, parking dangers/stress, illegal speeding motorbikes, crashes of emergency vehicles and other issues overspilling onto residential streets 24/7. Transition" on the basis that for a decade all reports have not had any positive impact on reducing the unintended negative impacts of growth. The policy requires development to 14 (a) "Integrate sensitively with adjoining residential neighbourhoods. Replace with new Route 3 to Nightingale Park via bus station path and Hills Road, avoiding Red Cross Lane. Remove existing Route 3 to avoid residential areas Babraham Park & Ride has established cycle routes away from Red Cross Areas built to high spec through Ninewells directly to CBC and Hospitals. This needs utilising to take away unintended negative consequences of CBC growth and over use of small residential areas bringing in crime, anti-social behaviours, traffic, parking stress, noise & pollution. benefits of campus growth for the local Red Cross Areas must include mitigating for the failures of previous growth that led to anti-social behaviour, littering and pavement parking.	
• Para 4 on page 212 says: The campus will grow to form a vibrant and sustainable neighbourhood, capitalising on its highly accessible location. It will be a high quality place to live... It isn't that now. The Nine Wells estate has almost nothing in the way of communal facilities, and Dame Mary Archer Way is a significant movement barrier between the Ninewells estate and the existing CBC facilities. • Capacity for approximately 1000 additional homes on the campus. The existing Ninewells population, plus 1000 new homes, is a lot of residents, yet their needs don't even get a mention. • There needs to be a transition down from 6 storeys at the west end of the phase 2 land to 4 storeys at the east end, and a transition from commercial to residential buildings. • Regarding Para 14b: This works both ways. The views of Nine Wells Wood and Magog Down from the main hospital ward tower and the children's hospital need to be preserved too	208143 (C Claxton) (208144, 208145, 208146, 208147, 208148, 208149, 208150, 208151)

• Regarding Para 17 on page 215: Figure 63 on page 219 shows something like this, extending northwards from Granhams Road to the eastern end of Nine Wells Wood. It needs to extend further north, to the "elbow" of Dame Mary Archer Way, to establish a green avenue through the ex-Green Belt land, visible from the hospitals, and creating a green boundary between the commercial and residential parts • Para 19 on page 215 says: Provide a network of world class, coherent, well designed and high quality public and communal spaces, taking a holistic campus wide approach, But again the needs of residents are not addressed at all. • Para 20 on page 216: this is entirely from the perspective of employees and visitors, the travel needs of residents are ignored. The residents don't just go to and from the CBC, they have lots of other journeys to make too. • Active travel needs more than the proposed east-west High Street, it also needs a safe and direct active travel route from/to Babraham Road, the 1000 new houses on the phase 4 land, and the existing Nine Wells estate. • Residents of the 1000 new houses on the phase 4 land are also going to need a bus route, unless they are expected to walk to Babraham Road or Dame Mary Archer Way to access public transport.	

Policy S/ED: Eddington, Cambridge

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

The University of Cambridge supported the general direction of the policy but suggested some amendments.

Natural England points out the proximity of the site to Eversden and Wimpole woods, and the need to consider mitigation. Historic England highlights nearby heritage assets, and that a range of views should be referenced. The HIA is clear than the site is not considered appropriate for tall landmark buildings. Therefore criterion 6 b should be deleted. The HIA references the need for reduced scale of development as well as landscape buffers and screening in the south-eastern area of the site. This should be included in the policy. The heights referred to in the policy and supporting text do not reflect the HIA. The Environment Agency request adding a requirement for a Flood Risk Assessment. National Highways provided the comments they made on the planning application for this site. Cambridgeshire Constabulary requested reference to fire & rescue, police and ambulance facilities funding.

Cambridge Past Present and Future ask for recognition of other views, including from Red Meadow Hill, and the additional cost of maintaining green infrastructure.

Other comments raise points including impact on car parking, rights of way, Huntingdon Road acting as a barrier, and the need for more variation in design and height of buildings. Better bus connections were requested. The Spatial framework should show the

Ascension Burial Ground City Nature Reserve, ands should include an East-West green corridor. The plan should make it clear that there should be no vehicular access at all from Storeys Way.

Response to the main issues raised in representations

Broad landowner support for the policy is noted. The policy has been amended to make it clearer the quantum of development for each phase and it is clear that future development should be well integrated with existing development. The policy does not provide a feasibility caveat to the provision of affordable housing as these matters are addressed through the housing policies of the Plan. The Local Plan, as set out in the Development Strategy and Homes Topic Papers, is clear that there is a housing need for specialist accommodation and that the Local Plan approach is, in part, to address these needs through the strategic sites of the plan. The employment wording in the allocation is now more flexible compared with the adopted Local Plan, and enables university related development to come forward at any time subject to policy requires of the plan.

The policy sets out the necessary supporting infrastructure required to deliver the site. Where this can not be secured and delivered onsite, the councils will seek to secure financial contributions for off-site provision.

The policy has been amended to note that future applications will need to consider the Eversden and Wimpole Woods SAC Impact Risk Zone and already notes that development proposals will need to take account of and safeguard nearby wildlife sites. The policy does not require the completion of Phase 1 of the development before Phase 2 can commence. This would need to be carefully considered through any future masterplan and phasing plan for the site, which would form part of the planning application process.

The Spatial Framework has been updated to reflect the previously missing wildlife sites and heritage assets. It would be for the planning application process to respond to the adjacent landscape and townscape features within and adjacent to the site and whilst these are broadly identified in the Context section of the policy, it now also makes reference to the east-west green corridor. The policy also includes additional reference heritage assets that would need to be considered through further heritage assessments as well as reference to strategic viewpoints. This list is not exhaustive and would need to be considered through these additional studies. The NPPF is clear that Local Plans should not prescribe specific building styles. Therefore the policy approach for high quality new buildings, as supplemented by the policies in the Great Places Chapter, as well as evidence such as the Skyline and Tall Buildings Strategy, is considered to be proportionate for plan making and provides a suitable policy framework to inform and assess future planning applications.

The indicative spatial framework has been updated to include Academic Led Development.

Wording has been added to the policy to address possible flooding concerns, which would also be addressed in more detail in the flooding and water management policies in the Local Plan.

The policy does not require existing footpaths to be removed, and these would be protected through other Local Plan policies and Rights of Way legislation. Whilst the ‘Girton Gap’ is still considered to be an important feature to avoid the coalescence of settlements and for them to maintain their own identities.

The policy, alongside the infrastructure related policies in the Local Plan, requires a comprehensive and detailed approach to be undertaken to address transport impacts of the development. This would include car park provision. However, it should be noted that the existing site is well serviced by active and public transport and future development should not undermine the existing

approach to sustainable travel that has already been achieved on the site. Given the M11 is a motorway on the Strategic Road Network, the Motorway Traffic (England and Wales) Regulations 1982(SI 1982 No. 1163) do not allow for buses to stop and pick up passengers on such roads. The policy wording has been amended in relation to private vehicle access as suggested by the representation. Subject to the approval and delivery of the Cambourne to Cambridge high quality public transport corridor, the site would be well connected with the proposed railway station at Cambourne. The site should provide new or connect to the active travel network to ensure people have access to other services, facilities and areas and therefore the policy maintains this requirement.

The policy notes the requirement for long-term management, maintenance and stewardship of infrastructure including landscape and open spaces. The requirement for financial contributions towards emergency services would be addressed through the infrastructure policy of the Local Plan and so is not repeated here.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The University supports the general direction of the policy to densify the site and make the best use of the available land. There are several detailed comments in relation to the policy wording which are attached in a table with comments set against the relevant policy/paragraph numbers. There is inconsistency across the plan of naming the site. Eddington should be used for all references to the site.	202528 (University of Cambridge)
Eversden and Wimpole Woods SAC should be included in the HRA (AA), particularly in relation to 'Physical Damage and Loss of Habitat – Natural England's Impact Risk Zone (IRZ) for this SAC is about	207603 (Natural England)

to be updated to a 6km core sustenance zone (CSZ) and a 10.2km landscape connectivity zone (LCZ) for barbastelle bats.	
No consideration is given to the Ascension Burial Ground as a prestigious cemetery or a City Nature Site. The site plan does not include an East-West green corridor and does not seem have sufficient green area at the east of the site to support existing wildlife in adjacent woodland, hedgerows and mature gardens. Figure 66 does not show the Ascension Burial Ground City Nature Reserve or mature hedgerows along field boundaries' noted in Context section v. It does not show the Grade II* listed property and Grade II listed garden at 48 Storey's Way almost adjacent the site and the further Grade II listed buildings at 29, 30, 54, 56, 63 and 76 Storey's Way.	202395 (K Wiemer)
Whilst the site does not include any designated heritage assets the site lies adjacent to Conduit Head Road and Storey's Way Conservation Areas and their associated listed buildings. Girton College listed at Grade II* and lodge (grade II lie to the north of the site. The American Military Cemetery, a grade I Registered Park and Garden lies at an elevated position of the west of the site, commanding long ranging views across the site. This contains the grade II* listed memorial and is also adjacent to the grade II * Madingley Mill. There are several designated heritage assets in the village of Madingley, including Madingley Conservation Area, Madingley Hall (grade I), and its grade II Registered Park and Garden, the grade II* church of Mary Magdalene as well as numerous grade II listed buildings. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA. 5a What about views from Madingley Cemetery and Madingley Hall/RPG?	210130 (Historic England)

We recommend that you add these views to criterion 5a. We welcome criterion 5b although in criterion iii 'Farrow' should read 'Furrow'. Criterion 6b: The HIA is clear than the site is not considered appropriate for tall landmark buildings. Therefore criterion 6 b should be deleted. The HIA references the need for reduced scale of development as well as landscape buffers and screening in the south-eastern area of the site. This should be included in the policy. We welcome criterion 6c. Paragraph 3.2.27 - The heights in this paragraph are not supported by the evidence in the HIA. The HIA says nothing about 5 storeys at the edge of the site, nor does it allow for testing for taller buildings elsewhere in the site. Indeed, it specifies lower heights in the south-eastern part of the site. Amend paragraph to more accurately reflect the HIA. See our recent response to 25/03746/OUT in which we set out our detailed concerns regarding height.	
North West Cambridge has an allocation within the current local plan but has been recognised that there is the ability to increase the capacity for new homes. National Highways are currently consulted on the planning application for the increased quantum of development on site. National Highways offered no objection subject to the inclusion of suggested conditions, including the requirement for a Travel Plan with a sufficient monitoring regime to ensure the development does not result in additional trips on the SRN, namely M11 junction 10.	209009 (National Highways)
This policy should refer to the requirement for a site-specific FRA to include hydraulic modelling of the ordinary watercourses within the site to define the flood extents at the site. The policy should also clarify that a sequential approach should be taken with more vulnerable development located outside of areas of fluvial and surface water flood risk.	211182 (Environment Agency)
Concern around the increase of population at the site and the reduction in car parking.	201237 (S Williams)

The proposed expansion of Eddington/North West Cambridge. It’s unclear to me from the documents whether the pathway from just north of Howe's farm, across the fields to Madingley American cemetery will be maintained. As a regular user of this path for walking/mental health, I hope that this walking route is to be kept.	201489 (K Bright)
Sustainable infrastructure (carried over from initial development) vital. New connections are made at marginal cost. Homes kept simple. Open gap with Girton village not necessary. Growing affinity. Huntingdon Road a barrier that needs to be diminished. Concerning appearances from the West, Eddington looks understated and variations in both colour and height would bring create more interesting perspectives and lend the distinctiveness that Eddington deserves. Given the distance from Eddington to Cambridge the access to a railway station is still an issue. U bus provides this capability. Rapid transit to both Cambridge and the future Cambourne station need to be options.	202113 (R Stobert)
The policies overlook two key issues. First, they fail to consider the strategic viewpoint from Red Meadow Hill, which offers panoramic views over Cambridge, the University of Cambridge West Cambridge Campus, and the historic city’s setting, ensuring building heights do not disrupt this view. Secondly The growing population from development will place a financial burden on the charity managing the nature reserve, highlighting the need for funding to maintain visitor facilities and manage the area effectively. The respondent requests that the development of West Cambridge includes mechanisms to support the creation of the nature reserve, aligning with the overall vision for the Local Plan.	202982 (Cambridge Past, Present and Future)
Need to be clear on *how* the site's taller buildings will improve the city's skyline given the mediocre and controversial designs that polarise opinions. Will there be an alternative design that makes	203779 (A Carpen)

provision for the 'teeming towers and dreaming spires' the tourist literature contains about Cambridge? The current style is bulky, bland, minimalist and repetitive. Can this local plan make provision for a building style where ornate and architecturally interesting (and aesthetically pleasing/inspiring) spires can be incorporated into a design style given their complete absence in the existing development?	
If we are serious about public transport, we need to think about how to connect West Cambridge and Eddington with the rest of the bus network. Being close to the M11 would strongly incentivise people to drive to South Cambridge or London if this is not well thought out. I suggest adding bus stops on the M11 (request permission for the DoT) either south (for off-road busway connections) or north (for on-road busway connections) of Madingley Road. This allows the operation of express buses to places like South Cambridge or London, preventing cars from overburdening the M11.	203833 (A Chan)
Policy S/NWC: Eddington (5,550 dwellings/14,850 population) (p.225) Under the subheading ‘Uses’ Section 4 – add a new criterion i. as follows; “i. Provision of a fire & rescue service drop down point & contributions to fire & rescue, police and ambulance facilities funding”.	207476 (Cambridgeshire Constabulary), 207509 (Cambridge Fire and Rescue)
The Context does not include the need to respect the Ascension Burial Ground as a City Wildlife Site and a cemetery. The Context does not include the woodland at the southeastern edge where the site borders Archaeology/Astronomy nor the mature gardens that surround the eastern boundary of the site. Public Space includes no provision for amenity to the east of the site.	208625 (Madingley Road Area Residents Association)
The provision for Nature does not include an east-west green corridor for wildlife between the Green Belt on the west of the site and the city wildlife site, the large mature gardens of Castle ward, college playing fields and Archaeology/Astronomy grounds to the east and southeast of the site.	208626 (Madingley Road Area Residents Association)

There are several errors and omissions in Supporting Information Figure 66. Most notable are the absence of the Ascension Burial Ground City Wildlife Site and a Grade II* listed property on the eastern boundary of the site. The location of the primary school is incorrect. The location of mature hedgerows is not shown.	208627 (Madingley Road Area Residents Association)
The plan should make it clear that Phase one of the development should be completed before any Phase two is commenced. The phases defined as in S/NWC: Eddington. The plan should make it clear that there should be no vehicular access at all from Storeys Way, and the adjective 'private' removed from section 14, so to ensure there is no conflict with section 11(c). 'The Ridgeway' runs NW from the cul de sac of Storeys Way towards Eddington eventually reaching Huntingdon Road. The Planning document should reflect this and not be misled by the developer's labelling.	210832, 210833, 210834, 210835 (Storeys Way Residents Association)

Policy S/WC: West Cambridge

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

The University supports the general direction of the policy which aligns with the approved Outline Planning Approval and offers flexibility for change across the plan period. Detailed comments are provided in relation to the policy wording.
Natural England points out the proximity of the site to Eversden and Wimpole woods, and the need to consider mitigation.

Historic England highlights nearby heritage assets. Any development of this site has the potential to affect these heritage assets and their settings. Criterion 9b should be extended to include the setting of the listed buildings. Cambridge Past Present and Future ask for recognition of other views, including from Red Meadow Hill, and the additional cost of maintaining green infrastructure.

Cambridgeshire County council requested that the policy required facilitating the Cambourne to Cambridge Busway.

Other comments asked for better bus connections, and measures to make cyclists feel safe. Better connections to other destinations in Cambridge. Measures are needed to control light pollution. Several comments reference the West Fields should be protected from development.

Response to the main issues raised in representations

Policies in the Local Plan require new development to be well served by active travel and public transport. At West Cambridge, whilst the site is reasonably well served by public transport, it is expected to improve with the proposed Cambourne to Cambridge High Quality Public Transport Corridor, which is now referenced further within the Movement section of the policy. As part of future applications on the site, the proximity to all public transport stops would need to be considered and outlined in a Transport Strategy and the enhancement of existing footways/cycle paths would be identified where required. Wider cross city bus movements and active travel connections are to be considered through the CPCA Greater Cambridge Transport Strategy, as they are the responsible body.

An additional policy criterion has been added to reflect that the site is now located within the Eversden and Wimpole Woods SAC Impact Risk Zone. Additionally, sensitive lighting strategies will be required for new developments across Greater Cambridge and therefore this is addressed through other plan policies.

The policy has been amended to reflect existing heritage assets and strategic viewpoints in this area, including assets within the site.

The policy notes the requirement for long-term management, maintenance and stewardship of infrastructure including landscape and open spaces. The requirement for financial contributions towards emergency services would be addressed through the infrastructure policy of the Local Plan and so is not repeated here.

Objections to other specific site proposals are noted and addressed through the Housing and Employment Land Availability Assessment (HELAA).

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Would suggest placing buildings near bus stops and improving existing pedestrian access to these stops. Worth mentioning that the footpath/cycle path along Madingley Road is in dire condition and needs improvement for safety. As a cyclist I do not feel safe cycling on it. Also attached a draft proposal for an interchange between east-west running buses (4/905/X3/proposed busway) and orbital/north-south running buses that may utilise the M11 for consideration. They would allow buses to serve trips between West Cambridge and the M11 corridor, which is currently ridiculously slow by public transport.	203835 (A Chan)
We strongly object to the development of the land named "Land off the Lawns" with ID 115526. The key reason: this landlocked lawn is a biodiversity hotspot, one of the few remaining ones within Cambridge. Its difficult access is a feature. While the land is much enjoyed by the neighbours, who thankfully don't abuse it, this land is a key resource as habitat for wildlife. Please consult the sample of the large diversity (140 species) in invertebrate wildlife housed within the land in the iNaturalist citizen science project area for the land, as can be seen at the inaturalist.org website.	204114 (Professor A Cardona)
The University supports the general direction of the policy which aligns with the approved Outline Planning Approval and offers flexibility for change across the plan period. There are several detailed comments in relation to the policy wording which are attached in a table with comments set against the	202530 (University of Cambridge)

relevant policy/paragraph numbers. There is inconsistency across the plan of naming the site. Cambridge West should be used for all references to the site rather than 'West Cambridge'.	
Eversden and Wimpole Woods SAC should be included in the HRA (AA), particularly in relation to 'Physical Damage and Loss of Habitat – Natural England's Impact Risk Zone (IRZ) for this SAC is about to be updated to a 6km core sustenance zone (CSZ) and a 10.2km landscape connectivity zone (LCZ) for barbastelle bats.	207607 (Natural England)
Considering the planned growth of the biomedical campus, many trips between West Cambridge and the biomedical campus are likely. It is essential that these are done via active travel and public transport. This will require an emphasis in improving bus priority to make it more reliable in the face of traffic jams. Two other improvements to the cycling and walking provisions are also needed: - recognize Sheep's Green Bridge limitations and plan a replacement or additional river crossings - require additional walking and cycling connections between West Cambridge and the Sidgwick Site to relieve pressure on Burrell's Walk	203741 (T Preud'homme)
Given the large number of buildings planned for the site each potentially contributing additional light pollution to what is a relatively dark area of Cambridge, the lighting requirement should be in the policy. The University has assured me that for recently developed and future buildings, lighting will comply with category E2 (Village or relatively dark outer suburban locations). Despite this, it is unclear whether the most recently opened building (photo attached) complies with that standard. It would help for the requirement to be clear to architects from the earliest design stage to avoid unnecessary lighting from the outset.	203205 (K Weimar)

I am against development of the West Fields site off Barton Road, and I support the city council, which I believe has rejected this site. It is part of the Green Belt, which is an important part of what makes Cambridge attractive and liveable for residents, visitors, and scientific / business companies. The site is also prone to flooding.	201343 (C Humphrey)
Development on West Fields (Site ID 115681) should remain protected from development until at least 2045 to save the green belt and prioritise and maintain open green spaces.	205701 (Newnham Labour)
I support the position taken in the proposed Local Plan to exclude from the favoured development sites the West Fields south of the West Cambridge site. This open area currently breaks up the ring of new development that is gradually encircling the city, allowing city residents to walk or cycle out into the countryside avoiding urban areas. It also allows wildlife a route from the river and parks within the city to open countryside.	201473 (V Yates)
The policies should consider the impact on the strategic viewpoint of Red Meadow Hill, which offers a panoramic view over Cambridge and is significant for the historic city's setting. There is a need to acknowledge the transformation of land on the western edge of Cambridge into a nature reserve, which will enhance access to green space for West Cambridge Campus users. The respondent highlights the financial burden on their charity to maintain paths and manage visitors to the nature reserve, indicating a lack of funding for necessary facilities and management. The respondent requests that the policy includes mechanisms for the development of West Cambridge to support the creation of the nature reserve, aligning with the vision for the Local Plan.	202988 (Cambridge Past Present and Future)

Clear and explicit statements on the long-delayed West Cambridge Swimming Pool that the University of Cambridge still has not built must be incorporated into this section. Don't let the University get this struck out.	203827 (A Carpen)
Outline planning permission was approved under planning reference 16/1134/OUT. Sport England commented on the planning application on November 2nd 2017 raising no objection to the proposal. The provision of on-site sports facilities should be informed by an up to date evidence base, and any subsequent updates. Sport England are aware that the Council are in the process of undertaking a PPS and BFS, and that a FPM for swimming pools has been completed.	209222 (Sport England)
The grade II* listed Schlumberger Gould research Centre is located within the West Cambridge site. There are two Conservation Areas, West Cambridge and Conduit Head Road adjacent to the site (and their associated listed buildings). Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA. We broadly welcome criterion 9 Criterion 9b should be extended to include the setting of the listed buildings. 3.2.48 The Schlumberger Building is grade II*. The text needs to be amended (currently says grade II). Reference should also be made to the listed buildings in the adjoining conservation areas	210131 (Historic England)
Movement – there should be a statement referring to facilitating the Cambourne to Cambridge busway and associated active travel route.21	210586 (Cambridgeshire County Council)
It is entirely possible to deliver a safe, high quality cycling route between West Cambridge and the Biomedical Campus that would support 20-minute journeys. Delivering a 20-minute public transport journey would require significant reductions in general traffic in the city core particularly around Lensfield Road and the approaches to the city centre. Connectivity between West Cambridge and the Sidgwick	211772, 211773 (Camcycle)

Site must also be improved. These interventions involve decisions that could be explicitly acknowledged and supported through the Local Plan. Without this, bus-based solutions will remain constrained by congestion. Identify active travel and public transport connectivity between West Cambridge, the city centre and the Biomedical Campus as a strategic priority.	

Policy S/HHR: Land between Huntingdon Road and Histon Road

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments from the landowner broadly support the continued allocation of Darwin Green and welcomes a single comprehensive policy for the site, given its advanced planning and construction status. However, they propose several detailed wording changes to the policy.

Additionally, other comments request amendments focusing on ensuring appropriate noise mitigation (prioritising earth bunds over reflective barriers), maintaining watercourse base flows, securing good active-travel permeability without vehicular links to Girton, future-proofing the internal road network for buses, and establishing clear governance for the Country Park.

Historic England highlight heritage considerations (including potential assets and the Conservation Area). There are also comments requesting financial contributions to emergency services be explicitly included.

Response to the main issues raised in representations

The policy has been amended to reflect the recent planning consents for the various phases of the development. However, the policy retains the requirement for two primary schools, which is based on the latest understanding of education requirements generated by the development. If this were to change for later phases of the development, this would need to be justified and agreed with the Education Authority.

The policy provides additional criteria relating to noise mitigation measures and the requirement for the delivery and long term stewardship of the Country Park to be secured through a legal (S106) agreement. It also now identifies the adjacent Conservation Area and has also been updated in the Heritage Impact Assessment for the site. At this stage, there are no known other potential heritage assets in this location, but there is a formal process to designate new Statutory and Non-Statutory Heritage Assets where applicable.

The policy does not address the base flow of existing watercourses as this is addressed through Policy CC/IW: Integrated water management, sustainable drainage and water quality and therefore does not seek to repeat other policies set out in the Local Plan.

Financial contributions towards essential infrastructure, including emergency services, is addressed by Policy I/ID: Infrastructure and delivery and is therefore not repeated in this policy.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**
The respondent supports the continued allocation of Darwin Green under Policy S/HHR but requests minor changes to the policy wording. Darwin Green has historically been divided into two allocations, one under the Cambridge City Local Plan (Policy 20) and one under the South Cambridgeshire Local Plan (Policy SS/2), due to its location across two local authority boundaries. Both allocations have outline planning permission, with Phase 1 partly occupied and under construction, while Phases 2 and 3 are at Reserved Matters stage. The respondent supports a comprehensive policy approach for Darwin	203032 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)

Green in the emerging Greater Cambridge Local Plan, acknowledging the advanced construction and technical work already completed. The respondent has provided specific wording changes for Policy S/HHR, indicating proposed deletions and additions, with justifications for these changes outlined.	
It is important that earth bunds should be prioritised and if not, any noise barriers must be absorbent and not reflective. Reflective barriers along Orchard Park have increased noise issues.	203954 (Histon and Impington PC)
The policy should require a suitable compensation flow should be provided so the pre-development base flow of existing watercourses is achieved at all times	201663 (J Pavey)
Given the proximity to Girton and neighbouring areas, permeability will need to be addressed: • for active travel, to ensure good and safe access to new services and facilities and to existing bus services • agrees that the development should not provide direct vehicular access to/from Girton • the internal road network needs to be future proofed for buses	202140 (R Stobart), 203837 (A Chan)
Clear governance arrangements will be required for the Country Park	202140 (R Stobart)
Are Woodhouse and Impington Farms potential heritage assets	202140 (R Stobart)
Contributions to fire & rescue, police and ambulance facilities provision/ funding should be added to the policy wording	207477 (Cambridgeshire Constabulary), 207510 (Cambridge Fire and Rescue Service)
The Conservation Area has not been considered in the Heritage Impact Assessment or the policy wording	210132 (Historic England)

Summaries of Representations: Sites Other Site Allocations on the edge of Cambridge

Policy S/EOC: Other Site Allocations on the edge of Cambridge

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Historic England requested that criteria 1 of the policy be clarified to list the sites.

Other comments on this introduction were related to site allocation proposals. Green belt releases were proposed for a variety of reasons, including additional development needs, that grey belt should have been included, and due to the specific opportunities the proposals provide, including for housing, employment and a travel hub.

Response to the main issues raised in representations

In response to Historic England's comment the policy structure has been clarified.

Proposals for alternative site shave been considered though an update to the Housing and Economic Land Availability Assessment where they fit within the broad emerging strategy of the local plan. New evidence submitted has been considered, and where

considered appropriate scoring has been amended. Comments related to strategy choices have also been considered, particularly under the development strategy policies. It is not proposed to add additional village sites to the proposed submission local plan. An update to the Green Belt Study has been carried out to consider which areas would meet he governments definition of being grey belt. Whilst some site may meet the definition, exceptional circumstances is still required for green belt release, and the Councils do not consider that exists in light of alternatives available.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Criterion 1 is unclear as to which sites it is referring to. We recommend that Criterion 1 should list the four sites.	210133 (Historic England)
Land North of Madingley Road, Cambridge (HELAA Reference 40491 / Site ID 115543) Site is very suitable for an allocation for B2 (General Industrial) and B8 (Storage and Distribution) uses, including but not limited to high technology industries such as digital infrastructure data centres and gigafactories. Draft plan not currently meeting employment needs.	211514 (Trinity College Cambridge)
Land East of Gazelle Way site (HELAA Reference 40250) The Development Strategy should include additional allocations on the Edge of Cambridge to balance housing supply and mitigate risks of delays from New Settlements. Further growth on the edge of Cambridge is seen as sustainable due to existing infrastructure and proximity to jobs and services. The Council has not conducted a comprehensive Green Belt assessment, which is necessary to identify suitable Grey Belt land for development. Endurance Estates objects to the omission of the Land East of	205103 (Endurance Estates)

Gazelle Way site (HELAA Reference 40250), proposing it for a mixed-use development of in the region of 1,500 dwellings and employment space. Site is grey belt.	
Land adjacent to A1303 and M11, Rectory Farm, Cambridge (HELAA Reference 208800) Representation in relation to a site submission to be tested through the HELAA. A range of issues raised on plan strategy including that plan should address higher development needs, grey belt land should be located. Land adjacent to A1303 and M11 is suitable for residential or commercial development due to its sustainable location and access to transport. The site could also serve as a Travel Hub to alleviate pressure on Madingley Park and Ride, potentially freeing it up for housing or employment growth at Eddington or West Cambridge.	211091, 202044 (Wimpole Associates Ltd)

Policy S/EOC/NWO: Land north of Worts' Causeway

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

The policy requires further consideration of landscape and heritage impacts, specifically noting on-site and adjacent heritage assets that could be affected by the proposed development. Additionally, concerns were also raised regarding active travel site access and shared facilities.

One organisation identified that the site should be considered as part of a wider Green Infrastructure opportunity that aligns with the southern part of the city.

Response to the main issues raised in representations

The policy has been amended to account for the on-site and adjacent heritage assets that could be affected by the development. Additionally, the policy also reflects that landscape mitigation measures for the site should be linked to the green infrastructure provision on-site and how it forms part of a wider network. However, the proposal in the representation to re-consider the Development Strategy and Green Infrastructure network across the southern part of the City has not been taken forward in this specific allocation as it for the Development Strategy to consider this matter.

The policy already requires good access by active travel into the site but additional measures as well as new facilities are not currently deliverable having been considered as part of the planning application process for application 20/01972/OUT.

Table of representations

Summary of issues raised in comments	Comments highlighting this issue
We believe there could be a different approach taken to development and green space on the south-east boundary of Cambridge, which could deliver even better outcomes for nature and people. We refer you to the response made by the Wildlife Trust BCN and the potential for an enabling development which could better deliver the ambitions of the Cambridge Nature Network by extending new green space and habitat creation from Nine Wells, north-eastwards to Cherry Hinton Chalk Pits.	202993 (Cambridge Past, Present and Future)
More needs to be included on multiple entrances and exits - especially by footpath/cycle paths. Must avoid building another housing estate with only a single point of access. What contributions will be made to what shared facilities either on site or on neighbouring sites will be made so the area doesn't end up as a dormitory neighbourhood requiring long journeys to get essentials?	203782 (A Carpen)
There are no designated heritage assets within the site. The grade II listed Milestone lies just to the east of the site. The milestone will need to be protected during the construction works. We welcome the preparation of the HIA. We welcome criterion 1a. The policy should also refer to the Building of Local Interest, Netherhall Farm (though we appreciate it is	210134 (Historic England)

mentioned in the supporting text at paragraph 3.2.70). The policy/supporting text should also refer to the need to protect the milestone.	

Policy S/EOC/SWO: Land south of Worts' Causeway

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

The policy requires further consideration of landscape and heritage impacts, specifically noting adjacent heritage assets that could be affected by the proposed development. Additionally, concerns were also raised regarding active travel site access and shared facilities.

One organisation identified that the site should be considered as part of a wider Green Infrastructure opportunity that aligns with the southern part of the city.

There is broad landowner support for the allocation.

Response to the main issues raised in representations

The policy has been amended to account for the on-site and adjacent heritage assets that could be affected by the development. Additionally, the policy also reflects that landscape mitigation measures for the site should be linked to the green infrastructure provision on-site and how it forms part of a wider network. However, the proposal in the representation to re-consider the Development Strategy and Green Infrastructure network across the southern part of the City has not been taken forward in this specific allocation as it for the Development Strategy to consider this matter.

The policy already requires good access by active travel into the site but additional measures as well as new facilities are not currently deliverable having been considered as part of the planning application process for application 19/1168/OUT.

Table of representations

Summary of issues raised in comments	Comments highlighting this issue
We believe there could be a different approach taken to development and green space on the south-east boundary of Cambridge, which could deliver even better outcomes for nature and people. We refer you to the response made by the Wildlife Trust BCN and the potential for an enabling development which could better deliver the ambitions of the Cambridge Nature Network by extending new green space and habitat creation from Nine Wells, north-eastwards to Cherry Hinton Chalk Pits.	202999 (Cambridge Past, Present and Future)
More needs to be included on multiple entrances and exits - especially by footpath/cycle paths. Must avoid building another housing estate with only a single point of access. What contributions will be made to what shared facilities either on site or on neighbouring sites will be made so the area doesn't end up as a dormitory neighbourhood requiring long journeys to get essentials?	203781 (A Carpen)
There are no designated heritage assets within the site but the Grade II listed Milestone is close to the site. These needs to be protected during construction of the development and should be referred to in the policy/supporting text. Welcome the preparation of the HIA and criterion 1a of the policy wording.	210135 (Historic England)
The Cambridge Investment Partnership (CIP) support draft allocation S/EOC/SWO for land at Newbury Farm. As the Council is aware, CIP controls part of the draft allocation (Phase 3 - land on the western side)	204222 (Cambridge Investment Partnership)

and has already secured reserved matters approval, reference 24/01531/REM. The draft allocation accords with the details already approved.	
We strongly support the policy to reduce the urbanising impact on this edge of the Green Belt, to facilitate access to the countryside, and to manage car use.	210904 (Great Shelford Parish Council)

Policy S/EOC/BS: Bell School, Babraham Road

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Whilst the landowner is broadly supportive of the allocation, representations have been made that the policy should be more flexible in its approach to land uses and should provide the opportunity for residential or healthcare related development.

There are no designated heritage assets within or adjacent to the site.

Response to the main issues raised in representations

There are no amendments made to the policy. Whilst comments suggested that the policy should be more flexible in its approach to appropriate land uses, the site is in very close proximity to the existing educational facility and therefore provides an excellent opportunity to place purpose-built student accommodation adjacent to the school. In addition, the existing or future accommodation needs the school are not known. By allocating the site for student accommodation, the policy is taking a longer term approach to meeting existing or future occupier needs throughout the plan period.

The site is within close proximity to Cambridge Biomedical Campus (Policy S/CBC) which is identified in the Local Plan for approximately 1000 campus related homes. Therefore, this policy does not propose to allocate the site for keyworker NHS housing.

Table of representations

Summary of issues raised in comments	Comments highlighting this issue
The Bell Language School has closed. Can this site be turned into keyworker housing for the NHS hospitals?	203765 (A Carpen)
There are no designated heritage assets within the site and none nearby. No comments	210136 (Historic England)
The Bell Educational Trust is broadly supportive of the allocation of the Site at Babraham Road for residential uses. This is a highly sustainable site which is ideally suited for a range of uses that could make a valuable contribution to the NPPF requirement for 10% of the overall housing from sites under 1 hectare.	208389 (The Bell Education Trust)
The proposed allocation is for the remaining part of the Site which benefits from an extant planning permission for student accommodation. The site can only accommodate students associated with the Bell Educational Trust which historically meant the Bell School. Up until last year, this had been the intention of the Trust, but due to Bell going into administration, it is no longer an option.	208390 (The Bell Education Trust)
In line with Paragraph 127 of the NPPF, The Bell Educational Trust asks the Council to consider amending the policy to allow for greater flexibility regarding future occupiers and uses. Moreover, the requirements for student accommodation if any are unknown. The policy as worded would hinder the site being developed for other appropriate uses whether this be for student accommodation, other residential uses or even healthcare uses to contribute to housing need set out in Policy S/JH.	208391 (The Bell Education Trust)
It is therefore suggested that the wording of the policy be amended as follows: - Site area of 0.38 hectares	208392 (The Bell Education Trust)

- Capacity for approximately 100 student bedrooms or other residential uses or healthcare related uses in the alternative 1. Development proposals must demonstrate how they will meet the following requirements: a. With regard to new student bedrooms the need to contribute towards meeting the needs of the adjacent educational site or other existing educational institutions in line with Policy H/SA: Student accommodation whilst being carefully integrated; or b. Residential development and/or healthcare uses which sensitively respond in height, mass, density and landscaping to its immediate residential context.	

Policy S/EOC/FRE: Fulbourn Road East

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments raised concerns about the impacts of development on the adjacent properties and local townscape character. There were also comments regarding the site's accessibility by active and public transport, in particular the provision of a new railway station in Fulbourn.

One organisation identified that the site should be considered as part of a wider Green Infrastructure opportunity that aligns with the southern part of the city whilst another highlighted that the site should provide training opportunities for young people.

The landowner raised concerns about the lack of flexibility in the policy wording and noted that the site benefits from a planning permission. They also requested greater clarify on the proposed landscape buffer whilst Historic England noted that the site could impact nearby heritage assets and their setting and that the policy required clarification.

Response to the main issues raised in representations

The policy has been amended to provide greater flexibility in relation to the quantum of development. This is consistent with the approach taken for all site allocations in the Local Plan. The policy is also clearer that development should be informed by careful consideration of the local context, including townscape and landscape character and has removed the required to not build in the

previously undefined eastern part of the site. The supporting text also notes that the eastern part of the site is more sensitive in relation to the historic environment and so a design led approach is required for future applications.

The existing planning permission for the site is now referenced in the supporting text.

Responding to the comments on transport, the policy now emphasises the need to increase sustainable travel modes which will need to be addressed through a Transport Assessment, Travel Plan and Parking Strategy. There are no current proposals for a Fulbourn railway station from either East West Rail, Network Rail or the Department for Transport. New infrastructure of this scale would require significant investment which is beyond what can reasonably be expected from this one development.

The proposal in the representation to re-consider the Development Strategy and Green Infrastructure network across the southern part of the City has not been taken forward in this specific allocation as it for the Development Strategy to consider this matter.

Other Local Plan policies address issues relating to skills and training and so are not repeated in this policy.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**
Why have you decided the maximum height here should be so much less than that permitted at Mission Street (Land South of Coldham's Lane)? I would be delighted if you would put the same limit (no taller than three commercial storeys) also at Mission Street.	201238 (S Williams)

The respondent strongly supports policies 1a-f. They suggest a different approach to development and green space on the south-east boundary of Cambridge for improved outcomes for nature and people. The respondent references the Wildlife Trust BCN's response regarding enabling development to enhance the Cambridge Nature Network. They propose extending new green space and habitat creation from Nine Wells to Cherry Hinton Chalk Pits.	203003 (Cambridge Past, Present and Future)
There is already considerable traffic on Cherry Hinton Road & Fulbourn Road that extend beyond rush hours. Provision *must* be made towards having a new transport link from a new Fulbourn Railway Station on an upgraded railway line - which developers must contribute towards. Developers should be required to contribute towards public transport provision and *not* towards private commuter buses which provide local residents with no benefit and only costs - potholed roads and pollution.	203758 (A Carpen)
Provision should also be made for supporting new facilities for lifelong learning and for children and especially teenagers.	207471 (A Carpen)
BioMed Realty support the continued allocation of Fulbourn Road East under Policy S/EOC/FRE. However, to ensure the policy remains flexible and effective, several amendments are required. In particular, the policy should allow greater flexibility in the floorspace quantum and building height parameters, avoiding overly prescriptive limits that could constrain delivery. In addition, clarity is needed regarding the approach to any landscape buffer to the east of the site to ensure this is appropriately defined and controlled. Please refer to the covering letter for further detail on the recommended amendments to the policy wording.	201661 (BioMed Realty)

The policy should allow greater flexibility in the floorspace quantum and building height parameters, avoiding overly prescriptive limits that could constrain delivery	201661 (BioMed Realty)
Planning permission for development has been granted and implemented on site (ref. 21/00772/OUT, as amended by 23/03182/S73), demonstrating the deliverability of development within the proposed allocation. This is a fact that must be noted in the supporting text of the policy.	210427 (BioMed Realty)
The policy cites 56,000 sqm of development (the sub-text states 'approximately' 56,000 sqm). While the policy does not impose a fixed cap on development, the reference to a specific floorspace figure is unhelpful in its current form and risks being misinterpreted as a limit on the quantum of development. An amendment is needed to either remove the floorspace reference or replaced with a reference to an approximate figure of development	210428 (BioMed Realty)
Policy in its current form does not define what constitutes the 'eastern part' which introduces ambiguity.	210429 (BioMed Realty)
The inclusion of a fixed height restriction within the policy wording is unnecessary and overly prescriptive	210430 (BioMed Realty)
Section 1.f; this policy should require increasing sustainable travel modes, not merely consider it.	203597 (P Tribble)
Safe, direct cycling and walking and wheeling access is needed between Cherry Hinton and the Beechwoods/Roman Road/Babraham P&R. It would also connect to the Nature reserves and give safe pedestrian access avoiding Lime Kiln Hill which is simply unsafe on foot or cycle.	203836 (Mr Wookey)
Development has the potential to affect the Fulbourn Hospital Conservation Area and its setting. Criterion b is too vague. The policy should set out how much of the site can be developed. Criterion c – does not properly reflect the HIA. The HIA refers to the prevailing building height to the	210137 (Historic England)

north and west. To the north, development is 2 storey residential. Amend the policy to be clearer on heights. We welcome criterion e which reflects the recommendations of the HIAS.	

Summaries of Representations: Sites Existing Settlements

Policy S/NST: Northstowe New Town

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments focused on green separation, heritage, and community infrastructure. Several respondents emphasise that land forming part of the Longstanton and Oakington green separation — including Longstanton Meadows, ridge-and-furrow fields, and areas within the Longstanton Conservation Area — should be removed from the allocation or more clearly protected from development. This also included comments about the clarity of mapping, that recent permissions were granted within areas marked as green separation, and the need for a stronger policy statement preventing any built development in these gaps.

Historic England and other groups highlight the significance of Longstanton Paddocks, medieval remains, pillboxes, and nearby Conservation Areas, requesting explicit reference to these assets, with appropriate mitigation, and potentially a Conservation Management Plan noted in the policy. Other comments highlighted the need to protect ancient woodland and existing countryside, and to ensure heritage considerations shape land-use designations.

There were several comments regarding community facilities, services and social cohesion. Comments call for stronger provision for community spaces, emergency services contributions, improved healthcare delivery, faith and cultural facilities, and a clearer strategy for traveller pitch delivery. Northstowe Town Council also raises issues around employment space, self-build targets, education wording, and the need for a distinctive facilities and employment opportunities to help avoid the town becoming a dormitory settlement. Longstanton PC highlight the infrastructure burden on their village, which cannot support further development.

Homes England have broadly noted that matters that have been addressed through the consented developments should not be required in this policy to avoid conflicts with these consents and/or delays to implementation. They also note that the policy should not seek to introduce new requirements such as the provision of specialist and Gypsy and Traveller accommodation. Homes England also request clarification on ancillary uses within open spaces and note that some mitigation measures may fall beyond the red line boundary of the allocation.

Transport and connectivity concerns were also raised, with comments relating to for better public transport, fairer bus fares, and direct links to Cambridge North and the city centre. Respondents also support additional tree planting, clearer flood-mitigation requirements, and improvements to policy wording on recreation, including water-based activities and appropriate sports provision.

Response to the main issues raised in representations

- The Northstowe New Town policy is now supported by the Northstowe Strategic Enhancement Area (S/SEA/NST) Policy Area. This policy area specifically identifies that this land is designated to ensure that there is sufficient physical and visual separation between Northstowe and neighbouring settlements and maintains a soft, green landscape to enhance the wider rural setting and relevant Conservation Areas. This has also been reflected on the Greater Cambridge Local Plan Policies Map;

- The policy also identifies local heritage assets and that development will need to protect and, where possible, enhance their setting and how this will be managed through the preparation of a Conservation Management Plan. As this site was allocated in the South Cambridgeshire Local Plan (2018), has a site specific Area Action Plan (2007) and has been considered in further detail through subsequent planning applications, a Heritage Impact Assessment has not been undertaken;
- Additional flexibility has been set out in the Policy to support town centre uses coming forward within the new town that serves both local residents but also those in the wider surrounding area. This also includes greater flexibility in relation to specific forms of sports provision as this would need to be considered through a Sports Strategy; Additionally, the policy requires the provision of employment floorspace as part of a mixed and well balanced community;
- The policy outlines that the development of the new town must be well served by new services, facilities and open space and that these should be phased to the delivery of new homes so that residents, workers and visitors have easy access to them to meet their day to day needs. This also includes temporary provision until such time that permanent facilities are delivered. It has also been updated to reflect the latest education requirements;
- The policy identifies requirements relating to flooding and sustainable surface water drainage measures. Subsequent planning applications will therefore be required to address this policy requirement and for it to be secured through a legal (s106) agreement;
- Financial contributions towards essential infrastructure, including emergency services, is addressed by Policy I/ID: Infrastructure and delivery and is therefore not repeated in this policy;
- The Councils have identified a clear housing need for Gypsy and Travellers accommodation and the Council's preferred approach is to address this through a number of ways, including provision at the strategic sites. This is consistent with the previous approach of the South Cambridgeshire Local Plan (2018) and is reflected in the relevant conditions of the planning

permission for the site. Policy H/GT sets out the specific requirements for the implementation of this particular policy requirement. This approach also applies to specialist older persons accommodation.

- The policy requires the new town to deliver a range of homes including self and custom build. This would need to be considered for each phase of the development, in accordance with existing planning conditions attached to the outline permissions.
- Planning applications would have been considered on its own merits and in accordance with the adopted development plan.
- Adequate bus provision will need to be considered through future phases for development, specifically through subsequent versions of the Transport Assessment. This will inform whether additional funding is required to support additional services and/or a subsidy of fares for new residents.
- There are several ways in which new facilities can be secured and delivered. This will vary depending on site specific circumstances and it is not the role of the Local Plan to pre-determine a suitable approach to delivery.
- Whilst the council and the supporting text to the policy notes the existing planning permissions for the site, a number of policy requirements have been retained within the policy as they have yet to be implemented, for example, the Town Centre Strategy. This has been retained in the policy to ensure that any changes to the consented schemes can be considered against these policy requirements if required.
- The provision of ancillary uses to support sports and open space facilities is addressed through Policy WS/CF: Community, sports, and leisure facilities as it is not a specific matter related to this allocation.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**

Area bounded by Rampton Road, Long Lane, Mills Lane and Woodside (Longstanton Meadows) overlaps the Longstanton Conservation Area and forms part of the green separation between Longstanton and Northstowe. It provides substantial amenity value for the inhabitants of Longstanton and future inhabitants of Northstowe. It should be removed from the Northstowe Site allocation to make it clear that land to the west of Long Lane is not available for development.	201164 (A Helliwell), 211746 (Homes England)
The green separation between Northstowe, Oakington and Longstanton is part of the area's green infrastructure. The land between these settlements provides ecological connectivity, landscape character and access to countryside for nearby communities and should be recognised in the Plan.	204421 (Cllr Thomas Bygott)
The other problem with Northstowe and other new towns is lack of community, lack of community spaces, worse engagement, poorer mental health, and more anti-social behaviour. How do you plan to make these new towns have a realistic sense of community. This is not just about schools. Where can people join the bridge club, knitting circle, etc, etc, all these make a community and enhance individual's mental health? When Stevenage was developed, it quickly became the drug centre of England, in the 1970-80s. How can you learn from this example and others?	201503 (C Meads)
Group supports approach to heritage in Policies S/NS and S/NST, acknowledging the importance of heritage assets. Concerns regarding Longstanton Paddocks, where visible remains of the mediaeval village exist, which is subject to a management plan. Paragraph 11 of Policy S/NST restricts land uses between Northstowe and Longstanton to open land, which is deemed inappropriate for Longstanton Paddocks due to potential harm to heritage significance.	202945 (Northstowe and Longstanton Heritage Steering Group)

Recommend specifically mentioning Longstanton Paddocks in paragraph 54 of the Policy to ensure its significance as a key landscape feature is maintained and enhanced.	
Protected ridge and furrow field which forms part of the designated green separation between Longstanton & Northstowe needs to be recognised and made clear that field is protected and only used as green separation.	203780 (B Ball)
What is the one significant new leisure facility that this site could host, that has easy, frequent, and accessible public transport access, that could otherwise not be located in Cambridge City due to land prices and lack of land availability? Please make provision for this - co-ordinated with the other New Towns so that each place has at least one different facility that the others lack, thus encouraging people from within Cambridge to visit, and ensure that the New Towns are not dormitory towns. Ensure children & teenagers are involved at design stage.	203783 (A Carpen)
Under the subheading 'Uses' Section 7– add a new criterion n. as follows; "n. Contributions to fire & rescue, police and ambulance facilities provision/ funding"	207483 (Cambridgeshire Constabulary), 207514 (Cambridge Fire and Rescue Service)
Whilst the open land uses such as playing fields, allotments and cemeteries precludes housing, destroying ancient woodlands and existing countryside simply to provide a different sort of open space would be hugely detrimental. Proposals within the Longstanton Conservation Area should be reconsidered to provide a strong legal protection for existing countryside within it.	201154 (S Roberts)

The respondent supports the policy of providing a green separation on the northern side of Oakington, including tree planting to enhance the pastoral parkland character. The Oakington Inset Map is unclear regarding the green separation, particularly the brown areas and their designation, which the respondent finds confusing. The respondent presumes that the areas marked S/NS indicate site allocations but requests clarification on the map's key. The respondent raises concerns about recent planning permission granted for housing on land designated as S/NS, questioning how this aligns with the Northstowe policy area. The respondent objects to the use of any green separation land for housing, stating it contradicts the stated policy.	203557 (L Lawrence)
We note the inclusion of two Traveller sites in Northstowe of 12 pitches in each. We would like the Local Plan to clarify and confirm that these sites are to be located within the Northstowe Defined Development Extent and not on land bought outside these boundaries by Northstowe's developers, Homes England.	208077 (Oakington & Westwick PC)
We note and support the clear policies to maintain a green separation between Northstowe and Oakington and Westwick. It is important that there is no development from the Oakington and Westwick boundaries nor a further expansion of Northstowe. We note and support the commitment to plant additional trees and the need to maintain the green separation. We strongly object to any development being allowed in the green separation or that the green separation should take the form of playing fields, allotments, cemetery or for any other form of planned use.	208078 (Oakington & Westwick PC)
We suggest that GCSP submit an appeal against development for eight houses on the field between Manor Farm Close and the Northstowe boundary in order to maintain this green separation.	208079 (Oakington & Westwick PC)

We welcome the statement regarding flood mitigation, but there is a complete lack of detail and specifics in terms of location and form of flood mitigation. The Plan must include a statement regarding these issues.	208080 (Oakington & Westwick PC)
We note that the inset map provided is contradictory, suggesting that the area marked is both a green separation and also an area where certain forms of development could be permitted within the green separation. The map therefore needs to be redrawn to make absolutely clear that no development will be allowed between Northstowe and Oakington and Westwick and a policy statement should be included in the document to this effect.	208081 (Oakington & Westwick PC)
The Parish of Longstanton has provided the backbone for a significant amount of new housing in this area, notably the 'Home Farm' development within the village and now the development of Northstowe. The village's infrastructure cannot support further development. Councillors continued to raise concerns that this would not be the limit of land which is reclassified and that this process would be repeated as the need for housing arises.	208465 (Longstanton PC)
Residents have aired concern that some or all of the proposed 24 Traveller Pitches at Northstowe that would be located on any of the previously mentioned Green Separation Areas. While the council respects the need to provide facilities for all parts of the community, the historic significance and existing infrastructure within the village must be considered when locating these new facilities. These areas are not suitable for pitches. Confirmation is provided that the proposed Traveller Sites will be located within the Northstowe Defined Development Extent and not on adjacent land outside of the NDDE.	208466 (Longstanton PC)

Dedicated, direct, frequent, reliable and affordable connections should be provided connecting Northstowe with Cambridge North, and Northstowe with Cambridge City Centre. For the avoidance of doubt the current Guided Bus provision is unacceptable.	208058 (Northstowe TC)
We would like to underline the timescale for delivery of traveller pitches and add the requirement that such pitches may come only when a comprehensive set of facilities, strong community cohesion, and adequate provision of local services (policing, fire, healthcare, leisure, employment, etc.) are fully in place.	208059 (Northstowe TC)
A typo here predicts 1,018,000 homes; this should read 10,180	208060 (Northstowe TC)
The ratio of employment capacity to dwellings falls below other comparable settlements like Graven Hill and NW Cambridge. Without additional employment space Northstowe will be a permanent dormitory town and with more people commuting this may put more strain on the roads and public transport.	208061 (Northstowe TC)
While these uses are described using planning Use Classes, in addition it would be desirable to use plain language to describe what this means in practice. We would like Lab space to be specifically noted here, as it is in short supply locally.	208062 (Northstowe TC)
We note that Northstowe Phase 1 was delivered with zero self/custom build homes. There are three plots coming forward presently in the first parcel of Phase 3B, but we would welcome an additional target being recorded here so progress toward it can be tested against future planning applications.	208063 (Northstowe TC)

We are now far beyond "early occupation", and all involved parties have failed to deliver "Temporary (...) healthcare facilities" and indeed are in default on the Phase 2 S106 planning obligation requiring permanent healthcare facilities.	208064 (Northstowe TC)
It is unfortunate that the existing established S106 obligations provide for land for faith and cultural use but failed to provide for any monetary or in-kind contributions to realising facilities on that land. It is regrettable that providing facilities in a new and master-planned development has fallen solely on the shoulders of religious and community groups. This contrasts with Cambourne, where a S106 agreement provided for monetary contributions toward delivery of a church.	208065 (Northstowe TC)
We welcome and support this clear re-statement that Northstowe will be separated from adjacent settlements. This separation must be retained and neither Northstowe *nor the adjacent settlements* should be developed into the gap.	208066 (Northstowe TC)
Please strike "which will not undermine the vitality and viability of other nearby towns or compete with Cambridge;" It is essential that Northstowe Town centre is allowed to compete with others in the area. It would be highly inappropriate and unacceptable for the LPA to neuter development of the Town Centre because it could compete with other areas. Please also adjust "immediate surrounding area" to "wider surrounding area" for similar reasons.	208067 (Northstowe TC)
We support the principle of outdoor sports provision, but a bowling green is already provided in Northstowe with no further pressing need given the town's demographics. Would suggest padel or bocce is more appropriate for casual sports provision associated with a town park. It would be appropriate here to reference the close proximity of the secured swimming pool provision to the Town Centre.	208068, 208069 (Northstowe TC)

"Continue to offer recreational opportunities" please reword to "must offer water-based recreation opportunities in the future" as this is currently not happening	208070 (Northstowe TC)
We note that while the relevant S106 payments have been made during the development of Northstowe, for example to fund the capital costs of the Guided Busway, the current level of service provided to Northstowe residents in return is deeply unacceptable. In addition, the charging model adopted by the operator and approved by CCC sees bus journeys commencing in Northstowe attract higher fares than the same bus being boarded in adjacent settlements. The AAP demanded 12 months subsidised/free bus travel, so this text is a significant weakening of that. In any case, this was not made available to later residents. We believe that no such subsidy exists currently.	208071, 208072 (Northstowe TC)
Sport England supports criterion (d) requiring indoor and outdoor sports facilities and strongly supports paragraph 34 requiring maintenance plans for such facilities.	209226 (Sport England)
Parts of the Longstanton Conservation Area lie within the site. There are also 8 grade II listed pillboxes within the site. There are a number of other designated heritage assets nearby including Oakington and Westwick Conservation Areas and their associated listed buildings including the grade I All Saints Church, St Andrews Church and St Michaels Church, both listed at grade II* and several grade II listed buildings. Any development of this site has the potential to affect these heritage assets and their settings. There does not appear to be an HIA for this allocation. It is important that the policy identifies on-site, and nearby heritage assets and any mitigation and enhancement measures required to address any impact. Amend policy accordingly. Is there a	210141 (Historic England)

Conservation Management Plan for the site? If so, this should be referenced. If not, we recommend that this should be included as a policy requirement.	
Suggested wording amendment: “A nursery, secondary school, primary school and special school have now been built but further education facilities will be required to meet the needs of the new town, including additional primary schools”.	210590 (Cambridgeshire County Council)
Draft Policy S/NST includes detailed requirements relating to movement, connectivity and transport mitigation. However, for Northstowe these matters have already been comprehensively assessed and secured through the existing outline planning permissions, Environmental Statements, Transport Assessments and associated conditions and legal agreements. Any policy wording that could be interpreted as adding new requirements, constraining approved development parameters, or re-opening matters already resolved through the outline permissions would risk undermining the effectiveness of the policy and slowing delivery. As a result, this would be inconsistent with national policy and guidance on positive plan-making and deliverability.	211735 (Homes England)
The draft Local Plan seeks to include additional specialist accommodation of 1,050 units (Part 7a ii) and 24 permanent Gypsy and Traveller pitches (Part 7a iii). These are additional policy layers that are introduced to the Northstowe site that are not consistent, nor committed to in the outline development descriptions. Homes England has no additional land available at Northstowe and so these references should be removed from the draft policy.	211736 (Homes England)
The draft Local Plan and Policy S/NST should clarify how strategic sports hubs are intended to function within areas that are designated as protected open space. While the protection of open space is supported, sports hubs require ancillary development such as car parks and sports	211737 (Homes England)

pavilion. Policy should explicitly allow sports hubs to deliver necessary supporting infrastructure and ancillary development. Alternatively, sports hubs could be given a distinct policy designation that recognises both open space and community infrastructure, ensuring that built forms are not constrained by restrictive open space policies.	
The Lifespan section of the draft policy is particularly overprescribed as it requires comprehensive masterplanning, adherence to phasing plans and design codes and stewardship strategies. These details are already adhered via reserved matters applications, discharge of conditions application or planning obligations. The wording should be updated to reflect what matters have already approved and agreed for Northstowe.	211738 (Homes England)
The draft policy makes reference to required capacity improvements associated with the A14. Highways improvements delivered as part of the Northstowe development, including works affecting the A14 corridor, are intended to mitigate the impacts of the Northstowe development alone. Other site allocations / planning applications in the vicinity should not rely on this increased capacity and must demonstrate, through their own transport assessment, how any capacity constraints on the A14 would be mitigated as part of their proposals.	211741 (Homes England)
Part 7b of the proposed policy refers to a variety of uses proposed in the Town Centre (Phase 2) and includes incorrect floorspaces. The draft Policy should refer to the figures set out in the approved Town Centre Strategy (for Phase 2 (ref. S/2011/14/COND14). Part 7c states that retail and other town centre and local centre uses to be provided in accordance with an up-to-date Retail Needs Assessment and Town Centre Strategy.	211743, 211743 (Homes England)

There is an approved Town Centre Strategy for Northstowe under the Phase 2 outline (ref. S/2011/14/COND14). A retail needs assessment is not required by any of the outline consents and should not be introduced at this stage.	
The proposed policy requirements for education healthcare, community, cultural and leisure facilities are broadly consistent with the four outline permissions as it the requirement for temporary facilities. The policy refers to youth facilities which can form part of wider community facilities and the open space strategy. This approach is supported, provided it does not create additional triggers or obligations beyond those already secured through existing legal agreements and planning conditions.	211744 (Homes England)
The policy places a stronger emphasis on biodiversity networks and long-term landscape management than the outline summaries alone; however, this is consistent with the Environmental Statements accompanying Phases 3A and 3B and does not represent a departure from the approved development strategy.	211745 (Homes England)
Homes England are also landowners for land that is located outside of red line boundaries for the outline planning permissions. This is an acknowledgement that supporting infrastructure is to be delivered outside of the settlement boundary, such as the Southern Access Road East (if required) and flood mitigation measures.	211747 (Homes England)
I am very concerned about the addition of permanent traveller sites in the Northstowe town. Relocate these sites from Northstowe to the outskirts of villages. I appreciate the need for these sites, but I do not think in the main part of Northstowe is the correct location for them.	201732 (R Beaumont)

This plan is extraordinarily difficult to get to grips with. There has been no public meeting in Longstanton at which we could have found out what is proposed. Local residents have not been notified of this consultation. When I entered that I live in [REDACTED] (the westernmost part of Longstanton) it came up with nothing of significance, but I hear that there are plans for Traveller sites potentially just South of where I live. This process needs to be restarted in a way that actually involves local residents.	202590 (A Riley)
Longstanton & District Heritage Society believes that this local plan should emphasise the vital contribution Northstowe's rich heritage can make to the building of a strong community and providing the "unique identity and sense of place" promised in the town's original planning documents. LDHS asks for four particular aspects to be considered: 1. Clarification and confirmation of the conservation and protection status of the heritage asset known as "Northstowe Longstanton Paddocks". 2. Acknowledgement in the Local Plan of the new Heritage Strategy for Northstowe being commissioned by Cambridgeshire County Council Natural and Historic Environment Team. 3. Greater emphasis of the need to protect, conserve and present Northstowe's rich heritage as part of a connected Fen-Edge landscape and for the facilitation of heritage learning by all members of the Northstowe community alongside members of other local, connected communities. 4. Clear designation of the Green Separation between Northstowe and the villages of Longstanton and Oakington as "Protected Space". Specific areas are proposed for designation.	204189 (R Hetherington)

There appears to be an error in paragraph 3.3.67 which states 10,18000 homes	204383 (Abbey Properties Cambridgeshire Ltd)

Policy S/WNT: Land north of Waterbeach

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

The comments raise concerns about the overall vision for Waterbeach, particularly the continued allocation of greenfield land which is seen as eroding the area's historic low-lying landscape and local identity. While there is support for some elements, such as the Strategic Enhancement Area, respondents argue that the policy lacks sufficient clarity and ambition in delivering meaningful green infrastructure. There are worries that the proposed level of on-site green space will not meet recreational demand, potentially increasing pressure on nearby protected nature sites. Contributors also stress the need for clearer protection of heritage assets, stronger alignment with existing plans, and greater certainty that Waterbeach Village's distinct character will not be undermined.

A significant theme is the adequacy of infrastructure, services, and connectivity. Respondents highlight the need for clearer commitments to emergency services provision and education (including SEN and secondary school capacity), alongside better phasing to ensure infrastructure keeps pace with housing delivery. Transport concerns also highlight the proposed closure of the existing railway station, ongoing pressure on key routes such as the A10/A14, and calls for improved public transport, cycling links, and alternative solutions such as bus corridors and a new station at Milton. More broadly, there are doubts about the deliverability and sustainability of proposals, including unresolved issues around water infrastructure and the provision of Gypsy and Traveller accommodation. Concerns are also raised about inconsistencies with existing planning permissions and the Spatial Framework, as well as the risk that the scale and pace of development could outstrip both infrastructure provision and realistic delivery, ultimately

affecting community cohesion and long-term stewardship. There is also a comment requesting that the Waterbeach New Town SPD is carried forward to support the delivery of the site.

Response to the main issues raised in representations

The policy wording has been amended to provide greater clarity on the role and function of the Strategic Enhancement Area, whilst also requiring its delivery to be coordinated by the two landowners bringing forward the new town. There is also further reference to the role the SEA has in terms of filtering views from Denny Abbey and other heritage assets in that area. The exact location of specific uses within the SEA will need to be considered and determined through the planning application process, as it would not be reasonable to determine this through the Local Plan, especially given there are existing planning consents for the site and live reserved matters applications being considered. The recreational pressures generated by the development have been considered in Local Plan terms through the Sustainability Appraisal and the Habitats Regulations Assessment, with any identified mitigation measures required added to the policy. At the delivery stage, this will then be considered in further detail, ensuring the phasing of mitigation (including the delivery of accessible open space) is aligned to the delivery of new homes. The policy wording now reflects the important multifunctional nature of the SEA and how it will need to address the recreation, wellbeing and other needs of those living, working and visiting the new town.

The Greater Cambridge Local Plan Development Strategy sets out the councils identified strategy for growth and how the councils have arrived at this position, noting a range of evidence studies and how the plan is in general conformity with the national planning policy framework. Additionally, the plan and policies within it, are subject to consideration through the Sustainability Appraisal which consider environmental, social and economic indicators. The principle of residential led development at Waterbeach New Town as already been established through the South Cambridgeshire Local Plan (2018) and subsequent planning permissions. Therefore,

the proposed allocation remains for a residential led mixed-use development and supports the continued delivery of the site, including the necessary mitigation and supporting infrastructure.

The Councils have identified a clear housing need for Gypsy and Travellers accommodation and the Council's preferred approach is to address this through a number of ways, including provision at the strategic sites. This is consistent with the previous approach of the South Cambridgeshire Local Plan (2018) and is reflected in the relevant conditions of the planning permission for the site. Policy H/GT sets out the specific requirements for the implementation of this particular policy requirement.
The Housing policies of the Local Plan identify different housing types and tenures and how these should be delivered throughout Greater Cambridge. This allocation for Waterbeach New Town outlines the broad quantum of development, acceptable land uses and policy requirements, which must be read alongside the other relevant policies of the Local Plan. There are clear national definitions for the different types of affordable/subsidised housing products and the Local Plan, in combination with the Greater Cambridge Housing Strategy, will inform the housing types and tenures that come forward at the new town across each phase.

The policy has been clarified to confirm the education provision required to support the development and the phasing of this will need to be agreed with the education authority. Financial contributions towards essential infrastructure, including emergency services, is addressed by Policy I/ID: Infrastructure and delivery and is therefore not repeated in this policy.

The policy wording has been developed further to ensure there is an appropriate, context led, approach at the interface between the new town and the existing village to maintain its townscape character. The policy also supports higher density development around the relocated railway station, as suggested by the representation.

The transport impacts of the development are noted, and the Movement section of the policy sets out clear requirements for future development to address impacts generated by the new town. This will need to be phased in line with the delivery of the town and will require a multi-modal approach including high quality active travel connections, enhanced public transport provision (including the relocated Waterbeach railway station and public transport corridor) as well as highways improvements. The policy is clear that development should not have an adverse highways impact on existing settlements and that financial contributions will be required for measures identified in the Ely to Cambridge Transport Study as well as a monitor and manage approach for each phase of the development to ensure that the mitigation measures are adequate as the new town builds out. The Interim Greater Cambridge Transport Strategy notes that in the medium term (2030-2035), there will need to be a north corridor package of measures delivered, which includes targeted A10 improvements, with possible larger highway interventions delivered in the long term.

Whilst the principle of relocating the railway station was established through the 2018 South Cambridgeshire Local Plan, the Greater Cambridge Partnership will be responsible for its delivery. The proposal to also retain the existing station in combination with the relocated station will be subject to further consultation undertaken by the Department for Transport. There may be an opportunity during this consultation for respondents to put forward other options including other new stations along this route. At this stage, the Interim Greater Cambridge Transport Strategy does not identify either of these proposals.

The policy as well as other policies in the Local Plan note the timely provision of infrastructure, services and facilities are needed to support developments of this scale. This will need to be kept under review through subsequent phases of the development to ensure the needs of new residents, workers and visitors are meet as the town comes forward. The policy has been amended to provide some flexibility on this basis. The policy also requires temporary and meanwhile uses to be delivered to provide initial facilities where needed, as not all amenities will be commercially viable at an early stage of the town’s development before a critical mass of people has been achieved.

The comment regarding sustainable connections to the Wicken Vision area and Wicken Fen has been added to the policy whilst the request for further engagement is noted.

The provision of water and wastewater infrastructure is a clear requirement for any new development and is addressed through Policy CC/WE: Water efficiency in new developments and is therefore not repeated in this policy. Additionally, any detailed proposals for the delivery of such infrastructure are subject to planning consent.

The policy has been amended to confirm the number of new homes that will be delivered during the plan period. The long-term stewardship, governance and community identity are addressed in the policy as this will be an important part of how the town is delivered and maintains its long-term success.

It is not uncommon for completed homes to be advertised for sale whilst future phases of development are under construction. There is a build out period both for the properties as well as the supporting infrastructure like streets and local open spaces and it is unlikely to be economically viable for the house builder(s) to only commence latter phases of development once all earlier phases are sold. Additionally, this is a planning condition that cannot be reasonably applied to developments through the planning system.

Amendments to the indicative spatial framework have been made to reflect the consented development and factual updates to the policy have also been applied. However, some requirements, such as addressing potential areas of flood risk are still relevant until such time that the consented development in this area, and any necessary mitigation measures, have been implemented.

The supporting text to the policy now highlights that the Waterbeach New Town SPD will be a material consideration in the determination of future planning applications. However, under the changes to national planning policy, existing SPDs cannot be 'rolled over' or readopted by local planning authorities.

The policy wording and the indicative spatial framework provide a clear and consistent approach to ensuring that development is contained within the allocation area, and the role and function of the adjacent SEA. Any development proposals outside of the developable area or elsewhere in the parish, will need to comply with other policies in the Local Plan. Notably, the Defined Development Extents ensure that isolated development in the countryside is not generally supported whilst land to the south of the parish falls within the Cambridge Green Belt, which has national and local protections.

Made Neighbourhood Plans and adopted Local Plans have the same weight in decision making, however, if there is any conflict between the policies in the two plans, the most recently adopted/made plan takes precedence in decision making. Nevertheless, the Councils do not believe that the proposed allocation conflicts with the Waterbeach Neighbourhood Plan, as it is an update to an existing adopted allocation.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**
Vision and Identity • Object to allocation of further greenfield sites in Waterbeach which erodes low-lying historic fields that form part of the local landscape identity.	201331 (J Bell)

Uses • Under the subheading 'Uses' Section 4– add a new criterion m. as follows; "m. Contributions to fire & rescue, police and ambulance facilities provision/ funding" • Be clearer on the permission for a SEN School and that no more than two secondary schools are required. • I am concerned that housing proposed within Waterbeach New Town will not be genuinely affordable for people with existing local connections, including younger residents and families. The Draft Plan does not clearly explain: - How affordability will be secured over time - What proportion will be social or genuinely affordable rent - How local need will be prioritised. This undermines confidence that the development will support a balanced community.	207484 (Cambridgeshire Constabulary), 207515 (Cambridge Fire and Rescue Service), 210529 & 210591 (Cambridgeshire County Council), 208980 (J Williams)
Context • Strategic Enhancement Area welcomed but policy needs to be more explicit in identifying area for provision of strategic natural greenspace to serve the new development. • Current extent of on-site green infrastructure will not be sufficient or attractive enough to support the recreational needs of the new population and will therefore likely result in displacement of recreational pressure to nearby designated nature sites. • Policy should be amended to incorporate delivery of strategic green infrastructure within the strategic enhancement area in accordance with the masterplan SPD document. • The plan does not give sufficient assurance that Waterbeach Village's distinct character will be protected, risking increased traffic and loss of landscape and breaching the Waterbeach Neighbourhood Plan. • It is important that the policy identifies on-site, and nearby heritage assets and any mitigation and enhancement measures required to address any impact. • The new town at Waterbeach should include high-density development focused around its new station.	202983 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 208975, 208981 (J Williams), 210142 (Historic England), 208035 (Railfuture East Anglia)

Travel • Transport impacts on the A10/A14 and surrounding villages remain significant. • Object to closure of existing Waterbeach railway station. • No objection to new station but existing one should be retained. • Forcing residents to travel further to reach rail services contradicts Policy I/ST's aim to prioritise walking, cycling, and public transport. • Retaining both stations would enhance access to rail, reduce car dependency, support social inclusion, and provide network resilience. • Milton should receive a new railway station and a metro-style service, to improve connectivity and support the plan's sustainability objectives. • Support moving railway station to better serve the town, but for many destinations (west Cambridge, science park, retail park, city centre), it is not convenient for residents to do a feeder>train>feeder journey as it is slow, expensive, or infrequent. • Suggests bus lanes along southbound A10 to create a bus corridor to relieve the pressure on road. • Propose blocking through traffic in Milton and building a bus/cycling-only bridge across the A14. • Support the provision of high quality pedestrian and cycle links to nearby existing facilities such as Cambridge Research Park (CRP) • Policy wording used must be sufficiently robust to ensure any transport infrastructure which is critical to accommodating sustainable growth in this location is secured and adequately planned for.	201332, 201333, 201334 (J Bell), 201366 (D Malik), 201402 (R Swift), 201404 (P Johnson), 201405 (I Williams), 203844 (A Chan), 204476 (Royal London Mutual Insurance Society), 204670 (East Cambridgeshire DC)
Infrastructure • Delivery heavily dependent on timely and costly infrastructure, some of which has already been delayed.	201180, 202602, 202603, 203305, 203314 (Save Honey Hill Group), 208977

• Risk that housing delivery will outpace infrastructure provision. Plan should include stronger triggers to ensure infrastructure comes forward at the right time and mitigates potential for substandard living conditions. • Temporary facilities / meanwhile uses may not guarantee the same quality of service as a fully developed town. • Water supply, wastewater treatment and environmental capacity present unresolved risks. • Proposed pipeline solution has not been robustly reassessed against more sustainable alternatives, despite earlier studies identifying a local Waterbeach WRC as the preferred option. • The Plan is unjustified under NPPF 36b because the Waterbeach strategy depends on a pipeline founded on a misleading account of regulatory advice. • Plan unsound as it treats the Waterbeach pipeline as a necessity despite the CWWTPR DCO ExA Report confirming there is no operational need and no presumption of need under Section 105. • 2014 Water Cycle Study previously identified a local Water Recycling Centre would provide "betterment" for the River Cam and the local community. By promoting a pipeline justified solely by "facilitating" a relocation that is now unfunded and uncertain, the Councils are endorsing a strategy that fails to meet the "Exceptional Circumstances" established by the Secretary of State's Decision Letter and contrary to NPPF paragraph 11, as more sustainable alternatives (local treatment) exist. • DCO confirms that Pipeline South will become redundant once a new works is built. Proposing high-cost, high-carbon infrastructure that is designed to be decommissioned shortly after completion is inconsistent with the sustainability objectives of the Minerals and Waste Plan 2021 and the NPPF. • Insert binding policy wording to ensure that wastewater treatment and potable water supply are delivered prior to or alongside housing occupation, with clear triggers and monitoring.	(J Williams), 208035 (Railfuture East Anglia) 203593 (Horningsea PC)

• The access strategy relies heavily on the A10. Traffic impacts on the A10/A14 network require robust and timely mitigation, prevent rat-running through neighbouring villages. • Long-term stewardship arrangements for open space, community assets and unadopted infrastructure are essential but challenging at this scale. • The ongoing proposals for Waterbeach are problematic, being a dominant satellite attached to the side of an existing settlement and relying predominately on the existing village and overburdened road and facilities. The facilities and road improvements should have been in place prior to the impact and occupation of the new housing to avoid harm to the existing. The current Plan for the satellite New Towns is not sufficiently robust in phasing.	
Other • Stated capacity of up to ~11,000 homes may overstate realistic delivery by 2045 • Long-term stewardship, governance and community identity require stronger safeguards. • No further development should be approved until the new-town properties are sold. • New town has been infilled contrary to the original understanding and that no new schools have been provided • The Draft GC Plan does not assess cumulative development pressure across Waterbeach Parish as a whole, focusing almost exclusively on the New Town site. I am concerned that this leaves other sensitive parcels of land vulnerable to Incremental or speculative development, the loss of agricultural land and open countryside and harm to heritage assets and their setting • The Draft GC Plan does not provide sufficient reassurance that the separate identity, character, and quality of life of Waterbeach Village will be protected in the long term. I am concerned that: - Increased traffic, pressure on services, and loss of landscape setting will cumulatively erode village character. The Draft Plan does not clearly explain how it will remain in general conformity with the Waterbeach Neighbourhood Plan, as required by planning law.	201180 (Save Honey Hill Group), 201333 (J Bell), 208975, 208976 (J Williams)

Alignment with existing policy and planning application context: • It is noted that the policy and supporting text seeks to reflect key elements established through the outline planning permissions at Waterbeach New Town. However, there are a number of deviations from that framework which WDC wishes to highlight • Conflicting statements on heritage value, drainage and the use of design codes at phase level are included in the draft. • The requirement for 24 Gypsy and Traveller pitches in Policy S/WNT was not included in the adopted South Cambridgeshire Plan or the Waterbeach SPD and it is unrealistic that these could be delivered under the existing outline planning permissions. • The draft policy's wording that development east of Bannold Drove should be avoided because of flood-risk is inaccurate and fails to recognise relevance of provision within the outline planning permission for Waterbeach and should therefore be deleted. • The Spatial Framework Diagram in the draft plan deviates from the parameter plans in the outline permission and the SPD. • The draft policy makes no mention of any on-going role for the SPD • Omits any reference to the adopted Spatial Development Plan and northern buffer area and fails to capture the transport phasing linked to the A10 corridor. • Land-use allocations are presented as fixed quantities rather than "potential for" values and the policy attempts to protect a private museum, which exceeds the authority's remit.	209202, 209198, 209199, 209200, 209201, 211749, 211750, 211751, 211752 (Urban & Civic), 205116, 206847, 206848, 206849 (Waterbeach Development Company) 210989 (C Newell)
The National Trust considers that Waterbeach could be far better connected to the Wicken Vision Area and Wicken Fen via a foot/cycle bridge over the River Cam which would provide a more direct route via sustainable modes of transport. This development should look beyond its	211080 (National Trust)

boundaries to provide access to the wider landscape, particularly to the east. This should be included in the policy. The National Trust would welcome the opportunity to discuss this further. The National Trust are currently working with partners to deliver a new foot/cycle bridge over Burwell Lode to improve access to the south of Wicken Fen.	
What is the one significant new leisure facility that this site could host, that has easy, frequent, and accessible public transport access, that could otherwise not be located in Cambridge City due to land prices and lack of land availability? Please make provision for this - co-ordinated with the other New Towns so that each place has at least one different facility that the others lack, thus encouraging people from within Cambridge to visit, and ensure that the New Towns are not dormitory towns. Ensure children & teenagers are involved at design stage.	203784 (A Carpen)

Policy S/BA: Bourn Airfield New Village

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

The comments are generally supportive, particularly from key stakeholders such as Juniper and Natural England. The overall ambitions of the draft plan, including the growth strategy and the allocation of Bourn Airfield for a new community, are endorsed. However, there is a strong emphasis on ensuring the policy remains fully aligned with the existing outline planning permission, allowing for flexibility as the scheme evolves over time. Respondents call for clearer wording on how the policy will apply alongside extant permissions, and raise concerns about inconsistencies with the spatial framework, including omissions such as access points and a primary school. There is also objection to elements of the policy seen as premature or unjustified, such as the removal of land from the allocation area within the Strategic Enhancement Area and the inclusion of Gypsy and Traveller pitch requirements.

A range of site-specific and strategic issues are also highlighted. These include suggestions to strengthen transport provisions—particularly around public transport delivery—and to ensure comprehensive integration of all land parcels, including areas currently excluded from the allocation. Environmental and design considerations are raised, with support for enhanced biodiversity measures such as dark corridors, and calls for improved leisure, retail, and community facilities to avoid creating a dormitory settlement. East West Rail highlighted the relationship of the site with their proposals.

Heritage concerns are also noted, particularly the need to identify and protect nearby listed buildings and conservation areas, supported by appropriate assessment and policy references. More broadly, some respondents question whether the proposed land use mix is appropriate, suggesting alternative approaches such as a stronger focus on employment uses, while The National Trust emphasise opportunities for partnership working to improve sustainable connections to surrounding assets such as the Wimpole Estate.

Response to the main issues raised in representations

The policy has been amended to provide some flexibility around the quantum of homes and commercial floorspace. This enables future development proposals to respond to future needs whilst also ensuring that the policy approach is consistent with the other Local Plan allocations. The policy is broadly consistent with the consented application for the new settlement but has been updated to reflect any recent material considerations. For example, the requirement to form green networks linking with Cambourne North and surveys and mitigation, where needed, to address local bat species in the wider area.

The red line boundary of the allocation does not affect the implementation of the existing planning permission. The 2018 South Cambridgeshire Local Plan identified two boundaries for this site, a larger Strategic Site and the smaller Major Development Site in which the development would take place. The proposed allocation in the Greater Cambridge Local Plan applies a similar approach, with a site allocation for the developable area (previously known as the Major Development Site) and areas for mitigation and enhancement within the Strategic Enhancement Area Policy Area. The policy makes specific reference to the SEA for this site and identifies that it forms an important component of the new village. Therefore, which the role and function of the SEA has been clarified in the policy wording, the Councils have retained the proposed approach for the reasons set out above.

A significant proportion of Bourn Quarter has been built out whilst the remaining plots within the site have planning consent. The councils do not believe that the site needs to be kept within the allocation area, however reference is now made to the policy that the development of Bourn Airfield needs to integrate with this locally important employment site.

Amendments to the indicative spatial framework have been made to reflect the consented development and factual updates to the policy have also been applied.

The Councils have identified a clear housing need for Gypsy and Travellers accommodation and the Council's preferred approach is to address this through a number of ways, including provision at the strategic sites. This is consistent with the previous approach of the South Cambridgeshire Local Plan (2018) and is reflected in the relevant conditions of the planning permission for the site. Policy H/GT sets out the specific requirements for the implementation of this particular policy requirement.

The policy broadly sets out the necessary uses which are required to support this new community, including leisure provision, education facilities and community uses. This will need to be refined through any subsequent planning applications for the site and informed by the latest evidence and any other material considerations. These facilities should be informed by the views of local people, as set out in the NPPF and the Council's Statement of Community Involvement, which requires community engagement ahead of the planning application stage. The Councils have a strong track record of encouraging and facilitating youth engagement during the design development stages of planning applications and this is supported by other policies within the Local Plan.

The principle of residential led development at Bourn Airfield as already been established through the South Cambridgeshire Local Plan (2018) and subsequent planning permission. Additionally, the Councils evidence does not identify a current or future need for

further large-scale retail or employment uses in this location. Therefore, the proposed allocation remains for a residential led mixed use development.

Additional wording has been added to the policy to address the comments relating to ecology and the historic environment.

The comment regarding sustainable connections to The Wimpole Estate and the request for further engagement are noted.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**
No comments to make on the policy, which reflects previously agreed policy.	202984 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)
Juniper supports the overall ambitions of the draft plan including its growth strategy and the inclusion of Bourn Airfield as a site allocation. Policy S/BA should support the delivery of a new community at Bourn Airfield. Juniper supports the overall vision, identity and uses as expressed.	203427 (Juniper Propco (Bourn) Limited)
Policy for this site must be entirely consistent with the outline permission and support its implementation so that new homes can be delivered as soon as possible. The policy must provide for some flexibility to enable the delivery of development on the site to evolve to respond to changes in circumstances that may be encountered over the lifetime of the development of the site, should new planning applications be required.	203427 (Juniper Propco (Bourn) Limited)

Greater clarity is required, particularly regarding the relationship between the development being implemented in accordance with an existing planning permission and policy which would apply to any new applications.	203427 (Juniper Propco (Bourn) Limited)
The SEA around the developable area should be removed from the Local Plan as it is premature to de-allocate a part of the site that is integral to the whole scheme. These areas already benefit from a consented parameter plan.	203427 (Juniper Propco (Bourn) Limited)
The Spatial Framework for the allocation is not consistent with the outline permission. It should also provide flexibility for future amendments to the layout of the settlement. If retained, it needs to include the correct eastern vehicle access and missing primary school.	203427 (Juniper Propco (Bourn) Limited)
Amendment is needed to public transport section, either to a segregated bus link or equivalent scheduled rapid mass transit. Amendments also needed to reference related to Cambourne to Cambridge as it is not factually correct.	203427 (Juniper Propco (Bourn) Limited)
Bourn Quarter should be reincorporated into the allocation boundary, along with the land outside the Major Development Site area, to ensure a comprehensive approach across all areas and effective integration and connectivity between different uses. It should not be unpicked at this juncture.	203427 (Juniper Propco (Bourn) Limited)
Object to the Gypsy and Traveller approach in the draft plan, which is unsound and should be remedied by provision in forthcoming strategic sites, such as Cambourne North where it can be secured. The reference to Gypsy and Traveller pitches is unsound and should, therefore, be removed from Policy S/BA.	203427 (Juniper Propco (Bourn) Limited)
What is the one significant new leisure facility that this site could host, that has easy, frequent, and accessible public transport access, that could otherwise not be located in Cambridge City due to land prices and lack of land availability? Please make provision for this - co-ordinated with the other New Towns so that each place has at least one different facility that the others lack, thus encouraging people from within Cambridge to visit, and ensure that the New Towns are not dormitory towns. Ensure children & teenagers are involved at design stage.	203786 (A Carpen)

Develop Bourn Airfield as a retail and Business Park rather than more houses. No provision for entertaining these extra people or providing services for them	207462 (A Parfitt)
Natural England welcomes the strategic priorities of the Local Plan and are pleased to note that the Vision for Greater Cambridge, includes the aspiration for a big decrease in climate and environmental impacts, and increase in the network of nature, wildlife and multi-functional green spaces. We would encourage your authority to add wording to the Nature section of this policy about sensitive lighting strategies and providing dark habitats/corridors where possible, particularly if these can link with those planned in Policy S/CBN, and around the outer edge of the settlement.	207616 (Natural England)
There are no designated heritage assets within the site but there are some grade II barns to the north of the Grange I the Strategic Enhancement Area to the south of the site allocation. Great Common Farmhouse (also grade II listed) lies to the west of the site. Bourn Village and Hall Conservation Area lies to the south of the site. Any development of this site has the potential to affect these heritage assets and their settings. There does not appear to be an HIA for this allocation. It is important that the policy identifies on-site and nearby heritage assets and any mitigation and enhancement measures required to address any impact. Amend policy accordingly. We welcome reference to the grade II listed barns at criterion 9. We recommend that Criterion 9 should also reference Great Common Farmhouse (also grade II listed). Figure 88 This should also identify nearby heritage assets (much as the other Spatial Frameworks do)	210143 (Historic England)
The Wimpole Estate, including Eversden and Wimpole Woods SAC/SSSI is located approximately 6km to the south of Cambourne. It will inevitably draw visitors from the new developments at Cambourne and Bourne Airfield. However, it is currently poorly connected to these locations by sustainable transport. Policy S/CBN promotes better connections and sustainable modes of transport to surrounding villages, facilities and open spaces. The National Trust would welcome discussions with the LPA and developers about the opportunity to work in partnership to deliver sustainable transport options between Cambourne/Bourn and Wimpole.	211079 (The National Trust)

Barratt Northampton is currently progressing a Reserved Matters application forming Phase 1 of the Bourn Airfield new settlement. The representations focus solely on the Development Management policies, as they are of direct relevance to the delivery of the Bourn Airfield new settlement.	210501 (Barratt Homes Northampton)
EWR Co is proposing to route the new railway through a mined tunnel under the A428 and the Bourn Airfield site, much of the tunnel is within land that has planning permission. However, part of the tunnel may be located under land identified for mixed use/residential-led development in the land use parameter plan and Spatial Framework. It is important that proposals for any built development above or near to the tunnel are suitable for such a location and would not conflict with or prejudice the delivery of EWR. There may also be a requirement for EWR to utilise land within the site in order to construct the proposed tunnel, mitigate impacts on A428, and/or undertake utilities diversions. To avoid a conflict between the proposed allocation and the EWR Safeguarding Directions, EWR Co requests that draft Policy S/BA is amended in Para 15 and 3.3.110.	211895 (East West Rail)

Summaries of Representations: Sites New Settlements

New Settlements

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments on the new settlements introduction have been grouped to draw out the issues raised.

General comments

Essex County Council welcomed joint working on accessibility and connectivity on the cluster of sites south of Cambridge. National Highways highlighted the need for transport modelling to reflect anticipated development timing. Natural England suggested an alternative approach to the red-line mapping of sites. Historic England highlighted the need for Heritage Impact Assessment to also influence the detailed planning stage of sites. Other comments highlighted the need to consider the landscape impacts of new settlement sites, and it was questioned why site policies did not identify building heights. Comments expressed concern about the qualities of exiting new settlements. Cambridgeshire Local Access Forum raised the importance of building in active travel networks

and connectivity Cambridge Past, Present and Future said that garden town principles should be applied. Cambridge Acre said the development strategy risks drawing investment and services away from existing rural villages. Endurance estates considered they should be supplemented with additional village development sites. Thakeham Homes proposes sites which together would form a major new settlement.

Comments focused on Infrastructure

National Highways highlighted the need for transport modelling to reflect anticipated development timing. Anglian Water Services and NHS Cambridgeshire and Peterborough Integrated Care Board identified the need to plan for infrastructure to meet the needs of sites. Other comments were concerned with infrastructure delivery, and the impacts of planned infrastructure.

Comments focused on Land adjacent to A11 and A1307 at Grange Farm

Comments expressed concern regarding the proposal, and considered that it should be removed from the local plan. Reasons include: Would create Isolated car reliant community, limited public transport, lack of infrastructure capacity, loss of agricultural land, Impact on water and chalk streams, landscape and visual harm. Site previously rejected, inadequate evidence base to demonstrate benefits. Focus on completing the existing new settlements.

Comments focused on Cambourne

Comments expressed concern about the development being used to help justify East West Rail. It was seen as acknowledgement that failures with the current Cambourne site needed to be rectified. Where Cambourne could attract jobs to go with the homes. Development should not take place until public transport measure are in place.

Comment on Northstowe

One comment requested that land providing green separation and public access should be identified for protection.

Response to the main issues raised in representations

On the general comments, we will continue to engage with adjoining authorities, building on the engagement captured in our statement on duty to cooperate activities. Heritage consideration will be a detailed matter to consider at the planning application stage of the site development process, as will detailed design issues including building heights. The emerging plan includes a comprehensive set of polices to ensure high design quality. Proposals for additional sites have been considered through consideration of the development strategy, and testing of individual site proposes in the Housing and Economic Land Availability Assessment.

The Proposed Submission Local Plan is accompanied by further evidence exploring transport infrastructure needs and delivery, which have informed the Infrastructure Delivery Plan.

Comments on Land adjacent to A11 and A1307 at Grange Farm and North Cambourne echo those made against the site policies themselves. Response to issues raised have been provided on against those policies later in this document.

Table of representations

Comments raising general new settlement issues.

Summary of issues raised in comments	**Comments highlighting this issue**

ECC notes that the Local Plan states “We also have evidence that locating homes close to existing and proposed jobs at the cluster of research parks to the south of Cambridge would help reduce commuting and associated carbon emissions and congestion”. ECC welcome joint working to ensure consideration is given and actively planned to ensure accessibility and connectivity to key services and facilities that will benefit Cambridgeshire and Greater Essex residents, visitors and those investing in these localities.	210473 (Essex County Council)
We note that some of these allocations SEAs, particularly where SSSIs and other sensitive habitats are within or adjoining the sites. Whilst we welcome this, we also wish to make you aware of the case of Uttlesford District Council (UDC), who took a similar approach, but were directed by the PINS inspector to merge the development and non-development areas into one red line boundary for increased flexibility in masterplanning, in order to overcome constraints. Whilst this may not happen here, it would be prudent to be prepared, and we advise that a minimum buffer area adjacent to SSSIs should be decided upon in case the quantum of Green Infrastructure provision eventually becomes fragmented into smaller parcels across the wider red line boundary. We would be happy to provide more information and discuss this further with your authority in our ongoing meetings.	207608 (Natural England)
For some sites the policy wording states that a Heritage Impact Assessment will be required (e.g. North Cambourne/Grange Farm). This is a helpful requirement, but we suggest adding the words ‘more detailed HIA’, given that an HIA has already been prepared for these sites. The policy should also make clear that the HIA is needed to inform the masterplanning / proposals.	208920 (Historic England)

The policies should set parameters consistently and should respect the rural character of the open countryside. Storey heights do not appear to be controlled at Grange Farm and other new allocated development sites, which would have a significant and potentially detrimental effect on the open countryside. They have been partially set at Bourn Airfield New Village, however, it is unclear why the edge of the settlement is considered important at Bourn but not elsewhere, and why the Local Plan proposes no control over the height of the rest of the development on these very prominent sites in the open countryside.	210987 (C Newell)
The new settlements being proposed on former WW2 airfields are functionally prominent hilltop sites. The current Plan is not sufficiently robust to show this will be achievable sustainably within the environmental thread of sustainability.	210988 (C Newell)
It is unclear why the proposed Spatial Framework plans of these sites have excluded the perimeter buffers, as the Plan should retain control over these. These would be better controlled by inclusion within the site boundary and hatching as non-developable / open space / tree buffer areas as appropriate. The boundaries to these buffers should be reconsidered to be simple and clear to achieve the purposes of buffering and provide most efficient use of land (NPPF129). The development should maintain an area's prevailing character and setting (NPPF129). There are conflicts in the CBA Townscape reports, some of which are significant (such as Great & Little Abington villages having modest prevailing 1½ storey housing and being assessed as 4 storey prevailing heights).	211918 (C Newell)
Other recent large-scale developments, such as Waterbeach, have proved to be unattractive places to live. We are lucky to enjoy village life in a rural setting. A large scale, fairly high-	206600 (A Butchart)

density development so close to us would likely deliver a socioeconomic decline which may negatively affect South Cambridge's status as a sought-after place to live. It may not draw science and technology workers, who, like us, would choose to live elsewhere.	
For new development sites, particularly on the edge of Cambridge, in new settlements, and in the rural southern cluster, CLAF expects: •Early engagement with rights of way teams and access stakeholders during site master planning. •Provision of safe, convenient, coherent and attractive routes that connect new communities to existing path networks, services, public transport nodes and green spaces. •Routes designed to enable a range of non-motorised users, recognising that multi-user access benefits health, wellbeing and social inclusion	208167 (Cambridgeshire Local Access Forum)
Policies should require new settlement to conform with Garden Town Principles as defined by the tcpa (Town and Country Planning Association)	203007 (Cambridge Past, Present and Future)
The focus on creating well connected, self-sufficient new settlements is positive, but the strategy risks drawing investment and services away from existing rural villages. While strong public transport links to Cambridge are highlighted, there is little reference to how surrounding villages will connect to these new hubs or benefit from new facilities. The cumulative impact on rural roads, health services and schools is not addressed. Stronger rural proofing would include explicit links between new settlements and nearby villages, shared service planning and safeguards to avoid weakening existing rural centres.	203160 (Cambridgeshire ACRE)

South Cambridgeshire is becoming increasingly urbanised and losing its rural character	202427 (P Deer)
My main concerns are as follows: Increased traffic on local roads from the new housing and railway; Destruction of countryside and ancient sites; Cambridgeshire's very poor record on new towns - both Cambourne and Northstowe are cultural deserts with insufficient services and what services they have lagging development; Pressure on local services.	205254 (T Meyer)
Endurance Estates endorses the proposed New Settlement Allocations, including Cambourne North, as these locations represent excellent opportunities to capitalise on recent growth in a way which materially enhances the existing settlements. The new settlements should continue to have a significant role in the delivery of the overall housing need, however, Endurance Estates are of the view that these new settlements should be supplemented by additional development on the edge of Cambridge and within the sustainable villages in the district.	209708 (Endurance Estates)
HELAA Reference 208915, HELAA Reference 208916 and HELAA Reference 208917. Thakeham controls circa 1,800 hectares of land in South Cambridgeshire, located between Shepreth to the east and Kneesworth to the west, that is intended to deliver a zero carbon new town of more than 25,000 new homes, alongside new employment, services, amenities and requisite infrastructure to support a thriving community, the details of which can be found in our accompanying Vision Document. Furthermore, we have the potential ability to increase this to circa. 40,000 homes with the inclusion of the adjacent Ministry of Defence land at Bassingbourn. The 40,000 homes proposed are therefore an upper limit on the	209757 (Thakeham Homes)

potential for Wetherbrook. Wetherbrook New Town will support the growth spirations of the region, providing much needed housing to support economic growth but also provide production and manufacturing facilities, incubator and flexible workspace supporting the life science, biotech and medical sectors.	

Comments on Infrastructure issues

Summary of issues raised in comments	**Comments highlighting this issue**
It is National Highways understanding that new strategic sites, including North East Cambridge, Grange Farm, Cambridge East and Cambourne construction would be limited until 2032 therefore, National Highways recommend that traffic modelling reflects the expected delivery timescales.	209012 (National Highways)
Please note that specific comments regarding wastewater treatment at our WRCs has already been addressed under Policy S/DS. We support the requirements for a Foul Drainage Strategy to support the delivery of these settlements and consider that this requirement should be consistent across the new settlement policies (dependent of the stage of planning consent each site has progressed to).	210193 (Anglian Water Services Ltd)
Site allocations lacking explicit on-site health facility requirements should mention the need for financial contributions for health and infrastructure mitigation, aligning with the IDP approach. Engagement with Council Officers during early plan preparation and input into the	205091, 205093 (NHS Cambridgeshire and

Infrastructure Delivery Plan is Welcomed. An additional assessment by the ICB in Stage 2 of the IDP process will provide targeted evaluations of key site allocations and health infrastructure needs	Peterborough Integrated Care Board)
I am concerned about the number of trees and fields that have been used for the new A428 and now for the North west railway. If we keep building on farm land, there won't be enough fields for food and wildlife. As a resident of Papworth Everard, we don't want to be surrounded by roads railway's and housing it's not what we moved to a village for. We have had a lot of upheaval with the new A428 constantly changing and diverting traffic and then it will be the railway.	201170 (T Carter)
Strategic sites: test against lived reality Large allocations must be judged on: • real travel behaviour, • realistic public transport delivery, • and actual timelines — not optimistic assumptions. Development should not proceed where: • key infrastructure is speculative, • impacts are pushed onto existing communities, • or road access is constrained without alternatives. Sustainability that depends on "future fixes" is not sustainability.	208879 (D Smith)

Comments focused on Land adjacent to A11 and A1307 at Grange Farm

Summary of issues raised in comments	**Comments highlighting this issue**
The allocation of land at Grange Farm should not proceed. The site is greenfield with negligible connection to existing built up areas. As such any development would result in an	201296 (J McGill)

isolated community heavily reliant on outside resources; it would be strongly car-reliant; it would represent a "foot-in-the-door" for further unsustainable neighbouring development.	
Grange Farm needs to be taken out of the plan and existing new developments e.g. Cambourne, Waterbeach and Northstowe completed. The brownfield site at Cowley Road should be revisited. Grange farm site is on prime agricultural land within the green belt. The proposed urban development, situated on a rise, will dominate the landscape of surrounding local communities and significantly change the character of the area. Other approaches to SCDC's housing requirements can be met as set out in the consultation documents. Grange Farm was previously proposed for development and disregarded by GCSP on the grounds of being unsustainable; there have been no change in circumstances since that decision. No access is proposed between Grange Farm and the A11; additional traffic exiting onto the A1307 will cause increased congestion.	201860 (J Carter)
I find the plan to build 6-8000 new homes on productive farm land a disgrace, we have a population large enough For our fragile infrastructure Hospital at capacity, roads a bloody disgrace, schools at capacity, no appointments at health centres, The proposed development will dominate the landscape and will be visible from as far as Ely, Below the farm land is a chalk Aquifer feeding a chalk stream ,which would be destroyed.	201922 (G Johnson)
This draft Policy relies on a series of unsubstantiated assertions and claims about evidence. There is simply inadequate analysis and information to support what is claimed. This proposed Policy has all the hallmarks of having been added in at a late stage, which is exactly what has happened with the requirement to find additional homes to replace those	203569 (B Haydensmith)

originally in the Plan at the existing wastewater treatment works adjacent to Cowley Road. It is also highly opportunistic, with the unusual situation of one landowner providing an easy alternative for the location of homes the draft Plan seeks to identify	
These public transport-led developments from other new settlement sites all offer a marked contrast to the Grange Farm development, which despite claims that it will be sustainable and served by public transport, falls far short of the above examples. There is an attempt in the Draft Plan to deal with this when it says, “the new settlement will play a critical role extending the South-East Transport Scheme.” This is a highly speculative comment and even if some sort of extension to the main scheme can be provided, would fall far short of the public transport alternatives offered in Cambourne, Northstowe and Waterbeach.	208534 (B Haydensmith)
Grange Farm is severely constrained by major roads (A11 and A1307) and the protected Roman Road. Only one access is proposed—via a new roundabout on the A1307. The proposal lacks proper traffic modelling and data on existing network performance. Comparable settlements with similar or smaller populations have multiple access points. Highways England is unlikely to allow another junction on the A11. Even a link to the Worsted Lodge layby would increase pressure on FourWentways and risk queueing onto the A11. A1307 already carries heavy traffic, including many HGVs, and will face additional pressure from Haverhill’s growth. Queueing from the new roundabout is likely to extend into Little Abington. This will encourage rat running through the village to reach the A11/A505.	208535 (B Haydensmith)
Traffic is increasingly backing up due to congestion near Babraham Research Campus, Fourwentways and queues already extend to the A11/A505 slip roads at peak times. There	208536 (B Haydensmith)

are existing issues on the A505. A505 is highly congested and set to worsen with expansions at the Genome Campus and new housing nearby. Grange Farm traffic will add substantial pressure, with the A505 being the only viable westbound route. The respondent has doubts about the CSET extension. The extension requires crossing the A1307 and a new bridge over the A11—expensive and disruptive. Uncertainty whether this extension will ever be delivered. The respondent has concerns about walking / cycling routes. Only the southern end of the site has a realistically walkable route; northern areas would be too far. The respondent has concerns that the congestion and transport issues cannot be mitigated.	
Criticism that the allocation of this site was driven by the loss of the waste water plant site. This brownfield Cambridge site was ideal for new housing. The housing shortfall is marginal. Excluding the waste water site from future plans is inefficient, especially given likely lower long term costs compared to delivering infrastructure for alternatives like Grange Farm	208537 (B Haydensmith)
Policy S/GF is misaligned with strategic objectives, unsustainable, and transport problematic. The site should be removed and replaced with a better aligned alternative. There is a lack of evidence to allocate this site. There are no sufficient alternative site assessments and better alternatives have been ignored. The claim that proximity to research parks will reduce commuting is unsupported. Evidence shows limited job growth at nearby research parks, many of which already have associated housing allocations. No data is provided on expected travel behaviour or vehicle movement estimates, despite critical transport implications.	208538 (B Haydensmith)

The respondents have concerns about landscape and visual harm. Development would remove productive farmland and dominate gently rising landscape. Intrusive visual impact over a vast area (views as far as Ely Cathedral). High density flats needed due to constrained land area would worsen this impact. The development is too large for the available land, leading to overcrowding and inadequate green buffers. Boundary mitigation is inferior to that of other new settlements. The proposal threatens heritage assets including the Roman Road and Little Abington Conservation Area. Sewage infrastructure proposed on the village side of the A1307 would negatively affect existing residents	208539 (B Haydensmith)
Plan for sustainable travel is unrealistic. Most people working at the science parks already reside within Cambridge, These are unlikely to all relocate to grange farm. The plans for expansion within granta are less than the capacity at grange farm, therefore it is likely that at least some residents will be commuting elsewhere. It also ignores the fact that most families do not just go straight to work, they also need to drop off children. 6000 houses with an average of 1 car per household, commuting between 7-9 would be about 1 car per second being added to the a1307. Changes to plan: If this size project goes ahead, a junction needs to be added to a11 to protect the a1307 and the villages from excessive noise and air pollution from the inevitable congestion. This will also be more suitable for the Lorries for the storage facilities. I think grange farm rather than having a protected strip to the north of the area, should have it to the south along the a1307 so that little abington is not consumed by the new development	202599 (B Stapleton)

and the wastewater that runs off the hill that is planned for grange farm has got somewhere to be absorbed and stops abington being flooded. It will also help to shield grange farm from the noise of the a1307. The sewage works for the new town should not be in little Abington. There is a Bronze Age cemetery at the planned site, it is a danger to the protected chalk stream and destroys the pleasant rural charm of the properties along Bourn bridge road.	

Comments focused on Cambourne and Cambourne North

Summary of issues raised in comments	**Comments highlighting this issue**
The integration of Cambourne North with the existing town would seem not wholly unconnected with rectifying the failures of existing Cambourne (e.g. the lack of a town centre). Whether integration will be “supporting services and facilities“ in anything but the long term seems unlikely (see above). Regarding the “northern forest”, see remarks on Policy S/CBN.	201905 (C Deer)
Building on Currently farmed agricultural land is Wrong in ecological, sustainability, land utilisation and economic terms. The development North of Cambourne towards Elsworth is a prop to help justify the EWR rail line.	205368 (J Daffarn)

EWR has not produced a costed Feasibility forecast or Business plan, and to most local people it is an outrageously expensive white elephant that does not justify a station at Cambourne at all. Without that station there is NO reason for the development area almost linking Cambourne with Elsworth and Knapwell. National need for self-sufficiency means it is madness to lose this area.	
Cambourne North is a new settlement, separated from the existing town by a trunk road and a railway; it is anything but an organic outgrowth of existing Cambourne. The insistence on achieving integration between Cambourne North and the existing town would seem to acknowledge that things were not got quite right before (e.g. the lack of a town centre). Whether integration will be “supporting services and facilities“ in anything but the long term seems unlikely (see above). With regard to the “northern forest”, see remarks on Policy S/CBN.	202344 (P Deer)
The juxtaposition of commercial properties and housing is hoped to create jobs, but the success of attracting skilled jobs remains uncertain based on past experiences in Cambourne.	210451 (P Deer)
I support the expansion of house building in Northstowe, Waterbeach and Cambridge Airport, which are close enough to Cambridge for some people to cycle, which have adequate public transport provision and where it is possible to make further improvements to public transport. However, further expansion of Cambourne (too far from Cambridge and employment centres for most people to cycle, and currently lacking adequate public transport) is unwise until the rail link is in place and this will only create more motor trips into	203292 (J Palmer)

Cambridge, adding to existing congestion along all of the arterial routes into the city from the west – including Barton Rd/A603 where I live.	

Comment on Northstowe

Summary of issues raised in comments	**Comments highlighting this issue**
Northstowe Openspace The Northstowe Site allocation as delineated on the map includes area bounded by Rampton Road, Long Lane, Mills Lane and Woodside (Longstanton Meadows). This area overlaps the Longstanton Conservation Area and forms part of the green separation between Longstanton and Northstowe. It has recently been opened up for public access and provides substantial amenity value for the inhabitants of Longstanton and future inhabitants of Northstowe. It should be removed from the Northstowe Site allocation to make it clear that land to the west of Long Lane is not available for development	201164 (A Helliwell)
Homes England are fully supportive of the continued allocation of Northstowe as a sustainable new town and are committed to its ongoing delivery alongside Greater Cambridge Shared Planning and other key stakeholders. Key to this is ensuring that the existing planning permissions and local plan policy continues to support the delivery of housing and community facilities in the right way and in good time.	203984 (Homes England)

Northstowe is a New Homes Accelerator Site and policy should not introduce complexity or constraints which would slow delivery.	

Policy S/CBN: Cambourne North

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments focused on scale, landscape and transport impacts, and the relationship of the development with surrounding villages. Many respondents emphasise that development north of the A428 represents an excessive expansion into open countryside, eroding rural character and risks overwhelming existing settlements. Concerns highlighted the risk of coalescence with Elsworth, Knapwell, Boxworth and Papworth Everard, with calls for much stronger landscape buffers, early and substantial tree planting, and clearer guarantees that no built development will encroach toward the villages. Several comments also note previous Planning Inspectorate decisions have already identified the site's elevated topography and visibility as highly sensitive, and argue that these constraints have not been adequately addressed.

Environmental and ecological issues were also raised where respondents stress the importance of protecting ancient woodland, arable habitats, and species such as Barbastelle bats, with Wildlife Trust and RSPB highlighting that there should be explicit recognition of ecological constraints, stronger mitigation, and acceptance that off site compensation is likely to be required. Comments also noted that the proposed "Cambourne Forest" is too narrow, insufficiently defined, or risks becoming tokenistic unless planted early, managed professionally, and expanded to provide meaningful separation and biodiversity gain.

Transport and traffic concerns form one of the largest themes. Respondents highlight the likelihood of significant increases in car journeys, pressure on rural lanes, and rat-running through Elsworth, Knapwell and Boxworth. Many argue that the road network is already inadequate, with narrow bends, congestion, and no capacity for additional flows. Comments call for clearer traffic modelling, early delivery of active travel routes, binding mode-share targets, as well as a bypass for Elsworth. Several comments also questioned whether East West Rail will meaningfully reduce car use, with some questioning the viability of the station itself, the route choice, and the environmental cost of construction.

Infrastructure capacity and phasing were also major concerns. Respondents question whether water supply, drainage, schools, healthcare, emergency services and community facilities can support a development of this scale. Many stress that services must be delivered upfront, not after housing occupation, and that surrounding villages should benefit from S106/CIL contributions. Flooding concerns are prominent, particularly in Elsworth, Conington and Swavesey, with calls for robust attenuation, long-duration storage, and improvements to existing drainage systems.

Comments relating specifically to Elsworth, Boxworth, Knapwell and Papworth Everard emphasise the close proximity of the new settlement, fears of becoming suburbs of an expanded Cambourne and the impact on their conservation areas, historic landscapes and rural lifestyles. Suggested amendments include widening buffers, improving routes around Papworth, restricting access and ensuring that development boundaries are fixed to prevent future creep.

A smaller number of comments address housing numbers, employment provision and overall justification. Some argue that too many homes are proposed, that demand is unproven, or that Cambourne already has unsold properties. Others note that without strong employment strategies the area risks becoming a dormitory settlement, increasing commuting pressures.

Response to the main issues raised in representations

The councils have undertaken additional evidence since the draft Greater Cambridge Local Plan consultation on a number of themes which were identified in the comments. These relate to landscape, ecology, heritage and transport and are addressed in more detail below and within the Site Allocations Topic Paper.

The Councils have worked in collaboration with the Highways and Transport Authorities as well as National Highways as it has developed additional transport evidence. Through a series of detailed transport modelling exercises, it has been possible to identify the transport implications generated by the development during the plan period and the necessary mitigation measures required to ensure there are no significant adverse impacts on both local roads and the strategic road network (SRN) (A428/A14). This includes active travel (walking and cycling), public transport and access measures both within the site but across the wider local area. At this stage, the transport evidence is not recommending that a by-pass for the northern villages is required. Through this work, the Trip Budget has also been revisited to provide a more accurate limit on the number of peak hour trips that the highways network can accommodate and has also taken into account other development proposals in the local area to understand the cumulative impacts.

The policy requires a number of additional transport assessments to be undertaken as a development proposal is being prepared as part of a planning application. It is at this stage that more detailed testing and transport interventions will be identified and secured. The transport evidence and Local Plan recognise that additional mitigation measures may be necessary beyond the plan period in order to facilitate the full build out of the site.

The comments regarding the East West Rail proposal are noted however this is a project that is not being delivered by the Councils. The Councils are statutory consultees to that project and are also not the determining authority as it is being brought forward as a Nationally Significant Infrastructure Project (NSIP) and will be reviewed and determined by an independent government inspector. The merits of the overall project as well as key decisions relating to costs, route alignment and environmental considerations will be for EWR Co. to set out as part of their NSIP application. The Councils, through this allocation, are seeking to respond to the proposed new railway station at Cambourne in line with the requirements set out in national planning policy.

Through the additional evidence work undertaken, the Councils have revisited the boundaries of the allocation and the supporting Strategic Enhancement Area. The Landscape Visual Appraisal has identified the most visible and therefore sensitive parts of the developable area, and the allocation boundary has been amended by increasing the gap between Cambourne North and Elsworth. There have also been some minor amendments to the boundary near to Knapwell and on the eastern edge of the site. The Landscape Visual Appraisal also identified that the land to the west of the site is less sensitive in landscape terms and therefore this has been included within the development area. Additionally, the Heritage Impact Assessment has also been updated and identifies the necessary mitigation measures required to protect the setting of the adjacent conservation areas.

The matters relating to coalescence have sought to be addressed by the amendments to the allocation red line boundary. Additionally, the policy wording in relation to the role and function of the Strategic Enhancement Area (SEA) has been developed further to provide a clearer indication of the types of uses/activities and mitigation measures that are acceptable within it. The supporting text to the policy identifies that as new types of spaces are delivered within the SEA, these would gain planning status such as Protected Open Space or a Local Wildlife Site.

The phasing of mitigation measures, such as tree planting, will need to be coordinated and phased accordingly. The policy requires this to be set out through a Place Book approach in combination with other studies including a Phasing Strategy and Biodiversity Enhancement, Implementation and Management Plan. Based on the construction rates identified in the Housing Delivery Study, it is anticipated that Cambourne North will continue to be built over several decades, providing sufficient time for landscape mitigation measures to be implemented and for them to become established. Given the scale of the Cambourne North SEA and the opportunities it presents, there is significant potential for a forest to be provided in this location as part of a mosaic of landscape typologies. The allocation also recognises the RSBP Hope Farm and seeks to further their environmentally friendly approach to arable farming within the SEA.

Whilst the allocation will reduce the amount of arable farmland in this location, the policy seeks to minimise this through compact forms of development, focused around the proposed railway station and key areas of activity within the development. It also supports the continuation of farming within the SEA.

Whilst the site contains some Public Rights of Way, much of the land north of the A428 is not publicly accessible. The policy wording requires publicly accessible spaces and footpaths to be provided within the SEA.

Cambourne North contains and is adjacent to a number of ecologically sensitive and important sites, including Ancient Woodland and Sites of Special Scientific Interest (SSSI). As part of the additional evidence undertaken, the councils have engaged with local and national bodies and organisations including the RSPB, Wildlife Trust and Natural England to develop an evidence led approach to protecting existing sites, habitats and species and identifying the necessary policy requirements which will inform future planning

applications within the site. This includes management and monitoring requirements, the provision of new woodland buffers around protected sites, dark corridors across the site to form part of a wider ecological network and minimum buffer zones around sites and existing vegetation which are in excess of national standards. The existing ecological assets and the necessary mitigation and enhancement measures form a key element of the updated Spatial Framework and policy wording.

The timely provision of necessary supporting infrastructure will be required to support the development. This relates to all forms of infrastructure, including transport, water, sewage, community and cultural facilities and education. This is required in the policy to align with the phasing of development and agreement will need to be sought with the relevant bodies/authorities during the planning application process. Currently, no development is anticipated to come forward at Cambourne North until 2032 when there is sufficient water capacity to serve the development. The policy identifies the broad infrastructure areas that will need to be delivered through the development of the site, informed by the Infrastructure Delivery Plan. However, this will need to be kept under review based on the emerging land uses, quantum and housing mix. The Councils will continue to keep under review the most appropriate way to secure financial contributions from development across Greater Cambridge.

Known areas of flood risk have been taken into account through the updated evidence, all of which fall outside of the developable area. The policy wording in relation to the SEA notes that this area would need to address flooding issues and the policy now addresses site specific flooding requirements. In addition, Policy CC/FM: Managing flood risk sets out clear requirements for new development proposals.

The Councils are required by national planning policy to meet their identified housing needs through the preparation of the Local Plan. Cambourne North contributes towards meeting the need during the plan period but the policy looks beyond 2045 to set out

the council's longer-term aspiration for the town. The introduction of new transport projects as well as a wide range of services and facilities as part of Cambourne North will continue to make this location a desirable location for people to live, work and visit.

The policy sets an ambitious but realistic amount of new commercial floorspace for the development but notes that the councils would broadly support more employment development subject to meeting policy tests. This also does not include wider employment opportunities generated by the development such as construction, retail and supporting services like education.

The Councils agree that new developments should be multi-generational and designed to accommodate the needs of everyone. This is supported by a range of policies across the Local Plan including the design of new homes and public spaces.

The councils, through the Cambourne Spatial Options Assessment (2025) and Housing and Employment Land Availability Assessment (HELAA) (2026) rejected the option to develop to the south of the existing town and subsequently the sites in this location due to their suitability. Additionally, other sites submitted to the councils as part of the Local Plan process have been considered through the HELAA.

Table of representations

Summary of issues raised in comments	Comments highlighting this issue
Support • Very positive step for my children and those growing up here. • Development feels proportionate and rational.	**Individuals:** 203676 (N Woods), 201414 (J Carey), 200987 (R Howard)

Summary of issues raised in comments	Comments highlighting this issue
• The site of Cambourne North is appropriate for new development provided EW Rail proceeds. If it does proceed there would be less need for the busway via Coton. • Site can be extended westwards, utilising the remaining land between the A428 and the East West Rail corridor up to the new junction between the A428 and the A1198. • Plans attached to representations show potential additional development areas to the west which Endurance consider to be suitable for development and potential additional access from the new A428 / A1198 Junction currently under construction and utilising land under Endurance Estates' control. • Provision of new development both to the north and south of Cambourne, would have substantial benefits in sustainability terms and boosting housing supply in the short term, and that it is clearly the most suitable option when considered against the alternatives. • Commend strategic vision for promoting balanced growth by increasing sustainable employment opportunities alongside residential development, reducing car reliance, and supporting sustainable transport. • Emphasis on low-carbon development and biodiversity net gain is seen as a positive reflection of national priorities.	**Other organisations:** 204152 (Endurance Estates), 204253 (Richborough), 205149 (Taylor Wimpey East Anglia), 205158 (Taylor Wimpey East Anglia), 207609 (Natural England), 209976 (Endurance Estates), 211892, 211887 (East West Rail Company)

Summary of issues raised in comments	Comments highlighting this issue
• Welcome positive approach taken to shaping and planning this new settlement so far, and we will continue to work with you as you develop and refine the policies around this allocation. • Endurance strongly support and welcome the identification of Cambourne North as a New Settlement proposal with scope to contribute significantly to Greater Cambridge's long term housing needs over the Plan period and beyond. Taken together with the existing Cambourne settlement, the combined new town will have sufficient critical mass to enable it to support a wide range of employment, retail, leisure, cultural and other services and facilities that will ensure it can become a desirable, vibrant and sustainable place to live and work. • EWR Co strongly supports the proposed allocation and spatial framework and the vision for Cambourne North which aligns with an EWR station at Cambourne and which will maximise the benefits of this highly sustainable location served by the new station and EWR services. EWR Co agrees that the EWR project will make the town one of the 'best-connected places in the region', providing an opportunity to grow and enhance the town and increase the critical mass of population, employment and services available to the existing and future communities in the area.	
General	**Individuals:**

Summary of issues raised in comments	Comments highlighting this issue
General concerns raised about proposed new settlement: • Sprawl of development across A428 • Increase in crime • Doesn't fit in with plans for neighbouring settlements • How will developers be stopped from building poor quality homes • Build on brownfield sites rather than agricultural land • Prime agricultural land would be lost • Increased noise and light pollution • Development north of A428 previously been refused by Planning Inspectorate due to planning constraints and negative landscape impact • Focus on urban agglomerations and interests of rural South Cambridgeshire subservient • Policy should be strengthened to ensure Cambourne evolves into a cohesive town rather than a series of fragmented developments. • Comprehensive masterplan is essential. • Must prioritise seamless integration to prevent physical and social severance caused by the A428, • Integration with Cambourne impossible due to A428 barrier and EWR	201318 (M Meyer-Kelly), 201426 (E Chavida), 201496 (V Lebedeva), 201502 (C Meads), 201546 (L Payne), 201680 (C Davies), 201771 (I Claydon), 201807 (K Rhodes), 201877 (M Goldberg), 201891 (C Deer), 201953 (R Milns), 202000 (I Claydon),202027 (D Askew), 202161 (H Fordham), 202280 L Meyer), 202322 (P Deer), 202348 (C Farquharson-Robert), 203332 (R Jamieson), 203562 (D Pope), 203605 (R Askham), 203639 (J Tanner), 204236 (G Tanner), 204531 (I Chamberlain), 204656 (N Woods), 204710 (H Rhodes), 204776 (C Drummond), 204782 (I Maddison), 204964 (M Jordan), 205506 (D Brown), 205184 (J Cowdrey), 205189 (L Hanzi),

Summary of issues raised in comments	Comments highlighting this issue
• Reliance on higher density housing and specific requirements for the applicant to address integration issues is viewed as inadequate. • Environmental damage that may result from the development, is suggested to be justified by anticipated economic benefits. • Danger of failing the tests of “scale…appropriate to the location” “protect and enhance local features of green space”, “landscape” and “the necessary infrastructure capacity to support the development” • Plan lacks detail. • Houses aren’t being built close enough to the main part of Cambourne for it to be connected, • Houses will be of poor quality and with no or little gardens and what green space there is supposed to be won’t be looked after properly. • Essential that existing and future growth, and the implications on wider area, are taken into consideration, with any required mitigation identified and planned for from the outset. • Overly vague and the proposed Cambourne North development is excessively large. • Vital information is missing throughout draft plan, hindering consultees' ability to make informed decisions. The plan lacks transparency and has not provided meaningful information to local communities about the proposal's full impact.	205369 (S Keep), 205592 (E & J King), 205594 (I Chamberlain), 204656 (N Woods), 204765 (K Seifert), 205023 (J Cowdrey), 207404 (N Woods), 204795, 208652 (C Drummond), 208703 (J&C Collins), 211212 (C Askham), 211215 (C Askham) **Other organisations:** 202124 (Elsworth PC), 203016 (Cambridge Past, Present and Future), 204226 (Richborough), 204655 (Papworth Everard Parish Council), 204951 (Papworth Everard Parish Council), 204957 (Papworth Everard Parish Council), 205149 (Taylor Wimpey East Anglia), 206106 (Elsworth Parish Council), 207070 (Cambourne Town Council),

Summary of issues raised in comments	Comments highlighting this issue
• Based on scant research with dubious projections around, for example, expected employment figures in Cambridge and the requirement for more housing. • No consideration of development and impact of AI. • Building heights must be tightly controlled and not exceed reasonable heights for a rural setting • Development scope should meet local, not national needs • GCP has not complied with its duty to co-operate (SCI). Has been no engagement with Papworth Everard Parish Council despite being a statutory consultee for planning applications and an important stakeholder that is materially affected by what is proposed by GCP. • Should establish point of contact for local residents during large developments to help address concerns and keep community informed. • Not easy to accept such a significant impact this proposal will have on everyone. • Naming of Cambourne North and Cambourne Forest is seen as inappropriate; suggestions include New Elsworth or Elsworth South. • Should insist on solar panels on all utility buildings to help achieve net zero. • Expansion entering new territories of farmland and countryside which should be left alone. Cambourne getting too big for unnecessary reasons. This settlement needs to be stopped.	207074 (Cambourne Town Council), 208257 (Martin Grant Land Limited), 208500 (Central Bedfordshire Council), 208503 (Central Bedfordshire Council), 208504 (Central Bedfordshire Council), 208505 (Central Bedfordshire Council), 209332 (Cambridge Past, Present and Future), 209979 (Endurance Estates), 209980 (Endurance Estates), 209988 (Endurance Estates), 209989 (Endurance Estates), 209992 (Endurance Estates, 209999 (Endurance Estates), 210004 (Endurance Estates), 210005 (Endurance Estates), 210008 (Endurance Estates), 210020 (Endurance Estates),

Summary of issues raised in comments	Comments highlighting this issue
• Should include environmentally friendly houses with solar panels, heat pumps, and trees along roads, prioritising sustainability and nature. • If the space between the A428 and the railway is wide enough to allow playing fields, the distance between Cambourne South and Cambourne North makes it very difficult to envisage how the communities can be integrated. • Requires stronger policy wording, clearer evidence, and binding commitments on various issues before it can be supported. • Community led stewardship / strategy bodies must include the surrounding villages as equal partners with resources allocated to the village bodies to enable this democratic equality. The new development must be of benefit to all, not just the railway and builders. • For each section of the proposals, complete a 1 to 10 scoring system which summarises the real confidence of the writers of these plans that the promises they speculate on will be: 1 legally committed to by developers and other bodies responsible for this area without any future retraction/renegotiation 2. 100% funded long term after allowing for contingencies/inflation 3. Of genuine benefit to existing residents in the area 4. All will be sustainable and funded for at least 25 years ahead 5. The additional wealth created will be retained for the benefit of the local communities affected in the form of quality schools, doctors, emergency services,	210022 (Endurance Estates), 210025 (Endurance Estates), 210030 (Endurance Estates), 210044 (Endurance Estates), 210058 (Endurance Estates), 210063 (Endurance Estates), 210064 (Endurance Estates), 210066 (Endurance Estates), 210067 (Endurance Estates), 210068 (Endurance Estates), 210830 (Elsworth Parish Council), 210831 (Elsworth Parish Council), 211412 (CALA Group Ltd), 211594 (Places for People), 211721 Cambourne Town Council), 209331 (Cambridge Past, Present and Future)

Summary of issues raised in comments	Comments highlighting this issue
care homes etc as well as the quality Forest. 6.Timescales .Any promise must be qualified with a score. • Rise in crime associated with more people and lack of activities. • Will have massive impacts on surrounding villages, with potential benefits like improved bus services, but also significant adverse effects and inadequate mitigation measures. • Plan addresses well-being and social inclusion, but Cambourne North may face social and behavioural challenges due to its scale and development pace. • Land north of A428 is in Elsworth not Cambourne. • Land to the South of Lower Cambourne presents a viable option for immediate development, requiring less infrastructure and allowing for short to medium-term growth. • Planned development is far too large for the locality and if it does go ahead should be reduced in scale. • Insufficient discussion about the very significant impact of a prolonged construction phase on existing residential communities. • Encourage LPA to provide clear guidance on phasing and infrastructure delivery to ensure timely provision of transport and community facilities.	

Summary of issues raised in comments	Comments highlighting this issue
• Some of our residents, businesses and other bodies, benefits could flow from the location of a station for Cambourne and the creation of a new centre for the town north of the A428. • Concern how North Cambourne will operate as part of a single, coherent town, particularly given physical barrier created by the A428. • Architectural approach for North Cambourne must be sensitive to established character and identity of Cambourne and wider Cambridgeshire context and should inform scale, materials, proportions and public realm. • Overly distinctive or self-contained architectural theme risks creating an isolated development that feels disconnected from the existing town and would be inappropriate for new development. • Should adopt an architectural language that respects local history and townscape, demonstrated through a context-led, human-scale set of Design Codes. • MGL have provided a series of recommendations and suggestions in relation to the policy wording, supporting text and Spatial Framework diagram of Policy S/CBN. • Will contribute to food insecurity. • Endurance object to proposed site allocation boundary. It is too prescriptive at this stage and insufficient work / evidence has been undertaken/provided on key constraints such as landscape and heritage to support such a precise approach. This	

Summary of issues raised in comments	Comments highlighting this issue
is a long-term development that will take place over decades, and greater flexibility is therefore required to enable proposals to respond to more detailed assessment and masterplanning along with changes in circumstances over time. Consistent with policies in the Adopted Local Plans, we feel that the scheme should be design led and that the Concept Spatial Framework is too prescriptive at this early stage in process. • Considered that there is scope to extend development framework further west whilst still maintaining a suitable buffer to Papworth to the north west and without unduly impacting on known constraints or aspirations for Strategic Enhancement Area. This is illustrated through the additional areas shown in orange on the attached Masterplan Spatial Framework Strategy (Drawing Ref: 19-237-SGP-STE-XX-DR-A-011003-P03), which shows potential additional development areas to the west which Endurance consider to be suitable for development as part of the Cambourne North proposals. • Important that masterplanning approach learns lessons from original Cambourne settlement by not making neighbourhoods too separate from one another as this can reduce community cohesion and walkability. • Number or neighbourhood centres, their composition, mix of uses, scale, and timing of their delivery needs very careful consideration to ensure they are vibrant and integrated parts of the new community. This should be evidence driven and determined at the masterplanning stage and secured through appropriate	

Summary of issues raised in comments	Comments highlighting this issue
conditions/legal obligations. This detail should therefore be left to masterplan and planning application stage. • Getting right balance between homes and jobs is essential to creating a mixed and balanced community that its prosperous and has a high degree of self-containment. The town's accessibility by rail and strategic highway network provides an opportunity to be more ambitious in order to achieve the prosperous, thriving community set out within the overall vision. • Whilst there are a number of constraints as identified within the policy, these have been taken into account through the concept masterplanning work to date and it is considered that there is sufficient land within the site to allow for appropriate buffers to the relevant designations and protected features to be delivered. • It is important that flexibility is maintained on the precise boundaries of the development areas to ensure these can be adjusted to reflect more detailed assessment and design work as the design of the scheme progresses. • Endurance support need for various strategies to be developed based on robust evidence to inform overarching approach to land use and to ensure that a mixed, balanced, prosperous and sustainable new settlement is achieved. Accordingly, Endurance support in principle the need for a report covering an Intergenerational Housing Strategy to inform the level of housing typologies to meet the local need.	

Summary of issues raised in comments	Comments highlighting this issue
• Endurance also support in principle the provision of a report covering a Place Activation, Culture and Events Strategy. • Endurance consider there is a degree of overlap between a number of requirements for supporting evidence and that some rationalisation of policy requirements would be beneficial to ensure a more streamlined and legible application submission. • Endurance support provision of mixture of densities within site, with highest focussed around proposed new station and Town Centre. Neighbourhood centres and employment locations whilst being higher in density than most of the site are likely to be at a lower density than the Station Quarter and Town Centre given their less fee central location and function. • Part 14c) Whilst Endurance understand the need to deliver higher density development to make best use of land, this should not compromise the objective of creating a high-quality new community with design that responds to its setting and constraints and a range of house sizes and house types to meet a variety of needs. It is considered that the density range proposed is ambitious, and with a narrow range that is too limited and risks being unduly prescriptive. This could inhibit the place-making aspirations, resulting in a homogeneous development, lacking character and variety, or worse, render development unviable before the development even gets underway.	

Summary of issues raised in comments	Comments highlighting this issue
• Part 16) Endurance agree with general intent and consider that it is important that residential neighbourhoods provide a coherent built form that creates a distinct character for the different neighbourhoods. Whilst aspiration to incorporate complementary employment uses in each neighbourhood is generally supported, it is considered that some flexibility should be built into the policy through addition 'where possible'. This will allow a more flexible and evidence led approach, reflecting needs and the character of each area. • Part 33c) Endurance support and welcome a holistic approach to Cambourne's environmental, economic, social sustainability. Important that balanced approach is taken to prioritising these aspects of sustainability to ensure successful, vibrant economically viable, attractive and sustainable new settlement is created. • Part 45) Endurance are generally supportive of the principles set out and agree with the need to develop a sustainability focussed masterplan. Important that the aspirations are realistic. It should be noted that the policy context may no longer be applicable in light of proposed revisions to the NPPF. • Part 48) Whilst the ambition of achieving a highly sustainable new town is supported, further consideration of the feasibility and viability of the specific requirements is required, particularly as these go far beyond existing legislative and policy requirements. Endurance consider it important that the policy allows for flexibility, particularly in the earlier stages of the development recognising how requirements	

Summary of issues raised in comments	Comments highlighting this issue
and technologies will change over the 30-year implementation period. The requirement for rigid compliance to 'day 1' principles may otherwise impact viability and prevent delivery of the wider scheme. Also considered that there is unnecessary overlap and duplication with point (45) above. • Part 49) Endurance support this approach and consider that a clear phasing strategy that sets out the phased delivery of infrastructure and services alongside the delivery of new housing, commercial and other uses is essential to the successful delivery of the project. It should be recognised that this may need adapting and adjusting over time in response to changes of circumstances given the long-term nature of the development. • Part 51) Endurance support this approach in principle and consider it important to ensuring the long-term successful delivery and ongoing management of the new town, ensuring that its benefits are maximised and will endure for future residents over the long term. • Part 52) Endurance support the preparation of a Meanwhile Strategy in general terms subject to incorporating the proposed report into a more general Economic and Employment Strategy to also include inter alia measures to avoid empty or unused spaces and facilities, and to ensure early provision of amenities and facilities that foster a culture of inclusivity and encourage early community building.	

Summary of issues raised in comments	Comments highlighting this issue
• Part 53) Endurance support this approach and consider that this is essential to the successful delivery of the project. • Will give rise to issues of local governance. While development will take place within the parishes of Elsworth and Knapwell, Cambourne North will presumably fall under the aegis of Cambourne Town Council. What this mean for the continued existence of the parishes thereafter and how will they benefit from, for example, s106 monies also needs to be clarified at the earliest opportunity. Do not only wish to have put in place measures to mitigate the impacts of development. We also want to realise benefits for our communities from them, particularly in relation to improvements in infrastructure such as flood management, bus services, digital connectivity, etc. • Continued engagement by SCDC with our community/ communities is vital. EWR and Cambourne's growth is part of the Oxford to Cambridge corridor national infrastructure project involving stakeholders other than the parishes and the District Council and also the DCO process. Our small community/communities we have no direct interaction and little influence in these and look to the SCDC to represent our interests and therefore we welcome and wish to continue to have dialogue with SCDC. • Whilst this Government is fully committed to the delivery of East West Rail, there are no guarantees that a future government would be as committed. Emerging Local Plan	

Summary of issues raised in comments	Comments highlighting this issue
should focus more growth in Rural/Minor Rural Centres, which are considered sustainable, such as Melbourn. • East West Rail will be complicated to deliver and it is not feasible for Cambourne North to be delivered until such time as the new rail line and station have been completed. Accounting for the substantial uncertainty and major infrastructure required, it is plausible that delivery of the site could slip into the 2040s and the number of dwellings to be delivered as part of this plan period will be very limited. In this regard, the proposed 2,550 dwellings to be delivered in Cambourne North within this plan period is considered to be optimistic. The lack of certainty regarding the delivery of Cambourne North further strengthens arguments for additional small-to medium site allocations. • Inclusivity must be designed into all aspects of development if North Cambourne is to achieve a genuine place-making outcome. Provision should be made for all life stages. Designing inclusivity into developments from the outset is more effective and significantly more cost efficient than attempting to retrospectively add or adapt features once homes and spaces are already built. LPAs must adopt M4(2) standards, and M4(3) for wheel-chair accessible homes and the Plan must clearly address these standards. • The policy must be strengthened to ensure that Cambourne evolves into a cohesive, successful town rather than a fragmented series of developments. The policy should	

Summary of issues raised in comments	Comments highlighting this issue
ensure that Cambourne North is not merely an add-on, but a vital component of a well-integrated, economically vibrant, and self-sustaining town, providing a balance of jobs, services and housing.	
Transport and traffic • Significant number of car journeys generated. • Increased traffic through villages to north to reach A14. • Village roads are inadequate and no proposals for increased capacity. • Impact of new housing at Cambourne North, Bourn and continued development of Northstowe on highway infrastructure around the Swavesey area. • Insufficient consideration of traffic impact on local roads, particularly affecting communities along the A1198, including villages like Longstowe, Arrington, and Kneesworth. • Lack of provision for safe and sustainable alternative transport options along the A1198 corridor. • Little appreciation that for many people use of a vehicle a necessity • There are no cycle paths in villages. • This is the way the village has always been. We do not want to be beside a huge town. This is not what we bought into moving here. The distance of greater	**Individuals:** 200992 (T Roberts), 201325 (M Lester), 201495 (J Brinkman), 203639 (J Tanner), 201411 (Cllr P Sandford), 201452 (C Barnard), 201453 (C. Barnard), 201454 (P Deer), 201486 (E & J King), 201749 (S Barnard), 201680 (C Davies), 201770 (G O'Connell), 201757 (P Safranek), 201759 (N Safranek), 201768 (R Crowther), 201775 (D Meyer), 201786 (J Bennison), 201797 (N Hall), 201807 (K Rhodes), 201911 (W Parker), 201914 (C Deer), 201953 (R Milns),

Summary of issues raised in comments	Comments highlighting this issue
Cambourne is coming far too close and will impact the rural feel and traffic through the village • Development must unlock better walking, cycling and public transport for existing residents • Current road congestion is already severe, and claims of excellent connectivity are unrealistic. • Traffic calming measures is not a viable solution. • Need more details on traffic management. • Should be binding transport mode share targets. • Insufficient evidence that active travel and public transport will reduce car use. • Active travel and improved bus services welcomed, but do not meet all residents' travel needs. • Those requiring access to distant destinations or carrying goods. • Robust assessment of traffic flows through Elsworth and surrounding areas is lacking. • Need faster / easier connection to A14W. • Absence of traffic plan to handle extra traffic. • Need more station parking. • Need diversion road needed for local villages for railway traffic. • Unrealistic to expect new residents to not own cars.	202006 (D Langley), 202027 (D Askew), 202189 (M Stevenson), 202280 (L Meyer), 202901 (J Williams), 202348 (C Farquharson-Robert), 202441 (P Deer), 203208 (S Hughes), 203562 (D Pope), 203572 (A Pope), 203573 (G Pope), 203599 (J Fordham), 203602 (H Passan), 230674 (C Roberts), 203702 (S Wyer), 203834 (N Thornton), 203840 (A Chan), 203896 (R Chamberlain), 203981 (L Richards), 204095 (C Davies), 204100 (N Turton), 204141 (R McClure), 204526 (I Claydon), 204602 (A Watson), 204604 (R Hoadley), 204607 (D Potts), 204656 (N Woods), 204952 (C Gouldsbrough), 207403 (N Woods), 205165 (J Grantham), 205189 (L

Summary of issues raised in comments	Comments highlighting this issue
• Already traffic delays in Elsworth at peak times. • Traffic volume on Brockley Road, Elsworth has increased significantly, causing difficulties for residents turning onto the road, especially during peak hours. • Cambourne crossing two major roads is illogical from an urban planning perspective and creates divided car bound communities further increasing traffic. • Limit car access between Cambourne and Cambourne North. • Should enable improved active and public transport links for current residents, with binding mode share targets, early delivery of the active travel network, and restrictions on car access between Cambourne and Cambourne North. • Cumulative impact of consented and proposed development required. • Public transport proposals are uncertain and unlikely to reduce car use. • Area's sustainable transport options and liveability must be improved. • Urge council to ensure that the "high quality public transport route" provides good coverage at reasonable times. • Local villages should have relief roads before development commences. • Sustainable transport infrastructure needs to be in place early. • Road network needs careful planning. • Reconsider the reliance on private transport for reducing CO2 emissions.	Hanzi), 205307 (C Smith), 205441 (A Williams), 205446 (R De Beaux), 205507 (D Brown), 207382 (C Deer), 207396 (L Skerritt), 207403 (N Woods), 207460 (L Payne), 207466 (A Mitchell), 208609 (Quod), 208642 (S Keep), 208643 (S Keep), 208644 (S Keep), 204264 (J Brown), 202158 (M Shrosbree), 202495 (G Stevenson), 204236 (G Tanner), 204782 (I Maddison), 204817 (J Harris), 202517 (H Brown), 202610 (J Rolfe), 202740 (L Turton), 207422 (N Thornton), 207767 (R McClure), 207768 (R McClure), 208018 (P Crisp), 208708 (J&C Collins), 209350 (D Pope), 209361 (B Skerritt), 209365 (C Roberts), 209456 (C Davies), 211214 (C Askham),

Summary of issues raised in comments	Comments highlighting this issue
• The proposed 'Landbridge' would need to be enormous to be effective and I can't locate it on the plan. • Requirement to 'consider connections to all parts of Cambourne and to surrounding villages' runs counter to the no-coalescence argument • We are concerned that these roads should not become greater rat-runs to the new station and development. Elsworth and Knapwell village roads cannot cope with current levels of traffic. • Policy currently focuses on travel between Cambourne and Cambourne North, neglecting traffic routes through Elsworth and the implications of relocating the rail station. • Lacks sufficient measures to mitigate traffic impacts through the villages, with reliance on traffic calming measures deemed inadequate without more effective solutions. • Connections between North Cambourne and existing areas of Cambourne require detailed review and careful design to prioritise permeability, legibility, and safety for all users • There is little detail on roads which will be used for traffic to and from the railway station and Cambourne centre as well as local traffic. A bypass or similar is necessary for Elsworth. Current roads are totally unsuitable.	**Organisations:** 203076 (Swavesey PC), 203438 (Juniper Propco (Bourn) Limited), 203608 (British Horse Society), 206107 (Elsworth Parish Council), 206108 (Elsworth Parish Council), 206111 (Elsworth Parish Council), 208637 (Swavesey PC), 211078 (National Trust), 207070 (Cambourne Town Council), 207072 (Cambourne Town Council), 207078 (Cambourne Town Council), 207079 (Cambourne Town Council), 207080 (Cambourne Town Council), 208036 (Railfuture East Anglia), 208500 (Central Bedfordshire Council), 208503 (Central Bedfordshire Council), 208504 (Central

Summary of issues raised in comments	Comments highlighting this issue
• Expansion must unlock better walking, cycling and public transport for existing residents • Limit car access between Cambourne and Cambourne North. Set binding mode share targets. • Require early delivery of the main active travel network and crossings • With 13,000 homes and an estimated 1.5–2 cars per household, this equates to around 19,500 additional cars. If just 5% pass through Elsworth, Boxworth or Knapwell, that is approximately 975 extra vehicles. • Assumed that budget of 2,500 trips in peak hours relies on significant investment in sustainable transport, which although proposed, cannot be guaranteed to be the preferred method of travel for future occupiers. • Reservations about assumption as it appears to suggest what the modelling says the network can accommodate, rather than the result any sustainable transport interventions might have. • Further work needed in relation to traffic impacts of combined proposals at Cambourne on local and strategic road network, both within and beyond the Greater Cambridge area. Given proximity of the proposals to Central Bedfordshire, essential that CBC are engaged in process as soon as possible, so we can help to identify the issues arising within our administrative area, understand the implications for our	Bedfordshire Council), 208505 (Central Bedfordshire Council), 209001 (National Highways), 209002 (National Highways), 209003 (National Highways), 209004 (National Highways), 209996 (Endurance Estates), 209997 (Endurance Estates), 209998 (Endurance Estates), 210028 (Endurance Estates), 210028 (Endurance Estates), 210029 (Endurance Estates), 210045 (Endurance Estates), 210046 (Endurance Estates), 210047 (Endurance Estates), 210048 (Endurance Estates), 210049 (Endurance Estates), 210050 (Endurance Estates), 210051 (Endurance Estates), 210052 (Endurance Estates),

Summary of issues raised in comments	Comments highlighting this issue
residents and communities, and help to identify where, and the extent to which, mitigation is required. • There is no clear consideration of the increased traffic through peripheral villages, particularly northern, that this will generate. This will come through its employment zone, cultural zone and as a dormitory town for any industrial sites, particularly those being developed along A14. • Policy S/CBN promotes better connections and sustainable modes of transport to surrounding villages, facilities and open spaces. The National Trust would welcome discussions with the LPA and developers about the opportunity to work in partnership to deliver sustainable transport options between Cambourne/Bourn and Wimpole. • Motorised quick access routes North/South for aged people/ambulances/police/fire etc across or into new development facilities not shown. • Clarification requested on vehicle trip budget referenced in policy in terms of whether this evidence base has already been prepared and is available to review or, if not, confirmation on when it will be produced. • New transport and active travel infrastructure linking Cambourne North with Cambourne, surrounding villages and the wider countryside should be required to function as inclusive, multi-user routes, accommodating pedestrians, cyclists and equestrian.	210053 (Endurance Estates), 210054 (Endurance Estates), 210055 (Endurance Estates), 210056 (Endurance Estates), 210517 (Cambridgeshire County Council), 210811 (Elsworth Parish Council), 210812 (Elsworth Parish Council), 210813 (Elsworth Parish Council), 210814 (Elsworth Parish Council), 211776 (Camcycle)

Summary of issues raised in comments	Comments highlighting this issue
• Concerned that existing and already-committed transport improvements—such as the Cambourne–Cambridge bus service and other measures intended to address current transport pressures—could be delayed or deprioritised as a result of the scale of new development. These commitments must be delivered as planned and not deferred. • Essential that parking strategy is fully future-proofed and grounded in realistic patterns of behaviour rather than idealised assumptions about modal shift. • Parking provision must reflect actual car ownership levels, household composition, servicing and delivery requirements, and transitional period before public transport and active travel networks are fully mature. • Any parking strategy must be supported by a clear, deliverable, and enforceable management framework, aligned with Cambridgeshire County Council parking guidance and regularly reviewed against observed demand rather than projected best-case scenarios. Failure to plan for realistic parking demand from the outset would create long-term pressures on the public realm and undermine the overall success of the development. • The Cambridge to Cambourne busway should be extended to directly serve Cambourne station enabling high quality bus services between Cambourne railway station and existing parts of Cambourne and the proposed Bourn Airfield housing allocation.	

Summary of issues raised in comments	Comments highlighting this issue
• As currently drafted, Cambourne appears likely to bring significant and potentially unacceptable adverse impacts on the safe and efficient operation of Cambourne Junction on the A428. The Transport Evidence Report identifies that there is still significant congestion on the highway network (with DS2 proposed improvements) around the site meaning that the model suggests high levels of trips will still remain within the sector. • National Highways are unable to agree to the proposed approach (managing SRN impacts through an indicative trip budget prior to an outline application) at this stage without the benefit of further modelling work for the proposed development. If a trip budget is to be proposed this needs testing within an operational model, with detailed timings/parameters identified and a monitoring approach agreed to enable NH to confirm whether proposals are deliverable in SRN terms. As identified in Circular 01/22, SRN capacity enhancements need to be identified as part of the plan making process, because this provides the best opportunity to consider the cumulative impacts of development and identify appropriate mechanisms for delivery. • National Highways endorse the Local Plan work on 'Transport Vision and Principles' for Cambourne. We support the report's identified next steps, highlighting that additional work is required to consider achievability of vision assumptions and to ensure a robust evidence base is established to support a site allocation of this	

Summary of issues raised in comments	Comments highlighting this issue
significance; we note that even with an ambitious shift to alternative modes demand still exceeded the trip budget. • The emerging Local Plan text and Figure 78 identify a number of additional active travel crossings over the A428, with mention of potential bus provision in associated documents. We recommend further discussion with National Highways regarding emerging crossing locations / existing bridge improvements to consider feasibility and to ensure suitable commitments and costings are included in the Infrastructure Delivery Plan. It may be practical, demonstrated through further modelling work, to consider the need for additional A428 bridge crossing options for private cars, to remove local trips from Cambourne Junction. • Support proposed approach which seeks to integrate the two halves of settlement and consider this to key design challenge for the scheme. A key aspect to this will be maximising potential crossing points across the A428 and future East West Rail, both in terms of road and pedestrian & cycle routes to ensure effective integration. Character and usability of these links will also be important to promote integration. • Comprehensive Transport and Movement Strategy for town as a whole is required which will integrate both the existing and new community with one another and with the planned improvements to be delivered through East West Rail and the C2C Busway.	

Summary of issues raised in comments	Comments highlighting this issue
• Benefits of addressing existing transport and movement challenges with existing Cambourne community are plentiful but particularly manifest in the consideration and setting of a trip budget where the shifting of existing trips is a lever which North Cambourne can use effectively. • The trip budget needs to be better evidenced through detailed and collaborative further working before specificity can be provided and agreed. Monitor and Manage can be employed effectively to ensure compliance through scheme delivery but this control mechanism should also be used to ensure the scheme's Vision is being met. It is considered that Monitor and Manage is the mechanism to ensure preferable outcomes. • Part 18) Endurance consider that wording and interpretation of policy is unclear and whether it is referring to the approach into the town from Elsworth to the north or into the existing part of the town from Cambourne North. It is also unclear why this route should be a focus over others. Further clarity in the wording of the Policy is requested. • Support need to ensure necessary mitigation from A428 and East West Rail and consider the appropriate location of employment uses of one means of securing this. • Part 34) Endurance broadly support proposed policy approach as currently set out and consider that it establishes appropriate principles for the movement strategy.	

Summary of issues raised in comments	Comments highlighting this issue
Policy wording should be adjusted to specifically reference a Vision-led approach for the transport and movement strategy for Cambourne North. • Part 36) Endurance consider that reference to delivery of landbridge being in the early phases of the development should be removed to provide more flexibility. Further consideration of this requirement is required in terms of how this might work and when it could reasonably be delivered having regard to both placemaking and viability considerations. In any event, it is considered that further flexibility is required as to the nature of this and the timescales for delivery. • Part 37) Endurance support the proposed approach in principle, and consider that it is important that the design encourages walking and cycling and makes appropriate provision for active travel throughout both within the settlement itself and through its connections with the existing community, surrounding villages and providing appropriate access to the countryside. • Part 38) Endurance consider proposed policy approach as currently set out is too prescriptive. Considered policy wording should provide flexibility and have regard to what is necessary and allow for alternative approaches where these would achieve similar outcomes. Final bullet point should include the words ‘endeavour to’, recognising that this requires cooperation from other parties.	

Summary of issues raised in comments	Comments highlighting this issue
• Part 39) Whilst Endurance broadly support the approach the words "…minimise duplicated parking provision" should be deleted such that the focus is on reducing vehicular trips. • Part 40) Endurance consider amendments are required to the detailed wording and requirements to ensure that it is clearer and includes more flexibility. Our proposed wording is set out in the document entitled Cambourne North GCLP Reg 18 Reps Final. • Parts 41 & 42) A new vehicular access should be provided from the new junction between the A428 and the A1198 south west of the site currently under construction and as illustrated on the attached plan. Employment Development Access Off Proposed Northern Dumbbell Roundabout General Arrangement Plan (Drawing Ref 48168-P005-001) utilising land under Endurance Estates' control. New junction could serve employment uses between the A428 and East West Rail whilst also helping to separate and reduce heavy goods traffic from entering via existing Cambourne A428 dumbbell access junction, improving the design, character and amenity of these areas and ensuring they are more welcoming for pedestrians and cyclists on the key gateway into Cambourne and assisting with the integration of Cambourne north with the existing settlement. Provision of this secondary access would provide more flexibility in terms of phasing and construction arrangements as part of the implementation of the scheme as well as improving emergency access to the town.	

Summary of issues raised in comments	Comments highlighting this issue
The following change to the policy wording is proposed: c. Vehicle access from two existing junctions on the A428 (at Cambourne and Caxton Gibbet) and the Broadway overbridge. Possible further access from Ermine Street to support later phases. • Part 42) the following change to the policy wording is proposed in red: 42. All expansion proposals at Cambourne will be subject to a monitored and enforceable peak-hour vehicular trip budget, to be agreed with the Local Highway Authority. The indicative trip budget is approximately 2,500 trips in the AM peak and 2,500 trips in the PM peak. Any refinements to this trip budget based on more detailed evidence must be agreed with the Local Highways Authority prior to submission of the outline application. A monitor and manage approach will be undertaken to ensure that the development remains within the agreed trip budget for the site throughout its delivery, and any variations to this monitor and manage approach would need to be agreed with the Local Highway Authority. • Part 43) Endurance support this approach in principle but subject to the comments regarding need to adopt a vision-led approach and review of the proposed trip budgets outlined. Important to ensure that any proposed mitigation is proportionate to the scale and nature of any impacts. • Part 43) The following change to the policy wording is proposed: 43. To support delivery of the agreed masterplan, a strategic and local transport mitigation plan must be prepared by the developer in consultation with the Local Highways Authority and	

Summary of issues raised in comments	Comments highlighting this issue
Local Planning Authority. This will include (but not be limited to) high-quality mobility services that prioritise modal shift and monitor ongoing performance. Innovative measures to drive higher sustainable mode shares, trip internalisation and reduce vehicular trips will be supported. • May also be beneficial to include commitment within part 43 of Policy S/CBN to adding other relevant stakeholders to what is currently a very short list, of those who the developer must consult with on the Strategic and Local Transport Mitigation Plan. • Considered that Policy S/CBN would benefit from clearly stating that the busway link and EWR are prerequisites and development will not commence/continue until these schemes are place, given the trip budget they state. • Transport evidence carried out to date suggests that development here can be mitigated, subject to the delivery of EWR and C2C with relevant extensions into the site at Cambourne North, along with other site specific highway, public transport and active travel improvements. County Council supports development of a stringent trip budget for the new settlement. This mitigation package is not inconsiderable. The County Council would like to continue working on a detailed transport and mitigation strategy for Cambourne. • Camcycle consider cambourne is a way of catering for the growth envisaged by the plan, but only if the Local Plan is honest about the scale of the challenge and willing	

Summary of issues raised in comments	Comments highlighting this issue
to embed enforceable requirements that make sustainable travel the default rather than an assumption.	
East West Rail (EWR) • Development is to justify the EWR rail line. • EWR not produced costed feasibility forecast or business plan. • East West Rail should be completely cancelled or at least postponed until a full business case is made for it which can be publicly scrutinised and challenged • Outrageously expensive white elephant that does not justify a station at Cambourne at all. • Without station there is no reason for development area almost linking Cambourne with Elsworth and Knapwell. • Should be focus on impact of traffic on villages related to the EWR station. • Site is appropriate for new development provided EWR proceeds. • Reliance on EWR for transport capacity is questionable, as evidence suggests only a small percentage of residents will use it for commuting, leading to increased road usage. • Idea EW will support 13,000 more Cambourne households is crazy.	**Individuals** 200987 (R Howard), 201286 (M Jordan), 202348 (C Farquharson-Robert), 203562 (D Pope), 205368 (J Daffarn), 203939 (A Parfitt), 204486 (D Brown), 204696 (D Sampson), 204765 (K Seifert), 205307 (C Smith), 205590 (C Meads), 207345 (K Rhodes), 207382 (C Deer), 208639 (S Keep) **Organisations** 202004 (Haslingfield PC), 203438 (Juniper Propco (Bourn) Limited), 203628 (Cambridge Approaches), 204226 (Richborough), 206107 (Elsworth Parish Council), 207078

Summary of issues raised in comments	Comments highlighting this issue
• Will lose huge amounts of money. The wrong route. Longer than needed and very expensive. The tunnel will be a disaster. • Railway line should take the original rail route as the infrastructure is mostly already there. • Station should be in South Cambourne, away from the A428. • There's an old disused railway that could be reintroduced at a fraction of the cost. • Long-distance guided bus and freightway would be more cost effective. • Contradiction between the environmental aspirations in the Plan and the carbon footprint of constructing EWR and the concreting over of a substantial area of green fields. • Funding for the railway station should not come from Section 106 monies from house builders. • Greater clarity should be provided about the provision of East West Rail and the Cambourne to Cambridge bus link. • the County Council's Transport Evidence Report shows only 1% of trips from extended Cambourne would go to Cambridge Biomedical Campus, contradicting EWR's justification for the route. • EWR would contribute minimally to Cambridge's economic growth. • Development of 13,500 houses appears viable without EWR.	(Cambourne Town Council), 208036 (Railfuture East Anglia), 208938 (Cambridge Growth Company), 209000 (National Highways), 209981 (Endurance Estates), 209982 (Endurance Estates), 209983 (Endurance Estates), 210015 (Endurance Estates), 210016 (Endurance Estates), 210017 (Endurance Estates), 210031 (Endurance Estates),

Summary of issues raised in comments	Comments highlighting this issue
• Insufficient justification for linking the housing development to the railway project, potentially wasting public funds through lack of accountability between planning authorities and EWR Company. • Completion of East-West Rail Stage 3, crucial for Cambourne North, is unlikely before the late 2030s, impacting deliverability of land to the north of Cambourne. • Proposed railway station is likely to attract additional vehicular traffic from neighbouring towns and villages seeking park-and-ride or informal commuter parking. Without adequate and well-planned provision, there is a significant risk of overspill parking impacting residential streets, local centres, and surrounding neighbourhoods. • Support significant housing growth around new station, but this development must be dense enough to ensure the railway can serve it effectively. • CGC recommends that consideration is given to building in flexibility for a greater level of employment ambition at Cambourne West and North linked to the provision of an EWR station. It could be clearer how the Local Plan draws from this evidence to set the vision for the role of the employment land in terms of the sectors catered for and on the amount of development that would optimise employment growth. The additional scale of growth is supported by the Council's evidence base and East West Rail. • National Highways are engaged in ongoing discussions with East West Rail (EWR) regarding the delivery of a new railway station at Cambourne, north of the A428.	

Summary of issues raised in comments	Comments highlighting this issue
Highway improvements needed to facilitate the station and associated track are currently being considered, and implications for futureproofing are being reviewed with the need for further meetings to discuss cumulative impacts. • Support East West Rail and C2C infrastructure schemes and consider that these provide a huge opportunity to create a truly sustainable new settlement subject to their future integration with North Cambourne development. • Considered important that EE, MGL and GCSP continue to engage with East West Rail to ensure that design ambitions for project are appropriately taken into account in design of the EWR alignment, station, and associated infrastructure. • EWR should be encouraged to design with new town in mind. • Support the new station interchange becoming focal point for new town. East West Rail's proposal to move the station towards the A428 roundabout is welcomed and ambition supported, ensuring that it is more central within the town and thus more accessible to both new and existing residents. • Fits with Government objectives of focussing development around train stations and using these as drivers of sustainable development. • Creating a hub around new station will ensure that a high-density mixed-use development can be delivered around station, providing a range of services and facilities in the most sustainable and accessible location, whilst also ensuring through	

Summary of issues raised in comments	Comments highlighting this issue
improved connectivity the scheme is properly integrated with the existing community at Cambourne. • Unclear why Part 11 (e) of policy is necessary. Since major infrastructure (EWR, C2C and A428 enhancements) are to be delivered by others and schemes will likely be implemented, approved and or advanced prior to submission of an application for Cambourne North, this is a difficult requirement to meet. • important to recognise that delivery of new station will be carried out by East West Rail rather than site promoters and it is therefore important that the Local Plan policy should recognise this and incorporate flexibility given that design is progressed by the East West Rail Co. and will be consented via the DCO process.	
EWR Co has reviewed the proposed Cambourne station location and updated its design proposals to move the station 700m west to a location north-east of the A428/Cambourne Road double roundabout. The updated station is expected to enable a greater degree of growth, be more consistent with adopted Local Plan (avoiding constructing on Local Green space), have lower environmental impact (further away from Knapwell Wood), be preferred by communities and stakeholders. EWR Co is in the process of identifying how the new entrance would integrate with the wider masterplan area and how it will interface with existing and new local transport services, and walking and cycling routes, including the proposed extension to the Chisholm Trail.	211882, 211893, 211894 (East West Rail)

Summary of issues raised in comments	Comments highlighting this issue
Land within the S/CBN allocation site identified as being required for the delivery of EWR, and includes land needed for the new railway, Cambourne station, and associated development. This land is included in the EWR safeguarded area. EWR Co supports the principle of criterion 12, but requests the following minor amendments for clarity and to ensure the proposals do not conflict with the Safeguarding Directions. EWR Co agrees that seamlessly integrating Cambourne with the new railway station to the north of the A428 and the EWR route will be critical. To this end, it supports criteria 50-54 of draft Policy S/CB, which sets out that Cambourne and Cambourne North (draft S/CBN) will be planned. In order to integrate the new station with Cambourne, EWR Co is proposing a new footbridge over the A428 to the north of Cambourne Sports Centre. The land required to deliver this new crossing within the S/CB allocation site. This land is included in the EWR safeguarded area. To avoid any potential for conflict between development within the proposed allocation site and the EWR Safeguarding Directions, EWR Co requests additions to draft Policy S/CB.	
Coalescence • Need green belt around Cambourne North to better protect the villages against coalescence.	**Individuals** 201807 (K Rhodes), 201907 (C Deer), 201909 (C Deer), 201914 (C Deer), 201307 (J Turner), 201763

Summary of issues raised in comments	Comments highlighting this issue
• Opposed to destruction green belt land at Cambourne North. • Proposal impinges on neighbouring villages. • Too close to Knapwell. • Would ultimately join with Scotland Farm and Hardwick. • Development boundaries should be fixed to ensure no creep resulting in reduced space between Cambourne North and neighbouring settlements. • Proposal too close to existing settlements and would compromise character of conservation areas and listed buildings. • Parish boundaries must remain intact. • Loss of identity of villages. • Should be a minimum 1km buffer around existing villages, managed by parish council or woodland trust. • Landscape buffer should preserve the open aspect around Elsworth, not act like a fence. • Concern about long term stewardship of landscape buffer and forest. • Houses will be 400 metres from Elsworth and will not prevent coalescence. • Should be a more even distribution of housing. • Cambourne will be isolated due to the railway and A428 with no connections to the existing centre.	(A. Irvine), 201953 (R Milns), 202441 (P Deer), 203702 (S Wyer), 200992 (T Roberts), 200993 (T Roberts), 201470 (C Blencowe), 202347 (P Deer), 202354 (Boyd), 202610 (J Rolfe), 203599 (J Fordham), 203641 (B Skerritt), 203896 (R Chamberlain), 203981 (L Richards), 204095 (C Davies), 204572 (A Watson), 204656 (N Woods), 204765 (K Seifert), 204952 (C Gouldsbrough), 204817 (J Harris), 205189 (L Hanzi), 207176 (W Parker), 207399 (N Woods), 207382 (C Deer), 207539 (D Wood), 207422 (N Thornton), 207526 (P Deer), 208638 (S Keep), 208707 (J&C Collins), 210884 (R McClure)

Summary of issues raised in comments	Comments highlighting this issue
• The evidence base does not demonstrate that the full extent of the non-developable area is necessary, proportionate, or the most effective means of achieving settlement separation. • The strategic enhancement area covers land not in the control of the Authorities or land promoter and so brings into serious question the environmental enhancement promoted by the policy and the soundness and effectiveness of the Cambourne North allocation. • Imposition of extensive designations across land owned and controlled by Varrier-Jones Foundation, without any engagement with the landowner, is unduly restrictive and risks prejudicing the ability of the emerging Local Plan to respond flexibly to future development needs. • Scale and large extent of draft strategic enhancement area allocation is disproportionate and covers land that could sustainably accommodate future development without compromising the separation of Papworth Everard and Cambourne North. • Object to Strategic Enhancement Area which extends over a significant portion of the • C/CBN. It would inhibit any future complimentary development potential offered by the Site Ref. 48096.	**Organisations** 202124 (Elsworth PC), 202127 (Elsworth PC), 202133 (Elsworth PC), 203385 (The Varrier Jones Foundation), 207024 (Mac Mic Land),

Summary of issues raised in comments	Comments highlighting this issue
Environment • Placing adventure playground in new 'forest' area is perceived as a desperate measure to mitigate impact on more sensitive environments. • Green belt destroyed, protected species homeless. • Early proposals referenced a “forest” as a natural buffer. More recent plans fail to reflect commitment and offer no satisfactory or meaningful boundary. Critically important to shield the village from new development, prevent visual intrusion, and preserve its rural setting. • Expansion threatens to erode countryside and green spaces and related mental health and wellbeing benefits, diminishing opportunities for children to enjoy nature and for communities to maintain balance and wellbeing. • Insufficient consideration of environmental impacts and weak defence of removing important arable land which will be increasingly important in a changing climate. • Hope Farm should be preserved in its entirety due to its successful nature-friendly farming practices and positive impact on local wildlife. • 'Forest' is a misnomer. It's just a few trees. • Trees planting must start before any building.	201411 (Cllr P Sandford), 201807 (K Rhodes), 202000 (I Claydon), 202027 (D Askew), 202280 (L Meyer), 202348 (C Farquharson-Robert), 202354 (D Boyd, 202441 (P Deer), 202610 (J Rolfe), 203599 (J Fordham), 203602 (H Passan), 203702 (S Wyer), 204236 (G Tanner), 204526 (I Claydon), 204611 (A Watson), 204614 (A Watson), 204656 (N Woods), 204710 (H Rhodes), 204730 (A Watson), 204817 (J Harris), 204964 (M Jordan), 205307 (C Smith), 205505 (D Brown), 205591 (E & J King), 205672 (M Meyer-Kelly), 205674 (S Barnard), 207405 (N Woods), 207422 (N Thornton), 208647 (S Keep), 208648 (S Keep),

Summary of issues raised in comments	Comments highlighting this issue
• Tree planting for Cambourne Forest needs ongoing professional care, unlike all the dead sticks along the A14. • Countryside to the North of the A428 will be destroyed and the integrity of historic villages threatened. Ancient woodland and sites of historical importance will be compromised. • Impacts on local SSSIs and County wildlife sites, given length of time it will take to establish a Cambourne 'forest'. • Proposed Cambourne Forest is too narrow to effectively prevent coalescence; increasing its depth is recommended. • Visitor access and parking for the proposed forest should be carefully planned to avoid negative impacts on local villages. • Green/forest zones for Cambourne expansion are excessive and should be restricted to allow continued productive arable farming. Infrastructural details are scant and offer no mitigation for expected increase in traffic through Elsworth for rail travel. Elsworth already has intermittent flooding and proposals to improve drainage in the village and downstream to Fenstanton, Swavesey etc are required to cope with rapid runoff from housing developments. • There is no landscape buffer in the south east corner.	202801 (P Gladders), 210991 (C Newell), **Organisations:** 201542 (RSPB), 211078 (National Trust), 206112 (Elsworth Parish Council), 207610 (Natural England), 207611 (Natural England), 209332 (Cambridge Past, Present and Future),

Summary of issues raised in comments	Comments highlighting this issue
• Loss of 100+ trees (aged 40 to 100) along St Neots Road unacceptable and will increase noise and sound pollution for some residential neighbourhoods in Cambourne. • Significant concerns regarding proximity to RSPB Hope Farm, which is within the Strategic Enhancement Area. • Should be contractual commitment for developers to plant woodland before construction, in collaboration with local authorities to ensure successful management. • The National Trust strongly supports the provision of on-site SANGs and new woodland. In accordance with guidance from Natural England, SANGs must be developed and available for use prior to the occupation of the new dwellings which they are intended to serve. The provision of new recreational space and woodland would help ease pressure on these sites and their designated features. However, it is not clear where the woodland would be located or how it would be delivered. This needs to be made clear in the proposed Submission Plan. • Forest should be managed/owned by independent professionals from day 1 to be of any value • To deal with environmental issues such as light pollution we want to see measures such as warm light, low spill light fittings being mandated. • Noise, light and visual pollution.	

Summary of issues raised in comments	Comments highlighting this issue
• Note policy specifies that development must ensure ancient woodlands and SSSIs are kept free from public access and that measures that minimise ecological pressures from domestic animals must be identified and delivered. Whilst we agree with this in principle, have questions about how these points will be achieved in practice. There should be a requirement to monitor effectiveness of measures put in place and a commitment to implementing alternative solutions if initial measures are ineffective. • Support detailed consideration given to incorporating dark corridors into new settlement. This will be especially important for avoiding and mitigating potential impacts to bats associated with Eversden and Wimpole Woods SAC but will equally be of benefit to many other species. • The term ‘SANG’ has a specific definition and set of criteria associated with it and the authority should carefully consider whether to use very prescriptive term, or whether alternative GI phrases should be used for a more bespoke approach e.g., 'SANG-like'. • Cambourne GBI Framework currently proposes 60ha of semi-natural greenspace, but to meet 3ha/1000, 93.6ha would be required. • To meet the official SANG standard of 8ha/1000, 249.6ha semi-natural greenspace would be required. We advise that 3ha/1000 greenspace which meets the Natural England GI Framework Standards criteria should be an absolute minimum,	

Summary of issues raised in comments	Comments highlighting this issue
particularly where mitigation for recreational pressure is needed, and that more should ideally be required. • Support for significant new greenspace and habitat, with consultation with RSPB Hope Farm to achieve nature conservation objectives, and recognition of impacts on Barbastelle bats and ancient woodlands.	
Habitats • Development threatens protected habitats, local character, and ecology and local wildlife. • Should be a detailed acknowledgement of what will be lost with a measured assessment of the inevitable damage • Imperative that the site is developed to enhance biodiversity. • Area is home to protected species, including multiple varieties of bats, turtle doves, barn owls, foxes, badgers, hares and tawny owls • Species rely on undisturbed countryside for survival, and their displacement would represent an irreversible loss to local biodiversity. Such environmental damage contradicts commitments to conservation and sustainable development. • Will not achieve the plan's biodiversity ambitions	201807 (K Rhodes), 203639 (J Tanner), 207176 (W Parker), 201452 (C Barnard), 204095 (C Davies), 204584 (A Watson), 205645 (C Deer), 205674 (S Barnard), 207468 (D Meyer), 208640 (S Keep), 208703 (J&C Collins), 208705 (J&C Collins), 209349 (D Pope), 211213 (C Askham) **Other organisations:**

Summary of issues raised in comments	Comments highlighting this issue
• Mature native plants should be used for forest planting, it should occur before building works to ensure proper growth. • Need to ensure policy supports long-term viability of Hope Farm, which has demonstrated significant increases in biodiversity. • Provision must be made for addressing the ecological impact, both in the construction phase and longer term, through early evaluation and ongoing management and taking remedial action such as the creation of alternative wildlife habitats. • Concerns currently remain about how impacts to these sites will be avoided. • Part 33 of this policy is supported, although we advise that ecological survey and monitoring should also be added as a requirement for specific sensitive locations outside of the site's red line boundary that may be impacted by development. This would help to inform the requirements of part 22, and the suggestions mentioned above relating to this. • Endurance support approach in principle. This will require careful consideration through further assessment work and masterplanning. Extent and scale, delivery and management of the Cambourne Forest requires further consideration and clarification. This must be considered in the context of the wider package of greenspace, biodiversity and infrastructure enhancements. Expectations need to be realistic, and the Councils must also recognise that as woodland does not positively contribute to BNG calculations, some trade-offs may be required.	201542 (RSPB), 202987 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 202990 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 207086 (Elsworth PC), 206112 (Elsworth Parish Council), 207609 (Natural England), 207612 (Natural England), 210043 (Endurance Estates), 210555 (Cambridgeshire County Council), 210556 (Cambridgeshire County Council), 210557 (Cambridgeshire County Council),

Summary of issues raised in comments	Comments highlighting this issue
• Concerned that location and scale of the allocation site and adjacent to Cambourne North SEA have potential to adversely impact irreplaceable habitat (ancient woodland) and protected sites (including Special Area of Conservation). Do not believe this potential impact on biodiversity has been adequately considered. The allocation does not comply with the NPPFs notion of 'sustainable development' and there will be significant conflict with draft BG/BG. It also appears to be wholly at odds with the two Council's draft biodiversity strategies and their support of the LNRS. Urge that the current form of the site allocation is reviewed, including more detailed rigorous ecological investigations, reworked and potentially removed / relocated / scaled back to avoid significant impacts to biodiversity and avoid blocking the delivery of the LNRS. • Site may support functionally linked land for barbastelle bat population of Eversden and Wimpole Woods Special Area of Conservation (SAC). Surprised not to see baseline study of bat usage in the landscape to inform the site allocation process, or a draft Habitats Regulations Assessment. Currently, there is not sufficient publicly available information to ascertain the usage of this landscape by bats and therefore, we recommend a more detailed assessment, potentially including detailed bat survey work, is complete to determine whether the proposed site allocation for Cambourne North is appropriate, in the correct location or of the correct type / scale.	

Summary of issues raised in comments	Comments highlighting this issue
• Areas where natural and ecological considerations necessary for development of a sustainable new town will be extremely challenging, including loss of functional foraging habitat of Barbastelle bats and avoiding impacts on ancient woodlands. • Will not be possible to avoid or mitigate on site all impacts on the ancient woodlands. • Policy correctly acknowledges potential for adverse impacts on land used for foraging by Barbastelle Bats and is functionally linked to the internationally important maternity roost at Wimpole. Policy does not provide connectivity from Elsworth Wood and Knapwell Wood ancient woodlands to the south and south-west towards Wimpole. This is a major failing. • Providing proper landscape connectivity for Barbastelle bats will require strategic green infrastructure corridors across the A428 and East West Rail (EWR), including potentially a green bridge “dark corridor”. Even with these it will not be possible to include complete dark corridors particularly across the A428. • Inclusion of buffer zones and strategic green infrastructure network will provide some mitigation for impacts on the ancient woodlands within Cambourne North, but not sufficient to avoid recreational impacts on the woodlands, which may be significant. • Policy and supporting text should acknowledge it will not be possible or will be highly challenging to avoid or mitigate impacts on-site and there is high likelihood that compensatory measures will be required to address impacts on the ancient woods and Barbastelle bat population.	

Summary of issues raised in comments	Comments highlighting this issue
• The LNRS Local Habitat Map, shows approximately half of the Cambourne North & adjacent SEA being allocated for habitat creation, primarily woodland. Strongly recommend these areas are excluded from the allocation site – if they continue to be included, then we would suggest they are allocated as woodland creation within the SEA, but it would be essential that woodland creation is secured in advance of urban development. Suggest to further minimise impact to biodiversity, that the allocation site if focused immediately adjacent to existing urbanised areas (e.g. A428, Cambourne and potential railway station), rather than sprawling into the rural countryside.	
Landscape • Loss of agricultural land • National need for self-sufficiency means it is madness to lose this area. • Valley south of Elsworth should be protected. ○ Planning Inspectorate rejected development on site due to: Elevated location contributing to its visibility from surrounding roads and villages, making any development highly noticeable. Despite potential mitigation measures like open space and landscaping, the proposed development would significantly adversely impact the rural landscape.	203939 (A Parfitt), 205368 (J Daffarn), 200987 (R Howard), 201770 (G O'Connell), 201771 (I Claydon), 201773 (I Claydon), 202441 (P Deer), 203509 (L Greenwood-Davies), 203519 (A Martins), 203543 (L Greenwood), 203602 (H Passan), 203605 (R Askham), 203702 (S Wyer), 204526 (I Claydon), 207470 (D Meyer),

Summary of issues raised in comments	Comments highlighting this issue
• The Inspectorate concluded that the negative landscape impact of the proposal outweighs other considerations, including the possibility of establishing a Park and Ride site. • New forest should be planted before development, including EWR. • New 'forest' tiny compared to housing, should be more gain for nature like original Cambourne. • The topography shows that the Cambourne is 260 feet or so higher than Elsworth so any building will tower over the village. • Area contains historical sites, including mounds, an abandoned village, and ancient woodland, which may be adversely affected by the development. • Given extent of proposed development we struggle to see how there will be any space left for arable fields. • Endurance support need for strong and robust landscape framework to be incorporated into proposed masterplan for scheme. However, it is considered that the extent and approach to the SEA needs further consideration to ensure the approach is supported by robust evidence and is deliverable. It is also important that detailed extent of development area is informed by the landscape framework to ensure a robust and integrated approach. Flexibility should be provided within the policy to enable departures from the indicative development envelope to enable this.	208019 (P Crisp), 208704 (J&C Collins), 208705 (J&C Collins), 208706 (J&C Collins), 209349 (D Pope), 209354 (A Pope), 209359 (B Skerritt), 209363 (B Skerritt), 209455 (C Davies), 210456 (P Deer), 210844 (R McClure), 210991 (C Newell), **Other organisations** 201542 (RSPB), 206110 (Elsworth Parish Council), 210009 (Endurance Estates), 210010 (Endurance Estates), 210011 (Endurance Estates), 210012 (Endurance Estates), 210013 (Endurance Estates), 210033 (Endurance Estates), 210034 (Endurance Estates), 210035 (Endurance Estates), 210036 (Endurance

Summary of issues raised in comments	Comments highlighting this issue
• Policy requirements and context for S/SEA/CBN Cambourne North Strategic Enhancement Area seem unclear and it is considered that a specific policy / policy section should be set out for this rather than just being shown on the Policies Map and referenced within the Cambourne North policy. • Masterplanning process should secure objectives of Strategic Enhancement Area, allowing RSPB to manage Hope Farm effectively and continue monitoring nature. • Green Infrastructure should buffer Hope Farm to reduce disturbance impacts and support local wildlife, while recreational access should be limited to existing public footpaths. • Land-use and management in the surrounding SEA should complement wildlife populations on Hope Farm, with appropriate habitat creation. • Access restrictions and provision of SANGS are welcomed to protect ancient woodlands, but effective design measures must be ensured. • The land to the north, where the majority of the forest is planned (noting that this would be a mixture of different landscape typologies and not just planted trees), falls away from the ridge that the A428 is on. Therefore, planting in this buffer can only offer a limited visual buffer to the village to the north. However, Papworth has limited intervisibility with much of the site and there is scope to reduce the buffer here and increase the development envelope subject to detailed landscape assessment – due to the undulating nature of the land.	Estates), 210037 (Endurance Estates), 210038 (Endurance Estates), 210039 (Endurance Estates), 210040 (Endurance Estates), 210041 (Endurance Estates), 210042 (Endurance Estates), 210195 (Anglian Water), 210815 (Elsworth Parish Council), 210829 (Elsworth Parish Council), 211078 (National Trust),

Summary of issues raised in comments	Comments highlighting this issue
• Endurance considers there is no reason to include a buffer at western edge of proposed settlement between the A428 junction land at the East Rail Route. It is considered that this land should be incorporated into the scheme, providing additional employment land a further point of access directly onto the new A428 junction. Our suggested approach is illustrated further on drawing Masterplan Spatial Framework Strategy (Drawing Ref: 19-237-SGP-STE-XX-DR-A-011003-P03) which shows potential additional development areas to the west which Endurance consider to be suitable for development as part of the Cambourne North proposals. • Part 22) Constraints identified within the policy have been taken into account through concept masterplanning work to date and it is considered that there is sufficient land within the site to allow for appropriate buffers to the relevant designations and protected features to be delivered. Important that flexibility is maintained on the precise boundaries of the development areas and buffer zones to ensure these can be adjusted to reflect more detailed assessment and design work as the design of the scheme progresses. • Endurance support principle of creating dark corridors within development. Extent and nature of these will require careful consideration through further assessment work and masterplanning.	

Summary of issues raised in comments	Comments highlighting this issue
• Support principle of providing appropriate buffers to woodlands and watercourses within development. Extent and nature of these will require careful consideration through further assessment work and masterplanning. • Endurance support principle of retaining existing trees, hedges and water features within development wherever possible. Extent and nature of these will require careful consideration through further assessment work and masterplanning. • Parts 30, 31, 32 33a) Endurance support this approach in principle. This will require careful consideration through further assessment work and masterplanning. • Anglian Water supports landscape-led design to deliver ecological enhancement, and multi-functional green and blue infrastructure, which will contribute towards integrated water management and mitigating flood risk. • Support requirements within clause 19 under the Resources section of the policy regarding sustainable water management. Whilst the quantum of growth is lower than Cambourne North, we question why the approach in the Resources section, is not aligned with Policy S/CBN which includes the preparation of a Climate and Sustainability Innovation Delivery Plan and a Foul Drainage Strategy. • Want geographical ‘separation’ between the villages and Cambourne North. Hope that this could be achieved through the planning process (with red lines on development, provisions in planning consents that are enforced, section 106	

Summary of issues raised in comments	Comments highlighting this issue
agreements, etc.) and by physical means such as screening with tree planting and the preservation of existing SSIs. • Not clear where the woodland would be located or how it would be delivered. This needs to be made clear in the proposed Submission Plan.	
Heritage • Endurance agree that a proportionate and phased amount of desk based, and field evaluation will be required to determine impact on both known and unknown heritage assets. Whilst extensive archaeological features were identified during the survey work before the Caxton Gibbet to Black Cat extension works began, these did not impact upon the layout and route significantly. • Welcome preparation of Strategic Cambourne HIA and site specific HIA. However, not all the recommendations for the HIA have been fully reflected in the draft policy wording. Please check and ensure that these are included. • Broadly welcome criterion 11 but recommend some re-ordering of bullet points. In particular, Historic Landscape Characterisation and Archaeological assessment need to be undertaken first to inform the preparation of the comprehensive landscape strategy. Therefore, we would recommend that you move criterion 11c to 11a.	210014 (Endurance Estates), 210138 Historic England)

Summary of issues raised in comments	Comments highlighting this issue
• In 11 c we would suggest referring to a '…more detailed Heritage Impact Assessment…' given that an HIA has already been undertaken. We recommend the wording could be amended to read: Historic Landscape Characterisation and Landscape Character Assessment, more detailed Heritage Impact Assessment, and Archaeological Assessment must be undertaken to understand the impacts of development on landscape character, long range and local views and heritage assets and their setting, identifying appropriate mitigation and enhancement measures. The Council's HIA and the results of these further assessments must inform the masterplanning for the site. • In 11c i recommend inserting following '…that respond to topography, historic landscape characterisation and archaeological constraints. • In 11 c iii recommend the policy could allow for the conversion/restoration of the farmhouse and barns and finding a suitable use together with a conservation management plan for the assets going forward. Criterion should also state that development should be excluded from a buffer area immediately surrounding these assets as shown in the framework plan. • 11d Recommend further discussions concerning the timing of desk based archaeological assessment. • Areas of known archaeological sensitivity should be highlighted in the policy and shown on figure 78.	

Summary of issues raised in comments	Comments highlighting this issue
• Welcome criterion 15. • Figure 78 should show heritage buffer identified in HIA around New Inn Farmhouse and Barns and the areas identified for strengthened landscaping in the HIA. • Figure 78 – concerned that the eastern most area shown as a Local Centre might be in the area of archaeological sensitivity. • Figure 78 should show the areas of archaeological sensitivity identified in the HIA. • Figure 78 concerned at the proposed location of employment development in close proximity to the listed New Inn farmhouse. The likely scale of the employment development may not provide a suitable setting for the listed buildings. • Supporting text is light on heritage (for example in comparison to the natural environment.). Suggest that the imbalance should be addressed. • Paragraph 3.3.25 The phrase 'to the south is potentially ambiguous – it could mean to the south of Childerley Hall whereas we think you mean within the southern portion of the site.	
Infrastructure • Development would overwhelm existing infrastructure.	201026 (F Panrucker), 201410 (M Eidevik-Skinner), 201680 (C Davies), 201953 (R Milns), 202027 (D Askew), 203639 (J Tanner),

Summary of issues raised in comments	Comments highlighting this issue
• Must accommodate all resulting needs within the proposed allocation, so that there are not detrimental, or cumulative impacts on services, facilities and infrastructure outside Greater Cambridge area. • Will there be sufficient water supply? • Services and access to them need to be provided at the same time as houses. • Will require safe, high-quality education provision. • Cambridgeshire schools rank poorly in funding per pupil - why add to this burden? • Insufficient water supplies. • Infrastructure should be delivered first. • Culture, performance and leisure facilities must be built before the houses. • New housing should not be considered until schools and early years provision is expanded. • Infrastructure will not enhance quality of life. • Local NHS hospitals and GP surgeries are already under significant pressure. They do not have the capacity to absorb the needs of residents from 13,000 new dwellings. • Build out speed crucial to delivery of services and facilities. • Plan silent on how CIL/S 106 might benefit parishes around Cambourne North. • Uncertainties on delivery of new infrastructure. • Services in Cambourne are insufficient, suggesting new area will face similar issues.	202280 (L Meyer), 202354 (D Boyd), 203602 (H Passan), 203674 (C Roberts), 203702 (S Wyer), 203939 (A Parfitt), 204236 (G Tanner), 204588 (A Watson), 204591 (A Watson), 204598 (A Watson), 204656 (N Woods), 204776 (C Drummond), 205184 (J Cowdrey), 205593 (E & J King), 205645 (C Deer), 207400 (N Woods), 207397 (L Skerritt), 207467 (D Meyer), 207539 (D Wood), 207770 (R McClure), 208020 (P Crisp), 208641 (S Keep), 208709 (J&C Crisp), 208710 (J&C Collins), 208711 (J&C Crisp), 208712 (J&C Crisp), 209358 (J Fordham), 209360 (B Skerritt), 209362 (B Skerritt), 209365 (C Roberts), 210454 (P Deer), 211211 (C Askham)

Summary of issues raised in comments	Comments highlighting this issue
• Infrastructure of areas like Elsworth and Knapwell cannot cope with the proposal. • Live performance hub should be assessed with local residents to address potential negative impacts. • Lack of clarity on community governance and how developer contributions will be allocated among affected parishes, raising concerns about the impact on Elsworth. • Should provide detail on investment to safeguard and provide facilities within villages. • Cambourne and Northstowe are cultural deserts. Expect N Cambourne to be the same. • Presents significant opportunity to enhance public rights of way network but this is not clearly reflected in the policy requirements. Existing public rights of way should be safeguarded and fully integrated into the masterplan. • Explicit policy support is needed to ensure connectivity, health and wellbeing benefits, and alignment with green infrastructure inclusive objectives. • Add doctors and dentists surgeries to plan from outset. Potentially even a local out of hours surgery, which would also serve surrounding villages. • Significant increase in population brings increased risk of crime, yet there is no robust infrastructure proposed to mitigate this. Expanding housing on this scale without parallel investment in safety and enforcement risks undermining the security and cohesion of an established, close-knit rural community.	**Other organisations** 207086 (Elsworth PC), 203608 (British Horse Society), “06109 (Elsworth Parish Council), 207071 (Cambourne Town Council), 207478 (Cambridgeshire Constabulary), 209224 (Sport England), 209982 (Endurance Estates), 209984 (Endurance Estates), 209985 (Endurance Estates), 209986 (Endurance Estates), 209987 (Endurance Estates), 210007 (Endurance Estates), 210017 (Endurance Estates), 210018 (Endurance Estates), 210019 (Endurance Estates), 210032 (Endurance Estates), 210061 (Endurance Estates),

Summary of issues raised in comments	Comments highlighting this issue
• Concerned by references to a “new” town centre for North Cambourne and reference to the existing High street to be a secondary High street. • Cambourne does not yet have a fully realised town centre, and there is a clear risk that proposals for an additional centre could undermine or delay delivery of the existing town centre strategy. • Under the subheading ‘Uses’ Section 9 – add a new criterion e. as follows; “e. Contributions to fire & rescue, police and ambulance facilities provision/ funding”. • Proposed development will put further pressure on an already stretched local NHS workforce. Many NHS employees at our local hospitals live in local area and therefore the increased stresses and pressures that they are put under could have a negative impact on their personal wellbeing which seems at odds to your wellbeing strategic priority of “to lead healthier and happier lives, ensuring that everyone benefits from the development of new homes and jobs. • Sport England raises concern regarding the use of the term “leisure” and not explicitly referring to indoor and outdoor sport provision. To ensure clarity Sport England recommends criteria a(f) refers to indoor and outdoor sport provision explicitly. The policy should also set out that the indoor and outdoor sports provision should be informed by an up-to-date PPS. Sport England recommend a Sports and Open Space Strategy is also sought as part of the policy.	210062 (Endurance Estates), 210065 (Endurance Estates), 210194 (Anglian Water), 210588 (Cambridgeshire County Council),

Summary of issues raised in comments	Comments highlighting this issue
• Framework for North Cambourne should also have sufficient flexibility to ensure that future development is not compromised by infrastructure and that the necessary roads, bridges and other infrastructure required for the new community can be delivered appropriately. • Support provision of a network of neighbourhood centres across the wider Cambourne North development to ensure all residents have suitable access to day-to-day services and facilities within walking or cycling distance, ensuring creation of walkable neighbourhoods and sustainable living patterns. • Incorporation of a range of high quality open spaces is supported, but suitable balance needs to be sought between open green spaces and higher density living and working spaces around the station. This balance will need to be explored further through masterplanning. • Part 10 (d) regarding provision of Infrastructure improvements is vague and unclear in terms of nature and geographic scope of potential requirements. Accordingly, this aspect should be subject to review as part of a clearer infrastructure policy and supported by an Infrastructure Delivery Plan. • Up to date economic data on employment and retail demand should be used to inform the proposals for a station quarter – such that it can become a lively and well-used gateway to the wider development from early on in the delivery of the scheme.	

Summary of issues raised in comments	Comments highlighting this issue
• Whilst Endurance generally support the idea of providing flexible spaces, it is considered that this level of detail on the design of the frontages is too detailed and prescriptive for this initial stage. These matters should be addressed through future applications when detailed design considerations can be fully considered. It is also important that the Policy does not unduly prejudice market interest from retailers by being too prescriptive about retail formats whilst recognising that creation of active frontages and a balance of uses within the centres will be important. • Endurance support principle of providing active frontages within centres and providing flexible spaces at ground floor that enable future adaptation. It is considered the level of detail on design of frontages are too detailed for this initial stage and should be addressed through future applications and Design Codes. • Part 46) Endurance support this approach in principle. This will require careful consideration through further assessment work and masterplanning in support of future applications. Endurance, MGL and GCSO should engage further with Anglian Water to ensure there is a deliverable strategy for the life of the development, given well publicised capacity constraints in the short term. • Part 47) Endurance support this approach in principle. This will require careful consideration through further assessment work and masterplanning in support of future applications and detailed assessment in urban design and transport terms. Endurance question whether the proposed Street Space and Kerbside Strategy is	

Summary of issues raised in comments	Comments highlighting this issue
necessary. It is currently unclear what this is trying to achieve and it is considered in any event that it can be covered by other documents. • Part 50) Endurance support this approach and consider it essential to the successful delivery of the project. There needs to be recognition that delivery of some of the infrastructure is dependent upon 3rd parties and beyond the promoter's control. Further discussions with stakeholders will be required to ensure that the full range of requirements, anticipated costs and responsibilities for delivery are appropriately assigned. • Quantum of development, which will be delivered beyond the lifetime of the plan, will need to be appropriately phased to align with delivery of supporting infrastructure. • The strong framework for delivering green and blue infrastructure, aligned with the Local Nature Recovery Strategy, provides important multi-functional benefits, including water management and mitigating flood risk. • Support the robust requirements for managing surface water run-off and provision of foul drainage and sewerage proposal. • Agree that the preparation of a Climate and Sustainability Innovation Delivery Plan sets out the key expectations for delivering a climate resilient community and ensures the sustainable use of natural resources, including high standards of water efficiency and on-site water use. • Requirement for a Foul Drainage Strategy is also welcomed.	

Summary of issues raised in comments	Comments highlighting this issue
• Item 9c should include provision of special school, which is likely to be required to mitigate impact of such a large allocation. For Northstowe and some other developments there is a separate reference to education needs in the “Uses” list, so a similar approach is suggested for Cambourne North and amend to "Education facilities to meet the needs of the development including early years, primary schools, secondary schools, sixth form and for special educational needs”.	
Flooding • Flood mitigation measures to be implemented before construction begins. • Flood prevention needed as Elsworth floods frequently. • Elsworth was subject to a major flood event in 2001 when more than 20 homes were flooded • Conington and Fen Drayton already flood from surface water. Future-proofing flooding impact is vital. • Concerns regarding increased flood risk from developments within Swavesey surface water catchment area, as the existing drainage system is already at capacity. Water from large-scale developments should be conditioned to include attenuation basins capable of holding water for up to 4 weeks when the Webb’s Hole Sluice is closed.	201452 (C Barnard), 201519 (A Brown), 201680 (C Davies), 201768 (R Crowther), 201770 (G O’Connell), 201807 (K Rhodes), 202441 (P Deer), 201953 (R Milns), 202348 (C Farquharson-Robert), 202354 (D Boyd),203460 M Passan), 203639 (J Tanner), 203519 (A Martins), 203562 (D Pope), 203702 (S Wyer), 204526 (I Claydon), 204579 (A Watson), 204656 (N Woods), 204765 (K Seifert), 204776 (C Drummond),

Summary of issues raised in comments	Comments highlighting this issue
• Major developments should negotiate S106 contributions for onsite and offsite mitigation to address local flood risk concerns and improve existing infrastructure. • Flood and drainage management plans essential to address existing flooding risks in Elsworth, Knapwell, and Conington, particularly with the proposed increase in housing. • This policy should refer to the need to adopt a sequential approach, prioritising the location of more vulnerable development outside areas at risk of surface water flooding. Recommend that this policy refers to the requirement for the site-specific FRA to include hydraulic modelling of ordinary watercourses within the site to inform site layout and design levels. The policy should also refer to the recommendation to consider the integration of water management and SuDS at the site into the wider strategy for Blue and Green Infrastructure for Cambourne and how the site can contribute to wider flood and water management benefits across the sub-catchment. The policy could highlight that the adjacent Strategic Enhancement Area may offer opportunities to reduce flood risk through water storage or nature-based solutions. • Better to acknowledge that Cambourne and North Cambourne are separate and plan accordingly (this does not mean there shouldn't be bridges, cycleways etc.). • Part 44) Endurance support this approach in principle. This will require careful consideration through further assessment work and masterplanning.	204782 (I Maddison), 204817 (J Harris), 204952 (C Gouldsbrough), 207398 (L Skerritt), 207402 (N Woods), 207465 (A Irvine), 207482 (N Hall), 207769 (R McClure), 207929 (H Sutton), 208649 (S Keep), 208703 (J&C Collins), 208704 (J&C Collins), 209351 (D Pope), 209353 (A Pope), 209355 (G Pope), 209364 (B Skerritt), 211216 (C Askham) **Other organisations** 203059 (Swavesey PC), 211183 (Environment Agency), 210057 (Endurance Estates), 210816 (Elsworth Parish Council), 211183 (Environment Agency),

Summary of issues raised in comments	Comments highlighting this issue
• Development presents an opportunity to implement effective flood prevention measures in Elsworth, with an invitation for further discussions on this issue. • Policy should refer to need to adopt a sequential approach, prioritising the location of more vulnerable development outside areas at risk of surface water flooding. • Recommend policy refers to requirement for site specific FRA to include hydraulic modelling of ordinary watercourses within the site to inform site layout and design levels. • Policy should also refer to recommendation to consider the integration of water management and SuDS at the site into the wider strategy for Blue- Green Infrastructure for Cambourne and how the site can contribute to wider flood and water management benefits across the sub-catchment. • Policy could highlight that adjacent SEA may offer opportunities to reduce flood risk through water storage or nature-based solutions.	
Housing • Too many houses • No evidence of need for more, houses than currently in pipeline.	203939 (A Parfitt), 205189 (L Hanzi), 205590 (C Meads), 204952 (C Gouldsbrough), 207401 (N Woods),

Summary of issues raised in comments	Comments highlighting this issue
• 100 houses in Cambourne for sale (127atm) and no buyers - no desirability to live there. • Current rates of housebuilding are insufficient to meet demand and are delivered too slowly. Alternative construction methods - such as modular or modern methods of construction - should be actively encouraged to accelerate delivery. • Current approach of developing small parcels over extended periods (often around 18 months), as seen in West Cambourne, is not acceptable for North Cambourne. • Clear delivery targets should be established, with an ambition to complete individual parcels within six months where feasible. • All new housing should be delivered as zero-carbon or near-zero-carbon and include Renewable-based heating systems, High standards of insulation and energy efficiency, Solar panels and battery storage installed as standard, rather than merely “provisioned for”. measures should be mandatory rather than optional to ensure genuine long-term sustainability. • concerned that many homes are built with little regard for future adaptation. North Cambourne should adopt similar principles, ensuring homes can evolve as residents’ needs change over time.	**Other organisations** 207073 (Cambourne Town Council), 207076 (Cambourne Town Council), 207077 (Cambourne Town Council), 207511 (Cambridge Fire and Rescue Service), 209977 (Endurance Estates), 210000 (Endurance Estates), 210001 (Endurance Estates), 210004 (Endurance Estates), 210023 (Endurance Estates), 210024 (Endurance Estates),

Summary of issues raised in comments	Comments highlighting this issue
• Provision of approximately 13,000 homes at Cambourne North is supported and welcomed and it is considered that there is sufficient land available for development to deliver this, though further consideration of density assumptions is advised. • Endurance support aspirations of policy but consider that further flexibility is required in relation to a number of aspects set out to ensure the scheme is responsive to changing needs over time, reflective of the long-term nature of the proposal. For example, Endurance consider that requirement for 10% specialist accommodation is too specific. We support the need for a range of accommodation types for all needs, but10% of 13,000 homes would give rise to 1,300 specialist homes. Our suggestion is that such prescription is not necessary and should be evidence driven by documents such as updated Housing Needs evidence at the time, recognising the long term nature of these proposals with need likely to evolve over the 30-year implementation period. • Prescribed levels of specialist and Gypsy and Traveller pitch accommodation is not justified by Council's evidence base. Policy requires further flexibility to ensure that proposals can respond to changes in need over time as scheme matures and more up-to-date evidence on these needs becomes available. Council's evidence identifies alternative means to deliver pitches for G&T which are preferred to allocations on strategic sites. An approach which includes additional text policy such as	

Summary of issues raised in comments	Comments highlighting this issue
'approximately' 'or at levels as determined through an up-to-date assessment of local needs at the time', would allow for anticipated changes in need over time. • Endurance support in principle the need for a report covering an Intergenerational Housing Strategy to inform the level of housing typologies to meet the local need. • Part 14c) Challenging market conditions, cost of finance, and implications of Building Safety Act have created very challenging conditions for housebuilders to deliver apartments. Whilst these circumstances may adjust and improve, our view is that the policy should be flexible enough to account for changing circumstances over time through to 2060. Such a prescriptive density range in today's market, in this location, is considered a challenge. • A greater range of densities will aid overall delivery with lower densities in edge of settlement and other sensitive areas (such as near heritage assets) and higher densities in the town centre / the new Station Quarter. Suggested that a density range of 40-90dph, would allow for more design flexibility to respond to the various placemaking objectives and allow for a scheme that can deliver 13,000 dwellings. •	
Employment • Few local jobs will be created, increasing commuting pressures. • Incentives required to attract higher skilled jobs/companies to Cambourne North.	203639 (J Tanner), 205645 (C Deer)

Summary of issues raised in comments	Comments highlighting this issue
• Support inclusion of mixed industrial, laboratory, and office campus uses. However, a different approach to delivery is required. In Cambourne, employment sites have too often been delivered late in the development cycle, undermining local job creation and increasing commuter travel. • Concerned about imposition of unreasonable planning conditions, such as mandatory residential units above commercial premises. In many cases, commercial sites should remain wholly commercial. • Given increasing viability pressures on local commercial development, particularly from online retail, planning policy should focus on removing barriers to delivery rather than introducing additional constraints. • The opportunity at Cambourne allows one or more specialised clusters to be planned for from the outset allowing room for future expansion of businesses. • CGC recommends that consideration is given to building in flexibility for a greater level of employment ambition at Cambourne West and North linked to the provision of an EWR station. It could be clearer how the Local Plan draws from this evidence to set the vision for the role of the employment land in terms of the sectors catered for and on the amount of development that would optimise employment growth. The additional scale of growth is supported by the Council's evidence base and East West Rail.	**Other Organisations** 207086 (Elsworth PC), 207075 (Cambourne Town Council), 208938 (Cambridge Growth Company), 209978 (Endurance Estates), 209990 (Endurance Estates), 209991 (Endurance Estates), 209993 (Endurance Estates), 209994 (Endurance Estates), 209995 (Endurance Estates), 210002 (Endurance Estates), 210003 (Endurance Estates), 210006 (Endurance Estates), 210021 (Endurance Estates), 210026 (Endurance Estates), 210027 (Endurance Estates),

Summary of issues raised in comments	Comments highlighting this issue
• Insufficient allowance is currently being made for employment development to ensure a balanced, self-contained and prosperous new town is ultimately achieved. The proposed 108,000sqm of floorspace is not considered to be sufficient to support these aspirations to achieve a balanced, self-contained community consistent with the requirement to operate within a limited trip budget. • Employment is critical part of development mix to ensure a mixed, balanced and prosperous new community, with sustainable travel patterns and high degree of self-containment. • The proposed jobs target and amount of land provided for employment is considered to be too small to support size of the new town and ensure a self-sustaining town which minimises out-commuting. Revise the approach to employment development to be delivered as part of the allocation. • Number of movements from existing settlement, as well as from future residents, can be reduced if a large number and wide range of high-quality jobs are provided as this will have the impact of reducing number of in/out commutes for a proportion of the future population. This has material relevance to working within a limited Trip Budget. • Important that allowance is made for a wide range of employment provision that reflect different market demands and provide flexibility as needs and demand will evolve over time, particularly given the long term nature of the proposals.	

Summary of issues raised in comments	Comments highlighting this issue
• Additional land between A428, EWR and A1198 is considered to be ideal for further employment, facilitated by an additional access onto new A428/A1198 roundabout currently under construction and as illustrated on the attached plan Employment Development Access Off Proposed Northern Dumbbell Roundabout General Arrangement Plan (Drawing Ref 48168-P005-001) showing a potential additional access from new A428 / A1198 Junction currently under construction and utilising land under Endurance Estates' control. Proposed additional access can have significant benefit in reducing pressure on the main Cambourne A428 dumbbell access junction whilst also helping to separate and reduce heavy goods traffic from residential access arrangements and station approach, improving character and amenity of these areas and ensuring they are more welcoming for pedestrians and cyclists. • Endurance would support working with MGL and GCSP to develop an Economic and Employment Strategy at an early stage to help define parameters for this critical ingredient of the project, as part of a compelling overall vision for Cambourne. • Part 14b) Endurance consider approach is too inflexible and does not currently provide sufficient flexibility to reflect wide range of potential commercial uses appropriate to support a town of this size and market demands. Whilst such an approach will be appropriate for office and research and development uses, it would be less appropriate for industrial and logistics or mid-tech uses or many commercial and retail uses. The stacking of some employment uses has not, to our knowledge,	

Summary of issues raised in comments	Comments highlighting this issue
been achieved in the Greater Cambridge market and we would question whether this requirement is realistic, justified or necessary and we are concerned that it would make the site less attractive in the market and therefore be contrary to the aim of achieving an economically prosperous new town. More flexibility should be incorporated to enable different approaches to be taken to enable a wide range of employment uses to come forward in response to market demand. • The need for co-working spaces should be considered further as part of the Employment Strategy as it is important to avoid over-provision with spaces that then sit empty. The policy needs flexibility to enable the scheme to respond to market demand, viability and changes in way people work/live. • Endurance support intention to encourage a flexible range of mixed-use and employment uses which respond to their context. It is important that sufficient flexibility is built-in to the wording of the policy to reflect different types of employment uses that may come forward in different parts of the site.	
Elsworth The proposal will have a detrimental impact on Elsworth and its residents due to: • Close proximity of new settlement to village. • Risk of coalescence.	201174 (K Smith), 201303 (A Brown), 201307 (J Turner), 201396 (S Ireland), 201519 (A Brown), 201765 (A Mitchell), 201773 (I

Summary of issues raised in comments	Comments highlighting this issue
• Increased traffic through village, including during construction. • Loss of natural and historic landscape. • Impact on rural lifestyle. • Forest should be as wide as possible and planted early. • Do not want active travel links to new settlement. • Elsworth will become a suburb of “Cambourne City”. • Visual, noise and light pollution. • Negative impact on conservation area. • Effectiveness of landscape buffer. • Impact on character of Elsworth, a conservation area with grade II listed properties • Increased risk of flooding. Amendments suggested include: • Increasing buffer between Elsworth and new development. • Improve alternative routes around Papworth to alleviate traffic through Elsworth. • Provide bypass for Elsworth.	Claydon), 201891 (C Deer), 202212 (M Stevenson), 203460 M Passan), 203651 (L Skerritt), 203923 (T Hegan), 203939 (A Parfitt), 204765 (K Seifert), 207421 (N Thornton), 207422 (N Thornton), 207423 (N Thornton), 207469 (D Meyer), 207769 (R McClure), 207771 (R McClure), 208645 (S Keep), 208646 (S Keep), 209352 (D Pope), 209356 (G Pope), 209357 (G Pope), 201754 (K Smith) 206109 (Elsworth PC)
Boxworth • Concerns at impact of traffic accessing A14 through village.	201283 (J Witherow)

Summary of issues raised in comments	Comments highlighting this issue
Knapwell • Increased traffic through Knapwell, which would negatively impact residents on the narrow High Street which cannot be widened. • Traffic calming needed. • Rural approach to Knapwell would be urbanised, with village dominated by development, obscuring detailed landscape to the north. • Knapwell's historical significance, with its medieval layouts and field patterns, must be preserved by expanding the conservation area to prevent detrimental infill. • Potential for flash flooding due to road sealing and roof run-off, as Knapwell is located at the bottom of a geographic funnel.	203981 (L Richards), 204526 (I Claydon), 207463 (A Irvine), 207464 (A Irvine), 207465 (A Irvine), 207771 (R McClure),
Papworth Everard • Papworth Everard doesn’t want to be surrounded by roads railways and housing. • Concerns at what will happen in Strategic Enhancement Area. • Routes around Papworth should be improved to alleviate traffic through Elsworth. • Development boundaries should be fixed to ensure there is no creep during development delivery, or over subsequent years which would result in the reduction of spacing between Cambourne North and in Papworth Everard. • Papworth area is likely to build houses in the 'Cambourne Forest'.	201170 (T Carter), 201414 (J Carey), 201426 (E Chavda), 201470 (C Blencowe), 201501 (C Meads), 201519 (A Brown)

Summary of issues raised in comments	Comments highlighting this issue

Policy S/CB: Cambourne

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments focus on the adequacy of infrastructure, services and overall place-making of the town, with many respondents questioning whether Cambourne can sustainably accommodate further large-scale growth. Comments note that the existing town already lacks key facilities, with references to limited retail, absence of a post office, insufficient healthcare provision and poor accessibility to everyday services. Several comments describe Cambourne as a “dormitory town” and car-dependent design, raising concerns that new development risks compounding these issues unless community facilities, employment space and town

centre functions are delivered early and alongside the provision of new housing. There are also calls for stronger planning obligations to ensure essential services and infrastructure are operational before occupation thresholds are reached.

Transport and connectivity were raised by several people, with mixed views on the proposed policy. Many respondents support the principle of improved sustainable transport, particularly the early delivery of the Cambourne railway station, enhanced bus provision, and high-quality walking and cycling networks. However, significant concerns were raised about the deliverability of mode-share assumptions, the limited expected uptake of East West Rail, and the risk that most trips will continue to be car-based. Comments highlight potential increases in congestion, pressure on local roads, and safety risks, particularly around schools and junctions. There are several comments requiring clearer transport modelling, binding mode-shift targets, early provision of infrastructure (including crossings of the A428), and stronger integration between development phasing and transport delivery.

Environmental constraints and impacts are also frequently highlighted. Respondents raise concerns about habitat loss, impacts on designated sites including ancient woodland, and the need for stronger buffer zones and biodiversity net gain. Issues relating to water resources and aquifer capacity are also noted, with suggestions to delay development until sustainable water supply solutions are secured. Other environmental concerns include impacts on landscape character, and the need for dark corridors and sensitive lighting. Several comments also stress the importance of protecting and enhancing green infrastructure to mitigate recreational pressure and ensure meaningful ecological outcomes.

A further theme relates to the scale and form of development and its relationship with surrounding communities. Many respondents express concern that continued expansion risks coalescence with nearby villages and the erosion of rural character. This is coupled with criticism of design quality, with some describing proposed development as bland or poorly conceived, and calling for stronger

design standards, health considerations, and better integration with existing neighbourhoods. While some developers and stakeholders support the strategic growth of Cambourne and its role in meeting housing need, they emphasise the importance of clear phasing, coordinated infrastructure delivery, and high-quality placemaking to ensure that growth is balanced, deliverable, and beneficial to both new and existing communities.

Response to the main issues raised in representations

The policy supports the continued delivery of services and facilities required to support the existing town. This includes within Cambourne West, Cambourne Business Park and Cambourne Town Centre. Through the further provision of new facilities, as well as the proposed development of Cambourne North, the Council's aspiration is that Cambourne continues to grow into a successful town that includes a wide range of amenities to meet existing and future needs.

The policy previously required an improved network of Public Rights of Way to surrounding villages as well as throughout the town to enable people to travel into and around the town using active modes. This has been retained within the policy. Additionally, development at Cambourne West has been permitted and continues to be built out with most streets near the Village College providing traffic free routes for non-motorised users.

The policy notes the importance for connections (including by active travel and public transport) to Cambourne North and the proposed Cambourne railway station. It is important that these connections are delivered to minimise the use of private vehicles within the town and maximise the opportunities presented by new active travel infrastructure. Similarly, the policy wording has been amended to reflect the requirement for Cambourne West to financially contribute to the Cambourne to Cambridge public transport corridor. Whilst the merits of the East West Rail and Cambourne to Cambridge projects will be considered as part of a separate

planning process, the councils have undertaken further transport modelling to understand the impacts of development in this area on the local and strategic road network and the necessary mitigation measures required during the plan period. This has been undertaken in collaboration with the Highways and Transport authorities as well as National Highways and considers both the local and wider network, including within areas covered by other authorities. This evidence demonstrates that development in this area can be accommodated based on highways capacity and that an ambitious, yet deliverable, mode share is required to ensure compliance with the proposed Trip Budget for Cambourne North.

The quality of new buildings, design considerations and the impact of heat island effects are considered by other policies in the Plan and so are not repeated in this policy.

The provision of employment uses within the town continues to be an important part of the policy, both within Cambourne West but also the Business Park and Town Centre. There is significant potential for Cambourne to provide employment opportunities close to existing and planned homes, as supported by the policy. The Housing Trajectory for the Local Plan has been underpinned by the Housing Delivery Study (2026) and confirms that the council's housing needs will be met during the plan period.

The Defined Development Extent of the town has been reviewed and set out in the Policies Map. The site submitted close to the Caxton Gibbet junction of the A428 has been considered through the Housing and Employment Land Availability Assessment (2026).

Support from the house builders at Cambourne West is noted. The Cambourne North policy sets out clear requirements in relation to the coordinated design and delivery of infrastructure of that site and how it must provide movement connections with the existing

town. The Indicative Spatial Framework for Cambourne and Cambourne North has been updated and reflects the further evidence undertaken by the councils in relation to transport/movement, ecology, landscape and heritage.

Financial contributions to emergency services is addressed through Policy I/ID: Infrastructure and delivery whilst the management and maintenance of sports facilities is addressed in Policy WS/CF: Community, Sports and Leisure Facilities and so are not repeated in this policy.

The policy has also been updated to reflect the comments in relation to dark corridors and local heritage assets that could be impacted by development proposals within the site.

The landscape, transport, environmental and ecological impacts of the Cambourne North allocation have been considered and addressed against that policy. Water availability is a known issue in the Greater Cambridge area, and the Local Plan identifies that new development will only be able to come forward providing the necessary water infrastructure is in place, anticipated from 2032.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**
Cambourne lacks the amenities and facilities which were previously promised.	129984 (A Wilson)

No easy way to get to Cambourne to catch the bus or visit shops. One muddy pathway which is not lit at night and is impossible to use for anyone who is vulnerable. Bins are never emptied. Also need more pharmacies locally.	201158 (G Whitehouse)
Cambourne whilst being well connected with the A428, train and bus, is a failure of a town. It has very limited town services, for example no post office, only a single small super market, no centre. It's a town by design split by its infrastructure which limits non vehicle mobility and increases car use, it's currently and in future best described as a dormitory town.	201294 (T Roberts)
Support Cambourne railway station and believe its early delivery is essential. Local Plan should prioritise station and clearly link major development phases to secured funding and a defined delivery timetable. Without early provision, growth risks increasing car dependency and congestion, contrary to sustainability and climate objectives.	201346 (S Olechowski)
In the same manner as the Bourn outline planning permission, the section 106 agreement for Cambourne West secures funding towards CtoC. However, we note there is no reference to the requirement for a contribution within draft Policy S/CB (Cambourne West). This should be inserted to ensure consistency across the policies.	203435 (Juniper Propco (Bourn) Limited)
Designs look ugly and bland. Developers should not be allowed to impose identikit maximum profit minimum cost design. On "Key principles" please add reference to neuroarchitecture (in particular research findings in this field on the impact of building facades on mental stress levels in the brain) and ensure that building designs are subject to health impact assessments and demonstrate minimal impacts on raised mental stress generation. Also, urban heat islands.	203578 (A Carpen)

Highlights that adding 13,500 houses would triple trip demand, yet EWR's own 2023 data shows only 3% of Cambridge commuters would use the railway – remaining 97% would drive. The plan lacks quantitative evidence that roads won't exceed capacity. While EWR's business case claims credit for 25,000 new houses, it only serves 3% of commuters. The response argues GCSP must prove rail mode share can reach nearly 100% to avoid overwhelming the road network, warning that ideology-driven planning may fail commercially, citing poor Northstowe sales as a cautionary example.	203621 (Cambridge Approaches (William Harrold))
Active travel and public transport provision must be increased: - permeability for walking, cycling and public transport (e.g. via bus gates) must be a primary objective to connect the settlement together, with links open to private motor traffic an exception rather than a default choice - early delivery of strategic bus and active travel crossings across the A428 and rail corridor must be required - a protected and well-designed cycle network between neighbourhoods, the station, town centre, school and employment must be planned - introduce binding mode-share targets with penalty if not met	203745 (T Preud'homme)
Cambourne's perimeter bridleway provides excellent community facility for horse riders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.	204057 (S Rogers)
We moved to Elsworth to be in a rural location as it’s quiet and surrounded by the countryside. This is the way the village has always been. We do not want to be beside a huge town. This is not what we bought into moving here. The distance of greater Cambourne is coming far too close and will impact	204264 (J Brown)

the rural feel and traffic through the village. This is not acceptable for residence whiting to remain in a quiet village.	
Concerns raised about habitat destruction, particularly the loss of ancient sites like Coton Orchard and recreational pressure on SSSIs such as Overhall Grove and Elsworth Wood. Buffer Zones for SSSIs: Expansion of "green gaps" between development parcels and ancient sites like Overhall Grove to mitigate recreational pressure and 20% or higher BNG.	204302 (L Allpress)
The Environment Agency has objected to large-scale housing due to risks to the local water environment and underground aquifers. No further housing occupations should be permitted until the Environment Agency confirms that new sustainable water sources (such as the proposed Fens Reservoir) are operational to prevent chalk stream depletion.	204302 (L Allpress)
Opponents argue that expansion and infrastructure, including the C2C busway, will cause irreversible damage to the Green Belt and rural landscape.	204302 (L Allpress)
Local schools, including Cambourne Village College, have expressed concerns that planned road layouts will lead to severe congestion and safety hazards for cycling pupils. For sites near Cambourne Village College (e.g., Parcel 2.3), planners must replace narrow residential lane access with a dedicated, high-capacity link road to separate school traffic from residential streets. Implement LTN 1/20 schemes.	204302 (L Allpress)
Calls for growth to be halted until the East West Rail station location and delivery dates are confirmed, as current plans may not integrate well with future rail links.	204302 (L Allpress)

Cambourne Town Council has noted objections regarding insufficient employment uses within the allocation of some proposals. Mandatory Employment Space: Amending applications to strictly enforce the ratio of employment land (offices/light industrial) to housing, preventing Cambourne from becoming a "dormitory town."	204302 (L Allpress)
The Cambourne to Cambridge busway has been criticized for a low benefit-cost ratio and high estimated costs exceeding £200 million. Realigning the C2C Busway to follow existing road corridors (like the A1303) instead of cutting through the Coton Orchard and the Green Belt.	204302 (L Allpress)
Experts question the feasibility of delivering the required 400 dwellings per year to meet 2041 targets.	204302 (L Allpress)
Residents fear that continued sprawl will cause surrounding villages to lose their distinct identity and merge into a single urban area. Redesigning the Cambourne North masterplan to revolve around the future East West Rail station, ensuring high-density development is centred on the rail hub rather than spread out as car-dependent sprawl. Establishing permanent, legally protected "green wedges" between Cambourne West and Caxton/Bourn to ensure these villages do not lose their individual character to urban coalescence.	204302 (L Allpress)
Changing the "Section 106" agreements to ensure that community facilities (shops, GPs, and community centres) are built and operational before a certain threshold of houses (e.g., the first 500) are completed.	204302 (L Allpress)
The policy is not justified as the policy maps require amendments to include additional land within the development framework boundary for Cambourne West. The settlement boundary currently follows the Outline Planning Permission for Cambourne West and needs to be adjusted to include land north of this boundary up to the A428 road. Should include site 115583 and Oak Tree Cottage.	204369 (Abbey Properties Cambridgeshire Limited)

Vistry welcomes Policy S/CBN: Cambourne North, supporting its strategic approach to balanced growth, sustainable transport, low-carbon development, and biodiversity net gain. Vistry endorses Policy S/CB: Cambourne, recognising Cambourne as a strategic growth location with planned transport infrastructure improvements to meet Greater Cambridge's housing needs.	205053 (Vistry Group)
Vistry appreciates the policy's focus on linking new development with existing settlements, highlighting the importance of coordinated design, timely infrastructure delivery, and strong placemaking.	205053 (Vistry Group)
Vistry encourages the Local Planning Authority to provide clear guidance on phasing and infrastructure delivery to ensure timely development of transport and community facilities. Vistry requests that the policy be retained and strengthened as the plan progresses, and welcomes ongoing engagement with planning officers.	205053 (Vistry Group)
Map and especially section near Cambourne playing fields between Great and Upper Cambourne is confusing and not clear. The lack of clarity means it's not a sound or legally robust plan. It is not clear if three bridges are proposed or just one and why it is needed when there is one nearby already. This is an important wildlife area and corridor and will also impact local residents in this area.	205100, 206811 (M Jordan)
The whole orange-circled area and its surroundings constitute an important wildlife corridor, yet this is not recognised in the plan.	206812 (M Jordan)
There has been no direct consultation with residents in the yellow area of the orange circle, despite the likely noise, air-pollution and safety impacts from construction and early bridge works to an empty field and a non-operational East West Rail station.	206813 (M Jordan)

Support Policy S/CB: Cambourne. The policy provides a clear and consistent framework for managing future development in Cambourne.	205171 (Taylor Wimpey East Anglia)
Cambourne is rightly identified as a strategic location for growth, supported by significant planned improvements to transport, road, rail, and public transport corridors. This means it is well placed to help meet Greater Cambridge's substantial future housing needs identified in the draft plan.	205610 (Taylor Wimpey East Anglia)
Welcome policy's holistic approach to integrating new development with existing town. Its emphasis on coordinated design, infrastructure delivery, and strong placemaking principles will ensure growth benefits both established and future communities across Cambourne.	205611 (Taylor Wimpey East Anglia)
Current town centre is dominated by a supermarket, namely Morrisons. There is no permanent Post Office which is ridiculous and no real thought has gone into how to develop Camborne as a town in the past. Frankly it is far too big already to be considered a village.	207461 (L Payne),
Under the subheading 'Uses' – add a new criterion k. as follows; "k. Contributions to fire & rescue, police and ambulance facilities provision/ funding".	207479 (Cambridgeshire Constabulary), 207512 (Cambridge Fire and Rescue Service)
We would encourage the authority to add wording to the Nature sections of this policy about sensitive lighting strategies and providing dark habitats/corridors where possible, particularly if these can link with those planned in Policy S/CBN, and around the outer edge of the settlement.	207613 (Natural England)

Benefits of locating growth at Cambourne recognised due to proposed busway, improvements to the A428 between Black Cat and Caxton Gibbet, as well as the proposals for East West Rail (EWR) providing rail services between Oxford, Bedfordshire and Cambridge. What work has been undertaken to date to identify impacts on the local and strategic road network outside of the Greater Cambridge area, and the mitigation identified to combat these impacts.	208501 (Central Bedfordshire Council)
Vision led approach to transport, with the emphasis on delivery of sustainable transport schemes such as EWR and the Cambourne to Cambridge busway is supported, as recognition in Policy I/ST, point 3, of the need to address transport infrastructure in the wider area including across the district boundary. There will inevitably be an impact on the A1 corridor and local road network within Central Bedfordshire, which does not appear to be reflected within the impact assessment or Infrastructure Delivery Plan (IDP).	208502 (Central Bedfordshire Council)
Strongly supports EWR but that Cambourne would be better served by light rail mass transit linking to Cambridge, with EWR rerouted south avoiding Cambourne. This would support accessibility to key employment sites in Cambridge.	208757 (Cambridge Connect)
Opposes Cambourne to Cambridge on strategic and environmental grounds. A regional travel hub should be provided at the Girton Interchange.	208757 (Cambridge Connect)
There are a number of Conservation Areas to the south of Cambourne, all of these contain numerous listed buildings. There are other listed buildings to the west and the east of Cambourne. There are a number of scheduled monuments in the area as well as two further registered parks and gardens in the area at Bourn Hall (grade II) and Longstowe Hall (grade II*). Any development of this site has the	210139 (Historic England)

potential to affect these heritage assets and their settings. There does not appear to be an HIA for this allocation. It is important that the policy identifies on-site, and nearby heritage assets and any mitigation and enhancement measures required to address any impact. Amend policy accordingly.	
Are you planning to build three new bridges (road, cycle and foot) within the orange-circled 500 m stretch, or just one, and where exactly will it be located?	206810 (M Jordan)
Why is a new cycle/footpath route to Cambourne North required when an existing route is only 500 m away – the proposed route seems an unnecessary expense.	206812 (M Jordan)
Sport England supports the ambition for significant sports and leisure provision, including a regionally significant facility. However, the type and quantity of provision must be informed by a robust, up-to-date PPS, BFS, FPM. Sport England recommend that the policy also includes a requirement for management and maintenance plans for indoor and outdoor sports facilities.	209223 (Sport England)
Expansion to the south of Cambourne should be planned for, either as a stand-alone extension to the settlement, or in combination with development in another direction. As detailed in the submitted documents and plans, Land South of Lower Cambourne is unconstrained and could provide a highly sustainable extension to Cambourne. The benefit of developing multiple areas is considered to be underestimated in the document, particularly in the deliverability section and this is considered to clearly be the preferred option for growth. This needs to be reassessed and it is considered that provision of new development both to the north and south of Cambourne, would have substantial benefits in sustainability terms and boosting housing supply in the short term, and that it is clearly the most suitable option when considered against the alternatives.	204253 (Richborough)

Cambourne doesn’t have the amenities and infrastructure promised from last 20yrs! and now bursting. Will old promises be kept to restore any kind of faith and trust in councils and developers before our support is expected?	200980 (A Wilson)
Cambourne is one of the most challenging locations in Greater Cambridge in which to deliver genuinely sustainable travel at scale. The Local Plan does not yet demonstrate that this challenge has been fully confronted. Plan relies too heavily on future public transport investment to meet transport needs. Without binding mode share and trip internalisation targets, a clear pipeline of transport interventions, and wider changes to the fabric of Cambourne such as new local amenities, trip budgets risk becoming aspirational rather than effective. The Local Plan should: Make permeability for walking, cycling and public transport the primary objective of stitching the settlement together, with a presumption against vehicular permeability between the existing and expanded Cambourne Require early delivery of strategic bus and active travel crossings across the A428 and rail corridor, tied to clear phasing triggers Secure a continuous, protected and legible primary cycle network linking neighbourhoods to the station, town centre, schools and employment. Strengthen the trip budget approach by introducing binding mode-share targets and clear consequences if these are not met	211774, 211775 (Camcycle)

Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was acceptance of the need to deliver more housing in Greater Cambridge. There was some support for the allocation of development in new settlements. The allocation was supported by multiple respondents.

Concerns were raised about the oversupply of lab space and the empty sites at local science parks, and therefore a need for homes in this area.

Concerns were raised about the need for housing in this location, how the site was selected, if the site is appropriate for this level of development and the evidence that supports its allocation.

Concerns were raised about impact on landscape as this area is predominately rural and the site has varied typography and how this could create a challenge for a development of this scale in this location.

Concerns were raised about impacts on heritage, on the Conservation Areas in Great and Little Abington, on local Listed Assets and on the Scheduled Monument at the Roman Road.

Concerns were raised around local infrastructure provision, including schools, and impacts on surrounding local businesses.

Concerns were raised about utilities such as water supply, waste water treatment and electricity to ensure that there is enough

provision to accommodate new growth and minimise impacts on existing development.

Concerns were raised about flooding and management of sewers. Concerns were raised about timing of infrastructure delivery.

Concerns were raised about the impacts on existing communities of development of this scale, and how deliverable this site is. Concerns were raised about impacts on the chalk stream and pollution.

Ecological concerns were raised, comments were made about impacts on ecological network and habitats, SSSIs, hedgerows and protection of trees.

Transport concerns from local residents centred around traffic congestion, impact on the local road network, deliverability of CSET, and active travel connections.

Concerns were raised around impact on wider surrounding settlements including Hildersham, Abingtons and other nearby villages.

Concerns were raised about the design of the development. Concerns were raised about the housing delivery mix and impact of Traveller's site.

Further responses were raised by statutory consultees on protection of the Roman Road, Barrows and SSSI.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- Support noted, including the need for new homes, the benefits of planned housing, jobs, and infrastructure over ad hoc rural developments.

- The Councils have considered the representations made and have been working with the site promoters to develop further evidence to support the allocation and address the concerns raised during the consultation. The Councils have engaged with statutory consultees to iterate the wording of the policy and ensure the impacts of the development are managed and mitigated. Cambridge City Council and South Cambridgeshire District Council are working in partnership to produce a joint local plan.

- Through the development of the joint plan, the Councils have had to consider a range of development strategy options, from sites on the edge of Cambridge through to developments in villages, to consider the most sustainable way development needs could be met. This included reviewing freestanding new settlement site options, noting in our evidence that new settlements located on public transport corridors can be sustainable locations for development.

- South of Cambridge, the area around the M11 and the A1307 corridor is home to a range of major business parks with world-leading facilities and has some excellent and improving public transport links. The Government, Combined Authority and Local Partners have made clear the expectation for continued economic growth in the knowledge intensive sectors that already have space and plans to grow south of the City. The nationally significant science and digital cluster located in this area will require more employees – and suitable housing to realise its potential. A new community at Land adjacent to A11 and A1307 (Grange Farm) provides an opportunity to deliver new homes near to existing KI based campuses, and where planned improvement to public transport which would offer connections to the Cambridge Biomedical Campus. The homes could be supported by services and green spaces that respond to its setting.

- The strategy of the Local Plan is informed by selecting sites that are in the most sustainable locations. Sites that are in locations in areas of high quality public transport and connected to existing defined development extents are selected as a priority for development. The strategy looks first to allocating brownfield sites in the City and Edge of Cambridge and in sustainable locations and then looks to meeting housing need with new settlements at Cambourne North and Grange Farm for example. Of the proposed options for new settlements, Grange Farm is the best of the available options for development, as demonstrated by the HELAA and SA assessments. Options higher up the hierarchy have been prioritised

first and selected considering impacts on the environment, public transport and deliverability. Grange Farm as a site allocation has been selected through the evaluation of sites.

- The Housing Target for Greater Cambridge is calculated via the standard method, and this has given an identified need figure of 48,195 minimum dwellings to be delivered over the plan period. This is also similar to the figure that Greater Cambridge has an identified need for and therefore is the number of homes that the Local Plan is looking to deliver. Through all the sites allocated in the Local Plan, this delivers a figure of 48,065 dwellings to 2045 which is the end of Plan Period. Grange Farm will need to contribute 2,550 dwellings in the plan period to continue to demonstrate a 5 year land supply and deliver the number of units needed in Greater Cambridge in the most sustainable locations. The allocation of Grange Farm addresses the acute Housing Need in Cambridge, as identified in the Housing and Accommodation Needs Assessment.

- The Employment and Housing Evidence Update (2023) by Iceni Projects sets out that there is demand for lab floorspace. GCSP have undertaken engagement with landowners at these campuses where they have ambitions to expand, there is evidence that development is needed in this location for development. Development at Wellcome Genome Campus in Hinxton is allocated for predominately expansion of research and development floorspace and the delivery of 1,500 campus workers to support the function and expansion of the campus. The research campuses in this location are all looking to grow and expand, and therefore further housing is required to provide housing for the workers. Land at Grange Farm, east of A11 & north of A1307 Grange Farm is close to the committed 1,500 homes at Wellcome Genome Campus expansion, but those homes are specifically for staff at Wellcome Campus and as such that there shouldn’t be the same level of impact on delivery rates were both sites to be for market housing. Both sites are required to meet the identified need for homes in Greater Cambridge over the plan period.

- To sustain a development of this size, and to offer employment opportunities within the site, 35,000 sqm of employment floorspace has been identified as an appropriate mix of uses for the site. Greater Cambridge sustains a pipeline of an oversupply of employment floorspace to encourage job creation and ensure there is robustness and flexibility in the meeting needs of the market in terms of employment floorspace. Furthermore, this site is in close proximity to a number of expanding campuses such as Wellcome and Babraham, and will be well connected to Cambridge via the CSET connection.

It therefore proposes a settlement that can provide additional employment floorspace and be well connected to local employment opportunities.

- The Greater Cambridge Local Plan sets a vision for delivering sustainable development for the City and South Cambridgeshire. It is a joint Local Plan responding to cross-boundary issues. The site scored an overall red following the HELAA assessments. This is not untypical for large scale strategic sites where impacts on matters such as landscape will be significant compared with the existing baseline situation. Cambourne North, for example, also scored an overall Red in the HELAA. The process is site specific evidence and testing that will identify how these reds and other impacts can be mitigated as much as possible. For example, through landscape and heritage studies, we would identify specific sensitivities (like local or strategic viewpoints) and feasible mitigation measures, which are then incorporated into the policy.

- The initial HELAA assessment of the Grange Farm proposal reflects the initial site boundary submission from the landowner. Additionally, the Councils also tested a larger site within the HELAA which is aligned with the draft allocation and Strategic Enhancement Area boundary which was in the draft Local Plan. The supporting documents submitted by the landowner can be found on our consultation platform, please see the Supporting Evidence tab. Please note that the landowner did previously request that the initial site submission documents, submitted in 2021, be withdrawn from the HELAA process as it was prepared and submitted on their behalf by their former site promoter. These documents have therefore been withdrawn and superseded by the documents in the link above. It is common for site promoters to withdraw sites, supersede supporting studies/evidence and change promoters/planning agents during the course of the Plan making process, and this process is commonplace.

- The development strategy has allocated this sire as a suitable location for development. The potential sites have been considered and assessed by the HELAA and then if appropriate for development were assessed as reasonable alternatives in the Sustainability Appraisal. Then this informed the list of allocated sites. Then for each allocated site further evidence has been prepared to support its allocation. The development of evidence is underway and will continue. There is no pre-determined development at Grange Farm. Options are being worked through with site promoters to work out how development can be accommodated in the most sustainable way.

- The use of new settlements to meet housing demand has been assessed and evidenced through the HELAA, Sustainability Appraisal and Strategy Topic Paper. It is the approach that will reduce carbon emissions from transport emissions the most and ensure there is sufficient critical mass to be able to support critical infrastructure such as schools, healthcare and transport to ensure the development is sustainable and meets the needs of its residents.

- The site has been demonstrated to be deliverable, as set out in the Housing Delivery Study Addendum. The development is phased from 2034 to ensure sufficient water and transport infrastructure is in place, as well as based on out standard assumptions for delivery timescales of a site of this size. It is demonstrated that 2,550 units are deliverable at Grange Farm within the plan period, and this is set out in the Housing Delivery Study Addendum.

- On balance, when considering the site against the reasonable alternative options, the councils are therefore of the view that this site presented a deliverable and sustainable growth option for the emerging Local Plan.

- In response to concerns that this is the wrong location due to transport, officers are working with the site promoter and statutory consultees to plan work through options to deliver a transport mitigations for the site that will align with the trip budget that has been identified for the site to ensure that impacts on the wider transport network are minimised. This trip budget has been refined by the preparation of further evidence and the development of options to prioritise active travel and public transport to reduce the number of vehicles entering the wider network. The wider Transport Strategy for Cambridgeshire will also seek to manage wider transport issues, considering development and growth across Cambridgeshire.

- The councils have undertaken additional evidence since the draft Greater Cambridge Local Plan consultation on a number of themes which were identified in the comments. These relate to heritage, ecology in the HIA, viability and infrastructure in the IDP. In consultation with the Councils' and statutory consultees, the site promoter has undertaken additional evidence since the draft Greater Cambridge Local Plan consultation on a number of themes. These relate to primarily to landscape, ecology, heritage and transport and are addressed in more detail below and within the Site Allocations Topic Paper. This evidence

includes undertaking landscape assessments, heritage baseline assessments, preliminary ecological assessments and transport assessments and placemaking studies to demonstrate how homes can be delivered sustainably in this location. This has been developed in consultation with officers and statutory consultees.

- To be feasible and viable, it has been identified that 4,200 units is required to be delivered at Grange Farm to sustain a critical mass large enough to support the infrastructure needed for a sustainable settlement. The use of new settlements has been identified as being more sustainable than individual extensions to existing villages because it ensures that infrastructure can be developed to sustain the development and limits the amount of pressure on existing infrastructure. The site capacity has been reviewed in the context of the scale of development that is feasible to be delivered and the impact on the landscape.

- Further capacity testing has been completed by officers and by the site promoters to refine the capacity for the site. Officers have considered the impacts on landscape, ecology, requirement for delivery of biodiversity and green space and the number of units required to establish a critical mass to make infrastructure deliverable. The site capacity has been refined to approximately 4,500 homes, a reduction from 6,000 to minimise the impact of the development.

- There is an identified need to deliver sites for Gypsy and Traveller's in Greater Cambridge. The strategy to meet this need is a combination of optimisation of existing sites to ensure that these sites are occupied by Gypsy and Travellers at safe densities with correct utilities provision and then creating new Gypsy and Traveller sites adjacent to New Settlements. Policy H/GT sets out clear criteria to deliver Gypsy and Traveller sites in a way that minimises impacts on existing development and provides good quality pitches for Gypsy and Travellers. The delivery of sites for Gypsy and Travellers is part of the identified need for housing in Greater Cambridge and sites must be made available for them. The optimal capacity for a traveller site has been identified as 12 pitches per hectare. This figure has been identified as an appropriate scale to ensure that each pitch has sufficient amenity, access to utilities and a safe scale for occupants. This is set out in Policy H/GT as well as being a standard scale of delivery of G&T sites on strategic sites.

- The provision of homes at Grange Farm will be a mix of types, tenures and sizes to provide for a wide range of residents. There is a requirement for 10% of the total homes as specialist accommodation (within Classes C2 and C3), particularly for older people or those with disabilities. Housing affordability is an issue across Greater Cambridge and the delivery of this mix on strategic sites will contribute to meeting the need for affordable homes.

- The IDP has identified the school provision for the site. Further discussions with County have refined the details of this ask and the outputs have been included in the policy wording. At this point, it is assumed that Grange Farm will provide enough school places for the development at Grange Farm. The education and healthcare infrastructure projects identified in Chapters 11 and 12 of the IDP will also mitigate the additional demand on these services arising from planned population growth. Whether residents decide to pursue education and healthcare facilities within or outside of Greater Cambridge is a matter of personal choice, but the IDP identifies projects within or in close proximity to areas of planned housing growth to mitigate the additional demand in full. Local authorities are also legally obliged to cooperate with NHS bodies to secure the provision of healthcare facilities.

- The councils are acutely aware that developments identified in the local plan will need to be accompanied by the right infrastructure. The draft Local Plan consultation in 2025 was accompanied by assessments of infrastructure that would be needed to support proposed developments. Work on the infrastructure requirements is continuing for the next phase of the local plan process. The phasing of the delivery of Grange Farm will align with the construction of transport infrastructure and wider infrastructure delivery.

- The IDP has been developed using an evidence-led methodology that evaluates current infrastructure capacity and increased demand resulting from planned housing and commercial development. Working with delivery stakeholders including Cambridgeshire County Council, Cambridge and Peterborough Combined Authority, the Greater Cambridge Partnership and more, the Council has identified a range of priority transport measures in section 5.3 of the IDP. These transport measures are therefore planned to mitigate the transport impacts of growth brought forward by the emerging Local Plan, ensuring sustainable growth across Greater Cambridge throughout the plan period.

- In terms of infrastructure impacts on the Abingtons and Hildersham and the surrounding area, Grange Farm is designed to not impact on facilities through the provision of its own infrastructure aligned to the phasing of the development including healthcare facilities and schools. The Council welcomes collaborative working with West Suffolk Council on the infrastructure requirements arising from growth planned at Cambridge East, Grange Farm and any other developments proximal to West Suffolk to identify the potential need of cross-boundary infrastructure requirements. The Council also welcomes further engagement with West Suffolk Council on strategic cross-boundary matters and infrastructure issues during the preparation of the next stage of the emerging Local Plan.

- Whilst the Council understands that the Greater Cambridge Transport Strategy (GCTS) is progressing, the GCTS will assess major transport infrastructure projects taking into account the overall impacts of all identified schemes and cross-boundary impacts are considered where they are likely to occur. The Council will continue working with the Combined Authority to identify the potential impact of demand arising from Greater Cambridge on the transport network external to the area.

- Engagement with statutory consultees and the evidence will continue to iterate progressing towards the creation of planning application and considering the full transport strategy for Cambridgeshire. The phasing of infrastructure has informed the phasing of homes including the delivery of CEST and the extension to CSET. This has been agreed in discussion with statutory consultees. An initial trip budget has been prepared for the site as well as a list of infrastructure improvements needed as set out in policy to inform the transport strategy for the site.

- The site promoter has been developing further transport evidence in consultation with National Highways and the Highways Authority and planning policy officers to develop an evidence base for the transport strategy at Grange Farm and to further refine the policy requirements under the movement section including a refinement of the trip budget. Modelling has been undertaken to understand impacts on the Fourwentways Roundabout to consider the impacts of wider transport congestion in the area.

- The trip budget identified by GCSP evidence has been refined by further evidence completed by the site promoter in consultation. The policy requires a number of additional transport assessments to be undertaken as a development proposal

is being prepared as part of a planning application. It is at this stage that more detailed testing and transport interventions will be identified and secured. The transport evidence and Local Plan recognise that additional mitigation measures may be necessary beyond the plan period in order to facilitate the full build out of the site.

- Given the inherent scale of new growth required, the local plan site assessment process (including our Housing and Economic Land Availability Assessment) acknowledges that proposals such as new settlements could result in significant landscape and other impacts. However, given the sustainability benefits the Councils have determined that new settlement proposals that met evidence-based location and scale criteria should nevertheless be subject to consideration for allocation.

- The development strategy and consideration of spatial options and assessment of reasonable alternatives have contributed to the consideration of the configuration and setting of Grange Farm in its wider context. The spatial framework has been prepared to also recognise the interrelationships with existing settlements and the wider area, and this will be used to inform the masterplan.

- The acknowledged impact on the landscape is being mitigated by the use of the use of SEA to provide a buffer. The SEA will be predominately used for agricultural uses, GI and provision of new habitat and restoration. The Strategic Enhancement Area will contribute to retaining a clear green buffer between settlements and it is intended that some of this land remain in agricultural use to respond positively to the local setting. This has been reflected in the policy wording. The boundary of the Land adjacent to A11 and A1307 Grange Farm has been revised to mitigate impacts on the landscape. This includes mitigating views from the site to Roman Road which were identified in the GCSP HIA. These have been reflected in the spatial framework. The management of impacts on the landscape is not just about creating a barrier but also positively contributing to the landscape by being able to see through to the town to enhance the changing landscape. The Eastern Boundary aligns with the typography of the site and slopes down to a buffer created by the SEA. Agricultural uses are encouraged in the SEA to further minimise the impact on development on the landscape by retaining similar uses.

- The spatial framework has been drafted to set out mitigation measures required to minimise impacts on the Abington's and Hildersham. The Strategic Enhancement Area is proposed to contribute to creating a buffer between the developments to

reinforce the integrity of the distinct defined development extents. The use of screening and green buffer in appropriate locations will also contribute to maintaining these edges. The wording of the policy has been further iterated to specify what is acceptable in the SEA. This will improve the clarity of the role of the SEA. The PRoW are being considered in the development of the assessments of the site and will be reflected and protected in the Masterplan. The PRoW along the Roman Road has been identified on the spatial framework.

- The spatial framework has also been developed to set out key constraints, design considerations and a high level indicative layout to inform the design of the site. This contributes to ensuring that the design is of high quality and is suitable in its context- key design principles are established in policy. The policy wording also specifies that this development must be site wide Masterplan led and this Masterplan must be agreed with the Councils' ahead of any planning application approval. Furthermore, a side wide Design Code must be submitted alongside the Masterplan. This will ensure that development follows a clear overarching design and placemaking objectives and principles which will contribute to a high quality settlement. A range of densities have been suggested for this site to ensure that the building heights are reflective of the landscape and align with the typology of the development, with the tallest buildings being in the lowest parts of the sites. These will continue to evolve as plans go into more detailed planning stages. This will be done in collaboration with the Council to ensure design is of a high standard. The site promoter is proposing a unique stewardship model and their current plans for continued local interest in the site that will contribute to a high quality design.

- GCSP has produced a Heritage Impact Assessment (HIA) to support the allocation of the Grange Farm. This document identifies any impacts on heritage assets, listed buildings, scheduled monuments and any key viewpoints and provides mitigation suggestions which have been brought into policy wording and the Spatial Framework to ensure mitigation is considered in the masterplan of the development. GCSP have also been continually engaging with Historic England and the County Archaeology team to work through and agree any mitigation measures for the impact of the development on assets. The Bronze Age Barrows to the west of the site have been reviewed for listing and these are now a Scheduled Monument. These are indicated on the Spatial Framework with a setback for development to minimise impacts. A Geophysical Survey for the Roman Road and the Bronze Barrows has been undertaken by the site promoter and the findings of this has been reflected in the GCSP HIA. GCSP will continue to work with the site promoters and statutory consultees to further discuss

and mitigate against impacts and produce further archaeological evidence as needed, including a site wide DBA and successor surveys as identified by this document.

- GCSP is continually liaising with Anglian Water and the Environment Agency through the water scarcity group to ensure that options are being evaluated to set out a clear strategy on how waste water will be managed to manage impacts on the chalk stream and aquifers. Through the Integrated Waste Water Management Study and Site Specific Flood Risk Assessment to set out strategies for managing impacts of flooding and runoff from greenfield sites.

- The site promoter has engaged independently with Environment Agency, Anglian Water and Cambridge Water to understand how impacts can be reduced. This includes exploring options for sanitisation of water to recharge the aquifer. The options for mitigating impacts on the chalk stream and the River Granta will continue to develop through the development of evidence through to the planning application submission, in consultation with the Environment Agency and Anglian Water.

- Whilst the allocation will reduce the amount of arable farmland in this location, the policy seeks to minimise this through compact forms of development, and key areas of activity within the development. It also supports the continuation of farming within the SEA. The planning application for the site will also be required to complete a site specific flood risk assessment including the sequential test and exemptions test where relevant to ensure that the correct flood risk mitigation measures are in place.

- Grange Farm has been assessed in the Habitat Regulation Assessment and mitigation measure identified in this document have been incorporated in the policy wording, as well as suggested mitigations from engagement with Natural England. The policy and spatial framework has been revised to include policy wording to divert footpaths to just the PROW and not impact on the SSSI. Enhancements to the SSSI are also required in policy.

- The site promoter will be required to complete a preliminary ecological assessment, a cohesive stewardship strategy through early phase community engagement including through conservation groups to deliver community-based enhancement stewardship as endorsed by Natural England; and a recreation pressure assessment for the SSSI to support any planning

application. The Councils' and the site promoter will continue to work with Natural England to minimise the impacts on the SSSI and local ecology. Furthermore, ecological survey and monitoring is required for specific sensitive locations outside of the site's red line boundary that may be impacted by the development is required in the policy to minimise impacts on local habitat and ecological networks.

- Policy WS/HS Pollution, health and safety will apply to all development. This policy will require assessments to mitigate against the impacts of development and its construction. Mitigations through buffers will reduce impact on noise and light pollution. In terms of air pollution, an air pollution assessment will be required, and the prioritisation of active ravel and public transport will reduce impacts on air quality.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support • Really good proposal. people crying out for more homes • Benefits of planned housing, jobs, and infrastructure over ad hoc rural developments. • Support development that aligns with the local area's character, advocating for lower density and height of properties, particularly near existing buildings. • Do not object in principle to the development of a small new town instead of expanding existing villages.	201460 (D Watts), 201750 (J Hall), 201889 (W Cooper), 201804 (R Zimmern), 201889 (W Cooper), 201924 (M Dance), 202876 (C Pippen), 208420 (K Franklin), 208421 (K Franklin), **Other bodies:** 201556 (Stapleford PC), 201669 (Linton PC),

• approve principle of having developments near places of work and understand that they have to be of a certain size. • Contingent on adequate water, education, healthcare, and transport links. • Promotes active and sustainable travel methods, which is viewed positively. • BioMed Realty supports the allocation of Grange Farm as a new settlement. • Supports vision and objectives for Grange Farm as a new settlement that will serve existing and future communities, enhancing sustainability and infrastructure in surrounding areas, including Linton. • Open to exploring how land at Ley Rectory Farm could be sensitively assimilated into the wider development. Wish to stress the importance of ensuring that our residual farm remains viable for the long term. Please continue to liaise directly with The Pampisford Estate and its Trustees. • Pampisford Estate welcome suggestion that delivery will be within the Local Plan period and beyond. PE note Council's updated Greater Cambridge Housing Delivery Study Addendum assumes delivery of 2,550 new homes in the period to 2045. This is lower than position set out within our initial Delivery Strategy and we remain committed to this objective (c. 4,750 dwellings). PE do welcome ambition to plan for a coherent, well planned new town, with a scale and mix of uses to promote self-containment, with range of uses and amenities provided on site to support the needs of all residents. As landowner, PE look forward to working	203371 (BMR Granta Park Propco Limited), 204840 (Vistry Group), 209252 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 209254 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 209256 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 209264 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210722 Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210905 (Great Shelford Parish Council),

constructively with GCSP and wider stakeholders to determine the most appropriate form of development for the site. • As landowner, PE have been stewards of farm for generations. Committed to ensuring that scheme is sensitive to character and context, and is distinctive and separate from the surrounding settlements. PE look forward to working with GCSP to develop masterplan principles which will achieve this shared objective. • PE support ambition for mixed use town centre, and early delivery of amenities to support community integration from earliest stages of development. • Pampisford Estate Farms Limited and the Trustees of the James Binney Will Tr are very supportive of the principle of allocation, broad scale and location of the development and mix of uses proposed. Highlighted a number of areas where more work is necessary to achieve level of precision required for allocation at Regulation 19 stage.	
Do not support • I'm a resident of great Abington and I am not happy about this at all I moved from the city to get away from it and to enjoy a nice quite village now the village is going to be like the city and residents comments need to be respected in this matter I oppose this and do not wish for this to go ahead what so ever.	201310 (K Middleton), 201399 (W Bailey), 205486 (R Sainsbury); 208559 (Abington Residents Campaign), 209069 (Camcycle)

• We were horrified to discover that you are proposing to build a development at Grange Farm which would involves the construction of between 6,000 and 8,000 houses. • Request that the council remove or significantly reduce to respect exiting communities and environmental limits • Abington Residents Campaign (ARC) are completely opposed to Policy S/GF which proposes the introduction of a new Town at Grange Farm. • . In Camcycle's view, the site fails to meet the core requirements of a genuinely sustainable community and should not proceed.	
Not needed • Strategy is wrong and underpinned by an optimistic growth forecast. • Appears to surplus development capacity in the local plan. • Staff of the large science sites in the area already have houses. • Need for the development is not made, it is in excess of housing requirement. • What evidence is there that a development of this magnitude is required? Demand based on current evidence is nowhere near the level indicated in Plan. • Up-to-date forecasting model is required to reflect the future more accurately. • Is a supply of housing being developed near the Hinxton Genome campus, questioning the need for further housing in area. • Focus should be on brownfield sites.	201368 (J Lawrence), 201480(G Brookman), 201624 (D Farrant), 201624 (D Farrant), 201782 (J Tanner), 202022 (A Marns), 202142 (M Turner), 203123 (J Searle), 204111 (J Batchelor), 204201 (P Williams), 204586 (R Elston-Green), 204725 (C Gill), 204733 (M Appleton), 205360 (M Hardinge), 205741 (G Saunders), 205746 (C Feenan), 205947 (S Zmigrod), 206193 (R Barnes), 206199 (R Barnes), 206323 (C Cameron),

• Consultation material indicates the Draft Local Plan allocates materially more homes than the stated local need. • Not "justified" or "positively prepared." Remove allocation or significantly reduce and treat as long-term contingency, pending clearer evidence that optimistic growth scenarios are being realised. • Projections in the Draft Plan for additional population growth and corresponding supply of homes are asserted without any presentation of evidence underpinning those or the relevant sensitivity analysis. • Lack of concrete evidence that there is demand to live at Grange Farm from real individuals involved at local centres of economic activity.	207672 (T Collett), 207783 (P Williams), 207789 (P Williams), 208531 (C Alda), 208629 (G Jones), 210488 (C Gill), 210489 (C Gill), 211647 (G King), 211725 (P Seddon), **Other bodies:** 204707 (Little Abington PC), 204948 (Robinson College),
Should be somewhere else • Inappropriate location, threatening the 'necklace village' concept and damaging the South Cambs landscape. • Should consider brownfield sites. • Edge of city would be better. • There are better and more suitable sites. • Would be more prudent and flexible to continue the sustainable development of existing communities in the area of which Little Abington is a good example. • Inconsistent with national planning policy	201031 (R Smith), 201348 (K Christodoulides), 201367 (M Joslin), 201368 (J Lawrence), 201400 (J Wingfield), 201480(G Brookman), 201494 (J Tharby), 201518 (J Jackson), 201530 (I Rogers), 201531 (H Rogers), 201538 (T Davenport), 210539 (A Patterson Lee), 201542 (L Davenport), 201539 A Patterson-Lee), 201544 (L Davenport), 201577 (G Smith), 201591 (L Menzies), 201624 (D Farrant), 201635 (J

• Does not adequately assess or rule out alternative safeguarded locations further from existing settlements, suggesting a lack of a robust site selection process. • Other locations such as the "Duxford Triangle" bounded by the M11, A11 and A505 should be considered. • Alternatives have not been fully or robustly explored or justified. • Should be relocated to near Horningsea where the sewage farm would have been put. • Should be away from our settlement and built on level ground away from 1307. • Consideration should be given to other sites, e.g. junction off A11. Land near to Fulbourn? • Site is wrong side of A11. • North or South of A11 close to Wilbrahams. • Proximity of this site to Hinxton, Babraham and Granta Park seems to be only reason for choosing it. • More appropriate and sustainable alternative sites exist, including land at Hinxton adjacent to the Wellcome Genome Campus. • Will just provide expensive commuter belt housing as it's close to access roads to London.	Shaw), 201684 (S Bowen), 201694 (S Bowen), 201706 (R James), 201747 (B Seddon), 201753 (L Dav), 201756 (G Sharman), 201762 (D Turnidge), 201766 (F Snell), 201785 (G Farrant), 201798 (J Thirkettle), 201803 (S Fryer), 201804 (R Zimmern), 201821 (Y Arkwright), 201846 (E Goodyear), 201855 (J Hudson), 201884 (L McNicholas), 201887 (K Lander), 201890 (K Cooper), 201912 (J Dodd), 201952 (J Hann), 202009 (D Langley), 202020 (J Rivers), 202023 (P Cullimore), 202067 (D Milns), 202082 (D Palmer), 202092 (R Harman), 202142 (M Turner), 202337 (S James), 202477 (J Herbert), 202518 (H Brown), 202608 (C Cameron), 202708 (D Golding), 202737 (A&L Pepperell), 202796 (S McDonnell), 202907 (J Williams), 202912 (R King), 203141 (V Jury), 203187 (M Jury), 203188 (S Hughes), 203190 (M Furlow), 203389 (G Brookman), 203459 (L

• Needs to be focused on areas where sustainable transport is practicable from the start, not on constrained and remote sites such as this, which virtually demand use of cars. • Should be a plan for sustainable 'infill' developments in existing settlements to secure local schools, shops, services. • Alternative nearby sites, such as Bancroft Park, should also be considered to meet urgent accommodation needs. • Brownfield sites and other alternatives have not been fully explored, particularly the Cowley Road site which could accommodate over 8,000 homes. • If costs of delivering a viable Grange Farm settlement are comparable to — or exceed — the WWTW relocation costs, then decision to abandon NEC should be reconsidered. • Appears to have been rushed, likely as a reaction to Anglian Water wastewater treatment plant at North East Cambridge. • Greater Cambridge HELAA from 2025 shows that Grange Farm Site is not suitable or appropriate - overall suitability was "RED". • Publish a transparent reappraisal of reasonable alternative sites, including locations capable of accommodating new settlements, such as land at Six Mile Bottom, and any additional growth areas identified through forthcoming Cambridge Growth Company work.	Lambourne), 203582 (S Hatchell-Watson), 203648 (E Pimblett), 203653 (S Appleton), 203751 (T Preud'homme), 203797 (R Nagasaki), 203803 (J Cutting), 203805 (A Butchart), 203839 (T Solomonides), 203868 (M Broadhurst), 203911 (E Lambourne), 203931 (A Ross), 203961 (S Somerville), 204015 (J Fairs), 204111 (J Batchelor), 204147 (L Paine), 204156 (B Barkataki), 204196 (A Cooke), 204415 (J Fairs), 204586 (R Elston-Green), 204608 (R Hoadley), 204612 (D Potts), 204617 (J Mannion), 204644 (L Sainsbury), 204682 (E Lane), 204733 (M Appleton), 204759 (M Huntsman), 204783 (R Smith), 204810 (E McKeown), 204871 (V Valge-Archer), 204919 (K King), 205018 (J McDonald), 205020 (S Lee), 205092 (M Whittaker), 205147 (I Sainsbury), 205170 (J Graham), 205249 (K Brightwell), 205400 (S Nuttall), 205443 (A Williams), 205454 (R DeBeaux), 205512 (S Somerville),

• Would be more appropriate for North Cambridgeshire, where infrastructure is already established. • Should be located within walking distance of a mainline train station where all travel to work needs would be addressed. • Consider other locations with better road access and ones that would not cause dreadful congestion to surrounding areas. • Choice of an appropriate site should be led by results of an open presentation on all the alternative irrespective of the land ownership and the clear individual benefit. It appears that the current proposal has been promoted by local landowners without enough consideration of the alternatives. • Allocations to the north of Cambridge demonstrably optimise spatial alignment between new homes and the city's primary employment growth areas—Cambridge Science Park, St John's Innovation Park, the North East Cambridge district, and the Cambridge Biomedical Campus. • Further along A11 towards Fulbourn. • There is so much open land between existing villages to the east that it is closer to the M11, Whittlesford Station and the planned Transport Hub. • Turning Sawston into a town is both logical and beneficial for all. • Housing need could be met by 80 villages each having small developments that would be beneficial to increasing the footfall for businesses and providing an	205540 (G Minhas), 205733 (W Bailey), 205922 (C Paton), 205924 (J Snell), 205925 (J Snell), 205926 (F Snell), 205927 (F Snell), 206595 (A Butchart), 206606 (S Solomonides), 206892 (I Sainsbury), 206899 (I Sainsbury), 207226 (E Lane), 207227 (E Lane), 207235 (S Appleton), 207236 (S Appleton), 207237 (S Appleton), 207238 (S Appleton), 207406 (H Rogers), 207503 (K Lester), 207560 (L Sainsbury), 207561 (L Sainsbury), 207562 (L Sainsbury), 207563 (L Sainsbury), 207564 (R Elston-Green), 207593 (V Valge-Archer), 207597 (R King), 207605 (V Jury), 207673 (T Collett), 207675 (T Collett), 207679 (T Collett), 207921 (H Sutton), 208477 (D Pimblett), 208478 (D Pimblett), 208481 (G Crowe), 208527 (G Brookman), 208528 (G Brookman), 208529 (G Brookman), 208530 (G Brookman), 208547 (D Fraser), 208548 (D Fraser), 208549 (D Fraser), 208550 (D Fraser), 208551 (D Fraser), 208552 (D

increased reservoir of volunteer activities needed to sustain such groups as the scouts, youth groups, village halls and community activities. • Suggest between Babraham and Sawston or land between Pampisford Hall, Sawston, SW to Hinxton. • So much open land between existing villages to the east that it is hard to fathom why Grange Farm could be considered favourable. • Hildersham Parish Council (and a significant number of the residents) cannot help but feel that site near Cambridge North would be a much better choice. • When compared with Land at Hinxton (HELAA Reference 200765) as a reasonable alternative, Grange Farm appears less well aligned with the aim of directing development to locations where active and public transport are the natural choice and where there is a strong relationship with existing (and proposed) major transport infrastructure.	Fraser), 208556 (T Solomonides), 208569 (A Ross), 208570 (A Ross), 208571 (A Ross), 208572 (A Ross), 208573 (A Ross), 208574 (A Ross), 208575 (A Ross), 208576 (A Ross), 208578 (J Bowen), 208666 (E Taylor), 208667 (E Taylor), 209048 (J Darrell), 209717 (J Darrell), 209740 (J Barnes), 210385 (M Cookson), 210432 (B Davies), 210477 (W Bailey), 210486 (E Lambourne), 210664 (F Snell), 210665 (F Snell), 210817 (A Marns), 210826 (C Paton), 211020 (M Hardinge), 211034 (T & A Bradford & Jedrzejewski), 211734 (P Seddon), **Other bodies:** 201603 (Great Abington Parish Council), 203371 (BMR Granta Park Propco Limited), 204112 (P Gill), 204707 (Little Abington PC),

	208111 (Sawston Parish Council), 208153 (Great Abington Parish Council),208159 (Great Abington Parish Council), 209965 (Granta Land Ltd), 210707 (Great Abington Parish Council), 210963 (Great Abington Parish Council), 211676 (Smithson Hill),
Deliverability • No guarantee site can be available since there is an agricultural tenancy. • without clear delivery pathway, timescale, or funding strategy is deemed ineffective and risks long term planning blight, failing to meet national policy requirements. • Relies heavily on future studies, strategies, and mitigation measures to address known and significant impacts, including transport capacity, ecological protection, heritage impacts, wastewater treatment, and already strained healthcare, small schools/education facilities with lack of funding, and policing. • The Local Plan should not overly depend on new settlements for housing delivery in the early and middle stages, as medium-scale sites like Balsham Road, Linton can contribute effectively.	201367 (M Joslin), 201494 (J Tharby), 201542 (L Davenport), 201544 (L Davenport),207920 (H Sutton) 204840 (Vistry Group), 207790 (P Williams), 208322 (PX Land Ltd), 208781 (Axis Land Partnerships Ltd), 209965 (Granta Land Ltd), 211104 (Hallam Land Management), 211414 (CALA Group Ltd),

• Housing trajectory expects delivery of completed dwellings to start within 8 years of adoption of new Local Plan. Drawing on experience from other new allocations in the region, this would not appear to be realistic. • Questioned whether Grange Farm will be capable of delivering any new homes within the plan period and its inclusion within the GCLP therefore becomes untenable. • Requires a binding Delivery Strategy committed by promoter. • Dependent on, amongst other new infrastructure, the Cambridge South East Transport scheme which is not due to even be at public inquiry until later this year. This raises questions over its deliverability. • Deliverability Paper submitted for Grange Farm as part of 'call for sites', confirms that 3,560 dwellings (market and affordable) can be delivered during Local Plan period with the first dwellings being delivered in 2030. Councils' housing trajectory states that only 2,550 dwellings can be delivered during Plan Period. Question how accurate these figures are by both Councils and promoter for Grange Farm. • Discrepancy between number in Housing Trajectory provided by Council (up to 300 dwellings in 2040) and 275 dwellings in promoters Housing Deliverability Paper. Concerns that Council will not be able to deliver that number of dwellings across Plan Period.	

Unsustainable • Size and concentration of proposed development in this rural area deemed undesirable and unsustainable. • Bringing the city to the villages. • New town rather than a proportionate extension • Scale of development is not appropriate at this location. • Lacks explanation for selecting land adjacent to Abington for safeguarding. • Failing to provide proportionate and transparent evidence. • Relies excessively on future mitigation, rendering it unjustified, ineffective, and inconsistent with national policy. • Will function more as a large suburb rather than a self-sufficient town. • Does not provide sufficient positive benefits. • Area is already overpopulated. • An impact (positive and negative) assessment on local areas and towns - and further detail of what will be required to overcome negative impacts. • 6,000 homes identified to be built nearer to Granta Park, Babraham and Biomedical Campus in one block is not sustainable. There are not 12,000 jobs at these sites therefore people need to travel elsewhere for work which is not possible by foot or bike.	201281 (C Wolverson), 201311 (M Donovan), 201330 (J Sharman), 201480(G Brookman), 201482 (A Cameron), 201494 (J Tharby), 201681 (J Weston), 201689 (F Irwin), 201730 (C Paton), 201740 (G Lee), 201753 (L Dav), 201756 (G Sharman), 201764 (J Snell), 201795 (R Barker), 201805 (J Dowling), 201912 (J Dodd), 202142 (M Turner), 202163 (R Livermore), 202726 (A Victory), 202737 (A&L Pepperell), 203734 (D Fraser), 203773 (A Russell), 204111 (J Batchelor), 204810 (E McKeown), 205032 (A Spicer), 205457 (M Fentiman), 205741 (G Saunders), 205745 (R Lee), 205919 (C Paton), 205920 (C Paton), 207235 (S Appleton), 207236 (S Appleton), 207237 (S Appleton), 207238 (S Appleton), 207504 (P Hayden-Smith), 207573 (M Howes), 207927 (H Sutton),207967 (S Trueman), 208546 (D Fraser), 208547 (D Fraser), 208548 (D Fraser), 208549 (D Fraser), 208550 (D Fraser), 208551 (D

• Does not represent a sustainable development and in spite of proximity to the biomedical campus and proposed park & ride / guided busway schemes, will become a car-based commuter settlement, with easy access to London to the south. • Too small to be a sustainable new town or to deliver the scale of facilities on-site to prevent significant additional car journeys. • Inappropriate, being too small to be self-sustaining and too large to fit comfortably within the landscape, necessitating a reduction in size and ambition. • In transport terms, the site is not sustainable. • No plans to make new settlement a self-sufficient community, instead it is envisaged that residents will travel to work and presumably also for shopping, schools etc., • In transport terms, site is not sustainable. • Not in alignment with GCLP strategy to direct development to where active and public transport is the 'natural choice'. • Allocation not a logical conclusion when evidence on sustainable patterns of development around Greater Cambridge area are taken into account.	Fraser), 208552 (D Fraser), 208667 (E Taylor), 206602 (S Solomonides), 210820 (C Newgreen), 211645 (G King), **Other bodies:** 201556 (Stapleford PC), 203001 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 203060 (Cambridge Past, Present and Future), 207393 (Cambridge Past, Present and Future), 207384 (Cambridge Past, Present and Future), 207385 (Cambridge Past, Present and Future), 208322 (PX Land Ltd), 208781 (Axis Land Partnerships Ltd), 209698 (CEG Land Promotions Ltd), 209965 (Granta Land Ltd), 210905 (Great Shelford Parish Council),

Size of development • Needs to be considerably scaled back. • More modest development in keeping with the local need, natural environment and market. • Scale of development should be dramatically reduced to a level the area can realistically support and must not be 10x larger than the existing village population. • Disproportionate to the local settlement hierarchy and risks urbanising a rural area. • Should be at reduced scale as a village not a new town, and without warehouse land. • Too large for a rural area, risking unsustainability in local services such as shops, schools, and healthcare. • Already huge development in this area. • Out of character for rural setting. • Scale it down by at least 50%. • Scale and form are inconsistent with the settlement hierarchy and do not support the plan's strategy of focusing growth in sustainable, infrastructure supported locations. • Site seems wholly inappropriate for a development of the proposed scale and density.	200994 (M Logan), 201407 (G Sanders), 201517 (C Woodward), 201538 (T Davenport), 201542 (L Davenport), 201544 (L Davenport), 201545 (J Yarker), 201577 (G Smith), 201591 (L Menzies), 201635 (J Shaw), 201684 (S Bowen), 201696 (S Tossi), 201706 (R James), 201716 (C Rodgers), 201747 (B Seddon), 201753 (L Dav), 201756 (G Sharman), 201798 (J Thirkettle), 201855 (J Hudson), 201892 (R Berry), 201919 (G Menzies), 201952 (J Hann), 202337 (S James), 202616 (I Smith), 202696, (S Roberts), 202731 (J Barnes), 203123 (J Searle), 203141 (V Jury), 203190 (M Furlow), 203459 (L Lambourne), 203512 (R Tovey), 203636 (W Dott), 203648 (E Pimblett), 203652 (T Randle), 203653 (S Appleton), 203680 (S Jarvis-Dott), 203683 (D Simmons), 203797 (R Nagasaki), 203911 (E Lambourne), 204201 (P Williams), 204785 (R Foale), 204871 (V Valge-Archer), 204891 (D Newgreen),

• Expansion of the Draft Local Plan allocation beyond the originally promoted Grange Farm scheme raises questions about the necessity and role of newly included land. • Inappropriate, being too small to be self-sustaining and too large to fit comfortably within the landscape, necessitating a reduction in size and ambition. • Scale of development threatens the viability and identity of existing communities, potentially leading to commuter dormitory scenarios. • Inconceivable that a development of the scale proposed at Grange Farm, which is 75,000% larger than what the Draft Plan considers appropriate for category of settlement which Draft Plan itself prescribes for Little Abington, should proceed in light of this. • Significant overdevelopment in close proximity to Grange Farm development. • Disingenuous to bring forward site without detailed reference being made to the already contemplated additional plan to develop site further should adjacent Ley Rectory Farm become available. • The proposed development of approximately 6,000 dwellings is likely to generate between 9,000 and 12,000 private vehicles, in addition to buses, delivery vehicles, and commercial traffic required to support residential and employment uses. This level of traffic generation is wholly incompatible with the existing highway infrastructure.	204895 (J Clifford), 204931 (P Seddon), 205271 (P Dsantos),205486 (R Sainsbury) 205640 (L McNicholas), 205875 (C Randle), 205908 (A Hutchings), 205917 (M Rusted), 205923 (J Snell), 205967 (R Randle), 206164 (C Newgreen), 207138 (T Davenport), 207139 (T Davenport), 207140 (T Davenport), 207141 (T Davenport), 207142 (T Davenport), 207143 (T Davenport), 207144 (T Davenport), 207145 (T Davenport), 207146 (T Davenport), 207147 (T Davenport), 207148 (T Davenport), 207386 (W Dott), 207387 (W Dott), 207406 (H Rogers), 207685 (T Collett), 207925 (H Sutton), 207968 (S Trueman), 208601 (M Appleton), 208602 (M Appleton), 208607 (M Appleton), 208629 (G Jones), 205724 (F Goad), 210387 (M Cookson), 210390 (M Cookson), **Other bodies:**

• Not large enough to provide 6000 houses and all the infrastructure of a town – shops, offices, churches, library, fire station, police station, pub, restaurants, parks, museum, health centre care home etc. • New settlement as massive as the Grange Farm Development must be completely self-contained • Area is characterised by organic, incremental village growth over long periods, creating diversity in scale, design, and character. A large, single phase new settlement cannot replicate this. More appropriate approach would be small seeded settlement, followed by incremental, demand led development that reflects local character and avoids the “instant town” problem. • We were horrified to discover that you are proposing to build a development at Grange Farm which would involves the construction of between 6,000 and 8,000 houses. Based on the average figures from the Office of National Statistics these would be homes for about 2.35 people per household or between 14,000 and over 18,000 people	203060 (Cambridge Past, Present and Future), 204948 (Robinson College), 207383 (Cambridge Past, Present and Future), 207384 (Cambridge Past, Present and Future), 207385 (Cambridge Past, Present and Future), 208585 (Little Abington PC), 208588 (Little Abington PC), 208594 (Little Abington PC),
Infrastructure, Services and Facilities • Must be retail outlets (shops, pubs and restaurants) on the site. • Access to general practitioners is already limited and will likely worsen with the development.	200994 (M Logan), 201031 (R Smith), 201203 (A King), 201275 (E Pepperall), 201281 (C Wolverson), 201311 (M Donovan), 201312 (M Cookson), 201316 (M Craven), 201323 (H

• essential infrastructure—including roads, public transport, schools, NHS provision, policing, waste management, utilities, and mobile connectivity—to be fully funded, approved, and delivered before any housing is built. • More detail needed on timescale for facilities delivery. • Current infrastructure will note cope. • Existing schools do not have capacity for this growth. • GPs do not have capacity. • Lack of detail. • No mention of policing. • Addenbrookes does not have the capacity for this growth. • Increased demand for electricity. • Local shops and amenities are insufficient to support the anticipated increase in population. • Essential infrastructure delivery is unproven, risking housing ahead of services. • residents will need to travel for essential services and amenities, exacerbating congestion and reliance on cars. • Have facilities on site, Doctors, School, allotments, small general store/Post office. Picnic area, swimming pool, skate park. • Provide a partner led GP practice and plan effectively with Addenbrookes.	Biggs), 201330 (J Sharman), 201340 (G Broad), 201348 (K Christodoulides), 201358 (R Parkin), 201360 (V Hefford), 201369 (G Marshall), 201375 (B Spencer), 201398 (Francoise Goad), 201434 (G Moore), 201459 (T Stone), 201482 (A Cameron), 201483 (J Sneddon), 201517 (C Woodward), 201518 (J Jackson), 201529 (M Cooper), 201533 (A Smith), 201538 (T Davenport), 201541 (T Davenport), 201542 (L Davenport), 201544 (L Davenport), 201545 (J Yarker), 201570 (R Perucchini), 201577 (G Smith), 201580 (S Fraser), 201591 (L Menzies), 201665 (K Hefford), 201681 (J Weston), 201689 (F Irwin), 201696 (S Tossi), 201706 (R James), 201716 (C Rodgers), 201720 (J Fairs), 201723 (A Hutchings), 201725 (J Carr), 201726 (J Mayes), 201731 (L Scott), 201740 (G Lee), 201747 (B Seddon), 201748 (M Radcliffe), 201750 (J Hall), 201753 (L Dav), 201761 (B Gutteridge), 201764 (J Snell),

• Businesses and shops in the new town may require a larger catchment area to thrive. • Similar developments in Waterbeach and Northstowe were promised shops, schools and doctors and they are still waiting. • numerous examples both locally and around the country where infrastructure provision that was promised at the start of a project has been slow in coming or in many cases yet to materialise in spite of houses being built and people moving in • Fails to adequately address cumulative impacts. • No mention of additional emergency services. • Build swimming pool; climbing centre; pump track for bikes. • Proposed retail and postal facilities at Grange Farm could undermine existing village services. • Should include a specific policy safeguard that retail provision at Grange Farm is limited in scale and does not include a supermarket or competing postal facility, in order to protect existing village services. • Successful delivery of Grange Farm depends on resolving significant infrastructure interventions and funding arrangements. • Under the subheading 'Uses' Section 7– add a new criterion n. as follows; "n. Contributions to fire & rescue, police and ambulance facilities provision/ funding".	201772 (H Howe), 201782 (J Tanner), 201788 (H Cornwell), 201790 (S Ackerman), 201795 (R Barker), 201798 (J Thirkettle), 201802 (R Cornwell), 201804 (R Zimmern), 201846 (E Goodyear), 201850 (S Zmigrod), 201848 (R Allum), 201882 (N Rumble), 201883 (A Quinn), 201887 (K Lander), 201890 (K Cooper), 201892 (R Berry), 201912 (J Dodd), 201919 (G Menzies), 201921 (E Crutchington), 201943 (J Dowling), 201952 (J Hann), 201996 (S Fordham), 202017 (J Reynolds), 202020 (J Rivers), 202023 (S. Byatt), 202024 (S Byatt), 202047 (M Tiplady), 202067 (D Milns), 202092 (R Harman), 202142 (M Turner), 202299 (R Barnes), 202325 (E George), 202477 (J Herbert), 202568 (K Deeming), 202605 (Z Smith), 202638 (C Yeomans), 202696, (S Roberts), 202699 (K Russell), 202701 (K Russell), 202727 (A Annis), 202737 (A&L Pepperell), 202876 (C Pippen), 202915 (A Batty), 203123

• Lacks funded commitments for essential infrastructure, risking unsustainable stress on existing water supply, transport, and healthcare services. • New settlement would have a peak electricity demand of some 15MW requiring a 33kv supply from National Grid. More than one feeder connection would be required, and this would undoubtedly be above ground on posts or pylons making further intrusions into the landscape. • Object to Policy S/GF relating to the proposed new settlement at Grange Farm, for the reasons set out below. In its current form, the proposal is unsound due to unresolved transport constraints, poor accessibility to strategic public transport infrastructure, and serious flood risk implications for surrounding communities. • CCC note that Grange Farm is likely to require a new special school or expansion to Granta school, add special educational needs to Item 7k. • First phase should include community space and shop (even if on a temporary basis until further phases have been completed and purpose built community space and retail units built). • Policy should be modified to ensure that the quantity and type of indoor and outdoor sport provision onsite are informed by an up-to-date PPS, BFS, FPM. Sport England recommend that a management and maintenance plan is required for the indoor and outdoor sport facilities, and a Sports and Open Space Strategy is submitted if these were not secured as part of the outline planning permission.	(J Searle), 203407 (P Allum), 203459 (L Lambourne), 203529 (O Barnes), 203615 (A Palmer), 203636 (W Dott), 203648 (E Pimblett), 203803 (J Cutting), 203911 (E Lambourne), 204147 (L Paine), 204181 (S Morgan), 204201 (P Williams), 204725 (C Gill), 204773 (G Boselli), 204807 (P Munns), 204821 (Abington Stores and Post Office), 204871 (V Valge-Archer), 204919 (K King), 204921 (R Rix), 205032 (A Spicer), 205142 (N Whittaker), 205164 (T Stone), 205425 (S McDonald), 205457 (M Fentiman), 205482 (M Brattesani), 205602 (S Richards), 205606 (S Goodhart), 205616 (M Whittaker), 205618 (S Lee), 205632 (R Rix), 205641 (L McNicholas), 205660 (K Cooper), 205679 (S Fordham), 205681 (R Gilmour), 205732 (W Bailey), 205740 (G Saunders), 205766 (J Sneddon), 205814 (R Perucchini), 205815 (R Perucchini), 205823 (E Scott), 205940 (R Barker), 206035 (J Dowling), 206036 (J

• PE support desire to include primary and secondary education. Should be extended to include early years provision. Note in particular that these should be delivered “from the early phases” of development. We support sentiment but are aware that there is considerable experience in the Greater Cambridge area of careful management of timing of opening new schools (both primary and secondary), with implications for other nearby schools. • PE support in principle the desire to see provision of a new healthcare facility on the development. We wish to encourage early dialogue with the Integrated Care Board to understand the likely requirements and land take. • PE support intentions of policy, noting further work is required to establish the scale of each element of open space, sports provision and to work through how best to integrate into a landscape led masterplan. • A&E facilities at Addenbrookes hospital already under strain and cannot take any further capacity until it is developed and expanded. • Major infrastructure such as energy and roads should be comprehensive but other services and facilities should be in response to demand. Would not need large out of town grocery store to support first seeded development as would destroy viability of stores in existing local villages. • Proposal does not include any meaningful comparative analysis of facilities, amenities, public services, open space, or infrastructure required to sustain a	Dowling), 206204 (R Barnes), 206252 (P Brown), 206320 (G King), 206604 (S Solomonides), 206605 (S Solomonides), 201048 (R Sainsbury), 207049 (R Sainsbury) 207050 (R Sainsbury) 207138 (T Davenport), 207139 (T Davenport), 207140 (T Davenport), 207141 (T Davenport), 207142 (T Davenport), 207143 (T Davenport), 207144 (T Davenport), 207145 (T Davenport), 207146 (T Davenport), 207147 (T Davenport), 207148 (T Davenport), 207236 (S Appleton) 207386 (W Dott), 207386 (W Dott), 207543 (R Allum), 207544 (R Allum), 207545 (R Allum), 207555 (C Rodgers), 207585 (D Donohue), 207594 (V Valge-Archer), 207597 (R King),207963, 207975 S Trueman), 208012 (J Logan), 208428 (N Brown), 208481 (G Crowe), 208530 (G Brookman), 208533 (C Alda), 208554 (T Solomonides), 208581 (J Bowen), 208599 (M Appleton), 208663 (E Taylor), 209049 (J Darrell), 209718 (A Spicer), 209728

population of this size, nor how these would be delivered in an area currently characterised by rural villages and agricultural land. • Concerned that policy does not prejudge appropriate uses, or timing, which will be negotiated application stage. PE committed to ensuring early provision of community facilities to encourage and foster strong sense of community, potentially through some meanwhile uses. However, desire to see this in place “from the outset” could infer this is required before any occupiers and demand. We are keen to learn from best practice in other successful new communities, in places such as Welbourne, Nansledan and Poundbury, for inspiration. • PE support planning for essential services, facilities and infrastructure and we are committed to working with all statutory undertakers, GCSP and other interested parties to ensure timely delivery of infrastructure. Viability will be an important consideration.	(E Jones), 209745 (J Barnes), 210076 (V Cox), 210394 (M Cookson), 210395 (M Cookson), 210408 (M Cookson), 210425 (O Barnes), 210437 (R Wells), 210484m (E Lambourne), 210808 (A Marns), 210809 (A Marns), 210819 (C Newgreen), 210828 (R Barnes), 211016 (R Froment), 211656 (G King), 211709 (J Dowling), 211710 (J Dowling), 211718 (J Clifford), 211728 (P Seddon), Other bodies: 201556 (Stapleford PC), 202029 (Weston Colville PC), 202041 (Weston Colville PC), 202042 (Weston Colville PC), 202043 (Weston Colville PC), 204840 (Vistry Group), 207480 (Cambridgeshire Constabulary), 207513 (Cambridge Fire and Rescue Service), 210589 (Cambridgeshire County Council), 208112 (Sawston Parish Council),

	208115 (Sawston Parish Council), 208158 (Great Abington Parish Council), 208774 (Croudace Homes), 208947 (CPRE Cambridgeshire and Peterborough), 209225 (Sport England), 209265 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 209266 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 209267 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210495 (Robinson Collage), 210724 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210771 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210906 (Great Shelford Parish Council), 211413 (CALA Group Ltd),

Sewer and Flooding • Sewage plant is planned as a prominent feature on a main access route to Little Abington. • Impact of odours on nearby dwellings. • Run-off poses a flooding risk for the A1307 and the Abingtons. • Location for the new water treatment plant is undesirable due to potential odours affecting nearby housing. • How large an area of land will need to be allocated for the sewerage treatment works and when will the anticipated location be mapped out? • No discharge to River Granta. • Rainwater recycling. • Will treatment plant have facility to accept tankers to discharge effluent/sludge from other sources. • Will treatment plant be exclusively for the use of Grange Farm development. • Will large area of land be needed for treatment works and when will location be mapped out. • Should not be used for replacement Cambridge sewerage treatment works. • Would cause unpleasant smells which would disproportionately impact Abington residents due to the location. • Move water treatment plant to the side furthest from the Abingtons.	201031 (R Smith), 201281 (C Wolverson), 201316 (M Craven), 201330 (J Sharman), 201360 (V Hefford), 201369 (G Marshall), 201375 (B Spencer), 201415 (M Fryer), 201416 (M Fryer), 201417 (M Fryer), 201418 (M Fryer), 201459 (T Stone), 201482 (A Cameron), 201518 (J Jackson), 201529 (M Cooper), 201539 (A Patterson-Lee), 201554 (R Martin), 201624 (D Farrant), 201665 (K Hefford), 201681 (J Weston), 201694 (S Bowen), 201696 (S Tossi), 201724 (M Rusted), 201761 (B Gutteridge), 201785 (G Farrant), 201790 (S Ackerman), 201795 (R Barker), 201804 (R Zimmern), 201805 (J Dowling), 201821 (Y Arkwright), 201848 (R Allum), 201881 (R Randle), 201883 (A Quinn), 201919 (G Menzies), 201952 (J Hann), 202017 (J Reynolds), 202067 (D Milns), 202092 (R Harman), 202142 (M Turner), 202296 (R Barnes), 202299 (R Barnes), 202477 (J Herbert), 202699 (K Russell),

• Loss of natural drainage. • Surface water flooding already a problem. • Fails to adequately address cumulative impacts. • Development should not proceed unless assessments demonstrate no harm to the chalk stream or increased flood risk. • No detailed, independent and verified flood, water and waste water impact assessment. • The proposed site and much of the adjoining area is in the drainage field for the protected Granta river and a treatment plant here would present a clear threat to it. • River through village often bursts its banks in winter, following heavy rainfall. • PE note requirement to ensure that foul water can be appropriately managed, as part of overall water cycle. Have commissioned work in this area from a suitably qualified expert, and we expect that this will help shape an appropriate policy for the site, based on what is practical and deliverable. We are clear that ultimately the Water companies have a statutory duty to provide for waste water collection and recycling, but we are aware of constraints locally and environmental pressures, and are committed to exploring what we can do to ensure integration into the wider network.	202701 (K Russell), 202726 (A Victory), 202731 (J Barnes), 203190 (M Furlow), 203389 (G Brookman), 203407 (P Allum), 203459 (L Lambourne), 203680 (S Jarvis-Dott), 203805 (A Butchart), 203934 (L Donahue), 204015 (J Fairs), 204201 (P Williams), 204395 (P Klein-Ensminger), 204617 (J Mannion), 204635 (M Starr), 204664 (S Haynes), 204807 (P Munns), 204810 (E McKeown), 204879 (J Dowling), 204891 (D Newgreen), 204919 (K King), 205032 (A Spicer), 205147 (I Sainsbury), 205164 (T Stone), 205387 (M Hardinge), 205432 (N Marshman), 205482 (M Brattesani), 205508 (M Victory), 205601 (S Richards), 205620 (J McDonald), 205712 (A Wells), 205713 (A Wells), 205726 (F Goad), 205764 (R Wells), 205822 (C Randle), 205911 (M Rusted), 205939 (R Barker), 205974 (R Randle), 206029 (J Dowling), 206168 (C Newgreen), 206198 (R Barnes), 206322 (G

	King), 206326 (C Cameron), 206597 (A Butchart), 206896 (I Sainsbury), 206897 (I Sainsbury), 207068 (L Cookson), 207149 (M Huntsman), 207179 (S Bowen), 207227 (E Lane), 207237 (S Appleton), 207387 (W Dott), 207408 (S Haynes), 207504 (P Hayden-Smith), 207543 (R Allum), 207557 (G Smith), 207559 (G Smith), 207562 (L Sainsbury), 207571 (P Gill), 207574 (M Howes), 207585 (D Donohue), 207590 (D Donohue), 207596 (R King), 207599 (P Brunning), 207653 (A&C Soares), 207659 (P Lester), 207680 (T Collett), 207786 (P Williams), 207965 S Trueman), 208430 (N Brown), 208432 (N Brown), 208532 (C Alda), 208543 (K Auckland), 208572 (A Ross), 208603 (M Appleton), 208605 (M Appleton), 208629 (G Jones), 208555 (T Solomonides), 208664 (E Taylor), 209719 (A Spicer), 209721 (A Spicer), 209743 (J Barnes), 210075 (V Cox), 210403 (M Cookson), 210431 (B Davies), 210485 (E

	Lambourne), 210660(S Zmigrod), 210705 (G Saunders), 210797 (D Marns), 210802 (D Marns), 210819 (C Newgreen), 210841 (G King), 211015 (R Froment), 211017 (R Froment), 211021 (M Hardinge), 211033 (T & A Bradford & Jedrzejewski), 211036 (T & A Bradford & Jedrzejewski), 211655 (G King), 211699 (J Dowling), 211720 (J Clifford), 211732 (P Seddon), 211786 (H Sutton) Other bodies: 207743 (Whittlesford Parish Council), 208119 (Sawston Parish Council), 208590 (Little Abington PC), 208592 (Little Abington PC), 210769 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust),

Drinking Water • Existing concerns regarding the supply of drinking water in the area. • Chalk aquifer and sewage system will not support an additional 6000 homes. • Abington is the driest area of an already dry part of UK. The site is on chalk which supplies our drinking water and keeps the river Granta as a rare chalk stream. • Lack of water locally with solution to come from a new reservoir which is north of Cambridge (pumping costs). • Proposal of more houses without a plan to supply potable water is of great concern. • Water is a vital commodity that requires long term planning and protection. • No mention of a water management plan. • Grange Farm requires 3-4 million litres daily by 2032. Grafham Water Transfer will not be online until 2032. Suspend allocation unless Cambridge Water confirms water supply for 2025-2032 in writing, or defer to post-2032. • Site is over major aquifer highly sensitive to contamination from pollutant runoff. Extent to which risk can be mitigated is unclear, but a major development in this location is clearly undesirable in this water-stressed region.	201031 (R Smith), 201281 (C Wolverson), 201316 (M Craven), 201369 (G Marshall), 201375 (B Spencer), 201459 (T Stone), 201482 (A Cameron), 201624 (D Farrant), 201655 (P Zimmem), 201681 (J Weston), 201785 (G Farrant), 201804 (R Zimmern), 201805 (J Dowling), 201848 (R Allum), 201881 (R Randle), 201882 (N Rumble), 201883 (A Quinn), 201952 (J Hann), 202017 (J Reynolds), 202022 (A Marns), 202477 (J Herbert), 202600 (L Cameron), 202737 (A&L Pepperell), 203459 (L Lambourne), 203680 (S Jarvis-Dott), 203911 (E Lambourne), 204181 (S Morgan), 204196 (A Cooke), 204201 (P Williams), 204395 (P Klein-Ensminger), 204664 (S Haynes), 204725 (C Gill), 204773 (G Boselli), 204810 (E McKeown), 205387 (M Hardinge), 205387 (M Hardinge), 205432 (N Marshman), 205618 (S Lee), 205731 (W Bailey), 205767 (J Sneddon), 205914 (M Rusted), 206030 (J Dowling), 206896 (

	Sainsbury), 207237 (S Appleton), 207408 (S Haynes), 207504 (P Hayden-Smith), 207550 (B Garnish), 207562 (L Sainsbury), 207566 (S Fryer), 207590 (D Donohue), 207681 (T Collett), 207784 (P Williams), 207924 (H Sutton), 207964 S Trueman), 208016 (J Logan), 208429 (N Brown), 208481 (G Crowe), 208529 (G Brookman), 208578 (J Bowen), 208599 (M Appleton), 208629 (G Jones), 210431 (B Davies), 210485 (E Lamborne), 210490 (C Gill), 210796 (D Marns), 210801 (A Marns), 211651 (G King), 211701 (J Dowling), 211732 (P Seddon), **Other bodies:** 203005 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 207743 (Whittlesford Parish Council), 208118 (Sawston Parish Council), 208587 (Little Abington PC), 208947 (CPRE Cambridgeshire and Peterborough),

Landscape & countryside • Views and vista from Roman road need to be considered. • Too close to Roman Road. • Near ancient woodland. • Loss of countryside • Loss of best and most versatile (Grade 2/3) agricultural land. • Questions if loss of land can be compensated by increased open spaces and biodiversity. • Topography makes it unsuitable. • Will be visible many miles away. • Impact of high rise properties. • Undermines national policy aimed at preventing the coalescence of settlements and preserving countryside character. • Coalescence of Abington, Hildersham and Pampisford • Cumulative impact of nearby developments, including Babraham and solar projects, will further harm the local environment. • Would scar the landscape, harming the character of the Abington villages and the A1307 corridor. • Insufficient Mitigation and Landscape Capacity.	200994 (M Logan), 201031 (R Smith), 201275 (E Pepperall), 201281 (C Wolverson), 201323 (H Biggs), 201330 (J Sharman), 201357 (K Battom), 201367 (M Joslin), 201372 (A Wells), 201375 (B Spencer), 201408 (R Lee), 201434 (G Moore), 201467 (R Wells), 201482 (A Cameron), 201483 (J Sneddon), 3201494 (J Tharby), 201518 (J Jackson), 201530 (I Rogers), 201531 (H Rogers), 201538 (T Davenport), 210539 (A Patterson Lee), 201541 (T Davenport), 201542 (L Davenport), 201544 (L Davenport), 201545 (J Yarker), 201591 (L Menzies), 201624 (D Farrant), 201651 (M Mannassi), 201681 (J Weston), 201690 (J Kelly), 201691 (C Randle), 201694 (S Bowen), 201696 (S Tossi), 201706 (R James), 201723 (A Hutchings), 201726 (J Mayes), 201753 (L Dav), 201756 (G Sharman), 201782 (J Tanner), 201785 (G Farrant), 201788 (H Cornwell), 201790(S Ackerman), 201803 (S Fryer), 201805 (J

• Evidence supporting site selection admits the boundary is too constrained to properly mitigate harm to sensitive environmental assets. • Site is not suitable for a new town of this size. • Erosion of the rural landscape that currently provides a clear and valuable break between settlements. • Strong, enforceable protections for countryside, must be guaranteed. • Cannot be in keeping due to its scale. • Proximity of Grange Farm to the Kingsway Solar Farm a potential issue. • Concrete over more arable land increases reliance on food imports. • Jeopardising the green belt and the rural landscape south of the city. • Land outside the development boundary may remain in agricultural use and not default to informal open space. • Policy should ensure built forms are well-screened and integrated into the landscape with significant tree planting to mitigate visual impact. • Policy should restrict development to low rise to reduce impact on landscape. • Make clear that ancillary development, such as the bridge, is subject to the same policy requirements regarding landscape, heritage and ecology. • Would cause irreversible harm to a sensitive chalkland, rural-edge location. • Damaging views from the High Street's heritage assets, the Gog Magogs, and the wider Hertfordshire Chalk Downs.	Dowling), 201846 (E Goodyear), 201855 (J Hudson), 201881 (R Randle), 201882 (N Rumble), 201892 (R Berry), 201898 (R Pargeter), 201912 (J Dodd), 201943 (J Dowling), 202015 (D Marns), 202017 (J Reynolds), 202020 (J Rivers), 202023 (P Cullimore), 202055 (P Snow), 202067 (D Milns), 202092 (R Harman), 202104 (M Barry), 202162 (L Crisp), 202163 (R Livermore), 202296 (R Barnes), 202337 (S James), 202359 (A-M Melloy), 202481 (P Brown), 202571 (R Haining), 202600 (L Cameron), 202696 (S Roberts), 202708 (D Golding), 202726 (A Victory), 202731 (J Barnes), 202737 (A&L Pepperell), 202792 (A McDonnell), 203002 (S Price), 203141 (V Jury), 203187 (M Jury), 203389 (G Brookman), 203417 (F Davis), 203512 (R Tovey), 203529 (O Barnes), 203615 (A Palmer), 203680 (S Jarvis-Dott), 203730 (K Auckland), 203797 (R Nagasaki), 203805 (A

• Must require a full Landscape and Visual Impact Assessment (LVIA). • Note that an amount of greenspace has not yet been specified. Natural England advise 3ha/1000 greenspace which meets the Natural England GI Framework Standards criteria should be an absolute minimum, particularly where mitigation for recreational pressure is needed, and that more should ideally be required. For a site of 6000 homes, a minimum of 43.2ha semi-natural greenspace would be needed. • Precautionary, landscape-led approach that reduces development intensity, strengthens environmental protections, and aligns growth with environmental and infrastructure capacity is required. • Impact on local and wider views. • No detailed, independent and verified visual impact assessment. • Will be visible from further away than Trumpington, Duxford, Great Chesterford and Bartlow. • Council's own Skyline and Tall Buildings Strategy concludes site is unsuitable for tall or visually prominent development and identifies a high residual risk of harm even with mitigation. • Soft landscaping proposals will not mask development. • Boundaries of "green" shown on the drawing within the Grange Farm plan does not specify the size of these or how they will be protected.	Butchart), 203807 (S Solomonides), 203839 (T Solomonides), 203934 (L Donahue), 204111 (J Batchelor), 204147 (L Paine), 204156 (B Barkataki), 204586 (R Elston-Green), 204617 (J Mannion), 204635 (M Starr), 204803 (E Jones), 204807 (P Munns), 204895 (J Clifford), 204919 (K King), 204921 (R Rix), 204994 (V Cox), 204999 (D Stephen), 205142 (N Whittaker), 205193 (V Silvey), 205271 (P Dsantos), 205401 (B Davis), 205425 (S McDonald), 205430 (E Davies), 205457 (M Fentiman), 205487 (G Minhas), 205512 (S Somerville), 205544 (G Minhas), 205607 (S Goodhart), 205619 (J McDonald), 205635 (M Furlow), 205680 (S Fordham), 205705 (A Wells), 205730 (W Bailey), 205734 (J Wingfield), 205742 (R Lee), 205749 (C Feenan), 205750 (C Feenan), 205751 (C Feenan), 205757 (R Wells), 205759 (R Wells), 205762 (R Wells), 205763 (R Wells), 205765 (J Sneddon), 205813 (R Perucchini), 205876

• The development would significantly affect the distinctive chalk landscape, open views and rural approaches. Supply of electricity would be via above ground post or pylons making further intrusions on the landscape. • PE are concerned about lack of clarity about purpose, appropriate land uses, location, definition/purpose and spatial extent of proposed SEA. The term Strategic Enhancement Area is potentially misleading given wide-ranging nature of policy intention and its generalised use across different contexts and boundary interfaces. PE are fully supportive of a landscape led design, but consider that further work is required to establish size and nature of proposed SEA, the purposes and land uses for this area. As long term landowners, both PE and Mr Franklin intend to continue to farm their residual land holdings, and therefore definition over the proposed SEA and consideration of impacts on the residual farm will be important considerations for both landowners. • Support in principle need for robust landscape framework. We have commissioned expert consultants on landscape, ecology and heritage to explore these issues further. Remain concerned about current definition of SEA and agree that this should be devised based on a more detailed evidence driven understanding of site constraints and opportunities, and a landscape led masterplan proposal. • Policy should require legal mechanisms that prevent buffer at the Ley Rectory Farm Barns interface being thinned, repurposed or built upon in future years	(C Randle), 205905 (A Hutchings), 205912 (M Rusted), 205920 (C Paton), 205921 (C Paton), 205945 (R Barker), 205955 (S Zmigrod), 205968 (R Randle), 206027 (J Dowling), 206150 R Livermore), 206153 (R Livermore), 206196 (R Barnes), 206197 (R Barnes), 206202 (R Barnes), 206250 (P Brown), 206314 (G King), 206315 (G King), 206595 (G Butchart), 206602 (S Solomonides), 206603 (S Solomonides), 206605 (S Solomonides), 206900 (I Sainsbury), 207653 (A&C Soares), 207139 (T Davenport), 207140 (T Davenport), 207141 (T Davenport), 207142 (T Davenport), 207143 (T Davenport), 207144 (T Davenport), 207145 (T Davenport), 207146 (T Davenport), 207147 (T Davenport), 207148 (T Davenport), 207149 (M Huntsman), 207178 (S Bowen), 207227 (E Lane), 207235 (S Appleton), 207238 (S Appleton), 207406 (H Rogers), 207504 (P Hayden-Smith), 207556 (C Rodgers), 207559

	(G Smith), 207563 (L Sainsbury), 207565 (S Fryer), 207569 (P Gill), 207580 (J Weston), 207591 (D Stephen), 207591 (D Stephen), 207593 (V Valge-Archer), 207595 (V Valge-Archer), 207599 (P Brunning), 207679 (T Collett),207922 (H Sutton), 208011 (J Logan), 208425 (N Brown), 208433 (N Brown), 208527 (G Brookman), 208543 (K Auckland), 208544 (K Auckland), 208547 (D Fraser), 208548 (D Fraser), 208549 (D Fraser), 208550 (D Fraser), 208551 (D Fraser), 208552 (D Fraser), 208570 (A Ross), 208578 (J Bowen), 205579 (J Bowen), 208582 (J Bowen), 208605 (M Appleton), 208629 (G Jones), 208663 (E Taylor), 208665 (E Taylor), 208667 (E Taylor), 208739 (F Orgee), 208748 (T Orgee), 209047 (J Darrell), 209188 (T & A Bradford & Jedrzejewski), 209257 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 209272 (Pampisford Estate Farms Limited

	and the Trustees of the James Binney Will Trust), 209724 (E Jones), 209731 (J Barnes), 209732 (J Barnes), 209739 (J Barnes), 209741 (J Barnes), 210396 (M Cookson), 210409 (M Cookson), 210416 (O Barnes), 210417 (O Barnes), 210418 (O Barnes), 210419 (O Barnes), 210420 (O Barnes), 210649 (S Zmigrod), 210650 (S Zmigrod), 210654 (S Zmigrod), 210661 (S Zmigrod), 210681 (G Saunders), 210706 (G Saunders), 789210791 (R Perucchini), 210803 (A Marns), 210819 (C Newgreen), 210822 (C Paton), 210836 (R Barnes), 210850 (N Brown), 211027 (T & A Bradford & Jedrzejewski), 211033 (T & A Bradford & Jedrzejewski), 211652 (G King), 211654 (G King), 211694 (J Dowling), 211695 (J Dowling), 211716 (J Clifford), 211717 (J Clifford), 211732 (P Seddon), 2117323(P Seddon), 211787 (H Sutton),

	Other bodies: 201602 (Great Abington Parish Council), 202029 (Weston Colville PC), 202031 (Weston Colville Parish Council), 203060 (Cambridge Past, Present and Future), 207383 (Cambridge Past, Present and Future), 203266 (Horseheath Parish Council), 204948 (Robinson College), 207384 (Cambridge Past, Present and Future), 207385 (Cambridge Past, Present and Future), 207614 (Natural England), 208114 (Sawston Parish Council), 208154 (Great Abington Parish Council), 208155 (Great Abington Parish Council), 208592 (Little Abington PC), 208947 (CPRE Cambridgeshire and Peterborough), 209272 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210906 (Great Shelford Parish Council),

Impact on chalk stream (Granta) • Threatens one of only 260 chalk streams in the World which runs through our village. • Strong, enforceable protections for chalk stream must be guaranteed. • Chalk aquifer and sewage system will not support an additional 6000 homes. • The site is on chalk which supplies our drinking water and keeps the river Granta as a rare chalk stream. • No amount of water management on site will prevent contamination. • Chalk streams are internationally important and are already impacted by existing agriculture and sewage plants upstream at Linton. • Policy must provide robust evidence on how the development can proceed without further jeopardizing the fragile local water table and the health of these rare chalk stream habitats. • No detailed, independent and verified environmental and hydrogeological impact assessment. • Development should not proceed unless assessments demonstrate no harm to the chalk stream or increased flood risk.	201368 (J Lawrence), 201372 (A Wells), 201407 (G Sanders), 201467 (R Wells), 201482 (A Cameron), 201538 (T Davenport), 201541 (T Davenport), 201542 (L Davenport), 201544 (L Davenport), 201554 (R Martin), 201570 (R Perucchini), 201624 (D Farrant), 201655 (P Zimmem), 201662 (N Ockendon), 201706 (R James), 201761 (B Gutteridge), 201762 (D Turnidge), 201790 (S Ackerman), 201795 (R Barker), 201855 (J Hudson), 201882 (N Rumble), 201912 (J Dodd), 201985 (J Sainsbury), 202017 (J Reynolds), 202142 (M Turner), 202337 (S James), 202600 (L Cameron), 202731 (J Barnes), 202737 (A&L Pepperell), 203190 (M Furlow), 203417 (F Davis), 203868 (M Broadhurst), 203911 (E Lambourne), 204181 (S Morgan), 204196 (A Cooke), 204725 (C Gill), 204807 (P Munns),

• Under strategic plan green infrastructure initiatives number 1 is the revitalisation of the chalk stream network - part of the same area as the Grange farm development - nothing mentioned in the Grange Farm plan on how the chalk streams will be protected or affected by this development. • The allocation sits above the river Granta chalk-stream catchment where ecological status is not good, and where regional plans recognise water scarcity and the need to avoid increases in abstraction until new strategic resources come on line. Large scale developments here risks run-off a water - quality impacts on a nationally rare Habitat. • The site sits on a shallow chalk aquifer and adjacent to the rare River Granta chalk stream; construction runoff could pollute these highly sensitive ecosystems. • In the absence of clear, robust and enforceable evidence demonstrating no adverse effect, permission should be refused at Grange Farm. • Exhibits laudable elements and characteristics (being up-slope) so that it could, if all the proposed mitigations and water handling systems are included, be neutral to positive in overall impact on the River Granta. • Trustees have for years been very concerned about impact of CSET proposals, particularly on Nine Wells and the Brook. The Trust supports on-road alternative being put forward by Better Ways for Busways group.	204891 (D Newgreen), 204895 (J Clifford), 204919 (K King), 205147 (I Sainsbury), 205164 (T Stone), 205387 (M Hardinge), 205401 (B Davies), 205430 (E Davies), 205546 (G Minhas), 205601 (S Richards), 205706 (A Wells), 205711 (A Wells), 205731 (W Bailey), 205737 (J Wingfield), 205748 (C Feenan), 205758 (R Wells), 205767 (J Sneddon), 205805 (R Martin), 205942 (R Barker), 205949 (S Zmigrod), 205950 (S Zmigrod), 206168 (C Newgreen), 206898 (I Sainsbury), 207786 (P Williams), 207138 (T Davenport), 207139 (T Davenport), 207140 (T Davenport), 207141 (T Davenport), 207142 (T Davenport), 207143 (T Davenport), 207144 (T Davenport), 207145 (T Davenport), 207146 (T Davenport), 207147 (T Davenport), 207148 (T Davenport), 207150 (M Huntsman), 207237 (S Appleton), 207387 (W Dott), 207564 (R Elston-Green), 207571 (P Gill), 207574 (M Howes), 207583 (G Brookman), 207591 (D

	Stephen), 207592 (D Stephen), 207599 (P Brunning), 207659 (P Lester), 207928 (H Sutton), 208016 (J Logan), 208429 (N Brown), 208532 (C Alda), 208543 (K Auckland), 208599 (M Appleton), 208605 (M Appleton), 208629 (G Jones), 208752 (T Ogree), 206026 (J Dowling), 208429 (N Brown), 206898 (I Sainsbury), 208752 (T Ogree), 210074 (V Cox), 210403 (M Cookson), 210413 (O Barnes), 210492 (C Gill), 210678 (G Saunders), 210679 (G Saunders), 210792 (R Perucchini), 211651 (G King), 211693 (J Dowling), **Other bodies:** 201609 (Great Abington Parish Council), 203005 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 203060 (Cambridge Past, Present and Future), 207383 (Cambridge Past, Present and

	Future), 207384 (Cambridge Past, Present and Future), 207385 (Cambridge Past, Present and Future), 208157 (Great Abington Parish), 208592 (Little Abington PC), 209017 (Hobson's Conduit Trust),
Pollution • Noise and air pollution • Such light and noise pollution in such a rural setting is not something that should be promoted by any local authority, or body representing it. • Extensive public lighting will create light pollution and ensure the settlement will be visible from afar night and day. • Introduce a “quiet zone” on the south□eastern edge that excludes high□impact, noise□generating and HGV□intensive uses. • Development will be subject to high levels of traffic noise for most of the 24 hour day. • Construction lasting up to 20 years will generate prolonged noise, dust and mud, adversely affecting nearby residents and wildlife.	201368 (J Lawrence), 201375 (B Spencer), 201635 (J Shaw), 201696 (S Tossi), 201821 (Y Arkwright), 202047 (M Tiplady), 202142 (M Turner), 202296 (R Barnes), 202699 (K Russell), 204773 (G Boselli), 202701 (K Russell), 204879 (J Dowling), 204891 (D Newgreen), 205715 (A Wells) 205877 (C Randle), 205951 (S Zmigrod), 205954 (S Zmigrod), 205969 (R Randle), 207559 (G Smith), 207566 (S Fryer), 208547 (D Fraser), 208548 (D Fraser), 208549 (D Fraser), 208550 (D Fraser), 208551 (D Fraser), 208552 (D Fraser), 208604 (M Appleton), 208629 (G Jones), 206034 (J Dowling), 206041 (J Dowling), 210680 (G Saunders), 210805 (A Marns), 211708 (J Dowling),

	Other bodies: 202029 (Weston Colville PC), 208591 (Little Abington PC),
Habitats and Wildlife • Impact on habitats. • Strong, enforceable protections for wildlife must be guaranteed. • Impact on SSSIs. • Increased pressure on existing open and biodiverse spaces in Stapleford parish, including Magog Down, Chalk Hill Down, and Wandlebury Country Park. • Established open spaces may become overcrowded, negatively impacting natural assets, and recommend using CIL/S106 funds to manage the impacts of increased footfall. • impact on precious flora and fauna especially Grey Partridge populations. • Sufficient and sufficiently robust and legally binding safeguards are essential to ensure commercial developers are held to the requirements, both during construction and for the long term maintenance of, for example, biodiversity mitigation.	201311 (M Donovan), 201316 (M Craven), 201357 (K Battom), 201372 (A Wells), 201467 (R Wells), 201538 (T Davenport), 201541 (T Davenport), 201542 (L Davenport), 201544 (L Davenport), 201662 (N Ockendon), 201753 (L Dav), 201762 (D Turnidge), 201785 (G Farrant), 201788 (H Cornwell), 201790(S Ackerman), 201803 (S Fryer), 201821 (Y Arkwright), 201898 (R Pargeter), 201915 (G Battom), 201919 (G Menzies), 202023 (P Cullimore), 202047 (M Tiplady), 202082 (D Palmer), 202481 (P Brown), 202912 (R King), 203407 (P Allum), 203934 (L Donahue), 204999 (D Stephen), 205164 (T Stone), 205271 (P Dsantos), 205457 (M Fentiman), 205618 (S Lee), 205678 (J Sainsbury),

• Must include specific mitigation strategies and funding to manage the impacts of increased recreational activity on the important ecological, heritage and amenity assets on the adjacent Gog Magog Hills – so that they continue to contribute to the quality of life of the wider Cambridge population. • Item 11d should be revised to replace ‘minimise’ with ‘avoid’ and to take into account Wandlebury and Magog Down by adding 'and other nature and heritage sites’ • How will the development prevent unofficial access points to the Roman Road being created? • Welcome inclusion of SEA to buffer Roman Road SSSI from development, but concerns currently remain about how impacts will be avoided. • Grange Farm is taking away from a natural environment and whilst the plan acknowledges various things as previously mentioned there is no specific detail on how this will be protected or enhanced with only throwaway lines like ”consider these assets” “deliver enhancement wherever possible” these mean nothing and will allow the developer to ignore. • Will the houses have eaves for swallows and house martins, and purpose-built bricks for swifts, and areas for sparrows etc.? • Ecological survey and monitoring should also be added as requirement for specific sensitive locations outside of the site’s red line boundary that may be impacted by	205680 (S Fordham), 205709 (A Wells), 205710 (A Wells), 205878 (C Randle), 205970 (R Randle), 206250 (P Brown), 206316 (G King), 206599 (A Butchart), 207068 (L Cookson), 207653 (A&C Soares), 207138 (T Davenport), 207139 (T Davenport), 207140 (T Davenport), 207141 (T Davenport), 207142 (T Davenport), 207143 (T Davenport), 207144 (T Davenport), 207145 (T Davenport), 207146 (T Davenport), 207147 (T Davenport), 207148 (T Davenport), 207227 (E Lane), 207564 (R Elston-Green), 207565 (S Fryer), 207566 (S Fryer), 2307567 (J Wallace), 207584 (G Brookman), 207585 (D Donohue), 207591 (D Stephen), 207592 (D Stephen), 208527 (G Brookman), 208547 (D Fraser), 208548 (D Fraser), 208549 (D Fraser), 208550 (D Fraser), 208551 (D Fraser), 208552 (D Fraser), 208569 (A Ross), 208629 (G Jones), 206028 (J Dowling), 205913 (M Rusted), 210403 (M Cookson), 210414 (O Barnes),

development. Should be requirement to monitor effectiveness of measures put in place to combat recreational disturbance on SSSI, for example, and commitment to implementing alternative solutions if initial measures are ineffective.	210791 (R Perucchini), 210824 (C Paton), 211652 (G King), 211694 (J Dowling), 211696 (J Dowling), 211728 (P Seddon), **Other bodies:** 201556 (Stapleford PC), 201604 (Great Abington Parish Council), 201605 (Great Abington Parish Council), 202029 (Weston Colville PC), 203001 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 203060 (Cambridge Past, Present and Future), 207383 (Cambridge Past, Present and Future), 207384 (Cambridge Past, Present and Future), 207385 (Cambridge Past, Present and Future), 207614 (Natural England), 2207615 (Natural England), 08592 (Little Abington PC), 210906 (Great Shelford Parish Council),

Historic Assets • Impact on local heritage. • Evidence supporting site selection admits the boundary is too constrained to properly mitigate harm to sensitive heritage assets. • Strong, enforceable protections for heritage assets must be guaranteed. • Impact on Roman Road. • Impact on scheduled ancient monument and Fleam Dyke. • Heritage buildings should be protected from being overshadowed by new developments, requiring careful and sympathetic consideration. • Concerns regarding the archaeological significance. • Impact on Abington's Conservation Area • Preservation of heritage assets have not been fully assessed or mitigated. • Must include specific mitigation strategies and funding to manage the impacts of increased recreational activity on the important ecological, heritage and amenity assets on the adjacent Gog Magog Hills – so that they continue to contribute to the quality of life of the wider Cambridge population. • How will the development prevent unofficial access points to the Roman Road being created? • No Heritage Impact Assessment.	201316 (M Craven), 201483 (J Sneddon), 201531 (H Rogers), 201538 (T Davenport), 201541 (T Davenport), 201542 (L Davenport), 201544 (L Davenport), 201591 (L Menzies), 201624 (D Farrant), 201690 (J Kelly), 201731 (L Scott), 201753 (L Dav), 201762 (D Turnidge), 201782 (J Tanner), 201795 (R Barker), 201803 (S Fryer), 201805 (J Dowling), 201821 (Y Arkwright), 201898 (R Pargeter), 201919 (G Menzies), 202023 (P Cullimore), 202092 (R Harman), 202163 (R Livermore), 202414 (M Whitcombe), 202481 (P Brown), 202616 (I Smith), 202675 (N Fraser), 202726 (A Victory), 202731 (J Barnes), 203407 (P Allum), 203512 (R Tovey), 203931 (A Ross), 204181 (S Morgan), 204196 (A Cooke), 204201 (P Williams), 204465 (H Sutton), 204617 (J Mannion), 204810 (E McKeown), 204939 (G Brown), 205016 (G Dalton), 205457 (M Fentiman), 205487 (G Minhas), 205387 (M Hardinge), 205545 (G

• Must acknowledge and assess cumulative landscape harm of Grange Farm alongside Kingsway Solar Farm and CSET corridor. It should state that development will be refused if the combined impact creates a continuous "urban wall" across the southern landscape. • Scale of proposed development and its proximity to designated and sensitive sites mean that significant adverse impacts are still likely, despite mitigation. • Impact on Roman Road, Brent Ditch, Fleam Dyke, the A11, the Henge next door to the Bronze Age Barrows, • Does not “preserve or enhance” designated heritage assets, nor the appearance of the Conservation Area of Little Abington (and Great Abington), nor the views into or out of them. • Would be contrary to Planning (Listed Buildings and Conservation Areas) Act 1990 as it would dominate and damage the conservation area's character and appearance due to the proposed size and population density and dominant elevated location on the hill overlooking Little Abington. • There is an historic ancient right of way from the A1307 into a chalk pit which lies within the development. This path was used for centuries by villagers to obtain chalk and clunch to maintain and repair their homes. This heritage should be preserved.	Minhas), 205635 (M Furlow), 205760 (R Wells), 205768 (J Sneddon), 205820 (E Scott), 205821 (E Scott), 205943 (R Barker), 206250 (P Brown), 206317 (G King), 206901 (I Sainsbury), 207051 (R Sainsbury), 207068 (L Cookson), 207138 (T Davenport), 207139 (T Davenport), 207140 (T Davenport), 207141 (T Davenport), 207142 (T Davenport), 207143 (T Davenport), 207144 (T Davenport), 207145 (T Davenport), 207146 (T Davenport), 207147 (T Davenport), 207148 (T Davenport), 207227 (E Lane), 207235 (S Appleton), 207504 (P Hayden-Smith), 207563 (L Sainsbury), 207565 (S Fryer), 207653 (A&C Soares), 207788 (P Willaims), 208011 (J Logan), 208013 (J Logan), 208481 (G Crowe), 208528 (G Brookman), 208569 (A Ross), 208570 (A Ross), 208629 (G Jones), 210389 (M Cookson), 210397 (M Cookson), 210409 (M Cookson), 210824 (C Paton), 210836 (R

• PE support Heritage Impact and Historic Landscape Character Assessments. We support in principle the need for robust landscape and masterplanning framework. Have commissioned expert consultants on landscape, ecology and heritage to explore these issues further, to ensure that we can respond to these key issues. • Whilst there are no designated heritage assets within the site boundary there are a number of designated heritage assets nearby. Any development of this site has potential to affect these heritage assets and their settings. • HIA notes there will be a high risk of residual harm to heritage given scale and nature of proposals. Essential that every opportunity is taken to mitigate impacts and also maximise enhancements for heritage. • Criterion 6 change 'historic assets' to 'heritage assets' and 'Scheduled Ancient Monument' to 'Scheduled Monument'. Amend 'Abington Conservation Area' to 'Great and Little Abington Conservation Area'. • b i Delete Ancient • bii Good to mention GII listed Worsted Lodge but other nearby listed buildings should also be mentioned e.g. 8 Cambridge Road • Needs to reference nearby Great and Little Abington Conservation Area and associated listed buildings. • B iii barrows, not burrows.	Barnes), 211027 (T & A Bradford & Jedrzejewski), 211653 (G King), 211694 (J Dowling), **Other bodies:** 201669 (Linton PC, 203060 (Cambridge Past, Present and Future), 203268 Horseheath Parish Council), 207383 (Cambridge Past, Present and Future), 207384 (Cambridge Past, Present and Future), 207385 (Cambridge Past, Present and Future), 208584 (Little Abington PC), 208596 (Little Abington PC), 209273 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210140 (Historic England), 210727 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210728 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210729 (Pampisford Estate Farms

• Suggest referring to a '…more detailed Heritage Impact Assessment…' given that an HIA has already been undertaken. • Do you mean Historic Landscape Characterisation? Purpose should be to inform the masterplanning. • Recommend re-ordering of the bullet points. • Recommend wording could be amended to read: 'Historic Landscape Characterisation and Landscape Character Assessment, more detailed Heritage Impact Assessment, and Archaeological Assessment must be undertaken to understand the impacts of development on landscape character, long range and local views and heritage assets and their setting, identifying appropriate mitigation and enhancement measures. The Council's HIA and the results of these further assessments must inform the masterplanning for the site.' • Include reference to 'improve understanding and legibility of Worstead Street Scheduled Monument and links to other Roman networks through interpretation and public art' (as recommended in the HIA). • 11 c should mention scheduled monument designation of Roman Road • 11 g should also mention that 'the open character of the landscape buffer should be maintained' (as recommended in the HIA). • 23 Lifespan – needs to include reference to the need for a Conservation Management Plan for the heritage assets.	Limited and the Trustees of the James Binney Will Trust), 210730 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust)

• Figure 82 Spatial Framework We welcome the identification of green space, landscape features around heritage assets. • The Town Centre is shown quite high up the hill. Given that heights of buildings are likely to be taller at the town centre, there is the potential for the built form to be visible above the ridge. We therefore recommend that Centre is moved lower down slope. • Paragraph 3.3.66 Long term Conservation Management Plan also needed for Roman Road and other heritage assets. This should also be included in the Policy. • Further work required to understand heritage importance of Roman Road, and area south of Roman Road and its interface with development. As landowner, geophysical survey work has been commissioned to aid our understanding of the site's heritage significance. Whilst it is recognised that there will be a need to provide some buffer to sensitive heritage and landscape features, there is further work required to determine the most appropriate way to achieve this. Design approaches, such as framing buried remains of interest to give them a visual setting, thereby enhancing their significance, may also be appropriate. • Further work required to determine most appropriate location for "centre" accounting for range of factors. Site topography and building heights will be important considerations, but there will be wider considerations including proximity and access to nearby communities, mix of uses proposed, phasing of	

development and infrastructure required to support delivery of such facilities. Policy should therefore be amended to support identification of a site for a new local centre, but leave flexibility in policy to find the appropriate design led response. • PE support variety of built form as set out in draft policy but conflicts with 7 A) which promotes an average density target of 50 – 55 dwellings per hectare. • PE support landmark features and buildings in appropriate locations, taking account of landscape and other technical work which will provide guidance on appropriate locations for taller buildings.	
Highways • Impact on A1307. • Impact on Four Wentways. • Exit onto A1307 will cause problems. • Consideration should be given to a new junction onto the A11. • Impact on A505/A1301 roundabout • will likely lead to more 'rat running' through Little Abington. • A505 needs increased capacity • Need safe continuous cycle links to other villages • A505 and A1307 are already badly congested during am/pm rush hours. • A1307 is high casualty road which will be made worse.	200994 (M Logan), 201011 (M Lunn), 201031 (R Smith), 201231 (M Sims), 201275 (E Pepperall), 201281 (C Wolverson), 201311 (M Donovan), 201312 M Cookson), 201316 (M Craven), 201323 (H Biggs), 201330 (J Sharman), 201340 (G Broad), 201348 (K Christodoulides), 201357 (K Battom), 201358 (R Parkin), 201360 (V Hefford), 201367 (M Joslin), 201368 (J Lawrence), 201369 (G Marshall), 201372 (A Wells), 201375 (B Spencer), 201407 (G Sanders), 201408 (R

• Timescale needed for adding/upgrading junctions. • No guarantee residents would walk or cycle to Welcome or Babraham Institute. • Scale of development warrants own highways infrastructure. • Underpass or bridge to new P&R • Dedicated lane on A1307 to Addenbrookes for emergency vehicles. • Buses already full. • Put park and ride near housing. • Will site be able to access Balsham Road junction on A11. • Transport estimates are widely optimistic with no scientific backing. • Claiming improved buses and cycling will fix this is unrealistic • Traffic analysis conducted just after post-Covid at the height of people still working from home. • Reliance on the proposed CSET scheme is speculative at best: it may never be approved or funded, and it would not connect most residents to their workplaces, meaning car use will remain inevitable. • Residents will need to travel for essential services and amenities, exacerbating congestion and reliance on cars. • Site is easily accessed from North London and commuting by train from Whittlesford. • Huge volume of traffic now as many staff at Addenbrooke's live in Haverhill.	Lee), 201415 (M Fryer), 201419 (M Fryer), 201434 (G Moore), 201443 (T Randle), 201459 (T Stone), 201482 (A Cameron), 201517 (C Woodward), 201518 (J Jackson), 201529 (M Cooper), 201530 (I Rogers), 201533 (A Smith), 201541 (T Davenport), 201542 (L Davenport), 201544 (L Davenport), 201545 (J Yarker), 201570 (R Perucchini), 201580 (S Fraser), 201584 (E Scott), 201591 (L Menzies), 201624 (D Farrant), 201635 (J Shaw), 201655 (P Zimmem), 201662 (N Ockendon), 201665 (K Hefford), 201667 (A Eleftheriou), 201668 (R Roberts), 201690 (J Kelly), 201691 (C Randle), 201694 (S Bowen), 201696 (S Tossi), 201697 (H Ward), 201720 (J Fairs), 201723 (A Hutchings), 201725 (J Carr), 201726 (J Mayes), 201731 (L Scott), 201748 (M Radcliffe), 201750 (J Hall), 201753 (L Dav), 201756 (G Sharman), 201761 (B Gutteridge), 201762 (D Turnidge), 201782 (J Tanner), 201785 (G Farrant), 201788 (H

• Only 2 routes directly onto the 1307 which doesn't auger well for a steady flow along the road. • Should be new traffic survey. • Should be different access to and from site. • Assuming all will take the bus or cycle is unrealistic. • Impact on those travelling to/from Haverhill. • Introduce additional frequent bus services into Cambridge. • Lack of understanding that it will attract visitors from surrounding villages, necessitating adequate transport provisions. • Concerns about accessibility and connectivity, making it feel more like an enclave. • Fully evaluate the impact of this development on the existing roads. • Need to take account of planned development further along A1307 at Haverhill and villages in-between. • Planned travel hubs would not alleviate impact as they are north on the A1307. • Already dangerous country lanes terrifying to walk and ride on. • Already congested area, with the A1307 at capacity, experiencing peak traffic of 1200 vehicles per hour in one direction. • Whittlesford Station is small and current transport plans, including the travel hub and Linton Greenway, are incomplete. • Enlarge Whittlesford train station.	Cornwell), 201790 (S Ackerman), 201798 (J Thirkettle), 201802 (R Cornwell), 201803 (S Fryer), 201805 (J Dowling), 201821 (Y Arkwright), 201846 (E Goodyear), 201848 (R Allum), 201855 (J Hudson), 201881 (R Randle) 201882 (N Rumble), 201883 (A Quinn), 201887 (K Lander), 201889 (W Cooper), 201890 (K Cooper), 201895 (A Cassidy), 201898 (R Pargeter), 201912 (J Dodd), 201919 (G Menzies), 201921 (E Crutchington), 201923 (D Rogers), 201924 (M Dance), 201952 (J Hann), 201996 (S Fordham), 202017 (J Reynolds), 202020 (J Rivers), 202022 (A Marns), 202023 (S. Byatt), 202024 (S Byatt), 202034 (D Reed), 202047 (M Tiplady), 202055 (P Snow), 202067 (D Milns), 202082 (D Palmer), 202092 (R Harman), 202299 (R Barnes), 202142 (M Turner), 202162 (L Crisp), 202163 (R Livermore), 202296 (R Barnes), 202325 (E George), 202359 (A-M Melloy), 202477 (J

• If transport hub at Babraham does not proceed, Grange Farm will just put even more traffic on the already overcrowded A1307. • Need mixed-use pedestrian/cycle path to the proposed research centre at Duxford Air Museum. • Plan to create a community of this size that is less dependent on the car may be slightly naive. • Access to the local train stations at Audley End, Whittlesford and Chesterford would only reinforce those congestion issues along with the lack of parking at those locations. • Allow for more private car parking spaces. • Relies entirely on major new transport infrastructure that is not consented, does not have secure finance and is technically challenging. • In transport terms, the site is not sustainable. • Public transport is future-dependent and not clearly committed (i.e., CSET). • Commission detailed modelling of the transport impacts of this development to identify the full suite of transport interventions required to make the development acceptable in planning terms, and to test its viability. • Design supporting bus infrastructure and services to link this development to destinations along the A11 and A505, potentially as far as Royston.	Herbert), 202481 (P Brown), 202568 (K Deeming), 202583 (H Pimblett), 202600 (L Cameron), 202616 (I Smith), 202632 (J Doncaster), 202638 (C Yeomans), 202675 (N Fraser), 202675 (N Fraser), 202699 (K Russell), 202701 (K Russell), 202708 (D Golding), 202726 (A Victory), 202731 (J Barnes), 202737 (A&L Pepperell), 202792 (S McDonnell), 202876 (C Pippen), 202915 (A Batty), 203010 (J Wallace), 203141 (V Jury), 203188 (S Hughes), 203359 (B Garnish), 203362 (A Hoare), 203389 (G Brookman), 203407 (P Allum), 203417 (F Davis), 203459 (L Lambourne), 203512 (R Tovey), 203529 (O Barnes), 203582 (S Hatchell-Wilson), 203586 (H Thomas), 203636 (W Dott), 203648 (E Pimblett), 203652 (T Randle), 203677 (E Randle), 203680 (S Jarvis-Dott), 203734 (D Fraser), 203773 (A Russell), 203798 (C Alda), 203805 (A Butchart), 203807 (S Solomonides), 203842 (A Chan), 203911 (E

• Does not explicitly identify A505 as critical infrastructure, nor does it set out a clear, funded and deliverable strategy for mitigating impacts of proposed new settlement and other growth on this corridor. • Test the feasibility and viability of this site allocation without CSET, given that scheme is both unfunded and at risk of not securing the order required for its construction. • Does not explicitly require public rights of way or equestrian access to be considered. Existing rights of way, including byways and footpaths, should be safeguarded and embedded within the masterplan. • Transport and active travel infrastructure linking Grange Farm with surrounding communities must be designed as inclusive, multi-user routes accommodating pedestrians, cyclists and equestrians. • Severe cumulative impact on the already-failing A11 Fourwentways roundabout and A1307(34 accidents in 10 years, one fatality), creating unacceptable danger to schoolchildren, elderly, and cyclists. • Should ensure that there is a fast through route for buses that stops right at the centre of the development site to foster frequent bus services that serve both Haverhill and Grange Farm without slowing passengers down. • Centre of Grange Farm too far from CSET for pedestrians.	Lambourne), 203931 (A Ross), 203934 (L Donahue), 203961 (S Somerville), 204015 (J Fairs), 204111 (J Batchelor), 204147 (L Paine), 204156 (B Barkataki), 204181 (S Morgan), 204196 (A Cooke), 204395 (P Klein-Ensminger), 204617 (J Mannion), 204635 (M Starr), 204664 (S Haynes), 204773 (G Boselli), 204785 (R Foale), 204807 (P Munns), 204810 (E McKeown), 204879 (J Dowling), 204891 (D Newgreen), 204895 (J Clifford), 204921 (R Rix), 204931 (P Seddon), 204977 (P Sainsbury), 205016 (G Dalton),205018 (J McDonald), 205020 (S Lee), 205032 (A Spicer), 205142 (N Whittaker), 205147 (I Sainsbury), 205154 (R Froment), 205164 (T Stone), 205187 (S Goodhart), 205193 (V Silvey), 205218 (S Richards), 205227 (P Mc), 205271 (P Dsantos), 205387 (M Hardinge), 205387 (M Hardinge), 205425 (S McDonald), 205430 (E Davies), 205432 (N Marshman), 205457 (M

• Full modelling of traffic volumes, junction capacity, and realistic travel behaviour must be completed before site is allocated. • The current draft cannot show whether the A1307 and A11 can safely or efficiently support the development. • Potential for 'rat-running' through villages. • Ensure any transport infrastructure which is critical to accommodating sustainable growth in this location is secured and adequately planned for. • Allocates land at Grange Farm based on transport provisions (CSET bus□way and A11/A1307 crossing) that have no confirmed consent or funding, making the allocation unrealistic. • Reliance on a future A11 transport hub to manage increased demand lacks a tested design, clear access strategy, and evidence of capacity beyond current needs. • Impact on public rights of way. • Grange Farm not suitable to service nearby campuses. • The IDP does not clearly indicate how CSET busway is to be funded, but it is assumed that the entirety of that cost will fall on the Grange Farm allocation. • Relies entirely on major new transport infrastructure that is not consented, does not have secure finance and is technically challenging.	Fentiman), 205502 (M Victory), 205545 (G Minhas), 205547 (G Minhas), 205606 (S Goodhart) 205633 (M Furlow), 205634 (M Furlow), 205642 (L McNicholas), 205662 (R Berry), 205707 (A Wells), 205708 (A Wells), 205714 (A Wells), 205725 (F Goad), 205727 (F Goad), 205729 (W Bailey), 205736 (J Wingfield), 205738 (J Wingfield), 205747 (C Feenan), 205769 (J Sneddon), 205810 (R Perucchini), 205811 (R Perucchini), 205812 (R Perucchini), 205816 (E Scott), (205879)n C Randle), 205880 (C Randle), 205906 (A Hutchings), 205907 (A Hutchings), 205915 (M Rusted), 205941 (R Barker), 205948 (S Zmigrod), 205971 (R Randle), 205972 (R Randle), 206031 (J Dowling), 206032 (J Dowling), 206033 (J Dowling), 206149 (R Livermore), 206154 (R Livermore), 206248 (P Brown), 206203 (R Barnes), 206249 (P Brown), 206251 (P Brown), 206319 (G King), 206327 (C Cameron), 206328 (C Cameron),

• Success of Culina transport company means an increase articulated lorry movements on A1307 and this will only increase as they use Haverhill depot as a dock location between the ports and the Midlands/London area. • Assumes that transport impacts can be resolved through later-stage interventions and modal shift, rather than demonstrating that sufficient, deliverable capacity exists at the outset to accommodate development. • Lacks clarity on how traffic would realistically move through A11/A1307 corridor, how peak-hour volumes would be managed, or how congestion would be avoided during construction and early occupation. • Reconstruct A11/A1037 junction. • Widen carriageway, junction improvements, bus priority of A1307 to Cambridge. • Provide traffic calming through the Abingtons. • Increase bus frequency. • New railway station at or near site. • Traffic data used to support the allocation appears to include periods affected by Covid-19 travel suppression. Baseline conditions may not reflect current or future traffic levels. • Delivery relies heavily on the successful approval of the Transport and Work Act (TWA) application for the CSET proposals for which no public inquiry date is set and no extension to Grange Farm provided.	206598 (A Butchart), 206601 (S Solomonides), 206602 (S Solomonides), 206605 (S Solomonides), 206689 (R Williams), 206690 (R Williams), 206895 (I Sainsbury), 207006 (B Davies), 207066 (L Cookson), 207067 (L Cookson), 207138 (T Davenport), 207139 (T Davenport), 207140 (T Davenport), 207141 (T Davenport), 207142 (T Davenport), 207143 (T Davenport), 207144 (T Davenport), 207145 (T Davenport), 207146 (T Davenport), 207147 (T Davenport), 207148 (T Davenport), 207150 (M Huntsman), 207178 (S Bowen), 207226 (E Lane), 207236 (S Appleton), 207386 (W Dott), 207389 (R Haining), 207407 (S Haynes), 207504 (P Hayden-Smith), 207523 (R Charles), 207551 (B Garnish), 207555 (C Rodgers), 207558 (G Smith), 207561 (L Sainsbury), 207565 (S Fryer), 207568 (J Wallace), 207570 (P Gill), 207572 (M Howes), 207579 (J Weston), 207582 (G Brookman), 207586 (D Donohue),

• Little evidence that people walk/cycle from South Cambridge villages and Cambridge to existing Science Parks. • Planned CSET route currently stops short of Grange Farm, terminating to the west of the A11 and would necessitate a further extension of the busway and a new Transport Hub to the east of the A11 to serve the new settlement. • Reliance on bus-led public transport strategies alone rarely achieves the desired modal shifts required to make a new settlement of this scale sustainable. • Occupation should be restricted to align with completion of CSET and its proposed extension in order to offer a choice of transport modes on day one. • Growth at Grange Farm could bring significant and potentially adverse impacts but acknowledge the generation of further evidence. • Has proposed segregated public transport connection been fully costed, and has necessary land been secured? Connection is presented as a fundamental dependency for viability of Grange Farm site. If it cannot be delivered, would the site be withdrawn? • National Highways require the CSET connection over A11 to be grade separated and not rely on the A11 junction. • CCC agrees that Grange Farm can be delivered in transport terms with sufficient mitigation, it is only deliverable if CSET Phase 2 is built as well as the extension to	207592 (D Stephen), 207594 (V Valge-Archer), 207597 (R King), 207605 (V Jury), 207653 (A&C Soares), 207659 (P Lester), 207667 (K Brown), 207674 (T Collett), 207785 (P Williams), 207923 (H Sutton), 207969 (S Trueman), 207978 (G Brown), 208017 (J Logan), 208431 (N Brown), 208478 (Pimblett), 208481 (G Crowe), 208482 (S Phipps), 208541 (D Simmons), 208542 (K Auckland), 208547 (D Fraser), 208548 (D Fraser), 208549 (D Fraser), 208550 (D Fraser), 208551 (D Fraser), 208552 (D Fraser), 208553 (D Fraser), 203839 (T Solomonides), 208426 (N Brown), 208546 (D Fraser), 208573 (A Ross), 208583 (J Bowen), 208598 (M Appleton), 208608 (N Brown), 208665 (E Taylor), 208738 (F Orgee), 208750 (T Orgee), 208751 (T Ogree), 209044 (J Darrell), 209045 (J Darrell), 209050 209069 (Camcycle), (J Darrell), 209720 (A Spicer), 209725 (E Jones), 209733 (J Barnes), 209734 (J Barnes),

CSET with grade separation over the A11 with bus priority across a new junction on the A1307. • CCC note that it is important to note that the size and scale of this development is vital in order for this to be deemed a sustainable location. CCC believe that this site would benefit from a detailed transport strategy to refine the trip budget for the site and set out the full mitigation package required. • Only viable if proposal for a Cambridge to Haverhill railway is taken forward, otherwise it will become similar to the original flawed planning many years ago for Cambourne, now only being corrected by East West Rail. • Grange Farm appears likely to bring significant and potentially unacceptable adverse impacts on safe and efficient operation of A11 and SRN junction, based on transport evidence currently available. Acknowledged that testing of Draft Plan in transport evidence currently available, demonstrated development of this site is reliant on introduction of extension to Cambridge South East Transport Scheme over the A11. National Highways require this crossing to be grade separated and not rely on A11 junction as this would likely interfere with operation of the junction. • Pampisford Estates are very supportive of ambitions of CSET project, which would bring improved public transport connections very close to the site, with the Travel Hub to be located south west of Fourwentways roundabout. Full integration with CSET is supported, however, the policy sets out a “segregated connection”, supported by a preliminary study by Mott MacDonald as part of the Council’s	209735 (J Barnes), 209736 (J Barnes), 209737 (J Barnes), 210070 (V Cox), 210071 (V Cox), 210076 (V Cox), 210386 (M Cookson), 210404 (M Cookson), 210405 (M Cookson), 210406 (M Cookson), 210409 (M Cookson), 210421 (O Barnes), 410422 (O Barnes), 210426 (O Barnes), 210436 (R Wells), 210483 (E Lambourne), 210490 (C Gill), 210655 (S Zmigrod), 210657 (S Zmigrod), 210658 (S Zmigrod), 210677 (G Saunders), 210685 (G Saunders), 210700 (G Saunders), 210702 (G Saunders), 201703 (G Saunders), 210794 (D Marns), 210795 (D Marns), 210806 (A Marns), 210807 (A Marns), 210810 (A Marns), 210818 (C Newgreen), 210819 (C Newgreen), 210823 (C Paton), 210827 (R Barnes), 211018 (R Froment), 211028 (T & A Bradford & Jedrzejewski), 211648 (G King), 211649 (G King), 211650 (G King), 211697 (J Dowling), 211702 (J Dowling), 2116703(J Dowling), 211704 (J

evidence base. PE feel there is insufficient work undertaken to be certain over deliverability and until work has been undertaken, we think it is premature to conclude that a segregated connection is the right solution taking account of deliverability and viability. PE have commissioned KMC Transport Planning to prepare a transport strategy for the project, and a key focus will be on the options for achieving integration with CSET. • PE support principle of effective integration of new community with proposed Cambridge South East Transport busway. Integration with CSET is supported, having potential to provide frequent, high quality connections into CBC and city. Feel that insufficient work undertaken to date to be certain over deliverability. We think it is premature to conclude that only a segregated connection (i.e. bridge link) is the right solution taking account of deliverability and viability. Alternative systems and integrations may provide same benefits, and these should also be explored. • PE wish to suggest rewording as follows: "Ensure transport and junction modelling is be undertaken to assess and confirm all possible points of vehicular access into the site and the necessary road and junction enhancements required to satisfy the Highways Authority and National Highways." • Have commissioned work to explore potential for direct access/egress from the A11 in north west corner of site, utilising the existing slip road serving the Total Energies filling station and materials recycling facility. We feel that this has a	Dowling), 211705 (J Dowling), 211705 (J Dowling), 211713 (J Dowling), 211726 (P Seddon), 211729 (P Seddon), 211730 (P Seddon), **Other bodies:** 201391 (Babraham PC), 201556 (Stapleford PC), 201610 (Great Abington Parish Council), 201669 (Linton PC), 202029 (Weston Colville PC), 202039 (Weston Colville PC), 202040 (Weston Colville PC), 202333 (Granta Land Ltd), 202540 (Granta Land Ltd), 202656 (Granta Land Ltd), 202670 (Granta Land Ltd), 203060 (Cambridge Past, Present and Future), 203604 (British Horse Society), 204684 (East Cambridgeshire DC), 204948 (Robinson College), 205241 (Axis Land Partnerships Ltd), 206219 (Granta Land Ltd), 207383 (Cambridge Past, Present and Future), 207384 (Cambridge Past, Present

potentially important role to play, and KMC Transport Planning are assessing potential options to provide additional access / egress to the A11. There would be a number of potential benefits if this can be achieved, including separate access/egress for construction traffic, and potential separation of heavy traffic from other road users. We accept that these arrangements would need to be agreed with National Highways as highway authority for the SRN. • PE support principle of a trip budget and welcome opportunity to negotiate this with local planning authority. We feel strongly that it would be premature for policy to seek to fix trip budget, which should be product of detailed assessment of appropriate development mix and transport strategy, taking account of local highway capacity constraints and wider strategy to deliver public transport and active travel connections. • In line with development of a masterplan, PE support development of strategic and local transport mitigation plan, which would form basis of a Transport Assessment in due course. • PE support aspiration that walking, cycling, and public transport will be primary modes - however, greater recognition required to confirm that cars will continue to play a significant role. We would like to see amendments to policy to support integration with CSET without specifying how this is achieved until further work has been completed. • PE support the broad ambitions for a Travel Plan.	and Future), 207385 (Cambridge Past, Present and Future), 207741 (Whittlesford Parish Council), 207742 (Whittlesford Parish Council), 208038 (Railfuture East Anglia), 208116 (Sawston Parish Council), 208117 (Sawston Parish Council), 208156 (Great Abington Parish Council), 208158 (Great Abington Parish Council), 208217 (Pigeon Land & LIH), 208322 (PX Land Let), 208586 (Little Abington Parish Council), 208781 (Axis Land Partnerships Ltd), 208947 (CPRE Cambridgeshire and Peterborough), 209255 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 209698 (CEG Land Promotions Ltd), 209965 (Granta Land Ltd), 208167 (National Highways), 210515 / 210518 (Cambridgeshire County Council), 210519 (Cambridgeshire County Council), 210760 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210763 (Pampisford Estate

	Farms Limited and the Trustees of the James Binney Will Trust), 210764 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210765 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210766 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210780 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210781 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 211593 (Places for People)
Impact on Abingtons and Hildersham • Facilities in Grange Farm could undermine the economic viability of local Abington facilities. • Crime rate will increase. • forcing people to consider moving to get away from it. • Loss of identity. • Coalescence with village.	201031 (R Smith), 201281 (C Wolverson), 201311 (M Donovan), 201330 (J Sharman), 201357 (K Battom), 201358 (R Parkin), 201360 (V Hefford), 201368 (J Lawrence), 201434 (G Moore), 201482 (A Cameron), 201467 (R Wells), 201494 (J Tharby), 201450 (C Feenan), 201518 (J Jackson), 201529 (M Cooper), 210539 (A Patterson Lee), 201584

• Noise, dust and heavy vehicle movement impacts during construction. • Unsettling for residents. • Abington has already absorbed Granta Park with zero benefit to residents. • Fails to protect the character and setting of Abington. • Does not provide clear benefits for current residents, leading to long-term uncertainty and potential negative impacts on traffic, infrastructure, and quality of life. • Is asynchronous with the village and extremely unsightly. • Residents will not interact with the village facilities. • Impact ion property values. • Will jeopardise house prices and cause emotional and financial harm to current residents. There is economic strain, threat to wellbeing and a deterioration in quality of life. • Should complement neighbouring villages rather than overpower and overshadow them. • Greater emphasis should be given to mitigating effect of any development on character of the historic Abingtons. • Bigger buffer zone north of the A1307 to protect Little Abington. • Proposed retail and postal facilities at Grange Farm could undermine existing village services.	(E Scott), 201635 (J Shaw), 201665 (K Hefford), 201690 (J Kelly), 201691 (C Randle), 201696 (S Tossi), 201747 (B Seddon), 201753 (L Dav), 201772 (H Howe), 201785 (G Farrant), 201788 (H Cornwell), 201802 (R Cornwell), 201803 (S Fryer), 201804 (R Zimmern), 201805 (J Dowling), 201821 (Y Arkwright), 201883 (A Quinn), 201892 (R Berry), 201898 (R Pargeter), 201919 (G Menzies), 201943 (J Dowling), 201996 (S Fordham), 202034 (D Reed), 202047 (M Tiplady), 202055 (P Snow), 202067 (D Milns), 202092 (R Harman), 202142 (M Turner), 202162 (L Crisp), 202175 (C Newgreen), 202296 (R Barnes), 202299 (R Barnes), 202337 (S James), 202359 (A-M Melloy), 202568 (K Deeming), 202571 (R Haining), 202608 (C Cameron), 202616 (I Smith), 202699 (K Russell), 202701 (K Russell), 202731 (J Barnes), 202737 (A&L Pepperell), 202915 (A Batty), 202992 (R

• Should include a specific policy safeguard that retail provision at Grange Farm is limited in scale and does not include a supermarket or competing postal facility, in order to protect existing village services. • Any retained allocation must include a clearly defined, policy-protected buffer providing genuine physical and visual separation between new development and the existing villages. • Public spaces in Little Abington and Great Abington would be negatively affected by increased noise, traffic, pollution and loss of rural views. • "Strategic Enhancement Area" too vague. Must explicitly define a minimum buffer width (e.g., 500m) between development edge and Abingtons to genuinely prevent coalescence and preserve village character. • The buffer area between the development and village needs to be widened along its southern edge. • Has been no assessment of crime impact. • Would undermine community cohesion. • It would create a contiguous development and entirely subsume, and therefore destroy, existing villages. • To achieve meaningful separation, plan should reflect historic settlement pattern of South Cambridgeshire. Sawston, Pampisford, Babraham, the Abingtons, Hildersham, Linton, and Great Chesterford have average separation of 3.3 km.	Gilmour), 203123 (J Searle), 203141 (V Jury), 203187 (M Jury), 203407 (P Allum), 203512 (R Tovey), 203516 (M Howes), 203529 (O Barnes), 203652 (T Randle), 203680 (S Jarvis-Dott), 203683 (D Simmons), 203803 (J Cutting), 203807 (S Solomonides), 203839 (T Solomonides), 203868 (M Broadhurst), 203911 (E Lambourne), 203934 (L Donahue), 204586 (R Elston-Green), 204635 (M Starr), 204682 (E Lane), 204783 (R Smith), 204807 (P Munns), 204810 (E McKeown), 204821 (Abington Stores and Post Office), 204871 (V Valge-Archer), 204879 (J Dowling), 204891 (D Newgreen), 205092 (M Whittaker), 205164 (T Stone), 205193 (V Siley), 205271 (P Dsantos), 205425 (S McDonald), 205482 (M Brattesani), 205487 (G Minhas), 205512 (S Somerville), 205635 (M Furlow), 205636 (M Furlow), 205661 (R Berry), 205728 (W Bailey), 205735 (J Wingfield), 205817 (E Scott), 206034 (J Dowling), 206151 (R Livermore), 206152 (R

Grange Farm site cannot meet this standard except by restricting development to the northernmost portion. • PE strongly support objective to avoid convergence of settlements and note that this has been a particularly strong point raised through initial community responses on project. Would suggest that policy wording could be sufficient to ensure settlements do not coalesce, without prejudging the appropriate way of achieving this. Committed to working with GCSP to devise appropriate design solutions to ensure that Little Abington and Great Abington (in particular) retain their own distinct identity. • Policy too vague on protections for existing residents at southern and southeastern boundary. • Policy limb should read “maintain the distinction between the Grange Farm development and neighbouring villages, in terms of character and physical separation.” Note also there are inconsistencies here with land being referred to as “Grange Farm” rather than “Land adjacent to A11/A1307”. Should be a consistent naming convention adopted for clarity.	Livermore), 206165 (C Newgreen), 206167 (C Newgreen), 206194 (R Barnes), 206200 R Barnes), 206250 (P Brown), 206318 (G King), 206324 (C Cameron), 206325 (C Cameron), 206596 (A Butchart), 207069 (L Cookson), 207181 (S Bowen), 207388 (W Dott), 207523 (R Charles), 207543 (R Allum), 207557 (G Smith), 207591 (D Stephen), 207598 (R King), 207599 (P Brunning), 207659 (P Lester), 207678 (T Collett), 207976 (G Brown), 208540 (D Simmons), 208547 (D Fraser), 208548 (D Fraser), 208549 (D Fraser), 208550 (D Fraser), 208551 (D Fraser), 208552 (D Fraser), 208602 (M Appleton), 208603 (M Appleton), 208629 (G Jones), 208664 (E Taylor), 208737 (F Orgee), 209729 (J Barnes), 210073 (V Cox), 210388 (M Cookson), 210398 (M Cookson), 210409 (M Cookson), 210415 (M Cookson), 210433 (P Mc), 210491 (C Gill), 210644 (S Zmigrod),

	210663 (J Snell), 210689 (G Saunders), 210821 (C Newgreen), 211021 (M Hardinge), **Other bodies:** 201608 (Great Abington Parish Council), 202029 (Weston Colville PC), 204948 (Robinson College), 208589 (Little Abington PC), 208590 (Little Abington PC), 209274 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210731 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust),
Wider area: • Fails to consider the wider impacts on surrounding settlements. • Two planned developments (Policy S/GF: Land Adjacent to A11 and A1307 at Grange Farm and Policy S/CE Cambridge East) are expected to impact upon West Suffolk given its proximity and the functioning of the surrounding towns of Newmarket and Haverhill.	208540 (D Simmons), **Other bodies:** 204784 (West Suffolk Council),

• Will require collaborative working with West Suffolk and a full assessment through the preparation of the local plan evidence base. • Nature of proposed connections is not clear and whether they will link to the towns of Haverhill and Newmarket within West Suffolk. • West Suffolk Council would welcome opportunity to work collaboratively and co-operatively to understand the detail of these proposals.	
Design Matters • Object to high density. • Scale is overwhelming. • Will be a disconnected, poor place to live. • Speaks of "high quality and well-designed buildings" but is very short on details - including room sizes, which remain below European standards. • Will have to build dense ugly properties to facilitate the level of development suggested inc probable high rise. • More appropriate design criteria should be applied that respect the rural character of South Cambridgeshire. • Concerns about the proposed housing density of 50/55 per hectare, questioning the fairness compared to the allocation of 12 pitches per hectare for travellers.	200994 (M Logan), 201443 (T Randle), 201459 (T Stone), 201591 (L Menzies), 201651 (M Mannassi), 201696 (S Tossi), 201747 (B Seddon), 201803 (S Fryer), 202067 (D Milns), 202092 (R Harman), 202568 (K Deeming), 202632 (J Doncaster), 202696 (S Roberts), 202876 (C Pippen), 202915 (A Batty), 203141 (V Jury), 203512 (R Tovey), 203931 (A Ross), 204586 (R Elston-Green), 204635 (M Starr), 205487 (G Minhas), 205544 (G Minhas), 205743 (R Lee), 205744 (R Lee), 205752 (C Feenan), 205952 (S Zmigrod), 205953 (S Zmigrod), 205956 (S Zmigrod), 205957 (S Zmigrod), 205958 (S

• Need for housing designs that are appropriate for a village setting, rather than those suited for urban environments. • Make the houses eco-friendly and well insulated. • “green areas” provided by these developments are not used or maintained and they are just paying lip-service to your “holistic” views to keep within planning guidelines. • Ensure the height of the buildings does not overshadow in any way the local area and designs architecturally blend into the local rural landscape. • Infrastructure-intensive uses should be prioritised near the A11 corridor to minimise impacts on agricultural land and maintain a coherent settlement structure. • Strategic enhancement area will be too small to meet strategic green infrastructure needs on-site. Even if the development provided significant financial contributions for strategic green infrastructure, it is highly unlikely that providers would be able to acquire the land required in the right places, as land assembly for strategic green infrastructure on the edge of Cambridge will ultimately depend on the landowners getting at least part of their own development aspirations in return for providing the land for strategic green infrastructure. • Introduce binding and enforceable limits on building height, density and massing to protect skyline views, heritage assets and village setting.	Zmigrod), 206195 (R Barnes), 206195 (R Barnes), 206201 (R Barnes), 207959 (S Zmigrod), 207557 (G Smith), 205818 (E Scott), 205916 (M Rusted), 206166 (C Newgreen), 207580 (J Weston), 207677 (T Collett), 208014 (J Logan), 208570 (A Ross), 208597 (M Appleton),), 208629 (G Jones), 208749 (T Orgee), 209047 (J Darrell), 209723 (A Spicer), 209730 (J Barnes), 209742 (J Barnes), 209744 (J Barnes), 210399 (M Cookson), 210401 (M Cookson), 210402 (M Cookson), 210407 (M Cookson), 210417 (O Barnes), 210424 (O Barnes), 210645 (S Zmigrod), 210646 (S Zmigrod), 210647 (S Zmigrod), 210648 (S Zmigrod), 210651 (S Zmigrod), 210652 (S Zmigrod), 210653 (S Zmigrod), 210659 (S Zmigrod), 210682 (G Saunders), 210683 (G Saunders), 210684 (G Saunders), 210886 (G Saunders), 210687 (G Saunders), 210688 (G Saunders), 210692 (G Saunders), 210693 (G Saunders), 210694 (G

• Advance planting as a pre‑commencement condition • Must include explicit building height limits (e.g., maximum 2 storeys) to ensure development does not visually dominate skyline or Cam valley. Must be specific prohibition on vertical landmarks or industrial structures that would break horizon when viewed from Gog Magogs or Roman Road. • Add mandatory requirement for "Dark Skies" compliant lighting strategy to prevent light spill from this elevated site into the surrounding open countryside. • Lack of detail regarding the sustainability of homes, specifically the inclusion of solar panels and grey water systems. • Tall buildings, skyline impact and failure to impose binding height controls. Policy S/GF does not define what constitutes a tall building, does not prohibit tall or landmark buildings, and does not impose binding height limits across the site. • Site Allocations Topic Paper expects a density around of around 50-55 dwellings per hectare – however, when taking into account site also includes a town centre, warehouses, offices, schools, shops, open and park spaces, and other facilities and amenities, this density may be higher still. In contrast, customary density for even a suburban development of houses would be around 35 dwellings per hectare. • Inclusion of energy efficient homes is essential and should be a stipulation of any new build contract given.	Saunders), 210695 (G Saunders), 210696 (G Saunders), 210697 (G Saunders), 210698 (G Saunders), 210699 (G Saunders), 210704 (G Saunders), 210804 (A Marns), 211029 (T & A Bradford & Jedrzejewski), 211030 (T & A Bradford & Jedrzejewski), 211032 (T & A Bradford & Jedrzejewski), 211707 (J Dowling), 211711 (J Dowling), 211733 (P Seddon), **Other bodies:** 201607 (Great Abington Parish Council), 201669 (Linton PC), 209258, 209269, 209270, 209275 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 203001 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 210723, 210725, 210726, 210732, 210733, 210734, 210735, 210736, 210737, 210738, 210740, 210741, 210742, 210743, 210744, 210745, 210746, 210747, 210748, 210749, 210750, 210751, 210752, 210753, 210754, 210755,

• Design ethos does not accord with character of South Cambridgeshire, which is principally small villages, that radiate from Cambridge. Proposal will create an urban environment, not sympathetic to the setting in its locality or the county context. • Create a continuous landscape buffer along the south‑eastern boundary to provide year‑round visual and acoustic separation, protected as a non‑built zone. • Ensure perpetual ownership and funded management of the buffer. • Design public‑space routes and lighting to minimise spill, glare and intrusion into existing dwellings. • Apply stepped‑down building heights and densities toward the boundary, with low‑rise, low‑intensity forms, frontages that face the buffer and privacy safeguards to prevent overlooking. • Any lighting near the boundary including for walking and cycling routes should be designed specifically to prevent glare and light spill into nearby homes and the countryside, using shielding and appropriate controls. • Descriptions provided regarding landscaping are a token gesture to appease. • Illustrations suggest four storey structures in close proximity create dense urban spaces, with architectural features not part of the South Cambridgeshire vernacular. Proposals are out of character in terms of local vernacular, scale, massing, architectural features and proportions synonymous of an ‘any place	210756, 210757, 210758, 210759, 210761, 210767, 210768, 210770, 210772, 210774, 210779 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust),

anywhere' developer lead approach leading to band, poor quality development and architecture. • Implement a movement strategy that prevents rat□running through Little and Great Abington. • High-impact, noise-generating and HGV-intensive uses should be located away from south-eastern boundary and should not be located at, within, or operate immediately adjacent to south-eastern boundary where allocation meets existing homes at Ley Rectory Farm Barns. • Single Masterplan implies a single phase, uniform development inconsistent with character of South Cambridgeshire villages, which evolved organically around historic centres such as river crossings and manor houses. Create small initial village core, then allow local developers, architects, and individual homeowners to build incrementally in response to demand. • Designs by John Simpson Architects are subjective and fail to safeguard local character. Illustrations suggest dense, four-storey development with architectural features alien to South Cambridgeshire. Comparable nearby towns such as Saffron Walden, Cambridge and Newmarket do not exhibit the proposed forms or styles. The approach is generic and developer-led, lacking local distinctiveness. • Large national housebuilders typically produce uniform, low quality designs that do not reflect local character. • Examine potential for community heating schemes.	

• Public routes and spaces along south-eastern boundary should be designed to respect privacy and minimise disturbance • Could be interpreted that the SF has already determine most appropriate design solutions and mitigation. PE have commissioned full multi-disciplinary team to explore these issues in detail, and to develop a robust masterplan framework for site, which identifies and respects site's ecological and heritage constraints/opportunities. • PE support desire for high quality design, and whilst we share the ambition for an exemplar approach, greater clarity is required on interpretation of what this means. We very much welcome the opportunity to develop a robust masterplan framework and to test the approach to a range of matters to reach common ground with GCSP on these points. • Request clarity on what is referred to by "the landscape within its rural setting". May be interpreted in different ways and therefore would welcome a discussion about what is intended here. • Should include clear spatial principle for south-eastern boundary where the allocation meets Ley Rectory Farm Barns to function as a low-intensity, quiet edge. • Masterplan and design code should be required to demonstrate, with appropriate assessment, that location and operation of non-residential uses and servicing activity will not create unacceptable noise, disturbance, vibration, odour or light	

impacts at existing homes at south-eastern boundary (Ley Rectory Farm Barns interface). • Policy requires “separation” but does not define, secure or prioritise it at south-eastern boundary where rural homes sit directly opposite the proposed allocation. Boundary alignment creates particularly tight interface with existing dwelling and garden, so any ambiguity around “separation” is especially problematic. • Incorporate defined south□eastern boundary buffer, a quiet□edge principle, a sensitive built□form transition, early delivery of screening, dark□sky lighting controls, construction controls and infrastructure/phasing triggers that halt later phases if key transport mitigations are delayed. • Masterplan and design code should be required to demonstrate, with appropriate assessment, that location and operation of non-residential uses and servicing activity will not create unacceptable noise, disturbance, vibration, odour or light impacts at existing homes at the south-eastern boundary (Ley Rectory Farm Barns interface). • Fully supportive of design led approach, and development of comprehensive site masterplan, and (later in the process) design codes, to ensure each development phase comes forward in accordance with overall masterplan vision. • Further work required to understand constraints, the development proposals and appropriate mitigation through set back, design/landscaping or management, in consultation with the relevant consultees.	

• PE support desire to develop high quality buildings that respond to surrounding context with appropriate massing, building heights and densities, as well as building form. Committed to design quality as set out in our vision for the project in our previous Local Plan submission. • PE support principle of town and neighbourhood centres; further work required to establish how many centres and what facilities can be supported by proposed 6,000 homes. Great care will be required to consider appropriate number of centres, their make up, scale and mix of uses, to ensure the objective of a vibrant, walkable new community is achieved. This may require decisions which weigh up the merits of fewer, larger “centres” vs a dispersed approach to amenity provision. This should be design led and not pre-judged by the policy. • PE consider that an average density of 50-55 dwellings per hectare is likely to be too dense in this location. We propose to test a number of scenarios as we begin to set a masterplan framework for project, and propose to test matters raised in the policy and believe at this point a slightly lower density is likely to prove more appropriate to the rural landscape setting. The policy should not need to define a target density until further work has been undertaken. • Further work required to understand constraints and opportunities, development proposals and appropriate mitigation through set back, design/landscaping or management. Consider this is likely to require a review of proposed boundaries of	

the Spatial Framework diagram both in respect of development area, and SEA ahead of the Regulation 19 consultation. • PE support, and are passionate, about need for high quality public realm. Our client's vision is that this development is different and something community is proud to call home. The layout and quality of the public realm will be critical to realising this ambition. • PE support provision of open space – more work needed to establish scale of provision as part of overall land use budget. This is being tested through our masterplan framework. • PE support effective integration of green and blue infrastructure. • PE support preservation and enhancement of significant ecological heritage and natural environment – suggest requirements will inform both extent of built development and scale, location and approach to delivering Strategic Enhancement Area. • PE support principle of maximising opportunities for ecological enhancement and building on special qualities of site. • PE support need to respond to designated historic and ecological sites – but note that further work is required to establish most appropriate design led approach to accommodating and respecting these important features as part of comprehensive approach to masterplanning.	

• PE support minimising recreational disturbance on ecology at the SSSI, but this needs to be looked at in a holistic way, as it may be that additional habitat of equivalent or better quality may be created as part of the scheme. • PE support creating dark ecological corridors. • PE support preservation of existing range of watercourses off-site and intend to develop a landscape led masterplan, with integrated green and blue infrastructure, SUDs and with careful consideration of all aspects of water cycle to ensure scheme sensitively integrates into the area. • PE support creation of clearly defined green buffers between development and established settlements. Role, purpose, extent and definition of SEA is an important consideration here. Welcome discussions with GCSP, and in due course with community, about how we best achieve this objective. • It is not viewpoints that are to be preserved, rather it is important to understand what it is about key views that is important. With a development of this scale, key views and character will change, so it is important to identify and understand what is important to consider and what it is we are trying to “preserve”. We would very much welcome a discussion with landscape officers about the key views that we should be giving particular attention. • PE support protection of existing landscape features, wherever possible and allowing for the most appropriate scheme as a whole. It should be noted that there may be elements of existing landscape features which do need to be removed	

(e.g. hedgerows) to accommodate site infrastructure or development, where justified. • As long term, locally resident landowners for generations, PE have been instrumental in establishing the strong planted treeline buffers around site. Dendrology is a particular passion of the family. We support desire to strengthen planting and enhancement of site boundary but suggest that further work is required to establish appropriate location for such boundary planting. We believe that there is a case for further screening to ensure visual containment and separation from adjoining communities. • PE support need for full ecology survey and biodiversity implementation and management plans throughout development of scheme. Early input from specialist ecologists is being sought to ensure biodiversity is a priority in development of the masterplan. • PE support need for positive management of ecological buffers, and are committed to a strong stewardship model to ensure proactive management and maintenance of all aspects of scheme. • PE are strongly supportive of broad ambitions for a strong connectivity and movement network across site and beyond, for all modes of travel. • PE strongly support need for walking, wheeling, cycling and public transport movements. Streets must be well designed and accord with best practice and guidance.	

• PE agree we should prioritise exploration of opportunities to enhance walking and cycling connectivity to key local employment destinations and public transport hubs. Further work will be required to establish how best to overcome local severance from A1307 and A11. PE is committed to working with local authority partners to achieve ambitions in area to ensure deliverable solutions. • PE feel that further work is required to understand distinctive and important features of Roman Road, and to determine the most appropriate design response. The policy should not seek to pre-judge the approach to Roman Road until a more detailed heritage assessment and design led approach to sensitively integrated development into local area. • PE support principle of promoting active travel connections. For reasons given in our comments on policy limb 13 (d), appropriate design solution should be derived from more detailed assessment and engagement with Cambridgeshire County Council as highway authority. • PE are concerned that policy as drafted pre-determines most appropriate design solution for project. Therefore, suggest alternative wording: “To reduce private vehicle usage from the outset of the development and to improve placemaking, alternative car parking and storage options should be explored at the edge of parcels or plots as part of a strategy of more remote parking solutions.” This does not set this as an absolute requirement, but requires this to be considered in the	

round as part of a robust transport strategy (necessarily with careful controls on car parking). • PE support Council's objective to consider low-carbon energy infrastructure, circular economy principles, and sustainable water management. Including an Integrated Water Management plan and Water Cycle Strategy. We have already commissioned work in these areas from a suitably qualified expert. • PE support need for any development to need to come forward in accordance with an agreed phasing plan. Expect this to be submitted indicatively as part of any outline application, with updates provided in support of each Reserved Matters application. This can be conditioned appropriately. • Whilst we support principle of development, PE wish to object to Spatial Framework diagram as drawn. Further work is required to consider a range of characteristics which we anticipate will give rise to changes. These may include such matters as: Scale, location and extent of the development boundary. Scale, location, purpose/definition and extent of Strategic Enhancement area. Site access points. Location of any on site Waste Water Recycling Centre. Approach to integration with CSET. Location of the "centre" or "centres". Set of distances and proposed design mitigation for any sensitive receptors (e.g. Roman Road SAM and SSSI). Edge treatments to secure separation from the Abingtons. integration of farming activities on residual land holdings.	

• PEe support the principle of a Spatial Framework for Grange Farm (Figure 81) but stress that it needs further work to test that it reflects the optimal / evidenced approach to the allocation. •	
Housing • Presence of site for travellers nearby may exacerbate existing issues in the village. • Insufficient detail on long-term management and integration of travellers' site. • Object to travellers' site. • Question need for travellers' site • Include social housing. • Local youngsters help/incentives to get on the housing ladder. 1,2,3, 4 bed houses and bungalows. • No more than 500 homes for the older generation and young first buyers. • Afraid travellers site will not remain at 12 pitches • How can we possibly need this many houses? • Reduce the number of houses. • Stop building expensive housing which locals cannot afford. • Unlikely that the affordable housing will ever materialise, usually disappear at some point.	201031 (R Smith), 201330 (J Sharman), 201340 (G Broad), 201696 (S Tossi), 201726 (J Mayes), 201802 (R Cornwell), 201846 (E Goodyear), 201889 (W Cooper), 201921 (E Crutchington), 201952 (J Hann), 203512 (R Tovey), 203653 (S Appleton), 203797 (R Nagasaki), 205032 (A Spicer), 205432 (N Marshman), 205482 (M Brattesani), 205608 (S Goodhart), 207606 (V Jury), 207667 (K Brown), 207682 (T Collett), 208629 (G Jones), 208749 (T Orgee), 209722 (A Spicer), 206040 (J Dowling), 210072 (V Cox), 210076 (V Cox), (210391) M Cookson), 210392 (M Cookson), 211019 (R Froment), 211036 (T & A Bradford & Jedrzejewski), 211714 (J Dowling),

• More work needs to be done to establish sort of housing employees of sites of this type want - do they want to live in a new settlement at all? • Remove traveller sites, reduce the overall amount of housing. • Traveller sites appear inappropriate due to recent issues in the village • Housing trajectory expects delivery of completed dwellings to start within 8 years of adoption of the new Local Plan. Drawing on experience from other new allocations in the region, this would not appear to be realistic. • Allocation should be removed or the trajectory should be reduced and pushed back. • Welcomes the inclusion of key worker housing to serve the surrounding life□science cluster. • Long lead□in time means homes may not be delivered until the late 2030s, creating a mismatch with the immediate workforce needs of Granta Park. Clear delivery mechanisms, early phasing and safeguards are required to ensure key worker housing is provided promptly, tied directly to major R&D campuses, and protected over time. • Allocation is unnecessary, with an overprovision of over 3,000 dwellings compared to the identified housing need of 10,330 homes by 2045. • Have housing developments locally that still have unsold properties after several years.	**Other bodies:** 201391 (Babraham PC), 201606 (Great Abington Parish Council), 208590 (Little Abington PC), 209260 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 209261 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210410 (M Cookson), 211022 (L Cookson), 202333 (Granta Land Ltd), 202540 (Granta Land Ltd), 202656 (Granta Land Ltd), 202670 (Granta Land Ltd), 203371 (BMR Granta Park Propco Limited), 210739 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust),

• Unlikely to be affordable for local young people, benefiting only landlords or those on benefits. • Colleagues on BRC campus do not recall being asked if they would be interested in buying housing closer to the site. Most were clear that house prices locally are prohibitively high and they would not look to relocate. This either suggests that site will be too expensive or cause a price crash locally, both of which would be terrible for both builders and local area. • With majority of a local science park employees being high earners it can be assumed that they would not wish to live in high-density housing developments such as at Grange Farm. • Housing numbers and mix of housing typologies and tenure needs to be developed based on further work on character, acceptable building heights, and housing needs (by typology and tenure). Concerned with the suggestion that 10% of dwellings should be specialist accommodation. For a scheme of this scale this will generate a very significant number of these homes, and this should be a product of up to date assessments of need (over time), rather than a policy requirement. • First phase should include both accommodation for young families and for mature and retired residents who will use the community space and shop. • Do not feel that Council has prepared a robust justification for requiring the provision of Gypsy and traveller pitches on site. This is a point that we wish to	

explore further with GCSP. Our reading of Council's own evidence is that it signposts a number of other solutions as being sequentially preferred, with allocations on new development as a last resort. The approach to siting of any G&T site would require great care to ensure effective integration with wider community. • Accept need for affordable housing for Addenbrooke's Hospital and the Biomedical campus. Many existing Addenbrooke's workers currently live in or around Haverhill as it is more affordable. Many argue affordable housing on Grange Farm site would aid Biomedical campus etc which may be true, but would need to be offset by all those workers who would leave because of increased journey times. • Average salary across Granta Park, Babraham Research Campus, and Hinxton Hall is approximately £35,000–£55,000, compared with national median of £37,600. This suggests that the primary housing demand is not for traditional "affordable housing" but for market rate homes suitable for skilled workers. • Assumption that nearby housing will support science campuses requires evidence. • PE support the policy expectation of homes that are adaptable. • Siting of any gypsy and traveller pitches should be a material distance from existing settlement community of Little Abington (and significantly more than is the case in the Proposed Grange Farm Development).	

Employment • Assertion that jobs will be created, aside from infrastructure roles, seems illogical. • No guarantee those moving in would want to work at the Welcome or Babraham Institute. • Accessibility to London may attract commuters rather than local workers. • Capacity issues at nearby science parks. • People who already have jobs will move here & commute. • Most people in Abington would love to work locally but can't find jobs in the two local business parks. • Must be local significant employment opportunity factored into the scheme. • Where will people work? • May be attractive for those working further afield. • Will there be sufficient local employment? • What is Class B2 General Industrial provision? • Asserted proximity to "future jobs" in Granta Park, Babraham and Hinxton is not substantiated beyond current expectations, with multiple major buildings currently vacant at Granta Park. • Logistics hubs appear unnecessary. • If logistics buildings are included, strict controls on height, massing, and traffic impact are essential.	201031 (R Smith), 201360 (V Hefford), 201518 (J Jackson), 201706 (R James), 201748 (M Radcliffe), 201772 (H Howe), 201890 (K Cooper), 201898 (R Pargeter), 202020 (J Rivers), 202067 (D Milns), 202092 (R Harman), 204759 (M Huntsman), 205618 (S Lee), 205881 (C Randle), 205944 (R Barker), 205973 (R Randle), 206037 (J Dowling), 206038 (J Dowling), 206039 (J Dowling), 206321 (G King), 206893 (I Sainsbury), 207560 (L Sainsbury), 207659 (P Lester), 207682 (T Collett), 207787 (P Williams), 208427 (N Brown), 208481 (G Crowe), 208531 (C Alda), 208580 (J Bowen), 208600 (M Appleton), 208629 (G Jones), 208753, (T Ogree), 209726 (E Jones), 209738 (J Barnes), 210393 (M Cookson), 210410 (M Cookson), 210423 (O Barnes), 210690 (G Saunders), 210691 (G Saunders), 211035 (T & A Bradford & Jedrzejewski), 211698 (J Dowling),

• Large warehouses would harm the landscape and increase vehicle movements. Furthermore, emerging technologies such as autonomous aerial vehicles (UAVs) may reduce the need for traditional logistics infrastructure, making large warehouses an outdated solution. • Growth forecasts of greater Cambridge area and particularly in the biomedical research hubs and at Addenbrookes hospital have not taken into account the growing impact of AI. • Little hard evidence for future expansion and development of Granta Park, Babraham and Hinxton Campus • Business / biomedical sites around Cambridge have vacant units and have been reducing staff numbers including Addenbrookes hospital which made over 200 persons redundant in last 6 months with further reductions due in 2026. • No forecast or impact on travel-to- work outcomes. • No allowance made for development to attract London workers. • The immediately proximate research parks at Granta Park and Babraham Research Campus together total no more than 4,800 employees at present. Babraham Research Campus has proposed additional development of 23,000m2 of R&D capacity on-site, however Granta Park is currently advertising for tenants in at least five buildings on-site indicating no requirement for additional site capacity.	211712 (J Dowling), 211731 (P Seddon), **Other bodies:** 202040 (Weston Colville PC), 208595 (Little Abington PC), 209262 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 209263 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210140 (Historic England), 209762 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust),

• Proposed development is of a scale wholly disproportionate and unnecessary to any such purported requirements. • Please provide concrete and specific evidence that this development will definitely make a major contribution to employment and economic benefit both to residents of the proposed Grange Farm development and those of other villages in the locality. • False assumption that Life Sciences will continue to grow. Companies are moving their HQs to mainland Europe. • Proposed warehouse far larger than a last mile facility and unless all the major carriers agreed to share the facility this would be of little benefit of reducing trips, and is anyway not the model operated by many. • Class B2 General Industrial provision - what exactly is this and where is it situated. • Retail and Office space again deliveries, and staff travel not considered and again majority forced onto the A1307. • Grange Farm is 8-10 km south-east of CBC, located in the Wider Catchment (lowest-priority) category pf CBC Housing Study. Remove allocation. If retained, reduce to contingency only and require explicit housing reservation for CBC workers. • PE wish to promote notion that a range of employment uses will be needed on site to create a mixed and balanced new community and also recognising relationship	

of site to nearby science parks in southern cluster. We do not feel that policy at this stage should be overly prescriptive, pending further work on appropriate scale and mix of employment uses. Whilst we are supportive of desire to promote local last-mile logistics hub / warehousing, wording infers that this is only purpose of any employment, which could serve to restrict the market (and prevent delivery). • PE support E(g)(i) office uses appropriate. Question need to be so specific about Use Classes Order. What is the intention here? Consideration should be given to increasing amount of floor space to create a sustainable community – further evidence / justification required to determine appropriate scale/ mix. • Have some concerns about location of particularly B8 uses on this site given the potential scale of development. • Support potential role that site can provide in terms of employment within last mile logistics we wish to encourage GCSP to encourage a wider definition of the employment offer until such time as further work has been undertaken on appropriate mix and quantum of employment to support new community. • Also support inclusion of community concierge as part of community provision in the area but wish to ensure the ambition for a last mile movement hub does not seek to limit the types of employment that development may accommodate more broadly.	

Other • Consider long-term environmental, infrastructural, and social impacts of proposal and conduct thorough scrutiny before proceeding. • Lacks detail and appears rushed. • Ill thought out and wholly inappropriate. • Think long and hard before allowing the planning to be passed. • Just another money making venture with very little thought for the surrounding area and inhabitants. • Living in a town, even one where you plan to give people green spaces, is not healthy or safe. • Prematurity and Planning Policy Conflict. • Conflicts with key principles of the South Cambridgeshire Local Plan. • The 'town' will need a focus to become a known centre for growth and new industry. • The planning team need to be more open and inform residents and businesses in a large surrounding area of Little Abington. • Every chance that the character of this area will be so altered that more development will quickly follow. • Until the evolution of the currently unsustainable Cambridge Green belt has been agreed, including the future of the 6	201312 (M Cookson), 201323 (H Biggs), 201408 (R Lee), 201684 (S Bowen), 201697 (H Ward), 201726 (J Mayes), 201747 (B Seddon), 201753 (L Dav), 201756 (G Sharman), 201772 (H Howe), 201848 (R Allum), 201887 (K Lander), 201915 (G Battom), 202082 (D Palmer), 202571 (R Haining), 202632 (J Doncaster), 202675 (N Fraser), 202696 (S Roberts), 202728 (I Goodhart), 203010 (J Wallace), 203187 (M Jury), 203359 (B Garnish), 203653 (S Appleton), 203677 (E Randle), 203730 (K Auckland), 203931 (A Ross), 204619 (J Fairs), 204783 (R Smith), 204891 (D Newgreen), 205543 (G Minhas), 205605 (S Goodhart), 205761 (R Wells), 205765 (J Sneddon), 205883 (C Randle),205975 (R Randle), 206147 (R Livermore), 206148 (R Livermore), 206313 (G King), 206894 (I Sainsbury), 207183 (S Bowen), 207659 (P Lester), 207676 (T Collett), 207683 (T Collett), 207684

• Current settlement projects (including Shelford and Six Mile bottom), allowing this to proceed will just add yet more, • Unnecessary, damaging, seepage outwards from Cambridge. • The plan needs more accurate and clear diagrams, where are the houses, shops, warehouses etc, the A1307 isn't clearly marked. • Compliance with duty to co-operate is not proven and cross-boundary aspects are high-risk • Concerns about the spatial structure and deliverability of draft policy. • Contains inconsistencies and contradictions throughout indicating that it is a cut and paste of generic planning statements rather than a carefully considered plan for the local area. e.g. access to roman road is sited as an advantage in the same doc that states access will be restricted to protect heritage. • The document does not give details about the actual developments that may or may not arise. • Need for the council to remain open and communicative regarding uncertainties surrounding the project. • Land was identified by landowner not planners so question legality • If a new town is needed then start process by building the case for a new town which is presented to the Council/Region/Secretary of State.	(T Collett), 207926 (H Sutton), 207965 S Trueman), 208477 (D Pimblett), 208545 (K Auckland), 208569 (A Ross), 208574 (A Ross), 208576 (A Ross), 208606 (M Appleton), 208629 (G Jones), 208630 (G Jones), 208631 (G Jones), 208632 (G Jones), 208633 (G Jones), 210400 (M Cookson), 210408 (M Cookson), 210409 (M Cookson), 210435 (C Feenan), 210438 (R Wells), 210493 (C Gill), 210494 (C Gill), 210656 (S Zmigrod), 210701 (G Saunders), 210798 (D Marns), 210800 (D Marns), 210825 (C Paton), 211646 (G King), Other bodies: 208593 (Little Abington PC), 208111 (Sawston Parish Council), 209253 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210084 (Historic England), 210773 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will

• Identify site options with a viable programme for delivery and a clear understanding of costs and risks including a consultation process across possible effected communities. • Fails the tests of soundness, being neither positively prepared nor justified, and conflicts with national policy. • Require transparency by publishing the full site selection evidence base and ensuring assessments are demonstrably independent of landowner funding. • Site scores 'Red' in the HELAA, with significant landscape, transport and environmental constraints, yet is promoted for a development of up to 8,000 homes, far exceeding assessed capacity. • When read alongside Council's own published evidence, including 1st December 2025's Housing and Economic Land Availability Assessment (HELAA) and Greater Cambridge Skyline and Tall Buildings Strategy, Pell Frischman Flood Risk Assessment and 'Grange Farm Promotion Document', Policy S/GF allocates a site assessed as highly constrained, acknowledges the likelihood of irreversible harm, promotes development at a scale that exceeds assessed capacity, and relies too heavily on future mitigation rather than demonstrable deliverability. • Amend the Plan to ensure consultation and engagement processes are accessible, consistent throughout the consultation period, and not reliant on digital-only submission methods.	Trust), 210775 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210776 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210777 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210778 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust), 210782 (Pampisford Estate Farms Limited and the Trustees of the James Binney Will Trust),

• Sketch plan only gives a vague idea of what is proposed. • Should be phased, with enforceable triggers ensuring that infrastructure, environmental protections, and transport measures are delivered before housing occupations occur. • Insufficient time for consultation. • Please clarify what land you are proposing to develop and on what timeframes. • Choice of appropriate site should not as appears in this case to be driven by the landowner Pampisford Estates and desire of Council to re-site main Cambridge sewage plant to the Abingtons to free up more valuable land for housing on the edge of the City. • What has occurred to now make Grange Farm acceptable for development, especially of this size, given it was turned down for good reasons only 4 years ago. • Similar developments at Waterbeach, Northstowe and Cambourne have proven not to have delivered the benefits originally proposed. What makes proposals for Grange Farm likely to result in anything different. • Title of development misleading. While it is described as “Grange Farm” development, the proposal in fact extends beyond Grange Farm and includes neighbouring land at Ley Rectory Farm.	

• Appears to be conflict of interest between vendor of the land and GCSP as former seems to be paying for some of the developments costs viz the memorandum of understanding. This is disturbing and contrary to acceptable practice. • Don't think any of the 'new towns' have been a success. Many New Towns are now at best 'ok' after decades of being lacking. • Prioritises housing numbers over environmental capacity, relies heavily on mitigation rather than avoidance, and greatly underestimates the sensitivity of chalk-influenced rural environments. • Talk of a quality development which I suspect is what every such proposal has promised in the past – the evidence of recent new builds in the locality is that quality is not at the forefront when building starts. • If HELAA red-rated site is to be allocated, Plan must clearly explain why and demonstrate how harm will be avoided. Policy S/GF fundamentally fails to do this. • Policy includes no formal review points, no pause mechanisms, and no ability to reduce scale if impacts exceed predictions. • Consultation Platform was difficult to use and changed halfway through the process to become much more complex. It should have been clearer how to submit a comment via post or email. • Conflicts of interest. Clear that a commercially-driven relationship exists between GCSP and The Pampisford Estate evidenced by memorandum of understanding	

dated 9 September 2025 between GCSP and The Pampisford Estate. Clear and demonstrable conflict of interest in respect of models and assessments commissioned by GCSP, which arises due to the funding of such purportedly independent verification of the development coming from those who stand to benefit from it. • New settlement at Abington was proposed in development of 2003 Cambridgeshire and Peterborough Structure Plan. The proposal was evaluated in the South Cambridgeshire District Council New Settlement Report of Oct 2001 and subsequently rejected. The reasons for rejection have not changed in the intervening years. • In the past Uttlesford District Council proposed land near Great Chesterford as the site of a major new settlement: "North Uttlesford Garden Community" within three miles of Grange Farm. Planning Inspectorate concluded that the proposal was insufficiently justified and it would perform least well against required Garden Community principles. Same should apply to Grange Farm. • Policy written in terms that indicate that development is pre-ordained and consistent with GCSP having already decided that the proposal is to go ahead and is staging a "consultation" merely because one is required, not because any notice will be taken of evidence or mere objections by members of the public. • Smaller, phased, organic approach aligned with South Cambridgeshire's historic growth patterns would be more appropriate.	

• There are three or four houses with gardens on the north side of the A1307. It is not clear from the present plans whether these will be protected from the urban development. • Unclear what site allocation boundary is. • Grange Farm is not part of the broader UK “new town” list. • Goes against every principle of self-determination to develop and impose an urbanised setting upon citizens who had decided, by definition, not to live in or near such a setting. • Developers of existing sites should be encouraged to build according to their original plans. • The requirement for a single “applicant” is concerning. • Must be fully costed. • Development of this scale should only be brought forward following a rigorous and open evaluation of multiple sites, regardless of land ownership, against clear and consistent criteria. • Policy contains numerous open-ended requirements for future studies and mitigation, which indicates that key impacts have not yet been fully understood or resolved.	

• Having not met the Wednesbury standard, the decision to include the Proposed Grange Farm Development in the Draft Plan is open to being struck out on such grounds. • Other new settlements are widely regarded to have failed to deliver amenities, services or social infrastructure benefits. People clearly do not want to live in these developments. Similarly, there is no credible evidence that such new settlements have delivered on-site economic jobs and prosperity. • Policies Map has been drawn such that Grange Farm is outside of “defined development extent” of Little Abington. • Authority already managing growth of three new rural settlements within its area posing the question of whether it has capacity to manage a fourth on an isolated rural site. • Suggest careful consideration is given to term “new town”. Terminology is important and new towns might create an association in people’s minds with some of the larger London overspill towns such as Milton Keynes or Stevenage, which are very much different to our ambition for this proposal. • Figure 9: The symbol for Grange Farm is shown in different locations on the online version and a PDF version of this diagram. • Must require robust Construction Traffic and Environmental Management Plans.	

• Cannot be persuaded that many people will want to live there in the early stages of development. • Cumulative impacts of this and other developments should be assessed. • Existence of memorandum of understanding between planning authority and landowner, including arrangements for landowner-funded verification of evidence, gives rise to concerns about appearance of bias. • PE support indicative list of documents to accompany any outline planning permission. We are not sure these are worthy of listing separately in each strategic allocation, as they would be expected of all major projects and could be covered elsewhere in the Local Plan for succinctness. • PE support inclusion of policy (as a principle) to provide a framework for consideration of future planning applications. As set out in our representations, the policy itself, accompanying evidence base and resulting Spatial Framework will require some further refinement. • PE support need for long term, management and maintenance of development and are committed to developing a leading stewardship model with direct landowner involvement. • Proposed Grange Farm Development would represent a material overhang to the saleability and value of properties in existing settlements of Little Abington and Great Abington – both while under consideration and, notwithstanding the material	

issues set out in this response which clearly demonstrate that such development should not proceed, should such development move forward. Such material detriment where development was subject to demonstrable, grounded objections but proceeded regardless by GCSP and the relevant local authorities would result in legal claims against the foregoing for the detriment suffered – and open the relevant Councils open to financial liability as a result. • Possible additional future development at Ley Rectory Farm would only exacerbate all issues identified. • Despite initial approval being granted for low-rise development at Granta Park which would blend with rural landscape, and which would not dominate rural skyline, permission has subsequently been granted for up to 4 storey buildings, violating the original concept. This raises serious issue of 'trust' between residents and the Planning Authority. • Consultation responses must inform revisions, and evidence shows misalignment with policies on climate resilience and heritage safeguarding.	

Summaries of Representations: Sites Rural Southern Cluster

The Rural Southern Cluster Introduction

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Concerns raised about the cumulative impacts of surrounding areas and criticisms about the strategy to selecting these sites. In particular the impact on transport and traffic, services, water and wastewater. Other comments highlighted infrastructure needs, and the need to invest in rural services and facilities. Whittlesford Parkway Station needed to be properly planned as a strategic transport hub and consider local impacts. It was also questioned why Duxford was not clarified as being in the rural southern cluster given the AV tech opportunities.

Support was expressed for removal of Hinton Way and Mingle Lane as a site allocation between the First Proposals and the Draft Plan stage. Concern about the location and scale of the new community at the A11 and A1307 (Grange Farm). Other comments objected to the non-inclusion of development proposals in a variety of villages. Reasons sites included the relative sustainability of the locations, the opportunities to support services and facilities. A number of comments where sites are in the green belt

considered their site was grey belt, and the plan should have identified grey belt opportunities. Many proposals challenged the findings of the Housing and Economic Land Availability Assessment, and proposed changes to the scoring.

Response to the main issues raised in representations

Comments have been noted and considered.

The development strategy has been informed by evidence which sets out that the impact of larger sites rather than incremental development has less carbon impacts and reduces impacts on villages across Greater Cambridge. This model also supports the focused delivery of infrastructure. Transport impacts and mitigation measures have been considered working with the Local Highways and Local Transport Authorities. Water infrastructure issues have been considered with the Cambridge Water Scarcity Group, which has brought together relevant agencies to ensure issues are properly planed for, including in order to protect the chalk streams.

At Whittlesford Bridge, the policy map incorrectly includes the former scrapyard site and the veterinary surgery car park but omits the demolition site at 39a Station Road West and the re-numbered property at 40 Station Road West, risking mis-allocation of development rights.

Support is noted for removal of Hinton Way and Mingle Lane as a site allocation. The position remains that it is not considered that there are exceptional circumstances for green belt release to meet general needs.

Proposals for alternative site shave been considered though an update to the Housing and Economic Land Availability Assessment where they fit within the broad emerging strategy of the local plan. New evidence submitted has been considered, and where

considered appropriate scoring has been amended. Comments related to strategy choices have also been considered, particularly under the development strategy policies. The deliverability of the plan has been tested through evidence including the Housing Delivery Study. The strategy focusing on other broad locations is considered to be sound. It is not proposed to add additional village sites to the proposed submission local plan. An update to the Green Belt Study has been carried out to consider which areas would meet he governments definition of being grey belt. Whilst some site may meet the definition, exceptional circumstances is still required for green belt release, and the Councils do not consider that exists in light of alternatives available.

Table of representations:

General Comments

Summary of issues raised in comments	**Comments highlighting this issue**
The combined effects of the proposed new settlement, existing committed development, employment growth at the Cambridge Biomedical Campus, and development pressures at and around the Imperial War Museum Duxford site are not properly assessed in the round. This is a significant omission, as these impacts will not fall evenly across the wider area but will be concentrated on specific transport corridors and villages, including Whittlesford, Thriplow, Heathfield and Newton. The Plan therefore risks underestimating impacts on transport infrastructure, water supply, wastewater capacity and local services.	211070 (Cllr R Williams)
The Parish Council remains concerned about the cumulative impact of multiple large-scale allocations within the Rural Southern Cluster. Taken together, these proposals will place significant pressure on strategic roads, village streets, health services and water resources. The Plan’s objective to reduce	207748 (Whittlesford PC)

reliance on the private car must be grounded in realistic alternatives and infrastructure delivered in advance of development. Water availability should be treated as a fundamental constraint on growth rather than an assumed future solution. The PC urges the GCSP to strengthen the Local Plan by aligning development scale and phasing with deliverable transport and water infrastructure, addressing cumulative impacts across the Rural Southern Cluster, ensuring that Whittlesford Parkway Station is properly planned as a strategic transport hub, and securing tangible public benefits through site-specific policies.	
I support the new proposed plan	202019 (H Campbell)
The strategy recognises the economic importance of the southern cluster, but its emphasis on business growth and strategic housing sites risks overlooking the needs of existing rural communities. While some villages are described as well connected, there is limited evidence on service capacity, school places, healthcare access or local transport frequency. Growth could increase pressure on small rural roads and village infrastructure. Stronger rural proofing would ensure investment in local services, safe cycling and walking links between villages and employment sites, and active involvement of parish councils in planning and mitigation.	203162 (Cambridgeshire ACRE)
Concerns were raised about the impact of new housing on local infrastructure, particularly regarding the lack of public transport and walking/cycling routes, which could exacerbate traffic problems. The respondent highlighted the apparent absence of health, education, and leisure provision, suggesting that residents would need to travel by car, increasing pressure on local amenities. A recommendation was made for the development of a cycle and walking route to connect Stapleford, Great Shelford,	203624 (S Berridge)

Whittlesford Parkway, and Duxford. Concerns were expressed about the loss of greenbelt land due to development at the Babraham Research campus, with a call to preserve and enhance the remaining greenbelt area for its beauty and biodiversity.	
Site allocations lacking explicit requirements for on-site health facilities should include wording that mandates financial contributions for health and infrastructure mitigation, aligning with the IDP approach. The respondent appreciates early engagement with Council Officers in plan preparation and the opportunity to contribute to the Infrastructure Delivery Plan. An additional assessment by the ICB during Stage 2 of the IDP process will provide targeted evaluations of key site allocations and health infrastructure needs, offering more detail for each site allocation.	205097 (NHS Property Services Ltd)
The new and expanded satellite industrial / commercial sites within parks and gardens of listed country houses (e.g. Babraham, Hinxton and Granta Park in the Southern Cluster) are not sufficiently robust to show the landscape, townscape, light pollution and heritage implications have been properly considered in principle and that the proposals will be achievable within the environmental thread of sustainability.	210992 (C Newell)
Ickleton PC is pleased that none of the 4 sites in the Parish emerging from the HELAA process are to be taken forward. Regarding Site ID 115965 you were advised at the First Proposals stage that it was unsuitable for the proposed development in the PC's view. The PC agrees that all the plots associated with the refused Agri-Tech Park are not suitable for development.	203453 (Ickleton PC)
These various car dependent sites are completely unsustainable, being far from where most people who might work on them live (i.e. Cambridge city) and relying on already super congested roads to get there. This sort of bioscience development should be focused on the biomedical campus. Create a	203588 (H Thomas)

single super-centre of bioscience rather than dispersed across places meaning that people cannot get from one to another.	
There are serious concerns in communities along the A1301 corridor, of a process of urbanisation from Stapleford to Saffron Walden. Major planning applications have been considered on a standalone basis, with scant consideration for cumulative or incremental impacts on landscape and existing settlements. Cross-border liaison under Duty to Cooperate is required.	203312 (Ickleton PC)
Whittlesford Parkway Station Policy Area, Whittlesford Bridge The policy map incorrectly includes the former scrapyard site and the veterinary surgery car park but omits the demolition site at 39a Station Road West and the re-numbered property at 40 Station Road West, risking mis-allocation of development rights. We are concerned that the proposed development could have a detrimental effect on our lives and the character of the area. Agencies are not working together effectively; representatives from SRW and SRE must be included in the planning process.	207891 207902 207903 (N Denham)
Draft Plan recognises IWM Duxford as being in an “area of major change”, but it raises a question why it is not also included as part of the Rural Southern Cluster, which recognises the associated need for housing, and which could be delivered around Duxford Village to support the sustainable growth of AvTech and the village. Continued investment in AvTech will also play an important role in diversifying the Rural Southern Cluster in South Cambridgeshire, providing some resilience if investment in biotech and life sciences slows.	211424 (Gonville & Caius College)

Comments on Land between Hinton Way and Mingle Lane Great Shelford

Summary of issues raised in comments	Comments highlighting this issue
Land between Hinton Way and Mingle Lane Great Shelford Support the decision to retain the land between Hinton Way and Mingle Lane within the Cambridge Green Belt. This aligns with the Plan's overall strategy, Policy S/GB, national Green Belt policy, the protection of local landscape, the conservation areas and the clearly expressed wishes of the local community. Housing needs are already met by major allocations at Cambourne North, Grange Farm, edge-of-Cambridge sites and new Rural Southern Cluster sites including Spicer's, Hinxton and Babraham, so there is no planning justification for allocating this land for development. I oppose building on Mingle Lane due to concerns about merging Stapleford and Shelford, harming the greenbelt, increasing traffic, and negatively impacting the rural parishes	200989 (A Phillips), 200996 (D Sanders), 201036 (A Kennedy), 201258 (S Ali), 201288 (K Lockhart), 201299 (N Campbell), 201673 (H White), 203166 (D Morgan), 201780 (M Vigouroux), 201808 (V Morgan), 202281 (A Lockhart), 202923 (C Bendelack), 203159 (C Schofield) 201780 (M Vigouroux), 201808 (V Morgan), 203159 (C Schofield), 203565 (N Hilliard) 207532 (S Berridge)

Comments addressing Land Adjacent to A11 and A1307 (Grange Farm)

The respondent expresses concern about the additional housing planned for the edge of Little Abington, citing the existing large development at Hinxton. They highlight that increased traffic from these developments will impact the already busy A505 road. The respondent notes that the planned developments lack access to public transport, even with a potential new park and ride near Babraham. They point out that South Cambs faces significant traffic issues, which will worsen without access to reliable train and bus services. The respondent raises concerns about the reliability of bus services, which are affected by current traffic levels. They conclude that unless strong management solutions are proposed, both sites are considered untenable.	201274 (S OFarrell)
The proposed new settlement does not meet development needs within environmental and infrastructure limits on a number of counts and is not consistent with national and regional policies. The Plan has not shown that reasonable alternatives (brownfield, intensification …) are inferior. Policy S/GF (Grange Farm) should be deleted and removed from the policies map	205360 (M G Hardinge)
Vastly reduce the number of houses. Remove the traveller pitches. Relocate the planned development to an area in need of investment.	201917 (J Coutts)

Comments proposing allocations

Whittlesford: The Walled Garden Whittlesford is right at the heart of the southern cluster (but seemingly left alone). You have a little cluster At Whittlesford Parkway station. However, i don’t think you have added enough housing for all the people that are moving in to the area for these new jobs. We have a small piece of land right beside	204789 (C Forbes-Cable)

the salt works at Whittlesford by the stream that would make a good addition and allow an extension. Please extend to add it in plus re-add an infill development site in Whittlesford:	
Land at Mill Lane in Sawston (HELAA Site Reference 40052) It is requested that land is identified as an additional allocation in Policy S/RSC: Rural Southern Cluster.	204424 (Hill Residential (Great Abington Site))
Land off Cabbage Moor in Great Shelford (Site Reference 40529) It is requested that land is identified as an additional allocation in the Rural Southern Cluster.	201973 (Shelford Investments)
Land off Hinton Way in Stapleford (Site Reference. 40369) It is requested that the development strategy for the Rural Southern Cluster includes an additional residential allocation.	202575 (Ely Diocesan Board of Finance)
Land North of Mill Lane, Sawston, (HELAA SITE ID: 115896) Whilst we do not object to the principle of allocating large new housing developments, we object strongly to the failure to balance this approach with a more diverse approach to housing delivery across Greater Cambridge in the emerging Local Plan. Allocating sites for housing developments in sustainable locations such as Sawston.	203083 (Northwest Biotherapeutics Capital Limited)
Land North of Mingle Lane and East of Hinton Way, Stapleford (HELAA Reference 40369 Site ID: 115763) Proposed development strategy misguided, over reliance on strategic sites. directly adjoins the previous Draft Allocation at Mingle Lane (site reference: S/RSC site HW). Near to Station, CBC, should be identified as grey belt. Comments on HELAA provided.	203092 (Granta Land Ltd)
Land at Mill Lane in Sawston (Site Reference 40052) It is requested that land is identified as an additional allocation in Policy S/RSC: Rural Southern Cluster.	203950 (Hill Residential (Sawston Site))

Land at Bury Farm, Haverhill Road, Stapleford. Proposes the Site for residential development, aiming to cater to local housing needs and complement Stapleford's existing settlement. Near CSETS, grey belt, well related to Shelford rail station.	205344, 210478 (Corpus Christi College)
Land at Whittlesford Walled Garden, Church Lane, Whittlesford The focus on large strategic sites raises concerns about uncertain infrastructure delivery timelines and unrealistic housing delivery rates, impacting affordable housing provision. housing and affordable housing needs would not be met by development strategy based and would not meet the homes strategic priority. Does not support the residents or services and facilities in those villages. Will not deliver the necessary green infrastructure.	208766 208767 208768 208769 (The CLC Trust)
Land to the North of A505, Duxford Allocate Duxford Hub Employment site. site. Responds to HELAA comments.	209703 (B Homent, J Tree & R Smith)
Land to the East of M11 in Duxford, CB22 4RE (HELAA Reference 40095 / Site ID 115180) would meet employment and housing needs both locally and for Greater Cambridge, deliver a sustainable future for Duxford village, and facilitate more sustainable journeys encouraging more walking and cycling from Whittlesford Parkway through Duxford and onto IWM Duxford.	211428 (Gonville & Caius College)
The preferred housing target and development strategy in the draft GCLP are unlikely to achieve the identified strategic priorities related to climate change, biodiversity, and social inclusion. The housing requirement does not align with job growth, potentially increasing car commuting into Cambridge, which contradicts climate change priorities.	202434 (The CLC Trust)

Policy S/WGC: Wellcome Genome Campus

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made by local residents with regard to concerns about selection of sites for development, impacts on local transport networks, a potential reduction in affordable housing. Some local residents have also supported the requirement for housing to go to campus workers. One local resident also raised the issue of leisure facilities and ensuring these are sufficient for local demand.

Historic England seek to correct references to the location of Hinxton Hall, and policy should reference requirement for a more detailed heritage assessment.

Concerns were raised by Uttlesford District Council about transport modelling and impacts on the road network in the Uttlesford District. Historic England raised concerns about the accuracy of some of the details of the heritage assets.

Further responses were received from Cambridgeshire Constabulary about contributions to emergency services.

Concerns were raised by the Environment Agency about the need for a sequential approach to flood risk and an FRA.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- In response to representations about the selection of this site for further expansion over Grange Farm, through the HELAA, the sites suitable for redevelopment for housing and employment uses have been identified and assessed for their acceptability for redevelopment. Grange Farm as a self-contained new settlement can provide residential units in close proximity to good public transport links and connect to existing networks, therefore Grange Farm has been identified for development.
- In response to concerns about impacts on transport, further transport assessments will be completed to support planning applications, and this will assess the impact on congestion. The policy wording encourages active travel within the expansion land, to neighbouring settlements and the main Wellcome Genome Campus which will help to reduce the number of vehicles on the road. The policy area and site allocation for the Wellcome Genome Campus proposes a mix of uses to support a mostly self-contained settlement with co-located jobs and homes to reduce the impact on wider transport networks.
- In response to concerns about reduction of affordable housing, the delivery of 1,500 residential dwellings on the expansion land for campus workers will contribute to the provision of housing for campus workers which ensures that the growth in this area in employment is supported by housing provision and therefore fulfils an identified housing need reflective of the context, even though it does not explicitly deliver affordable housing using conventional routes of delivery.
- In response to concerns about the provision of leisure facilities, the site allocation supports the delivery of leisure uses to support a residential-led mixed use development to co-locate employment, housing and amenities.
- In response to Uttlesford District Council's and Wellcome Genome Campus' concerns about transport. For the impacts on transport networks in Uttlesford and connections to Whittlesford Parkway Station and Great Chesterford Station, the policy area has included a requirement for a transport assessment including modelling impacts on the Uttlesford District Council road network, including Stump Cross junction (A11/B184). The wider modelling requirements have been written into the policy area and the lifespan section of the site allocation to set out what is needed to support further transport mitigations.

- In response to the Cambridgeshire Constabulary, the contributions made to fire & rescue, police and ambulance facilities provision and funding is covered by the IDP and not specifically in each site allocation.
- In response to Historic England, the comments are noted and the policy wording has been amended to reflect Hinxton Hall is within the site and a more detailed Heritage Impact Assessment has been required in the wording.
- In response to David Lock Associates on behalf of the Wellcome Genome Campus Ltd, the ambitions for the campus have been reflected in the new policy area to support the growth of the Wellcome Genome Campus. In terms of the amendments to the site allocation wording, the changes relating to accuracy have been made to reflect the planning permission, and allow for wider changes, and local context.
- In response to the Environment Agency, suggested amends have been made.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
To prevent fragmenting the landscape, the land adjacent to (and north) of the Wellcome expansion would provide a more suitable and sustainable location for new development instead of Grange Farm, Little Abington.	200982 (M&S Bishop)
Concerns about traffic congestion onto A505 and M11 junction 9 and need for more direct access to Wellcome Genome Campus from M11.	201535 (A Smith), 201557 (Stapleford PC),
Concerns raised about not contributing to affordable housing supply.	201557 (Stapleford PC) 210907 (Great Shelford PC)

Concerns raised about pressure on existing biodiversity sites nearby.	201557 (Stapleford PC), 210909 (Great Shelford PC
Development is too small to be sustainable and is not adequately plugged into the public transport network to overcome this without reliance on private cars.	210908 (Great Shelford PC)
Support the occupancy of residential properties being restricted to campus workers.	203066 (Cambridge Past, Present and Future), 203397 (Ickleton PC),
A new Parish Council should be created to serve the Wellcome Genome Campus.	203397 (Ickleton PC)
Leisure facilities are required at the Wellcome Genome Campus.	203788 (A Carpen)
Suggestion that light rail connectivity is needed for Wellcome Genome Campus.	203788 (A Carpen)
Transport modelling is requested to understand implications on Uttlesford road network.	204975 (Uttlesford DC)
Public transport connections should be enhanced, specifically to Saffron Walden, and Great Chesterford.	204975 (Uttlesford DC)
The site allocation should refer to Contributions to fire & rescue, police and ambulance facilities provision/ funding.	207516 (Cambridge Fire and Rescue Services, 207485 (Cambridgeshire Constabulary)
The policy and the vision should reflect the ambition and substantial scale of development now underway at the Wellcome Genome Campus. The focus is on a ‘one campus’ agenda. The plan needs to be permissive to growth and change and should be redrafted broadly to cover the vision, open	211228 (David Lock Associates on behalf of Wellcome Genome Campus Ltd)

connectivity, intensification, enrichment of science ecosystem, exceptional environment and experience, land use, spatial framework, built form, the setting and sustainability.	
In parts, the evidence base remains a little behind the curve on the importance of the Campus within the Southern Cluster. For example, Figure 3.3 in the Infrastructure Delivery Plan, which identifies growth locations does not include Hinxton. WGCL has commissioned a science and technology advisory group, with an external chair and members, to work with it (and major occupiers at the Campus) on a forward-looking 'Science Strategy' which will be shared with stakeholders over the coming months and in advance of the Regulation 19 Consultation.	211229 (David Lock Associates on behalf of Wellcome Genome Campus Ltd)
We suggest land-use and design guidance that sustains research, revitalises the conference centre, provides utilities, allows secondary uses, delivers 1 500 residential units for Campus workers (with scope for more) and protects heritage and biodiversity.	209115 (David Lock Associates on behalf of Wellcome Genome Campus Ltd)
The policy for the campus should be clearer between the expansion land and the modernisation of the existing campus. The quantum and uses expressed are solely on the expansion land, and the policy should recognise the uses on the expansion land and separately the uses supported more generally. The policy wording should recognise the potential of the existing campus and future intensification. The wording around the masterplan requirement should be clearer how it relates to the approved Strategic Design Guide.	209113 (David Lock Associates on behalf of Wellcome Genome Campus Ltd)
WGCL fully support the identification and recognition of the Southern Cluster along with the clear statement of intent with regard to the Campus. This strategy commitment is welcomed. The Plan recognises the potential for the evolved Campus to function as a place with homes, jobs and services,	209112 (David Locke Associates on behalf of

that might underpin classification in the settlement hierarchy in the future (as stated in Policy S/SH). The Campus will increasingly have the characteristics of a small town and WGCL are formulating a compelling Vision for this further evolution.	Wellcome Genome Campus Ltd)
The site includes the Grade II* Hinxton Hall, game larder, stables and North Lodge all listed at grade II as well as Hinxton Conservation Area. St Johns Church, the Old Manor House and The Oak House all listed at grade II* as well as numerous GII listed lie within the wider Conservation Area. To the north of the site lies Hinxton Grange and Stables, both listed at grade II. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of an HIA for this site. We welcome the criterion 10 and 11. Criterion 10a should be amended as Hinxton Hall lies within the site not to the north of the site (that is Hinxton Grange). Similarly, parts of the Conservation Area lie within the site. Therefore, the wording needs to be amended to more accurately reflect on site and nearby heritage assets.	210144 (Historic England)
The planning permission (S/439/18/OL) is for the expansion land only and it is worded in a way that is restrictive in places and does not reflect the planning permission's wording. Specifically, around campus housing, sales and letting system, temporary and meanwhile uses, public open space.	211227 (David Lock Associates on behalf of Wellcome Genome Campus Ltd)
The scope of the sciences supported onsite is too narrow and needs to be reviewed.	211226 (David Lock Associates on behalf of Wellcome Genome Campus Ltd)

We propose a flexible policy framework that defines clear boundaries for “Hinxton Campus” and “Hinxton Village”, encourages mixed-use ground floors, phased redevelopment and aligns with national growth corridors.	209114 (David Lock Associates on behalf of Wellcome Genome Campus Ltd)
Restrictions on intended tied housing for Campus workers should be rigorously applied. Governance issue should be examined at an early stage to avoid swamping of existing Hinxton community by an expanded Genome Campus. For instance, by creation of a new Parish Council serving the area of the Wellcome Genome Campus.	203379 (Ickleton PC)
The issues in this policy are largely covered by the existing S106 provisions of the outline permission granted under S/4329/18/OL. The education requirements may however have been under estimated. Whilst accepting that the demographic of the resident population on this site may not be typical of development elsewhere in South Cambridgeshire. Department of Education pupil yields suggests that for 1,500 homes, 540 primary and 255 secondary school places would be required. This would imply a need for a second primary school at some stage and allowance should be made for this in the masterplan. The provision of secondary education should also be reviewed as nearby schools are oversubscribed.	208104 (Sawston PC)
Hinxton. The proposal for the New Town at Hinxton is problematic and provision is not sufficiently robust, currently being a dominant satellite to be attached to the very small village of Hinxton. It is directly opposite Wellcome Genome Site also identified for expansion (S/AMC/GP) on a narrow but busy route which is already congested at peak periods.	211924, 211925, 210990 (C Newell)

The Plan proposals include very limited infrastructure (a piece of land for a school), which ensures that there will be undue pressure on Hinxton, one of the smallest of the South Cambridgeshire villages. 1.57 The Genome Spa al Framework drawing needs clarity and revision informed by a robust and accurate assessment of all the relevant constraints and appropriate mi ga on for this locality. The proposed uses also need to be clearly defined and robustly justified. The proposal also needs the provision of infrastructure to be increased to be proportionate to the scale of the development site.	
The sites needs to take a sequential approach to flood risk and prepare an FRA.	211180 (Environment Agency)

Policy S/BRC: Babraham Research Campus

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made by Stapleford Parish Council to support the SEA and paragraphs 2.4.25 and 2.4.26. However, the Parish Council raised an issue about the CSET route going through the SEA.

Cambridge Past, Present and Future suggested some editorial amendments to the site allocation.

Babraham Research Campus Ltd support the allocation of the site and highlight some editorial changes to reflect the planning application. They also raise that there is unmet need for further employment and residential development on the campus.

Camcycle asked for more ambition regarding transport measures. Concerns were raised by the Brish Horse Society that the policy does not explicitly address public rights of way or equestrian access.

Historic England raised concerns that the HIA needed to be reflected including in Criterion 8 Replacing ‘or’ with ‘and’, and the need to retain The Lodge.

The Environment Agency commented about flood risk and the need for water compatible development only in Flood Zone 3.

Further responses were received from Sport England who supports the policy and recommends explicit reference to Active Design.

Another comment questioned the impact of change to the SEA area on heritage assets.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- In response to Babraham Research Campus Ltd, with regards to the site boundary, the amendments have been made to the boundary to reflect the land ownership and latest proposals for the site.
- The SEA boundary has not been extended because it is felt that this area may be used for infrastructure works to support the road network and therefore the SEA may impede on that. The SEA as existing is designed to protect and enhance the landscape.
- Homes have not been ringfenced for occupation by campus workers because it is felt that the scale of development proposed here and the proportion of units delivered onsite, it would be disproportionate to request this.
- In response to Babraham Research Ltd, the policy has been worded as approximately, to allow for further
- In response to Stapleford Parish Council, the CSET route does not go through the SEA. The Spatial Framework has been corrected to reflect this change.
- In response to Historic England, the suggested amendments have been made to the wording.
- In response to the Environment Agency, the suggested amendments have been made to the wording.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Supports the need for improvements to environmental quality and accessibility in the SEA due to loss of greenbelt.	201558 (Stapleford PC)

Concerns that the plans by the Greater Cambridge Partnership to construct a busway through the Strategic Enhancement Area are in stark contrast to the goals of improving biodiversity and environmental quality.	201558 (Stapleford PC) 210910 (Great Shelford PC
With the loss of Green Belt that expansion of the Babraham Research Campus will involve, we strongly support the need for substantial compensatory improvements to the environmental quality of, and accessibility to, the proposed SEA. Development at the Campus must also maintain key views, enhance existing tree coverage, relate sensitively to its surroundings, and maintain and enhance the wider landscape	210910 (Great Shelford PC)
Units should be safeguarded for campus workers.	203095 (Cambridge, Past, Present and Future)
Greater consideration in policy is needed for local heritage assets and local views.	203095 (Cambridge, Past, Present and Future), 201558 (Stapleford PC), 207393 (Cambridge Paste, Present and Future)
Improved public transport connectivity is required to support the allocation.	203095 (Cambridge, Past, Present and Future), 207394 (Cambridge Past, Present and Past)
Existing rights of way should be protected and integrated into the site layout.	203611 (British Horse Society)

Amendments to the spatial framework are suggested including site boundary, removal of landscape buffer, commercial led development blocks, local nature reserve, and CSET.	203943 (Bidwells on behalf of Babraham Research Campus Ltd)
Suggestions to the policy wording to reflect the live planning application.	203943 (Bidwells on behalf of Babraham Research Campus Ltd)
BRC supports the continued allocation of Babraham Research Campus under Policy S/BRC for mixed-use development to meet the Campus's future needs to address unmet need for further residential and non-residential development.	203966 (Bidwells on behalf of Babraham Research Campus Ltd)
The site includes the grade I listed Church of St Peters and grade II listed Babraham Hall as well as part of Babraham Conservation Area. There are a number of other listed buildings nearby in the village of Babraham. In addition, there is a series of scheduled monuments on the higher land to the north and north west of the site including a long barrow, bowl barrow at Copley Hill, Wormwood Hill Tumulus, Causewayed enclosure and bowl barrow at Little Tree Hill and Wandlebury Camp a multivallate hillfort, earlier univallate hillfort, Iron Age cemetery and 17th century formal garden remains. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of an HIA for this site. The Policy states that Babraham Hall is grade II*. However, our records show this is listed at grade II. Please check and amend if necessary. We broadly welcome criterion 4 – 9 and 11.	210145 (Historic England)

Criterion 4 Add reference to the Babraham Conservation Area which covers part of the site. We welcome the requirement for a Heritage Impact Assessment. We would suggest referring to a '…more detailed Heritage Impact Assessment…' given that an HIA has already been undertaken. Add in the need to retain The Lodge, as recommended in the HIA. Criterion 8 Replace 'or' with 'and' to read 'Retain or and, where possible, supplement…	
: Sport England supports the policy and recommends explicit reference to Active Design.	209227 (Sport England)
We support the inclusion of point 10, which requires the development to 'apply the sequential approach to flood risk within the site, ensuring any development is subject to appropriate mitigation and does not increase flood risk elsewhere.' We recommend that this is expanded to clarify that only 'water compatible' development should be located within Flood Zone 3, and a site-specific FRA will need to include further assessment of the potential for groundwater flooding to inform the need for appropriate mitigation measures. Consideration should be given to the potential for the adjacent SEA to offer opportunities to reduce flood risk through nature-based solutions.	211178 (Environment Agency)
Expansion of the Biomedical Campus is understandable given its regional and national importance. However, the Local Plan does not yet set out a sufficiently robust spatial strategy to accompany this growth. The policy should: ● Require genuinely mixed-use development at a meaningful scale within and adjacent to the Biomedical Campus, including high-density housing with low car ownership, to reduce the need for long-distance commuting ● Avoid token residential provision and explicitly link employment growth to housing delivery in a walking or cycling distance to the campus	211770, 211771 (Camcycle)

Ensure that boundary treatments associated with Green Belt release do not create long-term physical or spatial barriers to movement, future connections or neighbouring communities ● Identify the active travel connections over the railway line as critical infrastructure and explicitly acknowledge the need for improvement ● Secure firm commitments to upgrade the key walking and cycling corridors serving the campus, including Trumpington Road, Long Road and the busway path with delivery tied to development phasing.	
Proposed Spatial Framework for Babraham Hall provides a very large SEA which is likely to change the countryside designation to residential and/or commercial. The impact in principle on heritage assets, the setting of Babraham Hall and curtilage structures has not been assessed and the reason for change of use of such a large area is not justified. Its removal from the Babraham Hall Framework Plan will not affect the delivery of housing in the Plan as that is shown provided closer to the existing village street.	211920 (C. Newell)

Policy S/RSC: Other site allocations in the Rural Southern Cluster

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made by developers about the nomination of sites. A variety of reasons were suggested, including the need for homes, the additional sites in the rural area, and in some cases, sites being grey belt.

Response to the main issues raised in representations

Proposals for alternative site shave been considered though an update to the Housing and Economic Land Availability Assessment where they fit within the broad emerging strategy of the local plan. New evidence submitted has been considered, and where considered appropriate scoring has been amended. Comments related to strategy choices have also been considered, particularly under the development strategy policies. The deliverability of the plan has been tested through evidence including the Housing Delivery Study. The strategy focusing on other broad locations is considered to be sound. It is not proposed to add additional village sites to the proposed submission local plan. An update to the Green Belt Study has been carried out to consider which areas would meet he governments definition of being grey belt. Whilst some site may meet the definition, exceptional circumstances is still required for green belt release, and the Councils do not consider that exists in light of alternatives available.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Land at Whittlesford Walled Garden Concerns raised in relation to the promotion of Land at Whittlesford Walled Garden for housing. Upward adjustments to the housing target are necessary, with a development strategy focusing on sustainable villages and exceptional circumstances for Green Belt land release.	202371 (Carter Jonas on behalf of the CLC Trust)
Land r/o No.1 Wren Park Whittlesford Cambridge (HELAA reference 52726) Disagreement with decision to categorise this site as Greenfield. Allocate land for development. Detailed comments are provided on the HELAA assessment.	207087 (R Arbon)
Foster's Field Hill Farm Road Whittlesford Cambridge (HELAA reference 52694) Allocate Foster's Field, Hill Farm Road, Whittlesford, Cambridge for development. Detailed comments are provided on the HELAA assessment.	207092 (R Arbon)
Land North of Mingle Lane and East of Hinton Way, Stapleford, Cambridgeshire (HELAA Reference 40369 (Site ID: 115763) and HELAA Reference 200771 (Site ID: 115189) Requested Change – Allocation of land for residential development	209968 (Pegasus Group on behalf of Granta Land Ltd)
Land North of Mill Lane, Sawston, CB22 3BY (HELAA Reference 40341) Allocate for development. Site evidence has bene provided. Reasons include need for additional allocations, site is considered grey belt,	210299 (Bidwells on behalf of Northwest Biotherapeutics Capital Limited)

Land at Dernford Reservoir (HELAA Reference 200751) Allocate for development. For the development of a data centre. Dernford Reservoir has a reservation for 450MW of power and can connect to one of three major substations within a 20-mile radius – a pivotal feature.	210309 (Carter Jonas on behalf of Rusell Smith Farms)
Land off Back Road, Linton (Site Reference 40343) Allocate for residential development. Comments provide a range of reasons including the need for additional allocations, over reliance on larger sites, and the sustainability the location.	210667 (Gladman Developments)
Land off Balsham Road, Linton (Site Ref. 40336) Allocate land for residential development. Comments provide a range of reasons including the need for additional allocations, over reliance on larger sites, and the sustainability the location.	210669 (Gladman Developments)
Land opposite Brewery Field, Duxford (site reference 115069) Despite acknowledgment of the presence of existing research parks and sustainable transport opportunities, there is one allocation within Duxford (a Group Village) for 60 homes and a carried over allocation from the 2018 adopted Plan for 280 homes in Sawston (a Rural Centre). We consider that further sustainable opportunities for growth have been overlooked in this area, including land within Duxford.	211271 (Mr & Mrs Smith)

Policy S/RSC/MF: Land at Maarnford Farm, Hunts Road Duxford

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was broad support from Historic England for the allocation of this site. Historic England confirmed that there are no designated heritage assets onsite.

Comments were made by local residents with regard to concerns to walkability and whether Whittlesford Parkway was in walking distance to the site.

Concerns were raised by local residents in terms of development pressures in Duxford.

Further responses were received from site promoters with similar sites and were challenging the allocation of this site over other sites.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- Support is noted from Historic England.
- Site allocations are selected in line with the development strategy for Greater Cambridge in locations where there is accessible to public transport and local amenity and infrastructure provision. The sites are assessed through the HELAA to assess their suitability for development and any constraints. Duxford is a group village and can therefore support 60 new homes.

- The HELAA assessment has concluded that in terms of accessibility, there is adequate accessibility to key local services, transport, and employment opportunities. Proposed development would not require delivery of accompanying key services.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Concerns raised about considerations of active travel including connections to Whittlesford Parkway.	201155 (T Clarke)
Support for the allocation.	204310 (KWA Architects on behalf of Waterbeach Instruments Ltd)
Concerns raised about similar site proposed for inclusion in the Local Plan where this site has been rated Green in the HELAA for ecology and the other site has been rated Amber.	204310 (KWA Architects on behalf of Waterbeach Instruments Ltd)
More amenities are needed to support additional development in Duxford.	202541 (R Genillard)
There are no designated heritage assets on this site and whilst the Duxford Conservation Area lies to the south-east of the site it is separated from the site by development and a playing field. We welcome the preparation of the HIA. We welcome the references to heritage assets and building heights in the policy.	210146 (Historic England)

Policy S/RSC/BR: Land south of Babraham Road Sawston

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was broad support from Historic England. Historic England confirmed that there are no designated heritage assets onsite. But the policy should

Comments were made by Great Stapleford to support clause 1c and amend the policy to reflect improve greenways and cycling and pedestrian access.

Concerns were raised by emergency services to include in the policy wording financial contributions to fire & rescue, police and ambulance facilities.

Further responses were received from Waterbeach Instruments Ltd to challenge the allocation of this site over a similar site.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- In response to Waterbeach Instruments Ltd, site allocations are selected in line with the development strategy for Greater Cambridge in locations where there is accessible to public transport and local amenity and infrastructure provision. The sites are assessed through the HELAA to assess their suitability for development and any constraints. The HELAA assessment has concluded that this site is suitable for allocation.
- In response to cycle access, it is felt that the wording in the policy is sufficient to support these connections.

- In response to Historic England, the support is noted and the policy has been amended to include landscaping on the southern boundary and reference to the Sawston Hall Registered Park and Garden.
- In response to Cambridgeshire Constabulary and Cambridge Fire and Rescue Services, the funding for emergency services is set out in the IDP as a planning obligation and does not need to be repeated in every site allocation.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Concerns raised about allocation of this site over a similar site proposed with similar characteristics.	204481 (KWA Architects on behalf of Waterbeach Instruments)
The site allocation should refer to Contributions to fire & rescue, police and ambulance facilities provision/ funding.	207486 (Cambridgeshire Constabulary), 207517 (Cambridge Fire and Rescue Service),
There are no designated heritage assets within the site boundary. However, Sawston Hall a grade II Registered Park and Garden, lies to the south-west of the site. Development of the site has the potential to impact the significance of this heritage asset through development within its setting. There does not appear to be an HIA for this site. However, we appreciate that this site is largely built out.	210147 (Historic England)

The policy should reference Sawston Hall RPG and the need for landscaping along the southern part of the site.	
Agree with clause 1c.	210911 (Great Shelford PC)
Support for greenway access to link Stapleford / Great Shelford to Whittlesford Parkway Station. Including pedestrian and cycling access to the Former Spicers Site.	210911 (Great Shelford PC)

Policy S/RSC/FSS: Former Spicers Site, Sawston Business Park, Sawston

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made by Whittlesford Parish Council to support the principle of the policy framework but raises concerns about walking and cycling infrastructure and connectivity to Whittlesford Parkway Station. Cllr R Williams considered the policy underplays the exceptional environmental, recreational and active travel opportunities presented by this site and should be strengthened.

Concerns were raised that there are environmental, recreational and active travel opportunities that should be focused on more, although the site allocation itself and specific clauses are supported. Comments set out that development was conditional on a path from Whittlesford to Shelford.

Concerns were raised about the impact on Green Belt, chalk downland and the Borough Hill Scheduled Monument and connectivity to other local villages.

Further responses were received from Historic England to require the HIA recommendations to be included in policy, and to require a more detailed Heritage Assessment, an Archaeological Management Plan, a Conservation Management Plan and to prevent development from occurring on the Borough Hill Scheduled Monument.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- Landscaped buffers have been included in the policy to offset any harm to the Green Belt and the surrounding landscape.
- The 2020 Planning Permission was not conditional of a cycle path explicitly from Whittlesford to Shelford, but with a cycle path to the A1301. The wording amendments in the policy to support connections to wider cycle networks should address this point and comments raised in relation to active travel connections.
- Wording has been included in the policy to improve pedestrian and cycle connections.
- The changes requested by Historic England have been made including the figure showing the developable area around the Scheduled Monument and the requirements for an Archaeological Management Plan and a Conservation Management Plan.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Respondents noted that the council should refer to the original plans by Huawei, which included a pathway along the river and through the woods, providing amenity space for walkers from Sawston and Whittlesford.	201272 (M Meredith)
A previous planning permission in 2020 for a research facility on this site was made conditional on building a new cycle path along the river Cam, connecting the 'blue bridge' on footpath 1 in Whittlesford to Shelford Road. There is currently no good cycle path from Whittlesford to Shelford, limiting opportunities for active travel. If this development goes ahead, it should include a cycle path from Whittlesford to Shelford.	201534 (A Smith)

The respondent is concerned about the lack of mention of community access and biodiversity plans in the new outline for development proposals.	201272 (M Meredith)
The respondent highlights that recent planning permission for the Babraham campus was granted due to biodiversity enhancement plans, contrasting it with the poor management of the land surrounding Spicers.	201272 (M Meredith)
Any development of this site should offset its harm to the Green Belt and in particular seek to improve the quality of the chalk downland between the Borough Hill scheduled monument on this site and the Wandlebury site on the same range of chalk hills.	201309 (M Foote)
Support for requirement for development to contribute to public transport provision.	201559 (Stapleford PC)
Active travel routes should be maintained and improved throughout the site including to Sawston and Shelford, Whittlesford to Shelford, and the Sawston Greenway Network.	201559 (Stapleford PC), 201534 (A Smith),
The site contains part of the scheduled monument. The scheduled monument known as 'Borough Hill' is a large multivallate (multi- ditched) iron age fort. This is an exceptional pre-historic site, of which there are less than a handful of surviving examples around the country. It is also on our heritage at risk register. We have previously raised concerns about the impact of the development on the significance of the designated asset. Our primary concern is the impact of the development upon the significance of the scheduled monument through a development within it setting. The closeness, scale and massing of the new development will significantly increase the quantum of the development in the area immediately adjacent to the monument. The setting of the monument will be irrevocably changed, and the significance of the asset will therefore be eroded and diminished. This development would therefore	210148 (Historic England)

result in harm to this significance. We recognise that the Spicers site is a brownfield site and that some form of redevelopment of this site would be acceptable in principle. However, development will need to be very sensitive to the monument adhering to the recommendations of the HIA. We welcome the preparation of the HIA. Two of the recommendations from the HIA are not reflected in the policy. These are: 1. Archaeological investigation should be undertaken in areas previously not subject to archaeological works. 2. Development should be limited to the area previously subject to development to avoid impacts on potentially significant archaeology associated with the monument. These recommendations should be included in the policy. It is sometimes beneficial to consider including the monument within the site boundary in order that appropriate mitigation and enhancements for the monument can be secured. We would suggest that this is an instance where such an approach could be useful. At the present time, only part of the monument is included within the site boundary. It is our view therefore that the whole of the scheduled monument should be included in the site allocation area.	
Whittlesford Parish Council supports the principle of a policy framework for the Former Spicers Site but considers that it should be strengthened to deliver clear public benefits and to reflect the site's relationship with Whittlesford, Sawston and Shelford. The policy refers to access to the A1301 but does not adequately address access to Whittlesford Road. The Council strongly supports the inclusion of high-quality walking and cycling infrastructure. The policy should explicitly require safe and direct routes connecting the site to Whittlesford village, Whittlesford Parkway Station, and a dedicated cycleway along Shelford-Whittlesford Roads, connecting the site to Little Shelford and improving active travel	207746 (Whittlesford PC)

connectivity between Whittlesford and Shelford. The policy should encourage public access across the wider site for walking, cycling and informal recreation, where compatible with development, to ensure that the site is integrated with surrounding communities rather than functioning as an isolated enclave.	
I welcome the inclusion of a site-specific policy for the Former Spicers Site within the draft Greater Cambridge Local Plan and support the principle of a coordinated policy framework for the site. However, I consider that the current draft policy underplays the exceptional environmental, recreational and active travel opportunities presented by this site and should be strengthened accordingly and need to be strengthened to secure health and active travel benefits in accordance with NPPF policies.	204138 (Cllr R Williams)

Policy S/RSC/CC: Comfort Café, Fourwentways Little Abington

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is broad support for the allocation from Historic England.

Concerns were raised about the oversupply of employment floorspace where there are lots of unoccupied employment floorspace units.

Further responses were received from Cambridge Past, Present and Future to specify that development 'must' not have any unacceptable adverse impacts on heritage assets.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- In terms of employment floorspace, Greater Cambridge maintains a high level of employment land availability as recommended in the Employment Land Review and the Greater Cambridge EHEU 2023 is a recognisable scenario for Greater Cambridge. The area has historically carried an oversupply of employment land, that is allocated or with planning permission, when compared to the amount of floorspace completed on an annual basis, however strong the economy has been. In planning positively for growth, the plan can continue to reflect the previous trends that have underpinned the successful expansion of the Greater Cambridge economy by providing an ongoing flexible supply of employment land.
- The suggested edits from Cambridge Past, Present and Future have been included within the policy.

- Support is noted from Historic England.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Concerns raised about the need to protect heritage assets.	203099 (Cambridge Past, Present and Future)
There are concerns about the proposal for small R&D and start-up businesses due to the proximity of Granta Park and existing empty buildings, raising the risk of oversupply.	203131 (G Dalton), 204470 (J Searle)
Whilst there are no designated heritage assets on site, there is a grade II listed building, the Temple café and restaurant, to the south of the site. Development of the site has the potential to impact the significance of this heritage asset through development within its setting. We welcome the preparation of the HIA. We welcome criterion 1a,1b 1e and 1f.	210149 (Historic England)

Policy S/SCP: Policy Areas in the Rural Southern Cluster

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Broad support for the allocation from Historic England.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- Support from Historic England is noted.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
We note that the policy for the Babraham Strategic Enhancement Area is within the main policy for Babraham Research Campus, criterion 15.	210150 (Historic England)

Policy S/PA/LN: South of A1307, Linton

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Concerns were raised about light rail connections.

Historic England broadly support this policy area.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- At this stage, it is not appropriate to make reference to a potential Linton Station.
- Support from Historic England is noted.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Make provision for a possible Linton Station / light rail link as per Cambridge Connect.	203789 (A Carpen)
Support for policy.	210151 (Historic England)

Policy S/AMC: Areas of Major Change in the Rural Southern Cluster

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Broad support for the allocation from Historic England.

Response to the main issues raised in representations

Support from Historic England is noted.

The Land east of M11 at Duxford proposal has been considered through the Housing and Economic Land Availability assessment process, and proposals in relation to the aviation sectors have also been considered. The Councils consider that the Avtech aviation related employment uses could be complementary to the existing Imperial War Museum, being a major tourist / visitor attraction, educational, commercial and aviation facility and an important employment site for aviation. The boundary of Policy S/AMC/IWM: Imperial War Museum was expanded to include the Avtech 1 site (the western parcel), to enable proposals to come forward via a policy compliant detailed planning application, if a firm proposal was developed. However, the Councils consider that the proposed aviation technology cluster is extremely nascent and it is not considered that there is a sufficiently strong economic case to allocate Avtech 2 land which lies to the east of the M11.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
We welcome the reference to heritage in criterion 1d.	210152 (Historic England)
Land east of M11 at Duxford (Site Reference: 40095) The draft Plan now recognises IWM Duxford as being in an “area of major change”, but it raises a question why it is not also included as part of the Rural Southern Cluster, which recognises the associated need for housing, and which could be delivered around Duxford Village to support the sustainable growth of AvTech and the village. In this regard, we note at Policy S/AMC/WHD: Whittlesford Parkway Station Policy Area is both within the AMC and RSC. Continued investment in AvTech will also play an important role in diversifying the Rural Southern Cluster in South Cambridgeshire, providing some resilience if investment in biotech and life sciences slows.	211424 (Gonville & Caius College)

Policy S/AMC/GP: Granta Park

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Concerns were raised by local residents with concerns about light pollution and visibility of Granta Park from key viewpoints around the local area. Inconsistency regarding approach to building height was questioned.

Concerns were raised about some minor amendments to the policy area to reflect the ambition and the planning permission at Granta Park by the site owner.

Concerns were raised about Grange Farm not being able to meet the urgent accommodation needs of Granta Park.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- Point 1d has been amended to set out that development should respond positively to the tree line to minimise the impact on the landscape in response to comments.
- The boundary has been amended in response to comments from BMR Granta Park Propco Limited.
- The uses section has been amended in response to comments from BMR Granta Park Propco Limited.
- All new sites of a strategic scale are held back until 2032 in the draft plan to ensure that there is sufficient water supply. Smaller windfall sites are able to come forward to meet urgent needs, this does not require a site allocation. The site allocations for residential use in this location have been allocated in line with the strategy for the Local Plan which minimises carbon emissions through the selection of well-connected sites. This is set out in the HELAA assessment.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Recent buildings on this, notably Site 1 (21/03822/FUL), have been very intrusive to the landscape including light pollution.	203112 (Cambridge Past, Present and Future)
BioMed Realty is concerned that relying on key worker housing at Grange Farm will not meet the urgent accommodation needs of Granta Park.	203553 (Carter Jonas on behalf of BMR Granta Park Propco Limited)
Support for the site allocation.	203553 (Carter Jonas on behalf of BMR Granta Park Propco Limited)
A more flexible approach to housing delivery is needed to deliver more housing to meet the needs of the expanding campus.	203553 (Carter Jonas on behalf of BMR Granta Park Propco Limited)
The planning permission should be better reflected in policy, including the site plan.	203348 (Carter Jonas on behalf of BMR Granta Park Propco Limited)
R&D floorspace should remain the dominant use, with flexibility for enabling facilities that strengthen the life-science ecosystem.	203350 (Carter Jonas on behalf of BMR Granta Park Propco Limited)

Open-space policy should recognise usability, function and operational needs, not just visual or ecological value.	203350 (Carter Jonas on behalf of BMR Granta Park Propco Limited)
The policy should be revised to include clause on delivery of essential infrastructure.	203350 (Carter Jonas on behalf of BMR Granta Park Propco Limited)
Discrepancy in the approach to Granta Park continues regarding ‘townscape’ character of this rural park and the rural villages of Great and Little Abington each side of it. The predominate scale is of 1½ to 2 storeys, even at Granta Park, not 4 storeys. There is an exception building outside the village at Granta park roundabout, at 4 storeys, but that building does not comply with the extant Local Plan.	211921 (C Newell)

Policy S/AMC/WHD: Whittlesford Parkway Station Policy Area, Whittlesford Bridge

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is broad support for the area of major change from CLC Trust, Great Shelford Parish Council, Imperial War Museum, Stapleford Parish Council, and Cambridgeshire County Council.

Concerns were raised by local residents with concerns about light pollution and visibility of Granta Park from key viewpoints around the local area. Concerns were raised about overdevelopment of the site, traffic congestion and connectivity. Concerns were raised about Grange Farm not being able to meet the urgent accommodation needs of Granta Park.

Detailed feedback was provided by a member of the public on their experiences using the Whittlesford Parkway, and the transport issues apparent in the village.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- The purpose of a policy area is to set the vision for an area, and to set out considerations or high level mitigations for any development proposals in this location. The detail of any mitigations or interventions will develop through the development of a masterplan and the development management process, with the support of statutory consultees and expertise of GCSP to minimise impacts on transport, landscape, heritage and the environment.

- In response to concerns impact on landscape, wording has been added to the policy to set out that development must positively respond to the treeline, to minimise impacts on the landscape.
- In response to traffic and connectivity concerns, a transport assessment will be required for any development for this site. National Highways will be consulted on any significant applications to manage the impacts on the road network. The policy wording reflect the need for cycle routes and improvement to connectivity to Whittlesford Parkway.
- In response to safety concerns and suggestions for traffic management and improvements for pedestrians, GCSP is not the highways authority, and it is the responsibility of the highways authority and national highways to manage these issues. The wording has been revised to set out the safety, and the needs of pedestrians needs to be priority.
- In response to concerns about overdevelopment, this allocation as it is a policy area does not have a capacity, however the policy area is masterplan-led and through the development of a masterplan development can be managed more effectively so it is of a sustainable scale.
- In response to Historic England, the suggested amends have been made.
- In response to KLW Planning, the proposal is a policy area not a site allocation to set out the vision for the area, where there is not sufficient detail on a developed proposal suitable for the site and where a site may be in multiple land ownerships. The area around the station has the potential for higher density development and must align with the delivery of a multi-modal travel hub.
- As a policy area, the site does not need to come through the Call for Sites process.
- In response to concerns about the underestimation of future demand.
- The extension of the policy area to include the site under HELAA reference 115874 / 40097, the land is designated as Green Belt and therefore is not included within the boundary for redevelopment.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Concerns raised over need to be more specific in the policy wording to recognise local context.	200997 (I Beeby) 207899 (N Denham)

Safety concerns raised about active travel routes between Pampisford and Sawston to Whittlesford Parkway.	201504 (J Harvey-Bowman), 204354 (N Denham)
Safety concerns at the A505 roundabout crossing, and pedestrian routes and the impact of lorry parking.	205788 (J Harvey-Bowman), 205789 (J Harvey-Bowman), 205787 (J Harvey-Bowman)
The pedestrian and cycle route between Whittlesford Parkway and Unity Campus feels unsafe and dangerous. Safety concerns of commuting by train, other Campus members opt to travel by car, further increasing demand for safe and sustainable travel options.	205786 (J Harvey-Bowman)
Safety concerns for pedestrians and the need for more public transport and a bus service from Sawston to Whittlesford Parkway.	205793 (J Harvey-Bownman), 205792 (J Harvey-Bowman), 205791 (J Harvey-Bowman), 205790 (J Harvey-Bowman),
Residents and members of the Unity Campus proposed a range of potential solutions including lighting, widening of paths, speed limits, signal control for pedestrians.	205794 (J Harvey-Bowman)
Support for the designation but concerned about underestimation of future demand.	206692 (Cllr R Williams)
The policy should include explicit requirements to secure step-free access and lift provision, improved bus and active travel connectivity, and the use of Section 106 obligations arising from development elsewhere in the Rural Southern Cluster to fund these improvements. The plan policy should also recognise and support local communities in dealing with the impacts of transport hubs.	206693 (Cllr R Williams)

The station design needs reviewing to be more effective. Improved connectivity between the station platforms is needed.	201536 (A Smith), 202607 (R Barrett)
Support for clauses 1 and 2 in the policy.	201560 (Stapleford PC), 210912 (Great Shelford PC)
Support for policy.	202117 (Cambridgeshire County Council), 207531 (Carter Jonas on behalf of the CLC Trust)
Support for cleaning up of the area but concerns about overdevelopment.	204354 (N Denham)
Concerns over nomination of the whole policy area as a policy area if it has not come through the call for sites process.	204912, 211677 (Lichfields on behalf of Smithson Hill)
The respondent notes the need for further site allocations in Whittlesford.	207531 (Carter Jonas on behalf of the CLC Trust)
Land east of M11 at Duxford Site Reference: 40095 Caius would be keen to work in partnership with all relevant bodies and local communities in preparing and adopting a masterplan led approach to the comprehensive development of the policy area. We consider such a policy lead approach would give the GCLP additional flexibility up to an including Examination in Public to demonstrate the Plan has the capacity to meet all objectively assessed needs. It would also offer a partnership approach allowing local communities early stage engagement in the plan making process.	211425 (Gonville & Caius College)

Policy S/AMC/WHD seeks a masterplan approach to bring forward a multi-modal travel hub at Whittlesford Parkway. Broad support is given to the policy as part of the wider strategic infrastructure strategy for the area. Development beyond Whittlesford Parkway should be able to come forward independently.	211455 (Henry Boot Development Ltd)
The Chapel of Hospital of St John the Baptist is a scheduled monument and listed at grade II*. The Red lion Hotel is listed at grade II. Whilst we welcome the reference to the assets on criterion 2, the policy should mention the type and grade of the assets. The policy should include a requirement for a heritage impact assessment.	210153 (Historic England)
We question whether, in view of alternative transport initiatives serving this area, in particular CSET Phase 2, significant further development on this very constrained site, beyond access improvements, is appropriate.	208105 (Sawston PC)
The policy appears to be based heavily on the 'Whittlesford Station Masterplan Stage One, Baseline Report, Final' from 2018 which is out of date. Many of its key proposals were shown to be either unfeasible or not cost-effective. The only potentially available site within the policy area, Land North of 39A Station Road (West), was recently given permission for a residential estate of 48 dwellings (23/01150/FUL). Future use of land which might become potentially available to increase parking provision is likely to be in conflict with the proposed revised NPPF Policy Change 2 – 'Building homes around stations'.	208106 (Sawston PC)
Access from the A505 to both Station Roads East and West is already addressed in the Royston to Granta Park Strategic Transport Study, (Strategic Outline Case, 2025).	208107 (Sawston PC)

A number of the assumptions around the future importance of Whittlesford as a transport interchange have been overtaken by changes in local development policies and the CSET Phase2 proposals for a travel hub at the Fourwentways A1307/A11 junction. Significant drivers for growth in usage of Whittlesford is cited in the 2018 Masterplan report. The Uttlesford Local Plan was withdrawn during the EIP and the Garden Village proposal dropped. The current Uttlesford emerging plan proposes no major development in the North of the District and this aspect of the Local Plan has been considered generally sound. It is noted that the GCP is no longer funding the Whittlesford Station Transport Infrastructure Strategy.	208108 (Sawston PC)
CSET Phase 2 will also offer direct and rapid access to Cambridge and Cambridge South stations and faster, frequent journeys to Kings Cross and Liverpool Street Stations. It will also offer direct access to the East Coast mainline at Hitchin and eventually to Cambourne and Oxford via EWR. Depending on the patterns of service operated by the rail and bus companies, it is likely that if CSET Phase 2 proceeds, Cambridge and Cambridge South will become the stations of choice for users in the South East of the District.	208109 (Sawston PC)
If it is still considered that a major rail-based transport hub is needed in this area, consideration should be given to the relocation of Whittlesford Parkway to a new site adjacent to the entrance to the former Spicers' Site on the A1301 Sawston Bypass. This site is better located to serve both Whittlesford and Sawston to both of which it is well connected by active travel routes. It has better access, is less constrained and would also serve as a major stimulus for the re-development of the former industrial site. Since it would involve a specific green belt release, land acquisition costs would be substantially less than within the proposed policy.	208110 (Sawston PC)

Whittlesford Parkway is a mainline station serving Cambridge, London and Stansted and is a key transport asset for the Rural Southern Cluster. Whittlesford Parish Council supports the designation of a policy area but considers that the policy significantly underestimates future demand and, as currently drafted, failed to recognise the reality of the policy area.	207744 (Whittlesford PC)
Parking pressure already impacts Station Road East, which is both a residential road and the location of industrial units. Policy does not provide a clear strategy for managing increased parking demand or for addressing constrained access at Station Road East, West Royston Road and Moorfield Road. The policy should recognise the residential element of Station Road East and that vehicular access to houses for residents is maintained and resident parking facilities enhanced. Whittlesford Parish Council requests that the policy explicitly commits to step-free access to the station, improved platform connectivity via a lift, enhanced cycle links to local villages, a deliverable commitment to increasing public transport links to the station and village, a clear parking and access strategy that protects residential amenity, and measures to address flooding and highway safety, all developed in consultation with the local community.	207745 (Whittlesford PC) 207900 (N Denham)
The development of Whittlesford Parkway as a travel hub together with employment and housing is wholly supported by IWM. The introduction of a bus turning circle is vital and a fundamental part of making Whittlesford station an effective travel hub to enable any significant mode shift to sustainable travel for IWM visitors and staff, being the nearest rail station.	208283 (Turley on behalf of the Imperial War Museum)
Land west of Duxford Road Whittlesford (HELAA Reference 59397) Inclusion of the station area as a policy area rather than as a formal allocation is not positive planning; the Plan should proactively allocate Whittlesford Parkway station for a range of accessibility and	204262 (KLW Planning)

infrastructure improvements and should allocate sites for residential and employment development around the station area, including Land west of Duxford Road. Croudace Homes should be involved in discussions regarding sustainable development around the station, alongside other willing landowners. A delivery plan with clear timelines for improvements at Whittlesford Railway Station is requested to ensure effective implementation. The recent Government consultation supports residential development near well-connected train stations in the top 60 TTWA, of which Whittlesford Parkway is one. The site meets the criteria for a well-connected station, with services exceeding the required frequency, connecting it to London and Cambridge. The GCP Masterplan highlights the need for improved bus services and cycling infrastructure, which could be supported by residential development around the station. Residential development would also complement planned employment provision. The GCP report suggests potential for a new car park to support station accessibility, which could be supported by appropriate contributions from Croudace Homes. The Plan should develop GCP's work to identify residential and employment allocations within 800m of the station to align with government proposals for development near well-connected stations. We attach a transport appraisal and our vision document for Land west of Duxford Road, both of which demonstrate that the site lies within 800m of Whittlesford Parkway railway station, and that the site is highly accessible to this well connected station, with potential to improve footpath and cycle path connections, to the benefit of existing residents of Whittlesford and new residents of the proposed development.	

The site should be proactively allocated as a site allocation not a policy area. Development is supported near stations in the NPPF.	204262 (KLW Planning)
Land North East of Whittlesford Parkway (HELAA Reference 40097) is located immediately adjacent to the 'Area of Major Change' (Draft Policy S/AMC/WHD), which proposes a comprehensive, masterplan-led redevelopment of the Whittlesford Parkway Station. By incorporating this additional land, the Council can include the wider land holding and fully optimise the opportunity to develop the Area of Change. The site offers an opportunity for immediate, high-density well-connected development, optimising land use to support the viability of the transport interchange and Area of Change. The site could also accommodate community uses as a supported in the Whittlesford Neighbourhood plan.	211097 (No6 Developments on behalf of the James Binney Will Trust)
The policy map incorrectly includes the former scrapyard site and the veterinary surgery car park but omits the demolition site at 39a Station Road West and the re-numbered property at 40 Station Road West, risking mis-allocation of development rights. The map fails to include Nr 40 SWR which was recently converted from the garage to Nr 38. We are concerned that the proposed development could have a detrimental effect on our lives and the character of the area. Agencies are not working together effectively; representatives from SRW and SRE must be included in the planning process.	204354, 207891, 207892, 207893, (N Denham)
The A505 is a very dangerous road. Regarding the junction between Moorfield Road and the A505, it is now far too dangerous to do a right-hand turn towards Duxford due the volume of traffic. This will have to be signalled even if it means standing traffic back to Four Wentways and Royston	207894
• The steps up and down make it extremely difficult for cyclists to get from one side to the other, obviously lifts would be ideal for this and disabled people to use the trains more from this station rather than Cambridge of Audley End.	207895, 207896, 207897, 207898, 207899, 207900, 207901, 207902, 207903,

• Cycles they have to weave in and out of the potholes and parked cars, there is no safe crossing point for cyclists at the bottom of Station Road West • Needs to be considered is the reduction of the speed limit to 20 mph • Bus turning circle requirement not clear. • Notices at the station saying there are no bus services etc. • Major unlawful parking in the area. • Narrow pavements, in some places only on one side. Cars have damages path areas, not well lit. • new entrance road to the proposed housing will make pedestrian access worse • agencies involved have not worked well together in the past and continue to do so. • Need better signage • Flooding due to blockages in railway drains	211877, 211878, 211880, (N Denham)
Agree that it must protect and enhance the Duxford Chapel and Red Lion Hotel heritage assets and their settings	211879, (N Denham)
There is strong, consistent, and well-evidenced demand for a safe, continuous, and well-lit pedestrian and cycle route between Sawston, Pampisford, Duxford, Unity Campus, and Whittlesford Parkway Station. The current route actively discourages sustainable travel, forces residents and workers into cars, and presents unacceptable safety risks. With Unity Campus continuing to grow, the need for improvements is both urgent and strategic. Unity Campus strongly encourage the Council to prioritise this route within the Local Plan and Active Travel programmes, and to work with local stakeholders to deliver meaningful, timely improvements.	210439 (J Harvey-Bowman)

Summaries of Representations: Sites Rest of the Rural Area

Rest of the Rural Area Introduction

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments raised concerns regarding sites on the A1307/A14 corridor for logistics. The largest number of these objected to the Brickyard Farm, Boxworth Farm, Boxworth site north of the A14 services, siting concerns including the size of buildings, relationship with nearby villages, traffic and safety. Newlands respond to comments, stating that their site has transport access benefits over other sites. A smaller number of sites referenced proposals in that area more generally, or other proposals specifically. Historic England asked for more information, in particular on the Slate Hall Farm site identified in the draft plan.

General comments from Parish Councils included Papworth Everard supporting the non-allocation of sites submitted through the call for sites. Little Gransden wanted to ensure if sites were added they addressed highway adoption issues. Great Wilbraham said development in the village was needed to support improvement to services and facilities. Swavesey PC expressed concern about the cumulative impact of development, and the need for it to be assessed.

Other comments included support for removing proposals at the draft plan stage to release of green belt and allocation of development at Mingle Lane in Great Shelford. One comment highlighted concern about protecting villages were not being applied equally to Cambridge. A comment expressed concern about the impact of development at Cambourne on surrounding villages. Another focused on protecting the countryside east of Cambridge.

The majority of comments to this introduction section objected to the non-inclusion of development proposals in a variety of villages. Reasons sites included the relative sustainability of the locations, the opportunities to support services and facilities, the need for the plan to allocate more smaller sites, over reliance on large strategic sites to deliver the numbers required, and the plan simply not allocating enough homes to respond to local needs or national proprieties. A number of comments where sites are in the green belt considered their site was grey belt, and the plan should have identified grey belt opportunities. Many proposals challenged the findings of the Housing and Economic Land Availability Assessment, and proposed changes to the scoring.

East West Rail advise that some sites promoted are where they are exploring provision of a light maintenance depot.

Response to main issues raised in representations:

Having identified a need for logistics space, the draft plan identified sites at the A14 Services and Slate Hall Farm to respond to that need. There are two other proposals in this area that were not selected. Further evidence has explored transport and heritage impacts and other issues. Having explored issues further, including considering comments made in representations, the two sites selected in the draft plan continue to be the preferred allocations. It should be noted however that promoters of all four sites have indicated an intention to submit planning applications ahead of submission of the local plan.

Proposals for alternative sites have been considered though an update to the Housing and Economic Land Availability Assessment where they fit within the broad emerging strategy of the local plan. New evidence submitted has been considered, and where considered appropriate scoring has been amended. Comments related to strategy choices have also been considered, particularly under the development strategy policies. The deliverability of the plan has been tested through evidence including the Housing Delivery Study. The strategy focusing on other broad locations is considered to be sound. It is not proposed to add additional village sites to the proposed submission local plan. An update to the Green Belt Study has been carried out to consider which areas would meet he governments definition of being grey belt. Whilst some site may meet the definition, exceptional circumstances is still required for green belt release, and the Councils do not consider that exists in light of alternatives available.

The representation regarding the Defined Development Extent has been addressed under Policy S/DE: Defined development extents.

Table of representations:

Comments focused on A1037/ A14 corridor Logistics Proposals

Summary of issues raised in comments	**Comments highlighting this issue**
Brickyard Farm, Boxworth Farm, Boxworth, (Newlands) (Site reference: 47353, 115237) Concerns expressed: • I have grave concerns regarding Newlands, as yet not proposed site, north of Boxworth at Cambridge services. Access to site, amount of lorries and other vehicles on an already busy flyover and roundabout system. The size of proposed enormous buildings not compatible with Buckingway B P or proposed Jaynic site to the south. Lack of water to site a problem. Amount	201308 (S Hoyland), 201455 (C O'Connor), 201456 (S O'Connor), 201488 (E and J King), 201758 (P Safranek),

of traffic through small villages and roads to get to it. Proximity to housing at Grapevine. I sincerely hope this is turned down at all planning stage • I am very concerned about the proposed Newlands development which is to the west of the road between Boxworth and the A14 services. The proposal is far too close the village of Boxworth, and the site is far too large. Already the traffic around the three roundabouts in this area are very congested and this will make it significantly worse. On many occasions the A14 service area is completely overloaded, the roundabouts at a standstill with lorries parking for the night on the roundabout itself. Finally, this development is not required for local needs but rather national and regional. • The Swavesey South Roundabout is poorly designed and lacks sufficient space, particularly for lorries, to manoeuvre safely; I have personally witnessed many accidents there. If Newlands proceeds, the additional traffic, especially juggernauts, will make the situation untenable. Furthermore, the proposed warehouses are enormous, of an inappropriate scale and height, and would dwarf our village and its beautiful medieval church • We object to the visual impact of huge buildings. Traffic access to such a large site is problematic as local roads are already inadequate, with no cycle path and no pavement. We are concerned that such a large site will put great strain on water supplies, sewage and drainage. In this region there are many empty warehouses, so the need for this site is not established • The proposed scale of the site and particularly the buildings are not in keeping with rural setting or current restrictions placed on Buckingway site. These will be 24m high boxes. Newlands state this is to serve national and regional needs not local as stated in this plan. Traffic is of great concern, both from lorries and employee traffic. • There is no route through from A428 except through local villages. Roads are very narrow, few pavements and are unfit • for increased traffic. Routes to and from A14 cannot take the traffic	201760 (N Safranek), 202756 (L Turton), 204089 (N Turton), 204184 (Histon and Impington PC) 201789 (J Benninson)

• Size and scale massive, will dominate local rural environment totally inappropriate so close to Boxworth where I live Buildings too high should be max 10m Huge increase in traffic going through Boxworth 24/7 will ruin quality of our quiet village life and increase accident risks Serves national not local needs Concerned Newlands will bypass planning objections by not being included in Local Plan and then will appeal	
A1307 should not be used as an access road to/from a development park. It was provided for local access, to keep local traffic off the A14 and allow a safer route for local residents.	207725 (Swavesey PC)
I agree with the sentiment of the local plan however, I cannot agree or disagree with the proposal as there are many unanswered questions. The plan especially around warehousing looks in isolation and not co-ordinated with the other multiple developments. There are questions on impact of traffic capacity, flooding / drainage and also landscaping with local villages. I am also aware of a warehouse proposal (Newlands) which will be put forward. From what I have seen, there are serious questions on scale and height of the units and traffic management through villages and sustainable commuting which is one of your priorities.	203743 (E McKerrecher)
Land to north west of Cambridge services. Likely access from Boxworth road will greatly impact an already congested roundabout at entrance to services, where traffic at times already tails back onto A14. Coupled with the other proposed development at the services would cause likely gridlock at busy times (early am and evening). The size of warehouses are disproportionate for the area and will greatly impact on visual landscapes. Local roads not suitable, and Boxworth residents in particular concerned about not being able to access a14 at busy times	201261 (C Howlett)
I am most concerned about the plans to develop four logistics, storage and business development sites along the A14 near Bar Hill. The increase in traffic will reduce air quality in the area. There is	205019 (A Bradford), 204477 (Cllr T Bygott),

only one entry and access road to Bar Hill and the siting of the access point to Tritax will exacerbate the already busy and at times congested A14, the roundabout and feeder roads. There will be a significant and detrimental effect on the local landscape. In sum, there are too many developments concentrated in too small an area with significant negative impacts and few benefits. The Newlands (land to the south of J24 of the A14) development is not included in the Draft Local Plan however we wish to make it clear that the proposed development does not meet the policy requirements relating to providing support for Greater Cambridge, the implied restrictions on the size and scale of rural developments (Appendix H) and paragraph 7 of this policy.	203701 (G Chamberlain), 202770 (Boxworth Parish Meeting)
The sheer size and scale of this development is inappropriate with these mega sheds having such an overwhelming and negative impact on the surrounding area. Am estimated extra 4500 daily traffic movements from this site would put severe strain on the local roads especially the A1307	201446 (S Pink)
My concerns against this are to do with: 1. Inappropriate scale and height proposed for the structure 2. The development needs to meet local needs, not be structured to serve regional and national needs 3. Traffic management is a significant concern—roads are too small, would be extremely disruptive to wildlife and would make living here less safe for humans and animals.	201498 (V Lebedeva)
The large commercial developments proposed near Cambridge services seem to ignore the many alternative sites closer to Cambridge including around the relatively newly built Bar Hill which has less natural biodiversity and the housing has less Historic significance. As above the road network through Boxworth already struggles with large lorries inappropriately using and parking on the roads and this will only worsen.	207177 (W Parker)

We appreciate that the introduction of B8 uses (albeit for local use) is something of a departure from previous employment policy in the Cambridge area. This potentially brings additional impacts on the historic environment, given the typical scale and massing of such development. We have some concerns about the employment allocations along the A14, particularly in respect of impacts on some of the churches on the elevated land above the relatively open, flat landscape. The HIA for Slate Farm for example doesn't address this matter, given the assets are at times over 500m, and yet there may still be some wider setting impacts. We need this issue to be explored further by you so that we may be clearer about the potential impacts for these employment sites. In order to do this, we would request revisiting the HIAs, and to explore this matter further so that we may have sufficient information to reach a more informed position. This should also include further evidence in relation to heights and mass informed by some visualisations.	210301 (Historic England)
Site allocation S/RRA/SCS (Land South of A14 Services), would require extensive numbers of HGVs to pass a further 750m through the Junctions to the south of the A14 that link to Boxworth Road and the entrance to the A14 Cambridge Services. The journey time for HGVs to access the westbound A14 Strategic Road Network is therefore over 4 times that of Newlands Park Cambridge (HELAA Reference 47353) and double the time to the eastbound carriageway. The journey times for Slate Hall Farm are significantly longer still. The traffic implications of this additional time/distance travelled by HGV's, upon a congested stretch of road, flagged vehemently in objections to Newlands previous proposal from Boxworth residents, does not appear to have been given due consideration, nor is it evidenced.	211688 (Newlands (Cambridge) Limited)

General Comments from Parish Councils

Summary of issues raised in comments	**Comments highlighting this issue**
Papworth Everard Papworth Everard Parish Council understands that none of the sites submitted by land owners or other interested parties that went on to be assessed in the HELAA in and around Papworth Everard have been brought forward by GCP for the new Local Plan. The Parish Council supports GCP in not bringing forward these sites for the reasons set out in the HELAA assessment.	205476 (Papworth Everard PC)
Little Gransden If the local planning authority is minded to include either or both of the areas adjacent to Primrose Walk, Lt Gransden within the next local plan then we would like the inclusion to be conditioned upon the developers upgrading Primrose Walk to such a standard that it would be adopted by the highways authority.	201420 (Little Gransden PC)
Great Wilbraham The Plan unfairly disadvantages Group and Infill villages like Great Wilbraham and leading to these villages decline. It goes against the Cambridgeshire Corporate Plan because it intentionally restricts who already suffer from loss of local amenities, lack of public transport, no safe cycle routes and pressure on the many social and sporting activities that are maintained, not by the Council, but by hard-working volunteers. Great Wilbraham has changed in recent years with regard to village	206559 (Great Wilbraham PC)

population, a change in housing needs, and almost non-existent public transport. Our community needs an economically diverse population, spread of age groups, primary school, shop, public house, church, access to healthcare, access to social and cultural space and high quality green space.	
Major new housing at Cambourne North, Bourn and continued development of Northstowe will impact both highway and water infrastructure around the Swavesey area. Cumulative impact needs to be a consideration of each individual development site. Site assessments contain general statements that developers would be required to produce traffic management plans or flood risk management plans but there is no point at which these plans are consolidated and their overall effects assessed. We believe this to be a significant shortfall in the Draft Local Plan and needs to be addressed before the next round of consultation	207728 (Swavesey PC)

Other Comments

Summary of issues raised in comments	**Comments highlighting this issue**
This comment relates to the Site Allocations section and its reliance on the Policies Map and inset maps to define development boundaries. In the area between Northstowe, Oakington and Longstanton, allocated sites and adjacent land are not clearly distinguished from areas intended to remain undeveloped. Several areas appear shaded or labelled in a way that is visually similar to allocated land, creating uncertainty about their intended status. This ambiguity risks unintended coalescence between settlements. The Plan should ensure that allocation boundaries are	204404 Cllr Thomas Bygott

unambiguous and that land intended to function as permanent separation is clearly identified and protected.	
Mingle Lane Great Shelford Support the decision to remove the formerly proposed Mingle Lane development from the plan. concerns over increased traffic. Current traffic on Mingle Lane is already heavy, exacerbated by potholes and parking on both sides, making driving dangerous, especially with church traffic. Local dental and GP surgeries, as well as primary and secondary schools, are at full capacity. Poor drainage system, which is compromised by tree roots protected by Tree Preservation Orders (TPOs).	201182 (A Waters) 208184 (J Coppendale)
You care about the aesthetics of these small villages. You don't care at all at what is being done to Cambridge itself. It will be literally unrecognisable, all because the councils get more council tax/business tax? Is it all just about money for you? You are betraying the existing population. Cambridge is going to be a horrible place and the residents have absolutely no way of stopping it happen.	201239 (S Williams),
The proposed housing development linked to the new East/West rail would create a ‘rat run’ through Knapwell, providing insufficient buffering and exposing the village’s protected church, woodland and listed cottages to heavily increased traffic, with speeds over 50 mph and a fatal accident already occurring. There is currently insufficient buffering to protect the village from the massively increased traffic flow. One proposal would be a bypass, which could include Elsworth and Papworth and Knapwell. This has been done locally for some smaller villages. Or a much larger buffer with trees and a separate route which doesn't come through Knapwell at all.	201599, 201600, 201601 (C Grainger)

Site allocations lacking explicit on-site health facility requirements should reference the need for financial contributions towards health and infrastructure mitigation, aligning with the IDP approach. Engagement with Council Officers during early plan preparation and input into the Infrastructure Delivery Plan is welcomed. An additional assessment by the ICB in Stage 2 of the IDP process will provide targeted evaluations of key site allocations and health infrastructure needs.	205102 NHS Cambridgeshire and Peterborough Integrated Care Board
The countryside east of Cambridge is not empty land waiting for development. It offers critical public rights of way, beautiful, ancient open landscapes, dark skies, important historical sites, and ecological connectivity. These resources support health, recreation, heritage, biodiversity, and climate resilience. Policies must be strengthened to stop speculative, large-scale developments and ensure all external proposals align with Cambridge's strategic plans. Without stronger protections, growth could damage rural landscapes and communities beyond the Green Belt. Developers see our countryside as easy pickings. NSIPs such as Kingsway Solar demonstrate how easily local planning frameworks can be bypassed, leaving our community to fight well-resourced external interests with little support. Villages like Weston Colville contribute to Cambridge's identity, food security, jobs and environmental goals but currently bear disproportionate development pressure without receiving benefits.	209246, 209247, 209250 (D Hepworth)
Windfall sites north east and south east of the village of Linton are problematic developments approved due to lack of a 5-year housing supply. They are shown incomplete on the village inset map and have incomplete boundaries. They therefore do not comply with the Plan criteria under Policy S/7 Page 11 Paragraph 30 and should not have been included in the defined development	211929 (C Newell)

extent. These are the Land at Bartlow Road development, and The Land at Horseheath Road development.	

Comments Seeking Additional Allocation sin the Rest of the Rural Area

Summary of issues raised in comments	**Comments highlighting this issue**
Land east of Cambridge Road in Hardwick (Site Reference 40414) It is requested that the is identified as an additional allocation. Comments address HELAA issues.	204203 (Hill Residential)
Land Adjacent to St Georges Way and Woodcock Close, Impington (HELAA Site Id: 115090) Comments made addressing HELAA issues. Site should be identified as grey belt and allocated.	201859 (Chivers Farms Limited),
Land at Branch Road and Long Road, Comberton (HELAA Site reference: 40261 Site ID ref: 115627) Supports the principle of sustainable development locations but concern about the feasibility of delivering homes in these areas due to potential site-specific issues. Need greater flexibility in the Local Plan to accommodate interim growth needs, particularly in Minor Rural Centres, to avoid failing to meet housing demands. Without a balanced approach between strategic and medium-sized sites, the Councils may struggle to maintain a sufficient supply of new homes. Response to HELAA comments provided.	204721 (Beechwood Estates Ltd)
Land west of Duxford Road Whittlesford Development in close proximity to services and facilities, would enhance the viability and vitality of local services and community facilities. Primary school has a capacity of 210 and currently has 185 pupils, so there is some available capacity for any children who would live in the new homes.	204281 (Croudace Homes)

The Walled Garden, Whittlesford Perfect site that could accommodate small houses for those aged 65+ with their needs being met in an infill central village position with specific facilities for their age while being able to enjoy village facilities. Should not be in the green built as it is village central and surrounded by houses, has been taken out of this latest plan having been in earlier stages.	205509, 204628 (C Forbes-Cable)
Land to the South side of West End Road , Whittlesford Include for development as it would be in keeping with the village remaining neat while adding a considerable amount of houses	205510 (C Forbes-Cable)
Crow's Nest Farm (HELAA Site Ref: 48096 and HELAA Site Ref: 208867) Represents a sustainable, deliverable and flexible opportunity for residential development which is capable of contributing positively to the housing supply over the plan period.	207044 (Mac Mic Land)
Ashwell and Morden Highlight the value of the Plan recognising the potential for additional development in the form of railway station growth within the plan period, and the importance of the Plan creating a flexible and positive policy framework that responds positively to the locational opportunities for station related development in Greater Cambridge within the Plan period. I AMLC are commencing a process of exploring the feasibility of such a project over the coming months and therefore a Call for Sites submission has not been made through the current consultation. Whilst the Local Plan will be assessed for soundness under the December 2024 version of the Framework and therefore need to be demonstrated to be consistent with the existing Framework, the Plan has the challenge of also needing to be consistent with the decision making policies of the new version of the Framework. if	208253, 208254, 208256, 211073 (Ashwell and Morden Landowner Consortium)

the land does prove to be available, suitable and viable for a railway station development, the AMLC and its prospective future development partner would welcome the opportunity to engage with GCPS during the Plan process.	
Swavesey In respect of our client's sites in Swavesey these are located adjacent to a sustainable settlement situated on the Cambridgeshire Guided Busway within the A14 corridor. They are suitable, available and could be developed relatively quickly without the need for any major infrastructure improvements. There are not any site-specific constraints for which mitigation cannot be delivered. Therefore, in our opinion these sites, and similar sites in the other sustainable rural villages, should be allocated in the plan to help deliver the growth ambitions for Greater Cambridge in a timely and effective way. We wish to stress the site owners desire to work collaboratively with the Council in respect of their proposed site allocations, and to emphasise the flexibility that exists in respect of this land, to respond to potential local development needs.	208399 (Ceres Property on behalf of land owner at Freisland Farm)
Land South of Horseheath Road Linton Endurance Estates objects to the proposed inset map for Linton on the grounds that it does not allocate Land South of Horseheath Road for residential development.	209752, 209753, 209754, 209755 (Endurance Estates)
Land West of Malton Road, Orwell The draft strategy is flawed due to the over reliance on the delivery of larger complicated sites. The estimated build out rates look to be unachievable based on the need to deliver major infrastructure to unlock these sites, coupled with expected market absorption rates. Growth agenda for Cambridge is likely to see the need for a higher number of houses then currently being projected in the Plan	203079 (Cemex UK Properties)

period. A more balanced delivery approach is required which also meets the requirements of the emerging NPPF which requires authorities plan for a diverse mix of sites across the Local Plan region. Site for 75 dwellings at Orwell has no constraints.	
Land at Long Lane, Fowlmere (HELAA Reference 59408) The Draft Plan's aim to sustain rural villages is supported, but it should proactively allocate growth to village locations. Transportation mode is important but should not be the sole consideration; bus services and the rise of electric vehicles should be acknowledged. The proposed development of around 65 homes in Fowlmere can enhance the village and support local services and infrastructure. The Greater Cambridge Local Plan should ensure proportional housing allocation for rural settlements to promote sustainable growth. This proposal reduces the size of the site and the quantum of development of approximately 65 dwellings.	204734, 210412 (Croudace Homes)
Land south of High Street and west of M11, Hauxton (HELAA site 40283) Redrow objects to Policy S/RRA, plan fails to allocate sufficient land within the rural area to meet the uplifted housing needs. Policy does not provide a mechanism for including additional sustainable village edge sites such as land east of Hauxton. Overall housing requirement should be increased, greater emphasis should be placed on distributing growth to the most sustainable villages, and the Plan should release appropriate areas of Green Belt, including “grey belt” land.	204539 (Redrow South Midlands)
Bedlam Farm, Impington (HELAA site reference 115413) Site can meet the identified need for warehouse development in the emerging Local Plan across a range of potential occupiers. Concerns with the HELAA scoring on the Site, and several elements have been rescored to demonstrate the site scores better.	201982 206046 (Bidwells)

Grange Farm, Girton (HELAA site reference 115388). Site represents a good opportunity for a range of employment uses, including the identified need for warehousing development, across the plan period. In particular, as a result of its location close to the strategic road network and Cambridge fringe. Concerns with the HELAA scoring on the Site.	201983, 206049 (Hardwick Farming Company)
Land North of Pampisford Road, Great Abington (HELAA site reference 40539) Objects to HELAA scoring on the Site. It adjoins the settlement boundary and represents a highly sustainable location, with local services within 500m and excellent access to major employment hubs south of Cambridge via public transport and active travel routes. The Site is not constrained by Green Belt, flood risk, heritage or ecological designations and is suitable, available and achievable within five years. A landscape-led design can enhance the site's integration with the existing village. The site should be reconsidered for allocation in the Local Plan to support growth and maintain the vitality of Great Abington.	204149 (The Trustees of the C Y Nutt Deceased Will Trust)
Land north and south of A428 - Kingsfields (HELAA site reference 51668). Site is capable of delivering circa 3,000 homes and approximately 83 hectares of employment land and would form a logical and well-connected expansion of Cambourne, consistent with the emerging spatial strategy and opportunities for enhanced connectivity. The northern parcel of Kingsfields presents an employment opportunity with a small mixed-use area south of the proposed EWR line and renewable energy to the north. The Southern parcel presents a residential led scheme with a primary and secondary school.	208275, 208276, 208278 (The Church Commissioners for England)
Land east of Balsham Road in Fulbourn (Site Reference 40271)	203899 (Hill Residential)

Identify as an additional allocation 40 dwellings, including affordable housing. The eastern part of the site to be used for an extension to the existing recreation ground or allotments. Upward adjustments are required to the housing target, the development strategy should direct development to the more sustainable villages, and there are exceptional circumstances to release land from the Green Belt. Would help to maintain a sufficient housing land supply in Greater Cambridge until the larger strategic sites start to deliver	
Land South of Lower Cambourne (HELAA Site ID (40447) Site ID 115601) The plan requires amendments to ensure that the level of growth and housing allocations reflect the Vision for Greater Cambridge as set out in the DLP. Expansion to the south of Cambourne should be planned for, either as a stand-alone extension to the settlement, or in combination with development in another direction. Presents a viable option for immediate development, requiring less infrastructure and allowing for short to medium-term growth.	204096 (Richborough)
Land at Six Mile Bottom (HELAA Site Reference 40078).) The Local Plan's evidence base should focus more on the eastern subregion, particularly the growth corridors along the A14/A11/M11, including the Cambridge to Norwich Tech Corridor and London-Cambridge Innovation Corridor. The potential dualling of the Newmarket line and the Cambridge East Transport Strategy are crucial for improving access and promoting sustainable travel in the region. Locations like Six Mile Bottom have significant potential to meet long-term economic and housing needs, addressing the growth and economic opportunity imbalance in the subregion.	204627 (Urban and Civic and Hill Residential)
Land off Bannold Road, Waterbeach (HEELA Site Reference: 115482)	204238 (Bellway Strategic Land)

The proposed site (HEELA Site ID: 115482) offers an opportunity for early delivery of housing and infrastructure, benefiting from proximity to existing and planned services. The allocation of the site would support the expansion of Waterbeach, providing much-needed housing and contributing to biodiversity net gain. Site is grey belt.	
Land East of Bridge Road, Impington (HELAA Site reference 200829) Benefits from strong public-transport and cycling links which will help reduce in-commuting and aligns with the Development Strategy's connectivity objectives. All other planning matters, including landscape / visual effects, can be satisfactorily addressed. Sustainable Grey Belt village sites need to be allocated as part of a blended development strategy to ensure that dwellings are delivered throughout the Plan period to meet all needs.	207906 (Barratt Redrow)
Site located to the east of Shepreth adjacent to the A10 Provides a significant opportunity for employment development. The Site is approximately 24ha and is currently in agricultural use. Unlike many sites in and around Cambridge the Site here is located outside of the Green Belt. Site is in a strategic and well connected location which is particularly suited for providing employment opportunities. The intention is to develop the Site for mid tech uses. The Site is to include a mix of offices, manufacturing and tech facilities to create an all-encompassing holistic location for new and existing businesses to grow.	208173 (Orchestra Land)
Land to the south-east of Cambridge Road, Foxton (HELAA Reference 40408) Land to the north and east of Barrington Road, Foxton (HELAA Reference 40412)	211093 (R2 Developments Ltd)

Concerns about the deliverability of the strategy for growth, and the location of new developments, primarily focused on the north and west of Cambridge, which may not align with employment growth along the A10 corridor. Need for a higher growth scenario in the emerging Local Plan. Call for more ambitious targets to meet government's growth objectives through additional site allocations such as our client's sites at Foxton.	
The following sites should be considered for allocation for development in the Local Plan: • Histon and Impington - NIAB Park Farm, Villa Road, Histon (HELAA 208851) • Girton - Land East of Redgate Road (HELAA 40241) • Histon and Impington - Land West of South Road (HELAA 40232) • Histon and Impington - Land North-East of Villa Road (HELAA 40236) • Histon and Impington - Barn 3, Park Farm (HELAA 200772)	211096 (NIAB Trust)
Land at Broad Lane, Cottenham (site reference 115451.) Committed developments at Cottenham, located off Rampton Road will contribute towards establishing a developed context for the promoted site that will assist in containing the landscape impact of any future development delivered on the promoted site. These committed developments also assist in establishing a direction of growth for future development at Cottenham, establishing a precedent for the further expansion of the settlement to the north. Comments address issues raised in HELAA.	211430 (Woolsington One Ltd)
Land East of Bush Close, Comberton ((HELAA reference 40501) A strategy that includes a particular focus, and reliance, on strategic sites in Greater Cambridge is logical and supported in principle. The current buffer of 6.5% is insufficient and fails to recognise the	211438 (Hopkins Homes)

delivery challenges which have historically held back early delivery on the large-scale strategic sites and should be certainly over 10%, circa 15-20%. As part of a robust sustainable housing supply to meet the needs of all, it is clear that medium sized sites, including sustainable Grey Belt sites, are needed as part of a blended development strategy to ensure that dwellings are delivered throughout the Plan period to meet all needs.	
Land to the South of Station Road, Harston (HELAA reference 115742) Object to Policy S/RRA due to insufficient housing and employment allocations in rural areas, which threatens village vitality and local services. The principle of sustainable development in rural areas is outlined in the National Planning Policy Framework (NPPF), which promotes housing that enhances rural community vitality. The Draft Local Plan's limited rural allocations could lead to an imbalance in housing supply, increasing reliance on strategic sites and undermining village growth. The approach of directing some growth to the villages should also take account of existing and proposed public transport improvements.	203428 (Jesus College)
Land East of Ridgeway and Old Pinewood Way, Papworth Everard (Site Ref. 40439) Land should be allocated.	211617 (Bloor Homes Eastern)
Land at Croxton Garden Village Croxton (HELAA Reference 40288) A new Garden Village in this location would have a highly functional relationship with Cambourne and would look to this expanded settlement to provide a wider range of goods and services. Importantly, the proximity of Croxton Garden Village to Cambourne would also allow for viable transport connections by active modes.	211625 (Vistry group)

Fulbourn area EWR Co is also exploring the opportunity for a light maintenance depot (LMD) to be located alongside the Newmarket Line in the Fulbourn area. EWR Co is aware of the promotion of a potential new housing development to the north of the Newmarket Line in the Fulbourn area and notes the potential for it to be served by a new station. These proposals do not currently form part of the draft Local Plan. EWR Co notes that, in principle it has no objections to exploring the opportunity for a new station to serve a potential development in this location.	211888 (East West Rail Company)
Land off Home End in Fulbourn (Site Ref. 40523) Remove from the Green Belt and identify as an additional allocation.	201951(KG Moss Will Trust & Moss Family)
Land at Court Meadows House off Fulbourn Road in Fulbourn (Site Ref. 40522) Identify as an additional allocation.	201954 (KG Moss Will Trust & Moss Family)
Land between A428 and St Neots Road, Hardwick (HELAA Reference 40550; Site ID: 115093). The respondent does not object to the wording of policy S/RRA specifically but raises concerns about the omission of their site on St Neots Road HELAA has incorrectly scored the site on various matters, including landscape and biodiversity, and believes it should be scored more favourably. The respondent argues that the site, previously promoted for E(g) employment uses, is also suitable for B2 and B8 uses to meet the identified need for warehouse space.	201590 (Paragon Land & Estates Limited)
Land off Ditton Lane in Fen Ditton Identify as an additional allocation in the Rest of Rural Area.	202091 (J Francis)

land east of Glebe Way Histon Identify as an additional allocation in the Rest of the Rural Area	202195 (Cambridgeshire County Council (Strategic Assets))
Land off Glebe Road in Waterbeach (Site Ref. 40372) Identify as an additional allocation in the Rest of the Rural Area.	202578 (Ely Diocesan Board of Finance)
land south of Fulbourn Old Drift, Fulbourn (Site Ref. 40355) identify as an additional allocation for employment uses in the Rest of the Rural Area.	202579 (Ely Diocesan Board of Finance)
Land south of Cambridge Road and north of Shelford Road in Fulbourn (Site Ref. 40354) Identify as an additional allocation in the Rest of the Rural Area.	202580(Ely Diocesan Board of Finance)
Land off High Street in Landbeach (Site Ref. 40361) Identify as an additional allocation in the Rest of the Rural Area.	202581 (Ely Diocesan Board of Finance)
Oakington Road, Cottenham (HELAA site 115443) Development of the Site would provide significant social, economic, and environmental benefits, including affordable housing, enhanced biodiversity, and support for local facilities and businesses. The Site is positioned as a sustainable extension to Cottenham, integrating with existing residential developments and contributing to the area's housing needs. Site should be identified as Grey Belt.	203134 (Christ's College, Cambridge)
Land off Station Road in Willingham (Site Ref. 40527) Identify as an additional allocation in the Rest of the Rural Area.	203320 (J Manning)
Land off Butt Lane in Milton (HELAA Reference 40365) Identify as an additional employment-led allocation in the Rest of the Rural Area.	203392 (Ely Diocesan Board of Finance)

Land at Ermine Street, Caxton (Site ID 115596) It is considered that the sustainability of Caxton (due to its proximity to Cambourne where there are a range of services/facilities) warrants the consideration of site allocations at the settlement. Represents a suitable location for sustainable rural housing growth. Part of the site benefits from outline planning consent for up to 9x self/custom-build dwellings, and so the principle of development on the site has already been established.	204339 (LVA (Mr Matthew McShane, Associate Partner))
Land east of Boxworth End in Swavesey (Site Ref. 40042) Identify as an additional allocation in the Rest of the Rural Area.	204580 (Axis Land Partnerships and Executors of Norman Winfrid Moore)
Land at Crow's Nest Farm (HELAA Site Ref: 48096 and HELAA Site Ref: 208867) Land at Crow's Nest Farm continues to represent a viable and deliverable opportunity to support wider growth, benefiting from its strategic location near Cambourne and its strong connectivity with the proposed EWR Oxford–Cambridge link.	205464 (Mac Mic Land)
Land west of London Road, Fowlmere (HELAA reference: 40116). The site's location within Fowlmere provides a location with access to key amenities such as a Primary School and Bus Services, whilst nearby towns and villages such as Shepreth, Melbourn and Royston provide a full range of required jobs, services, leisure and cultural facilities.	211037 (Wates Developments)
Land to the East Side of Cambridge Road, Melbourn (HELAA: 47757) Melbourn has access to a good range of facilities and services, including public transport as noted below and reflected in its identification as a Minor Rural Centre, able to accommodate additional housing growth	211050 (Wates Developments)

Policy S/SHF: Land north of the A1307, Bar Hill (Slate Hall Farm)

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Concerns were raised around increased traffic and congestion, creating safer cycling routes including a cycle path along Dry Drayton Road into Oakington.

Comments were made to suggest this location is most suitable for a distribution centre.

Comments were made by Huntingdonshire District Council and West Suffolk Council to work together to meet the demand for logistics and delivery.

Concerns were raised about flood risk, impact on landscape with the site being in open countryside, foul water, and that S106 contributions are used for attenuation ponds, water storage and other water infrastructure.

Comments were made to use is restricted to sub-regional logistics and does not become a national facility.

Concerns were raised around clarity around the Mobility Hub and its design, location and transport links.

Further comments were raised by the Environment Agency to support point 19 of the policy, and suggested requirements for FRA modelling to include Oakington Brook and set out that no development should be located within 8m of Oakington Brook apart from permitted access.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- The issue of cross boundary management of logistics and delivery will be picked up in the Statement of Common Ground.
- Evidence regarding the transport impacts and required mitigations for the A14 allocations proposed within the plan is being prepared to inform the Proposed Submission Plan, including drawing on transport modelling and, where relevant, on site promoter material. The transport measures required to enable delivery of each site are set out in the relevant allocation policies and within the Infrastructure Delivery Plan. The Highways Authority at Cambridgeshire County Council have commissioned additional evidence to understand the implications of logistics on traffic congestion and the road network in the A14 corridor.
- In response to concerns about traffic and congestion, and to respond to National Highways comments, a requirement for a Monitor and Manage Approach and a suitable mitigation package to be agreed by National Highways and Highways Authority.
- The policy wording set out requirements for active travel and a mobility hub to support connections to local villages, the policy has been amended to include Oakington.
- Part of the site lies with Flood Zone 3, and this area is proposed to be retained to manage flood risk and utilise for green infrastructure. The site will be subject to a Site Specific Flood Risk Assessment to mitigate against any potential flood risk issues.
- The management of water and foul water is set out in the wider Integrated Water Management Strategy for Greater Cambridge. Specific requirements for the site will be set out in development management Policy CC/IW: Integrated water management, sustainable drainage and water quality
- A HIA has been prepared to ensure that mitigations are suggested for the most design of the development in this location. A landscape buffer has been added to the Spatial Framework to mitigate impacts on landscape. In addition, wording around management of heights by scaling down to the edges and not creating a block effect, and the use of screening has been added to the policy wording.
- In response to Historic England the wording suggestions have been amended in the policy in line with comments. The HIA has been revised to take into account the potential impact on the historic environment of the Listed Building and has confirmed that Slate Hall Farm is a potential non-designated heritage asset and should be retained. This has been reflected in the policy wording.

- The Councils have a separate and agreed process for the consideration of Non-Designed Heritage Assets. Should this particular NDHA be nominated for consideration, the councils would then consider the historic merits of the property in line with this agreed process.
- A Mobility Hub is now defined in the glossary and the requirements for its delivery is set out in policy I/TH Travel Hub Facilities which has been renamed to mobility hub to align with the wider national approach.
- Suggested amends have been included to address comments from the Environment Agency.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Concerns raised about cycle routes to Dry Drayton and Oakington for people commuting.	201214 (G Tregonning)
This prominent site in the countryside is being released to meet the shortfall in Greater Cambridge for industrial and warehousing. The policy needs to ensure that it's use is restricted to sub-regional logistics and does not become a national facility.	201451 (C Barnard), 203115 (Cambridge Past, Present and Future)
Whilst this is development of a Greenfield site it is well placed for the A14 and for local employment. Low-carbon employee commuting could be easily facilitated from Bar Hill and Northstowe. If a distribution centre is required in the area, then this is the most sensible option.	201451 (C Barnard)
Concerns raised about traffic impacts the local road network.	201787 (J Bennison), 202549 (L Miller), 203096 (Swavesey PC)
Huntingdonshire District Council seeks to work with GCSP on masterplanning to ensure the sites offer complementary opportunities rather than create competition.	201658 (Huntingdonshire DC)

Concerns raised over surface water flood risk and runoff risks, water supply and waste water.	203096 (Swavesey PC), 203300 (A Dennis),
S106 funds should be spent on local attenuation projects.	203300 (A Dennis), 203299 (A Dennis)
Encourage bicycle last mile delivery services onsite.	203873 (J Prince)
Object to policy S/SHF due to its heavy reliance on a single strategic site for delivering 220,000 sqm of B2 and B8 commercial floorspace. The capacity of the site should be higher.	204224 (Bidwells on behalf of Tritax Big Box Developments)
Concerns are raised about Slate Hall Farm's access routes and the developer's lack of experience in delivering large-scale logistics developments, and Green Belt assessment completed by the Council.	204224 (Bidwells on behalf of Tritax Big Box Developments)
GCSP should work collaboratively with neighbouring authorities to meet logistics need.	204772 (West Suffolk Council)
Support for the site allocation.	205014 (Lichfields on behalf of Lolworth Developments Ltd)
Policy S/SHF should reflect the 240,000 sq.m of B2/B8 provision identified in policy S/DS and identify that the site’s capacity is to be refined through a landscape-led masterplanning process. Figure errors should be fixed.	205014 (Lichfields on behalf of Lolworth Developments Ltd)

Concerns raised that limitation to small-medium scale units is unnecessary and overly prescriptive.	205014 (Lichfields on behalf of Lolworth Developments Ltd)
Additional information submitted relevant to the HELAA for the site.	211090 (Lichfields on behalf of Lolworth Developments Ltd)
Whilst there are no designated heritage assets within the site, the grade II milestone is located nearby. The grade II * All Saints Church at Lolworth and the Grange (grade II) lie to the west of the site on slightly elevated ground. Whitehall Farmhouse lies to the north eats of the site at the edge of Oakington. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA. However, the HIA does not consider Lolworth Church, the Grange and Whitehall Farmhouse. Given the likely scale of the employment development, we have some concerns regarding this. The policy should also refer to these other heritage assets. The Plan should be clear as to whether Slate Hall Farm is a NDHA or not. We welcome the emphasis on landscape context. Given the likely scale of the employment development, we have some concerns regarding the potential impact on the historic environment of this employment allocation. The HIA should be reviewed prior to Regulation 19 to consider these other assets. This should also include further evidence in relation to heights and mass informed by some visualisations. We need to be able to establish whether there is likely to be an impact on these assets and, if so, what mitigation may be needed.	210154 (Historic England)

This policy allows for an extensive development. Oakington and Westwick is a semi-rural community which has recently seen extensive development from the neighbouring town of Northstowe. The building and commercial operation of yet another, extensive business area will further damage the community and bring few, if any, benefits, but will create significantly more traffic and erode the wildlife and countryside area.	208082 (Oakington & Westwick PC)
We welcome Refs: Heading Vision statements 3 and 5, and Heading Built Form, statement 10; however, the land on which the development is to be built is flat and, as noted earlier, the development will contain extensive B8 storage and distribution buildings B8 storage units can be more than 15 metres high. Clearer guidance is needed within the Local Plan on maximum heights of buildings. In particular, the development should not be visible from Oakington	208083 (Oakington & Westwick PC)
Heading Context statement 11 and Heading Resources statement 19, we welcome the statements regarding the water management from the site but call for a much stronger statement than simply “opportunities for betterment” of water management for Oakington Brook. The Plan should include a requirement that the water management of the site should significantly reduce the risk of flooding in Oakington and Westwick.	208084 (Oakington & Westwick PC)
We support the policy statements regarding Traffic Management, Active Travel and Public Transport. However, as in our comments on Flood Mitigation and Building Heights above, we are of the opinion that the policy statements 2 and 15 a, b tend to be aspirational rather than specific and compulsory.	208085 (Oakington & Westwick PC)
Dry Drayton Road (marked in yellow on Figure 107 below) running from Oakington and providing access to both the site and 1307, is an unclassified road which is already suffering from overuse by vehicles cutting through to the A14/Northstowe from central Cambridge. It will also become an access	208086 (Oakington & Westwick PC)

road to Northstowe and is already to be the subject of various traffic management procedures related to this. What is required is a complete upgrading, restructuring and widening of Dry Drayton Road to include dedicated, safe cycle and pedestrian paths, as well as speed reduction measures. A related ban on heavy lorry travel through Oakington and Westwick also needs to be introduced.	
Policy Statement 15a also refers to a “Mobility Hub”. There is no definition of the term in the document, nor details provided, nor an indication of its location. Currently no buses serve the proposed site and no proposals are made in the draft Local Plan. Dry Drayton Rd in its current state would not support a regular bus service. Therefore, we suggest greater clarity over the design, location and transport links to any Mobility Hub should be included in the document and further, we refer to our earlier point that Dry Drayton Rd must be significantly improved with the inclusion of cycle and pedestrian paths.	210843 (Oakington & Westwick PC)
The proposed allocation is situated adjacent to the A14, providing good access to the SRN. The proposed development capacity for approximately 220,000 sqm and is anticipated to support a range of logistics and industrial uses. Similar approach as to other proposals, suggests that the site could operate with a trip budget. This approach, although in principle is acceptable to National Highways, needs to be subject to a full operational junction assessment of the A14/ A1307 junction to ensure that the trip budget can be accommodated without severely impacting the SRN. This area is known to experience congestion during peak times. The proposed development may need to provide suitable mitigation package, potentially requiring physical mitigation works to the junction to accommodate the planned growth. In addition, the Monitor and Manage approach, along with any mitigation package needs to be approved and agreed with the relevant highway authorities.	209010 (National Highways)

Drainage: The applicant for one of these sites attended a meeting of our planning committee, and it became clear that the official government “Flood map for planning” does not account for the flood protection measures provided for Longstanton during the Northstowe development (aka the Hatton Road ponds). It is essential and mandatory for any developments upstream of this to be designed and considered only against accurate and up-to-date hydrological information.	210842 (Northstowe TC)
Support for policy point 19 and include requirement that the FRA must including modelling of Oakington Brook. No development should be located within 8m of Oakington Brook apart from permitted access.	211179 (Environment Agency)
Part 3 of the Draft Plan sets out the proposed site allocations, and vision for the ‘rest of the rural area’. Section 3.5.1 of the Draft Plan establishes that the Councils are seeking to support the vitality of the rural settlements in the region, however that there is an aspiration to ensure that ‘lots of new homes’ are not delivered in locations where car travel is the easiest or only way to travel such that development within the rural area is proposed to be concentrated in and around the villages that benefit from good transport links and other services.	211279 (Woolsington One Ltd)

Policy S/RRA: Other site allocations in the rest of the rural area

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

One comment supported the allocation in the draft local pan - Land west of Cambridge Road, Melbourn (Policy S/RRA/CR).

The majority of comments to this introduction section objected to the non-inclusion of development proposals in a variety of villages. Reasons sites included the relative sustainability of the locations, the opportunities to support services and facilities, the need for the plan to allocate more smaller sites, over reliance on large strategic sites to deliver the numbers required, and the plan simply not allocating enough homes to respond to local needs or national proprieties. A number of comments where sites are in the green belt considered their site was grey belt, and the plan should have identified grey belt opportunities. Many proposals challenged the findings of the Housing and Economic Land Availability Assessment, and proposed changes to the scoring.

Comments raised concerns regarding the Brickyard Farm, Boxworth Farm, Boxworth site north of the A14 services, siting concerns including the size of buildings, traffic and access.

Response to the main issues raised in representations

Proposals for alternative sites have been considered though an update to the Housing and Economic Land Availability Assessment where they fit within the broad emerging strategy of the local plan. New evidence submitted has been considered, and where

considered appropriate scoring has been amended. Comments related to strategy choices have also been considered, particularly under the development strategy policies. The deliverability of the plan has been tested through evidence including the Housing Delivery Study. The strategy focusing on other broad locations is considered to be sound. It is not proposed to add additional village sites to the proposed submission local plan. An update to the Green Belt Study has been carried out to consider which areas would meet he governments definition of being grey belt. Whilst some site may meet the definition, exceptional circumstances is still required for green belt release, and the Councils do not consider that exists in light of alternatives available.

Having identified a need for logistics space, the draft plan identified sites at the A14 Services and Slate Hall Farm to respond to that need. There are two other proposals in this area that were not selected. Further evidence has explored transport and heritage impacts and other issues. Having explored issues further, including considering comments made in representations, the two sites selected in the draft plan continue to be the preferred allocations. It should be noted however that promoters of all four sites have indicated an intention to submit planning applications ahead of submission of the local plan.

Table of representations

Comments supporting a draft plan allocation

Summary of issues raised in comments	Comments highlighting this issue
Land west of Cambridge Road, Melbourn (Policy S/RRA/CR)	204645 (Vistry at Bidwells)

Vistry supports Draft Policy S/RRA (Site allocations in the rest of the rural area) in as far as it includes the allocation of Land west of Cambridge Road, Melbourn (Policy S/RRA/CR) as a well-located, sustainable and deliverable site	

Comment proposing additional or alternative allocations

Summary of issues raised in comments	**Comments highlighting this issue**
Land south west of Villa Road, Impington (HELAA site ID 40232) Support HELAA conclusions of the site which rates overall suitability of the site as Red. No need for Green Belt release. Site proposal is deeply flawed.	201015 (M Colville)
Valley Farm, Meldreth Additional allocations in rural areas are required to make the plan sound. The site at is sustainable, located close to public transport links, active travel routes and a range of services. It is immediately available and deliverable, without the need for major infrastructure, in early stages of the plan period. It would therefore contribute to the objectives of the Local Plan. 2.7.3 The site could provide 198-266 dwellings. Landscape and heritage impacts can be mitigated. Safe highway access can be provided. 2.7.4 The site meets the requirements of the new draft NPPF for development close to railway	206220 (Lanpro Services at Granta Land ltd)
Land South of Horseheath Road Linton (HELAA Reference 40554) Housing allocations in rural areas are insufficient to meet local needs, particularly in villages. The respondent strongly objects to Draft Policy S/RRA for omitting several proposed site allocations in	205114 (Endurance Estates)

Linton, Balsham, Bassingbourn, and Orwell. Linton is highlighted as a sustainable settlement with adequate services and infrastructure, warranting allocation.	
Land at Hillside in Orwell (HELAA Reference 40496) Housing allocations in rural areas are insufficient to meet local needs, particularly in villages. The respondent strongly objects to Draft Policy S/RRA for omitting several proposed site allocations in Linton, Balsham, Bassingbourn, and Orwell. The respondent argues for the allocation of Land at Hillside in Orwell (HELAA Reference 40496) to support the village's essential services and maintain its vitality.	206834, 206840, 206841, 206842 (Endurance Estates)
Land at Beach Road, Cottenham (Site Ref. 40251) Upward adjustments are required to the housing target, the development strategy should direct development to the more sustainable villages, and there are exceptional circumstances to release land from the Green Belt.	211249 (Manor Oak Homes)
land south of Hauxton Road in Little Shelford (Site Refs. 52732 & 200769) Upward adjustments are required to the housing target, the development strategy should direct development to the more sustainable villages, and there are exceptional circumstances to release land from the Green Belt. All these factors indicate that additional allocations should be made in draft GCLP to meet development needs. Detailed comments provided on HELAA scoring.	211256 (R Harvey)
The Boundary, High Street, Horningsea (Site ID 59410) The HELAA assessment contains factual and procedural inaccuracies that have prevented proper consideration of a sustainable small site. The site was incorrectly assigned a “Red” access rating based on a constrained interpretation of the submitted red-line plan. Infill villages should not be excluded.	202046 (M Asplin)
Valley Farm, Meldreth [130982]]	202335 (Granta Land)

The site at Valley Farm, Meldreth is sustainable, located close to public transport links, active travel routes and a range of services. It is immediately available and deliverable, without the need for major infrastructure, in early stages of the plan period. It would therefore contribute to the objectives of the Local Plan. The site could provide 198-266 dwellings. Landscape and heritage impacts can be mitigated. Safe highway access can be provided. The site meets the requirements of the new draft NPPF for development close to railway stations.	
Land West of Station Road, Meldreth (Site ID: 115017 Additional allocations in rural areas are required to make the plan sound. The site at) is sustainable, located close to public transport links, active travel routes and a range of services. It is immediately available and deliverable, without the need for major infrastructure, in early stages of the plan period. It would therefore contribute to the objectives of the Local Plan. The site could provide 198-266 dwellings. Landscape and heritage impacts can be mitigated. Safe highway access can be provided. The site meets the requirements of the new draft NPPF for development close to railway stations.	202544 (Granta Land)
Land at Sheene Farm, Meldreth [131267]] Additional allocations in rural areas are required to make the plan sound. The site at Sheene Farm, Meldreth is sustainable, located close to public transport links, active travel routes and a range of services. It is immediately available and deliverable, without the need for major infrastructure, in early stages of the plan period. It would therefore contribute to the objectives of the Local Plan. The site could provide 365-521 dwellings. Landscape and heritage impacts can be mitigated. Safe highway access can be provided. The site meets the requirements of the new draft NPPF for development close to railway stations.	202657 (Granta Land)

Land East of Station Road, Meldreth (Site ID: 115143) Additional allocations in rural areas are required to make the plan sound. The site at is sustainable, located close to public transport links, active travel routes and a range of services. It is immediately available and deliverable, without the need for major infrastructure, in early stages of the plan period. It would therefore contribute to the objectives of the Local Plan. The site could provide 198-266 dwellings. Landscape and heritage impacts can be mitigated. Safe highway access can be provided. The site meets the requirements of the new draft NPPF for development close to railway stations.	202671 (Granta Land)
land at Silverdale Close, Coton (HELAA Reference 40079). Comments are made in the attached comprehensive document setting out the planning benefits for the development of 80 dwellings on The site boundary has been amended following comments within the HELAA and should be reassessed accordingly. The site meets the criteria for grey belt as set out in national policy, and the Errata Sheet confirms Green Belt release of parcel CT12 would have a 'negligible impact' on Green Belt land. The site should be considered again for allocation, particularly given the clear benefits set out in the attached.	202772 (Martin Grant Land Limited)
Whilst we do not object to the principle of allocating large new housing developments, we object strongly to the failure to balance this approach with a more diverse approach to housing delivery across Greater Cambridge in the emerging local plan. Allocating sites for housing developments in sustainable location such as Willingham would: • Deliver homes more quickly and in the first half of the plan period; • Provide certainty to smaller housebuilders; • Support the vitality of the rural area; • Delivery affordable housing in areas with pressing need; and • Offer greater flexibility for house buyers. The draft plan is currently placing a lot of risk for housing delivery in a limited number of very large pots, and in particular	202793 (Peter Norman)

the proposed large new allocations at Cambourne North and Grange Farm require the delivery of infrastructure at scale which is likely to delay their delivery. These delays have been experienced across many of the large strategic sites in Greater Cambridge in recent decades. Instead, we suggest a more blended approach, with a more rational approach to sustainable rural development is considered.	
Land West of Malton Road, Orwell (HELAA Reference 40324) Additional information for the site we are promoting.	203383 (Cemex UK Properties)
Land to the south of Rectory Farm, Harston (HEELA 2025 site ID: 115184) Jesus College object to Policy S/RRA due to insufficient housing and employment allocations in rural areas, which threatens village vitality and local services. The principle of sustainable development in rural areas is outlined in the National Planning Policy Framework (NPPF), which promotes housing that enhances rural community vitality. The Draft Local Plan's limited rural allocations could lead to an imbalance in housing supply, increasing reliance on strategic sites and undermining village growth. The approach of directing some growth to the villages should also take account of existing and proposed public transport improvements. With reference to Harston, whilst it is a relatively small village, it benefits from being within the A10 corridor, plus close proximity to further facilities and services available in nearby villages.	203399 (Jesus College)
The rural area policies lack sufficient housing and care home allocations, with only 20 homes at Melbourn, 65 at Caldecote, 200 at Fulbourn, and 120 at Melbourn, totalling less than 1% of the overall housing need in Greater Cambridgeshire as per Policy S/JH. The current allocations are contrary to NPPF paragraph 83, potentially leaving settlements like Girton and Over without meaningful housing	203402 (Abbey Properties)

supply during the plan period. There is a discrepancy with Appendix D of the Plan, which identifies a housing requirement of 90 new homes for Girton's neighbourhood plan, yet no new housing is included in the Local Plan.	
Land to the South of Station Road, Harston (ref: 115742) Jesus College object to Policy S/RRA due to insufficient housing and employment allocations in rural areas, which threatens village vitality and local services. The principle of sustainable development in rural areas is outlined in the National Planning Policy Framework (NPPF), which promotes housing that enhances rural community vitality. The Draft Local Plan's limited rural allocations could lead to an imbalance in housing supply, increasing reliance on strategic sites and undermining village growth. The approach of directing some growth to the villages should also take account of existing and proposed public transport improvements. With reference to Harston, whilst it is a relatively small village, it benefits from being within the A10 corridor, plus close proximity to further facilities and services available in nearby villages.	203428 (Jesus College)
Guilden Morden – HELAA Refs. 40300 (Land south of Church Street, east of High Street) and 40304 (Land off Swan Lane), which have been submitted for consideration as a consolidated proposal. Guilden Morden – HELAA Ref. 40315 (Land at Town Farm) Steeple Morden – HELAA Ref. 40294 (Land to the west of Brook End) Arrington – HELAA Ref. 40292 (Land to the southwest of Ermine Way) Kneesworth – HELAA Ref. 40299 (Land to the east of Old North Road) EW Pepper objects to Policy S/RRA. The following sites should be allocated for housing development, in the following settlements.	204091 (E W Pepper)

Land at Girton Road, Girton (site ID 115170) Not all locations in the Rural Area are equal as is implied by the policy, for example the proximity of Land at Girton Road, Girton to Cambridge and local amenities is strong evidence that sustainable transport options can be viable from rural areas. The residential allocation of Land at Girton Road is well connected to the city centre and aligns with the plan's ambition to support knowledge-intensive sectors by providing homes for employees within sustainable commuting distance. Development at Land at Girton Road would utilise land no longer in agricultural use and provide access to local shops, schools, and high-quality sustainable transport links.	204504 (Wain Estates)
Land south of West Street and west of South Street Comberton (Site ID 115659, HELAA Ref. 40152) The respondent objects to Draft Policy S/RRA due to insufficient site allocations in the Rest of the Rural Area. The respondent identifies as a suitable site to address housing needs in Greater Cambridge. The site is considered Grey Belt land according to the NPPF (2024) and should be reviewed for release from the Green Belt. The respondent recommends that the site be identified as Grey Belt in the forthcoming review, removed from Policy S/GB and Policy I/SI designations, and allocated for housing development.	204609 (Bellway Strategic Land)
Land west of South Street, Comberton (Site ID 115134, HELAA Ref. 40310) The respondent objects to Draft Policy S/RRA due to insufficient site allocations in the Rest of the Rural Area. The respondent identifies as a suitable site to address housing needs in Greater Cambridge. This Site should be allocated for housing development. Representation responds to the HELAA Addendum (2025) and discusses the site's merits in light of national policy changes since 2021, particularly the NPPF. The site is deemed suitable, available, and achievable for residential development, and is grey belt.	204626 (Bellway Strategic Land)

Land west of Cambridge Road, Melbourn (Policy S/RRA/CR) Vistry supports Draft Policy S/RRA (Site allocations in the rest of the rural area) in as far as it includes the allocation of Land west of Cambridge Road, Melbourn (Policy S/RRA/CR) as a well-located, sustainable and deliverable site.	204645 (Vistry)
Land south of High Street and west of M11, Hauxton, (HELAA reference 40283) Redrow objects to Policy S/RRA on the basis that the draft Local Plan fails to allocate sufficient land within the rural area to meet the uplifted housing needs identified elsewhere in these representations, and that the policy does not provide a mechanism for including additional sustainable village edge sites. Overall housing requirement should be increased, greater emphasis should be placed on distributing growth to the most sustainable villages, and the Plan should release appropriate areas of Green Belt, including “grey belt” land.	204767 (Redrow South Midlands)
'Land South of St Neots Road and West of Howells Way, Hardwick The respondent objects to Draft Policy S/RRA, stating that the housing allocations are insufficient to meet local needs in villages and omits ' for residential development. Proposed allocations are overly focused on strategic sites, which risks under delivery due to infrastructure constraints, and calls for a better balance between large and smaller-scale developments. The respondent highlights the importance of including rural locations in the development strategy to support the vitality of village settlements, referencing Paragraph 83 of the NPPF. The respondent promotes the site at Hardwick as a suitable extension for residential development, citing its logical location, existing services, and potential for transport enhancements.	204907 (Pigeon)
Land West of Beach Road, Cottenham (HELAA Reference 48095)	208775 (Croudace Homes)

Additional allocations in rural areas are required to make the plan sound. The site at is sustainable, located close to public transport links, active travel routes and a range of services. It is immediately available and deliverable, without the need for major infrastructure, in early stages of the plan period. It would therefore contribute to the objectives of the Local Plan. Landscape and heritage impacts can be mitigated. Safe highway access can be provided.	
Land at Station Fields, Foxton (Site ID: 115171 and HELAA Ref: 40084) Additional allocations in rural areas are required to make the plan sound. The site at is sustainable, located close to public transport links, active travel routes and a range of services. This site could support growth of the Cambridge Biomedical Campus and new local infrastructure such as a level-crossing bypass, A10 bridge and multimodal travel hub. It would therefore contribute to the objectives of the Local Plan. The site meets the requirements of the new draft NPPF for development close to railway stations.	208782 (Axis Land Partnerships Ltd)
Land off Brook Road, Bassingbourn (Site Ref. 40342) It is requested that is identified as an additional allocation as for the Rest of Rural Area (Policy S/RRA).	210668 (Gladman Developments)
Land off Whitecroft Road, Meldreth (Site Ref. 40338) It is requested that is identified as an additional allocation as for the Rest of Rural Area (Policy S/RRA).	210670 (Gladman Developments)
Land off Station Road, Over (Site Ref. 40551) It is requested that is identified as an additional allocation as for the Rest of Rural Area (Policy S/RRA).	210671 (Gladman Developments)
Land south of Willingham Road, Willingham (Site Ref. 40340) It is requested that is identified as an additional allocation as for the Rest of Rural Area (Policy S/RRA).	210672 (Gladman Developments)

Land South East of Hattons Road, Longstanton (HEELA Site ID 200801) These representations are accompanied by the submission of for consideration as an allocation in the Greater Cambridge Local Plan.	211088 (Hallam Land Management)
Land to the west of Water Lane, Melbourn, Cambridgeshire (HELAA Reference 40274) These representations are accompanied by the submission for consideration as an allocation within the Greater Cambridge Local Plan. Alongside the two already proposed allocation sites, the Site could provide additional housing to support sustainable growth of the settlement, which contributes towards the Councils' overall housing needs as well as providing an opportunity for the village to grow and thrive by supporting local services.	211089 (CALA Group Ltd)
These representations are accompanied by the following site submissions to be considered for allocation as part of the Greater Cambridge Local Plan: - Land to the south-east of Cambridge Road, Foxton (HELAA Reference 40408) - Land to the north and east of Barrington Road, Foxton (HELAA Reference 40412)	211093 (R2 Developments)
The following sites should be considered for allocation for residential development in the Local Plan: Swavesey – Land on the south side of Fen Drayton Road (HELAA Reference 208846). Swavesey – Land North of Home Close and West of Moat Way, Swavesey (HELAA Reference 40415). Swavesey – Land North of Home Close and west of Moat Way (smaller site) (HELAA Ref 208849).	211094 (Ceres Property)
The following sites should be considered for allocation for development in the Local Plan: • Histon and Impington - NIAB Park Farm, Villa Road, Histon (HELAA 208851) • Girton - Land East of Redgate Road (HELAA 40241) • Histon and Impington - Land West of South Road (HELAA 40232)	210096 (NIAB Trust)

• Histon and Impington - Land North-East of Villa Road (HELAA 40236) • Histon and Impington - Barn 3, Park Farm (HELAA 200772)	
Land at Beach Road, Cottenham (Site Ref. 40251). Upward adjustments are required to the housing target, the development strategy should direct development to the more sustainable villages, and there are exceptional circumstances to release land from the Green Belt. All these factors indicate that additional allocations should be made in the draft GCLP to meet development needs. Cottenham contains a good range of services and facilities, and employment opportunities. Key village facilities include a doctor's surgery, pharmacy, primary school, village college, church, shops, village hall, library, and a community sports centre, and access to the Guided Busway for wider transport.	211249 (Manor Oak Homes)
Rectory Farm, to the North-West of Milton (HELAA Reference 54906 / Site ID 115167) These representations have been accompanied by details to support for consideration as an allocation in the Local Plan.	211449 (Gonville & Caius College)
Land to the south west of Hurdleditch Road, Orwell (HELAA Reference 40378) These representations are accompanied by the submission of for consideration as an allocation in the Local Plan. The site is an agricultural parcel of land bounded by Hurdleditch Road to the east, as well as some residential development which wrap around to the southern boundary. Beyond the western and northern boundaries is further greenfield land.	211469 (Hayfield Homes Construction)
Land to the South of Butt Lane, Milton (HELAA Reference 40365) Turnstone Real Estate Limited are promoting as part of this consultation alongside the Diocese of Ely. Turnstone Real Estate Limited object to the site not being allocated as part of the Local Plan.	211590 (Turnstone Real Estate)

Land East of Ridgeway and Old Pinewood Way, Papworth Everard (Site Ref. 40439) Bloor Homes object on the basis that has not been allocated in the Local Plan. The site's suitability as an allocation has been set out in accompanying evidence.	2116117 (Bloor Homes)
Land North of Cambridge Road, Linton (Site Ref. 51654) Bloor Homes object on the basis that has not been allocated in the Local Plan. The site's suitability as an allocation has been set out in accompanying evidence.	211621 (Bloor Homes)

Comments referring to Brickyard Farm, Boxworth Farm, Boxworth, (Newlands) (Site reference: 47353, 115237)

Summary of issues raised in comments	**Comments highlighting this issue**
Strongly object the promotion of the site to the west of Boxworth Road: • Newlands promoting site to west of Boxworth Road, opposite the Cambridge services/Jaynic site. Combined effect would be a disaster for local environment. Traffic chaos would result. Newlands proposal itself wholly inappropriate: area far too large would create distribution monopoly for the area; not aimed at supporting Cambridgeshire; proposed building heights up to 24m (= 7 storeys) wholly inappropriate and incapable of mitigation by trees etc; Swavesey south roundabout can't cope even now. Alleged "community hub" just disguised lorry driver cafe; if it were real would simply compete with local village halls. Water/sewage capacity insufficient; creates flood risk.	201492 (P Rainey)
Very concerned about the potential Newlands development at J24 A14. This is not in the Local plan for good reason but is likely to apply for planning. This project is excessive in size and proposed for	205288 (A East)

National not local need. The access off the Swavesey dumbbell is unsatisfactory for an extra 4000+vehicles /day. There is no credible indication of how 2000+employees will get to the site other than by car - there is no public transport, cycleways or people living close enough to walk! Also I'm concerned about the lack of water and the handling of foul water.	
Proposal at the Boxworth junction with the A14. Obviously Newlands intend to apply, and appeal. Development focussed on unnecessary distribution warehousing. Proposal would involve a multiple of the current HGV use of the A14 junction which does not have capacity for the current HGV use. Inevitable congestion renders the business case for occupying the site for distribution non-viable. Would also create a multiple of the small vehicle use of the local Boxworth road. Scale of buildings proposed is totally inappropriate with no mitigation such as excavation to lower the ground level. Water supply and disposal will inevitably create further issues.	205351 (W East)

Policy S/RRA/ML: The Moor, Moor Lane, Melbourn

Summary of issues arising from Draft Local Plan representations:

The promoter of the site supports the policy and confirms that the site is deliverable, available and viable.

Comments have noted that the site is relatively far from the station and is likely to result in a number of car trips whilst the proposed number of homes on the site could be high density given the modest site area. There is a factual comment about the adjacent land uses and how they are described in the supporting text.

Historic England note that the Heritage Impact Assessment recommends development of no more than 2 storeys, but this is not reflected in the policy wording.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The site is adjacent to the existing Settlement Framework and the proposed Defined Development Extent, and it is within a reasonable walking and particularly cycling distance of Meldreth railway station. It is also within a short walk of Melbourn High Street and the village college. The suitability of the site from a highways perspective has been considered by the highways authority and is considered to be acceptable.

The supporting text has been amended to reflect the allotments and other boundary features whilst the policy includes specific building heights, as evidenced by the Heritage Impact Assessment.

As set out in the Site Allocations Capacity Schedule, the net dwellings per hectare is considered appropriate reflecting the

village location of the site. However, this would need to be tested in greater detail through a planning application process.

Table of representations

Summary of issues raised in comments	Comments highlighting this issue
We fully support allocating The Moor. The landowner has expressed his continued intention to promote the land for development though this Local Plan process. We consider that the site also remains deliverable and viable, when considered against both existing and emerging policy requirements. We are pleased to confirm that Land at the Moor remains both available and deliverable and that we, and our client, would be pleased to work with the Council in the progression of this site.	208350 (Sworders)
The site has no other access to the highway network and that vehicles to and from the site would pass Melbourn Village College and Melbourn Leisure Centre. The closeness of the site to services and facilities is a relative and subjective concept but it is noted that the distance to the railway station is about 1.1 miles and the route runs through the centre of Melbourn and the four way traffic light controlled junction formed by Cambridge Road, High Street, Mortlock Street and Station Road. In terms therefore of access to public transport links it is buses rather than trains which are truly proximate and preferable for those not using cars.	209056, 209057 (Fowlmere PC)
The supporting information also states that the site “is bounded by development on three sides, with screening provided by existing vegetation”. The existing development appears to FPC only to be on two sides, namely on the south-east boundary and across the road on the south-west. On the north-west boundary there are allotments (not traditionally referred to as “development”) and whilst the	209058 (Fowlmere PC)

science park is on the north-east boundary it is open green land rather than buildings across the boundary.	
The density envisaged appears to be high, particularly for housing in a village. It ignores the beneficial effects of private outdoor space and the spaciousness which people expect and seek in villages.	209059 (Fowlmere PC)
Welcome criterion 1b. The HIA refers to building heights of 2 storeys or less. This should be included within the policy.	210155 (Historic England)

Policy S/RRA/H: Land at Highfields (phase 2), Caldecote

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

The developer of the site supports the policy but identifies that the site could form part of a larger allocation. Historic England broadly support the policy whilst a site promoter for an alternative site states that their site should be allocated for development and the HELAA process has not been applied consistently. EWR seek to ensure if does not allocate land required for the railway.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- Alternative sites have been considered through the update to the Housing and Employment Land Availability Assessment (2026) whilst the Development Strategy Topic Paper sets out the council's position on why sites were rejected.
- Noting the broad support in the other representations, there are no proposed amendments to the allocation. The policy wording is broadly consistent with the outline planning permission for the site and does not prohibit it from being implemented.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**
We are disappointed that Site 40509 remains unallocated in the emerging Local Plan, which we consider unreasonable and unjustified. A review of the HELAA shows clear discrepancies between the assessments of allocated sites and Site 40509.	204316 (Waterbeach Instruments)

Vistry Strategic Land supports the allocation of Phase 2 (Policy S/RRA/H) and Vistry has provided comments in favour of it. However, it is recommended that the policy be amended to ensure that it reflects the planning permission for the site.	204046 (Vistry Group)
Site 40011, located on the east side of Highfields Road, is proposed as an additional phase to the draft allocation S/RRA/H, contributing more homes and green infrastructure. Phase 3 is positioned near facilities in Highfields-Caldecote, promoting accessibility by foot or bicycle. Access to Phase 3 from Highfields Road can be achieved through phases 1 and 2, ensuring safe and suitable access. The site is in a sustainable location and can provide additional homes and green infrastructure as an extension to Phase 2.	204954 (Vistry Group)
We welcome the preparation of the HIA and criterion 1d.	210156 (Historic England)
EWR Co is currently developing its proposals for environmental mitigation and temporary Public Rights of Way (PRoW) in this area, which have the potential to interface with the eastern boundary of this allocation site. The land which EWR Co has currently identified as being required for EWR within the allocation site is included in the safeguarded area. EWR project, EWR Co requests that draft Policy S/RRA/H is amended in order to avoid a conflict between the proposed allocation and the EWR Safeguarding Directions.	211897 (East West Rail)

Policy S/RRA/SCS: Land to the south of the Cambridge Services A14

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Executive summary:

There is broad support for the site allocation from Carter Jonas on behalf of Jaynic and the University of Cambridge.

Concerns were raised in relation to the need for and suitability of this use in this location.

Concerns were raised in relation to flood risk, water and impact on landscape.

Comments were made in relation to concerns about traffic congestion including impacts on the junction to the A14, roundabout and slip roads. Comments were also made on other sites which were not allocated in the draft plan.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- The need for this site for logistics and industrial uses is identified in the evidence base, the Greater Cambridge Warehouse and Industrial Space Needs 2025 and the Draft Greater Cambridge Employment and Housing Needs Update 2024-2045 20205. These studies outline the need for industrial and warehouse employment uses in Greater Cambridge.
- This site was selected for being in close to key transport route by the A14. The selection of the site was assessed through the HELAA, and the SA has explored the planning merits of the reasonable alternative sites, the Councils' preferred locations for the provision of B2/B8 space are on this site and Slate Hall Farm. Mitigation will be required for air quality, environmental protection, transport and archaeology, and this has been reflected in the policy wording.
- Point 1c has been added in response to representations concerned about building heights and the impact on the rural area. This sets out that -Building heights must be sensitive to the local rural context.
- In response to National Highways, the requirements for Transport capacity assessments have been included.

- In response to Anglian Water, point 1k has been added to the policy to ensure that construction of or route of the Grafham Pipeline is able to accommodate water infrastructure.
- Evidence regarding the transport impacts and required mitigations for the A14 allocations proposed within the plan is being prepared to inform the Proposed Submission Plan, including drawing on transport modelling and, where relevant, on site promoter material. The transport measures required to enable delivery of each site are set out in the relevant allocation policies and within the Infrastructure Delivery Plan. The Highways Authority at Cambridgeshire County Council have commissioned additional evidence to understand the implications of logistics on traffic congestion and the road network in the A14 corridor.
- The site will be subject to a Site Specific Flood Risk Assessment to mitigate against any potential flood risk issues.
- The management of water and foul water is set out in the wider Integrated Water Management Strategy for Greater Cambridge. Specific requirements for the site will be set out in development management Policy CC/IW: Integrated water management, sustainable drainage and water quality.
- In response to Cambridgeshire County Council, the reference to the requirement for an odour assessment and reference to the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) for further information.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Two large employment proposals (Land north of A1307, Bar Hill and Land south of Cambridge Services, A14) are located near the boundary with Huntingdonshire on which collaboration would be appreciated. The Economic and Employment Needs Assessment from Huntingdonshire identifies sector-specific needs to support local business and employment growth. Huntingdonshire District Council expresses a desire to work with GCSP on masterplanning to ensure the proposals complement local opportunities rather than create competition. The aim is to promote and diversify the local economy while supporting employment opportunities for residents with limited travel needs.	201660 (Huntingdonshire DC)

In light of the West Suffolk local plan approach, NPPF and PPG, the council asks Greater Cambridge to work collaboratively with its neighbouring authorities, including West Suffolk to seek to identify and address wider needs for large scale strategic logistics provision and data centres arising from national and regional demand and taking a strategic cross border approach. In particular as no provision for large scale B8 units or those meeting regional or national demand is made in allocations S/RRA/SCS and S/SHF and neither does policy J/NE support such proposals.	204774 (West Suffolk Council)
Proposals for new large logistics and business sites between the A14 Swavesey J24 and Bar Hill J25 junctions would impact Swavesey in the following ways. The Parish Council wishes to raise its concerns and highlight the following points: • There is a concern regarding the increase in traffic volume, including HGVs, delivery vehicles, and cars, leading to rat-running through villages alongside the A14. The integrity of the A14 flyovers is questioned, as they are reportedly sinking under current traffic flows. The respondent highlights the need for additional HGV parking to address existing issues and dangers in and around villages and the A14. Additional HGV parking is vital for any consented developments. A cumulative impact assessment of increased traffic from both consented and proposed housing and business developments in the area is required. • The size and height of proposed logistics buildings in a flat, open landscape near villages must be carefully evaluated for their environmental impact. • Concerns are raised about surface water from the site potentially increasing flood risk in Swavesey, necessitating a condition for attenuation basins. Cumulative data and management plans regarding the effects of developments on the Swavesey drainage system is requested with concerns over water release from basins after high river levels. All foul water from proposed sites will flow into Uttons Drove Treatment Works and then into the Swavesey system, adding to the surface water concerns already mentioned.	203039, 207719, 207720, 207723, 207727, 207728 (Swavesey PC)

• Major new housing at Cambourne North, Bourn and continued development of Northstowe will impact both highway and water infrastructure around the Swavesey area. • Cumulative impact needs to be a consideration of each individual development site.	
The Jaynic site on the land to the south of Cambridge services shows all traffic entering and leaving the site from Boxworth Road, a narrow, single carriageway road which is currently subject to a 7.5 ton weight restriction. Jaynic should be required to show how their site can be accessed from a combination of the A14 slip road (for HGVs) and the roundabout adjacent to the Cambridge Services.	202758 (Boxworth Parish Meeting)
Site is partly located within the Consultation Area for the Uttons Drove Water Recycling Centre. This should be identified as a constraint in the supporting text. The following supporting text is recommended for inclusion.	210601 (Cambridgeshire County Council)
Specific access proposals – Slate Hall Farm/C25 via the A1307, Jaynic via Boxworth Road, Tritax/Noon Folly's new slip-road onto the B1050, and Newlands via the Swavesey south roundabout – would add substantial traffic and are inadequately addressed. Where logistics developments are included in the local plan the relevant Policy should be amended to make specific reference to acceptable access routes to the national road network. We maintain that, far from being 'detail', without site access requirements being set out in the Draft Plan Policies we are unable to assess the cumulative impact on our local communities.	206379 (Boxworth Parish Meeting on behalf of A14 Logistics), 211432 (Boxworth Parish Meeting)
All developers should be explicit about how they will manage HGV parking provision to avoid further impacts on communities along the A14 corridor at Bar Hill and Boxworth.	206380 (Boxworth Parish Meeting on behalf of A14 Logistics), 211433 (Boxworth Parish Meeting)

Lolworth supports development that is planned, allocated, and policy-compliant under the GCLP. However, the Tritax proposal represents an unallocated, disproportionate, and inappropriate form of development that conflicts with the Local Plan's spatial strategy, harms the rural character of the area, and places unacceptable pressure on infrastructure and residential amenity. While Lolworth supports GCLP-allocated growth, the Tritax development should not be permitted on the basis of the above reasons and also that it will exceed the GCLP required capacity and is therefore not needed. For clarification Lolworth also supports the separate submission made or to be made by the A14 Logistics Forum.	201654, 205856 (Lolworth Parish Meeting)
The proposed Tritax development does not form part of the GCLP's spatial strategy and has not been identified as a suitable or necessary allocation through the plan-making process. Allowing a speculative, large-scale logistics development outside of the adopted or emerging plan framework would fundamentally undermine the integrity of the Local Plan system. The Tritax proposal represents a quantum of development entirely disproportionate to Lolworth's scale and function. The Tritax proposal is driven by regional or national logistics demand rather than the needs of Lolworth or its surrounding communities. Introduces traffic volumes and HGV movements that will place undue pressure on transport network. Tritax proposal would result in: Significant landscape and visual harm. Increased noise and air pollution Light pollution inconsistent with a rural setting. Lolworth has accepted and supports development where it is properly planned, justified, and allocated. The Tritax proposal does not meet these tests.	205850, 205851, 205852, 205853, 205854, 205855 (Lolworth Parish Meeting)
Whilst there are no designated heritage assets within the site boundary, there are a number of assets nearby, St Peters Church Boxworth and all Saints Church, Lolworth, both listed at grade II* as well as a	210157 (Historic England)

number of other listed buildings. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA. The HIA refers to the importance of managing heights in relation to heritage impacts. Employment uses have the potential for greater impact due to scale and massing. To that end the need for detailed heritage impact assessment should be included in criterion 1 c. References should also be made to nearby heritage assets in the policy. Given the likely scale of the employment development, we have some concerns regarding the potential impact on the historic environment of this employment allocation. The HIA should be reviewed prior to Regulation 19 to consider this issue in more detail. This should also include further evidence in relation to heights and mass informed by some visualisations. We need to be able to explore further whether there is likely to be an impact on these assets and, if so, what mitigation may be needed.	
Request provision of transport evidence base, appropriate strategic transport model assessment and supporting modelling to be provided.	209011 (National Highways)
Concerns raised around traffic congestion, specifically around the roundabout and slip roads to A14.	201260 (C Howlett), 201284 (J Witherow), 201324 (M Lester), 201445 (S Pink), 201449 (C Barnard), 201497 (V Lebedeva),
There are real concerns about traffic safety at this, already busy junction. With relation to climate crisis any further employment at this site means everyone has to drive to this site which will add more traffic. IF	201751 (S Barnard)

such a site is requited in this area it makes more sense to locale at southern Barhill southern site for distribution/logistics which is more integrated with transport networks.	
In favour of the lorry park increase in capacity if lorry parking is restricted.	201260 (C Howlett)
This is an inappropriate site for development for a number of reasons: Overdevelopment of a predominantly rural site; Access to/from the A14 via the existing junctions is poor and dangerous & unsuitable for additional HGVs; Adds additional freight traffic in a rural location, placing pressure on existing roads, and adding an enormous amount of addition CO2 and local air pollution; It is not served by public transport, therefore will lead to significant additional vehicle journeys by employees; It is contrary to the Climate Change emergency and to policies to reduce carbon and to protect biodiversity; Better alternative sites exist.	201449 (C Barnard)
The site is suitable next to existing services and lorry parking. Conditions are required for height restrictions and use of roundabout for access.	201490 (P Rainey)
The site should retain treeline and plant new trees.	201490 (P Rainey)
In the event that the draft allocation is maintained, we would ask that the site area proposed is revisited to avoid this conflict, and that additional wording is added to the Policy wording to require the future developer to engage with Anglian Water from the outset to agree the design and layout in order to ensure the two developments are compatible including their construction phasing, alongside agreeing appropriate easements and access for long term maintenance. Until such time that appropriate	210196 (Anglian Water Services)

amendments are made to the draft allocation and its wording to safeguard the delivery of the downstream route corridor for the Fens Reservoir, Anglian Water object to the draft allocation. We would welcome the opportunity to discuss the policy area and wording with you further	
This response recognises the drivers behind the principle of allocating land south of Cambridge Services for HGV parking and employment uses, but highlights several tensions and delivery risks. It notes the conflict between the scale and 24-hour intensity of the proposed development and objectives to preserve rural character, alongside under-specified mitigation for landscape, noise, and lighting impacts. It raises concerns about reliance on Boxworth Road for access and recommends a direct A14 slipway to reduce rural traffic impacts. It calls for a full Transport Assessment with junction modelling and an HGV routing strategy. It also seeks clearer definitions of “local needs,” tighter controls on ancillary facilities, stronger energy and drainage requirements.	201781 (A Jackson)
They need to make provision for rail/light rail freight. They haven't.	203791 (A Carpen)
I accept that delivering extra needed lorry parking at the Cambridge services. My concern is the access onto Boxworth Road should be straight off the services roundabout. Also the amount of traffic that will come through Boxworth Village. I also believe that Newlands Development are going to apply for a much larger logistic site opposite the Jaynic site which would completely alter the area of farmland looking towards Boxworth which at present is beautiful rolling countryside. Apart from causing considerable amount of traffic through Boxworth completely ruining one of the better views in Cambridgeshire with warehouses up to 24m high.	201284 (J Witherow)

Jaynic proposal South Boxworth Services. Access needs to be on slip road to services as the road into Boxworth is not suitable for an entrance by lorries. Buildings need to mirror size of Buckingway B P opposite. More info on increase in traffic through villages needed	201306 (S Hoyland)
There is no “local need” for an industrial site here. Note number of unoccupied units at existing sites along A14 corridor. Size of proposed units overbearing and developers are being misleading about actual height! Proposed access not in consultation with Highways.	201321 (R Morley)
It is not clear this development meets local needs. The roundabout level with the bridge over A14 is routinely congested; More HGVs will exacerbate this. Extra road capacity will be needed. Traffic through Boxworth is a concern now. The current weight restrictions are not enforced or policed & routinely ignored. The proposal to increase signage and calming measures is not credible given the failure of the current arrangements. The size of the buildings is not specified – the visual impact on the environment from big blocks is a major concern	201324 (M Lester)
This is an inappropriate site for development for a number of reasons: Overdevelopment of a predominantly rural site; Access to/from the A14 via the existing junctions is poor and dangerous & unsuitable for additional HGVs; Adds additional freight traffic in a rural location, placing pressure on existing roads, and adding an enormous amount of addition CO2 and local air pollution; It is not served by public transport, therefore will lead to significant additional vehicle journeys by employees; It is contrary to the Climate Change emergency and to policies to reduce carbon and to protect biodiversity; Better alternative sites exist.	201449 (C Barnard)
The respondent notes key issues against this proposal:	201497 (V Lebedeva)

Scale and height of proposed structure are inappropriate for this setting. It is scaled at national and regional needs, not local needs. Concerns around increased traffic and roads not being able to cope. This is an inappropriate setting for such a facility.	
The sole access to this site should be from the slip road off the A14, not from the Boxworth local road. Lorry parking spaces should be maximised to reduce illegal parking on local roads and the roundabout at the services. A shelter belt of trees should be planted between the site and Boxworth village, to reduce visual impact. These trees need to be professionally maintained so they become established. Buildings should be low rise and have solar panels to help meet net zero targets.	201487 (Dr E and J King)
Accept need for more logistic space that serves local needs. Scale of buildings and site needs to be in line with pre-existing buildings and planning restraints of Buckingham Way and service area. Service area is well screened and should provide model for this area.	202738 (L Turton)
The road network in South Cambridgeshire is reaching capacity, particularly roads into Cambridge, necessitating urgent attention. The planning, design and construction of the A14 bridges and junctions, including at Cambridge Services, has not worked. The lack of a full junction between the A14/M11 and A428 at Girton is a significant issue that requires resolution. Frequent traffic congestion and accidents at the Cambridge Services junction and roundabouts are concerning, particularly for school bus routes. There is a need for stricter regulations on HGV parking at roundabouts to enhance safety. The increase in lorry traffic from the new sites would be problematic, especially with the planned EWR station and North Cambourne developments. Redesigning junctions from the A14 and stopping HGV traffic going through villages is necessary to manage increased vehicle movements and improve safety.	203575 (G Pope)

The proposed site is not advisable given the current road network. The Newlands site with large warehouses is even less suitable.	
Building heights on this development should be similar to those of the Buckingway development on the opposite side of the A14, max 12/13m The additional lorry parking places are welcome but the access to this parking and the access to the site needs rethinking as traffic already backs up on the Cambridge Services roundabout. The developer has been told that access of the A14 slip road is not possible however National Highways should be engaged to review as there appears to be plenty of space to introduce an access off the slip road. Boxworth Road access in not acceptable	204071 (N Turton)
Although the development will mean additional traffic on local roads and congestion at the junction, it is by far preferable to alternative suggestions such as the Newlands proposal on the NW side of the Boxworth road. There is flexibility to build a separate access road so that vehicles can access and the site without using the Boxworth road, and the proposal includes additional HGV parking. (Currently illegal HGV parking is a cause of inconvenience and a safety hazard. The size and scale of buildings needs to be appropriate (like the development at Buckingham Way opposite) with minimal light pollution.	205246 (W East)
I am broadly supportive of this development but with a few concerns: The access needs to be away from the unsuitable local road - please consider a separate slip road off the A14. The Swavesey dumbbell roundabout on the Boxworth side is unfit for purpose already so will need major improvement. The size and scale of the buildings should be appropriate for the landscape i.e. small to medium size, and for local not national need.	205247 (A East)

There is emphasis employees cycling and walking to work. This will be easier from the Bar Hill developments. I'm in favour of additional lorry parking.	
As a resident of the village of Boxworth I obviously have some concerns with extra commercial building projects that I feel will impact on myself and the residents of the village. It should be plain to see that the area as a whole simply does not require the amount of warehouses being proposed at this time but after saying that, the building of this much smaller site than the one proposed by Newlands is much preferable not only for the aesthetics but far less traffic coming through the local villages and congestion on the A14.	205269 (P Kitson)
After visiting the public consultation held in the village hall close to us (Boxworth) it does seem that the developers have put a lot of thought and effort in to this project but two things stand out. 1. The proposed height of the warehouses (up to 24metres). 2. The considerable amount of extra traffic requiring entrance and exit to the site during building works and also once open for business.	205396 (P Kitson)
Entry and exit routes to site are critical, should not be off Boxworth Road. Swavesey South roundabout is not for purpose now. Provision of more lorry parking is welcome. Increase in traffic along rural roads needs consideration as does the policing of weight restrictions.	205639 (L Turton)
Direct lorry access off A14 into & out of the site only, preventing site movements accessing Boxworth Road. Noise & disruption to local residents (additional tree lines & sound proofing screens). Protect Boxworth Road's ancient treeline & idyllic access. Protect Boxworth roaming local habitats (muntjaks, badger & black squirrel). Boxworth Road bollard lorry restricting methods, prohibitive signage & ANPR cameras. Screening provisions, protecting sightlines to Boxworth village. Restrict building heights to	203940 (R Chamberlain)

10/12m. Comments are on a compromise basis, with an overall OBJECTION to the adjacent Newlands Development proposals.	
The Local Plan must gather data on a cumulative basis, to show the impact this proposal will have on the wider area. This is for volume of traffic on major and local roads and also for water management, both surface water and treated foul water. Development is proposed in this area for a number of large sites, all of which will send surface and foul water through the same drainage system out to the River Gt Ouse. Cumulative impact must be assessed.	202551 (L Miller)
Proposal at the Boxworth junction with the A14. Obviously Newlands intend to apply, and appeal. Development focussed on unnecessary distribution warehousing. Proposal would involve a multiple of the current HGV use of the A14 junction which does not have capacity for the current HGV use. Inevitable congestion renders the business case for occupying the site for distribution non-viable. Would also create a multiple of the small vehicle use of the local Boxworth road. Scale of buildings proposed is totally inappropriate with no mitigation such as excavation to lower the ground level. Water supply and disposal will inevitably create further issues.	205351 (W East)
The road network in South Cambridgeshire is reaching capacity, particularly roads into Cambridge, which raises concerns about traffic management. The planning and design of the A14 bridges and junctions, especially at Cambridge Services, have not been effective and require reassessment. The lack of a full junction between the A14/M11 and A428 at Girton is a significant issue that needs urgent attention. Frequent traffic congestion and accidents at the Cambridge Services junction, particularly on the roundabouts, highlight the need for improved traffic flow and safety measures. There is a concern regarding HGV parking on roundabouts, which should be addressed to enhance safety and traffic	203568 (A Pope)

management. The potential increase in lorry traffic poses a risk to local villages, particularly with the developments of the EWR station and North Cambourne. Consideration should be given to the impact on school bus routes, such as those servicing Swavesey Village College. Redesigning the junctions from the A14 is necessary to accommodate increased vehicle movements and to improve safety and reduce tailbacks.	
There are real concerns about traffic safety at this, already busy junction. With relation to climate crisis any further employment at this site means everyone has to drive to this site which will add more traffic. IF such a site is requited in this area it makes more sense to locale at southern Barhill southern site for distribution/logistics which is more integrated with transport networks.	201571 (S Barnard)
Access off Boxworth Road should be from A14 or services roundabout, Building heights should be tightly restricted to max 10m, and Development should meet local not national needs.	201784 (J Bennison)
I strongly object to the proposed development. This proposed 24.58-hectare logistics development near Boxworth presents significant risks to public safety, ancient woodland, and rural community wellbeing. The logistics scheme would concentrate HGV traffic on the A14 corridor, worsening congestion, pollution and delaying emergency-service response, posing an unacceptable public-safety risk. • The development would destroy ancient elm woodland and associated species, causing irreversible loss of irreplaceable ecological and heritage assets. Cambridgeshire is already one of the most nature-depleted counties in England; further loss of ancient habitat is unacceptable. • This area is already under pressure from solar farms, housing expansion and other industrial proposals, creating an overbearing concentration of development. The proposal threatens Boxworth's rural community by removing agricultural land, undermining generational farming livelihoods and eroding the village's heritage and wellbeing.	201886, 206006, 206007, 206008, 206009, 210498, 210499 (M Goldberg)

• Even with the proposed 25-metre landscape buffers, the development will generate significant light pollution, air pollution, noise disturbance, surface-water impacts, further congestion on the A14 and increase in emergency services and emergency response times. These harms cannot be offset by planting, drainage adjustments or visual-impact assessments. • This is a high risk logistical rest stop and will have cumulative impacts for the local community.	
The Draft Local Plan lacks a comprehensive assessment of the cumulative effects of proposed developments on traffic, road network adequacy, and flood risk, which is seen as a fundamental flaw.	203556 (D Pope)
The respondent expresses concerns about the proposed allocation under Policy SRRA.2, stating that the site's limited scale and capacity are insufficient to meet the strategic need for B2 and B8 accommodation in Greater Cambridge. The allocation is seen as prioritising specific operational needs over the delivery of modern, large-scale industrial and logistics space that aligns with market demand, raising doubts about its effectiveness.	204233 (Bidwells LLP on behalf of Tritax Big Box Developments)
Large industrial units are incompatible with existing landscape patterns of hedgerows, tree belts and open farmland, causing traffic impacts, light pollution and flooding issues.	204574 (I Chamberlain)
Support for the policy.	204661 / 204675 (Carter Jonas on behalf of Jaynic), 204818 (University of Cambridge)
Extra MSA Group fully support the proposed allocation for additional HGV parking at Cambridge Services, as set out in Policy S/RRA/SCS.	207081, 207082, 207083 207084 (Zerum on behalf of Extra MSA Group)

Policy S/RRA/BBP: Land at Buckingway Business Park, Swavesey

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Executive Summary

There is broad support for the inclusion of inclusion of reference to Cambridgeshire and Peterborough Minerals and Waste Local Plan from Cambridgeshire County Council. Cambridgeshire County Council supports the allocation of the site.

Concerns were raised about the pipeline for the Fens Reservoir as it goes adjacent to the site and Anglian Water have therefore requested continued engagement on the site.

Further responses were received from Historic England supporting the HIA and allocation and requesting amends to the requirement for a detailed HIA has been added to point 1d and the timescale for an archaeological assessment has been included in point 1f.

Concerns were raised about the allocation is not large enough to significantly address the identified need for strategic B2 and B8 accommodation as per the supporting evidence base.

Concerns were raised about the impact on traffic particularly around the A14 junction and the need for more public transport.

Concerns were raised by Swavesey Parish Council in relation to traffic and HGV parking.

Response to the main issues raised in representations

The responses have been considered and the representations considered on the individual Local Plan:

- Support noted for the inclusion of reference to supporting text and allocation from Cambridgeshire County Council.
- In response to Anglian Water, the policy has been revised to include wording to refer to continued engagement and design around the pipeline for the Fens Reservoir.
- In response to Historic England, the requirement for a detailed HIA has been added to point 1d and the timescale for an archaeological assessment has been included in point 1f.
- The comments from Tritax Big Box Development are noted with regard to employment floorspace supply of B8. There is an oversupply in Greater Cambridge of employment floorspace to provide flexibility in the market.
- Evidence regarding the transport impacts and required mitigations for the A14 allocations proposed within the plan is being prepared to inform the Proposed Submission Plan, including drawing on transport modelling and, where relevant, on site promoter material. The transport measures required to enable delivery of each site are set out in the relevant allocation policies and within the Infrastructure Delivery Plan.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
I have concerns about increase to traffic at the junction to the A14 if this goes ahead due to increased traffic. It makes more sense to site a logistics /distribution hub at the Barhill southern site where there would be better links to transport for employees. Any new employment created would mean that everyone would have to drive to this site as there isn't a good bus network here. With climate crisis council and planners need to be reducing road traffic not increasing it.	201752 (S Barnard)

This makes sense, but adequate consideration needs to be made for employee commuting as there is no public transport, so this will add congestion to local roads as well as increased carbon emissions.	201452 (C Banard)
Support for the allocation. 201451	202121 (Carter Jonas on behalf of Cambridgeshire County Council)
Concerns raised about impact on traffic congestion on local road networks.	203125 (Swavesey PC)
The respondent has no objection to the proposed allocation, noting it may contribute positively, though limited, to the overall supply of employment land. This site allocation is not large enough to meet identified need for B2 and B8 accommodation.	204280 (Bidwells on behalf of Tritax Big Box Developments)
The proposed allocation covers 2.11 hectares at Buckingway Business Park and has capacity for approximately 10,000 sqm of B2/B8 Industrial and Logistics development. This draft allocation is adjacent to the preferred route of the associated water infrastructure. As mentioned above, the design refinement process for the Fens Reservoir is ongoing and the alignment of the pipeline is potentially subject to change which may impact this allocation in due course. Given the proposals are still at an early stage, Anglian Water requests ongoing engagement with the Council throughout the preparation of the Local Plan, and the future developer at the appropriate time. This will ensure that both developments can be progressed and are compatible, including during construction and operation.	210197 (Anglian Water Services)
Whilst there are no designated heritage assets within the site, there is a grade II listed barn for the north-east of the site. There is also a cluster of listed buildings at Lolworth, including the grade II* All Saints Church. Any development of this site therefore has the potential to these heritage assets through	210158 (Historic England)

development within their settings. We welcome the preparation of the HIA. We note that the HIA has given some consideration to heritage assets at Lolworth. We welcome criterion d and the reference to Lolworth church. Employment uses have the potential for greater impact due to scale and massing. The need for a detailed heritage impact assessment should be included in criterion 1 d. We welcome criterion f though it would be further improved by clarifying when the assessment will be required. Given the likely scale of the employment development, we have some concerns regarding the potential impact on the historic environment of this employment allocation. The HIA should be reviewed prior to Regulation 19 to consider this issue in more detail. This should also include further evidence in relation to heights and mass informed by some visualisations. We need to be able to explore further whether there is likely to be an impact on these assets and, if so, what mitigation may be needed.	
Support for inclusion of supporting text.	210602 (Cambridgeshire County Council)

Policy S/RRA/SNR: Land to the north of St Neots Road, Dry Drayton

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

The site promoter supports the proposed allocation but requests that the site includes other employment uses to meet local needs, provide greater flexibility and align the allocation with the emerging National Planning Policy Framework. EWR seek minor amendments.

Historic England support the policy wording in relation to addressing any potential heritage impacts.

Response to the main issues raised in representations

The site remains allocated for E class uses. Through the allocation of other sites, the Local Plan seeks to meet its identified local warehousing and logistics needs and therefore it is not necessary to include these uses on this site. Additionally, the site is adjacent to a number of residential properties, and these types of uses may have adverse impacts on residential amenity.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**
The respondent supports the continued draft allocation of the site for employment uses but with suggested amendments:	201589 (Paragon Land & Estates Limited)

• The site has potential for a wider range of employment uses than those currently proposed in the draft allocation. • Amending the policy to include B2 and B8 uses alongside the proposed E class uses. • Changes regarding site area, capacity, and development requirements	
We welcome the preparation of the HIA and criterion 1e. Any development of this site therefore has the potential to affect the designated heritage assets and their settings. However, there is considerable vegetation and distance between the site and the proposed allocation.	210159 (Historic England)
The land within the site which EWR Co has identified as being required to deliver its proposals is included within the EWR safeguarded area. EWR Co supports the requirements of draft Policy including criterion 1b and 1c. EWR Co request the following minor amendments for clarity and to ensure the proposals do not conflict with the Safeguarding Directions.	211896 (East West Rail)

Policy S/RRA/OHD: Old Highways Depot, Twenty Pence Road, Cottenham

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

One representation received, which notes that the policy does not reflect all of the recommendations from the Heritage Impact Assessment.

Response to the main issues raised in representations

The policy has been updated to reflect the recommendations of the Heritage Impact Assessment.

Table of representations

Summary of issues raised in comments	Comments highlighting this issue
Development of this site has the potential to affect local heritage assets and their settings including views into and out of the Conservation areas. We welcome the preparation of the HIA however not all of the recommendations of the HIA are fully reflected within the policy. In particular, the following recommendations are absent: • Siting of development to avoid obstructing or interfering with views of the church tower from Twenty Pence Road	210160 (Historic England)

• Restricting building heights to limit visual intrusion into the conservation area and in views of the conservation area e.g., 1-2 storeys. These should be included within the policy.	

Policy S/RRA/NW: Norman Way, Over

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is broad support for the site allocation from Cambridgeshire County Council and Historic England.

Comments were made by Esco Prospect to encourage the allocation of residential uses in this area.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- This site allocation has been assessed as suitable employment uses through the HELAA and has demonstrated to be deliverable through the Housing Trajectory. The scale of development is appropriate for the level of services and amenities in this location.
- In response to Historic England and Cambridgeshire County Council, the support and comments are noted.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue

Support for policy.	202119 (Carter Jonas on behalf of Cambridgeshire County Council)
No residential development is proposed for Over despite being close to new site allocations proposing employment floorspace and therefore more jobs.	203146 (Chaplin Farrant Ltd on behalf of ESCO Prospect)
Whilst the principle of development of this site has already been established and there is a buffer of planting between the site and nearby heritage assets, any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA and criterion 1 a, 1b and 1d.	210161 (Historic England)

Policy S/RRA/CRH: Land Adjacent to Cambridge Road (A10) and Mill Lane, Hauxton

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made by Historic England welcoming the preparation of a HIA, and an image of the landscaped open space in the northern part of the site and no more than 2 storeys (residential) to be included in the policy wording.

Comments were made by the Environment Agency that an FRA and sequential approach are needed.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- In response to Historic England, these comments are noted and the policy has been amended to include wording around restrictions for the landscaped area already in the existing wording for clarity and point 1c has been added to include the restrictions on the building heights for residential development not exceeding two storeys.
- A requirement for an FRA and sequential approach are set out in Policy CC/FM Managing Flood Risk.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
This part of the site lies very close to the cluster of grade II listed buildings at Hauxton Mill. Any development of this site has the potential to affect these heritage assets and their settings.	210162 (Historic England)

We welcome the preparation of the HIA. There are opportunities for design to enhance the setting of the heritage assets. The HIA recommends an area of landscaped open space in the northern part of the site. This is shown in diagrammatic form in the HIA. This diagram should be included in the Local Plan. The HIA also recommends no more than 2 storeys (residential). This should be included in the policy.	
This policy should refer to the requirement for an FRA and need to take a sequential approach to the site layout.	211181 (Environment Agency)

Policy S/RRA/CH: Land at Compass House, Chivers Way, Histon and Impington

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is broad landowner support for the allocation however they requested that the policy also allow for residential uses, whilst several other comments raised concerns about the impacts of development on adjacent properties including overlooking and environmental factors like light pollution. Comments also noted heritage assets adjacent or close to the site and how development could have an adverse impact on them and their setting if not managed sensitively. The majority of comments requested that the policy include additional criteria so that these issues are addressed through the future design and layout of the development.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- In response to Historic England, these comments are noted and the policy has been amended to include additional heritage assets within close proximity to the site that could be affected by the redevelopment of the site.
- The Councils have a separate and agreed process for the consideration of Non-Designed Heritage Assets. Should this particular NDHA be nominated for consideration, the councils would then consider the historic merits of the property in line with this agreed process.
- The policy has been amended to reflect the comments made in relation to the relationship of the site within adjacent residential properties, requiring the careful consideration of direct and indirect impacts through the planning application process.
- Matters in relation to flooding are already addressed through other Local Plan polices and therefore, are not repeated in this policy.
- An additional requirement has been added to the policy in relation to mitigating any transport impacts in a timely way.

- The NPPF is clear that Local Plan should not impose architectural styles. However, the policies within the Great Places chapter of the Local Plan require development proposals to reflect the site's context, which may include its historic uses and architectural built form.
- The policy has been retained for employment uses only. The site is currently in employment use and therefore the principle of this land use has already been established. The introduction of residential uses in addition to employment uses would require further testing to understand the impacts generated by the proposal and whether they could be suitably mitigated. It is also not clear from the representation whether the introduction of residential development is, in part, replacing the existing office floorspace or in addition to the proposed uplift. Given this uncertainty and that at this stage, it is not clear whether a mixed-use development it suitable or achievable, the policy has not been amended regarding this point.
- The policy also requires development to take comprehensive approach to placemaking when considering adjacent sites, including Vision Park, which is supported by the landowner.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**
I am concerned about the redevelopment of the site: • flooding impacts given existing issues • Overlooking into existing residential properties • Light and noise pollution • Traffic near the Busway junction • Overcrowding on the bus network	201007 (L Cooper), 201008 (R Thomas), 201009 (D Hall)
The car parks already there seem mostly empty, are more offices necessary and will they be used? Would hope that the pond/cafe/trees will remain.	201007 (L Cooper)
The site is located close to a group of older properties that give Histon and Impington its character. I am concerned about how intensification here will affect the conservation area. The policy would benefit	201009 (D Hall)

from clearer limits on scale and type of use, better protection for the cottages facing the site and stronger expectations around drainage, traffic and screening. I am not against redevelopment, but feel the policy needs firmer safeguards so any future scheme fits well with the surrounding homes and the character of this part of Histon and Impington.	
The best bits of the old Chivers factory buildings should be rebuilt and restored - down to the last moss-covered roof tile. Failing that, any new building designs should explicitly demonstrate they have been inspired by the wonderful architecture and design of the old Chivers works.	203831 (A Carpen)
Whilst there are no designated heritage assets within the site, Histon Conservation Area lies to the north of the site. The grade II listed 82-92 Station Road also lies to the north of the site. The Mill Cottage Grade II and Impington Mill grade II* lie to the south of the site. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA. Criterion b should also refer to the Impington Windmill (grade II* and Mill Cottage (Grade II). The plan should be clear about the status of the potential NDHA.	210163 (Historic England)
General support for the allocation. The NPPF 2024 promotes comprehensive and coordinated development and it is considered the policy wording should be amended to include ensuring the development aligns through collaboration with the Mixed Use Development in Histon & Impington Station Area (Area of Major Change) (policy S/AMC/HIS) and with Vision Park (owned by our client). This will help to deliver coherent masterplanning, high-quality design outcomes and long-term	204479 (The Royal London Mutual Insurance Society Ltd)

deliverability with a comprehensive approach to placemaking across Vision Park, Compass House, and Histon & Impington Station Area holistically.	
This draft allocation covers the Site boundary and is currently allocated for Class E(g)(i) and E(g)(ii) uses. It is proposed that the allocation be updated to the following: “Site area of 1.7 hectares Allocated for mixed use employment and residential, including office (E(g)(i)), research and development (E(g)(ii)), residential units (including shared-living forms of residential accommodation) and associated ancillary uses.	211109 (Quod)

Policy S/RRA/CR: Land to the west of Cambridge Road, Melbourn

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Broad support for the policy however the landowner commented that the allocation should either support a residential only scheme or be more flexible to enable a residential led development to come forward, noting the lack of demand for this type of employment uses in this location.

Response to the main issues raised in representations

The policy has been amended to account for the representations received by the site promoter. This site is well served by the existing village, including its services and facilities, and is in close proximity to a large employment location. Given the consented development, the policy has been amended to reflect a change in the proposed land uses.

Table of representations

Summary of issues raised in comments	**Comments highlighting this issue**
There are no designated heritage assets within and site. The Melbourn Conservation Area and associated listed buildings lies further to the south-west of the site. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA. We welcome criterion 1c and 1d	210164 (Historic England)

Broadly support the proposal for residential development given the site's location within the village and proximity to employment uses. The Melbourn Science Park has planning permission for expansion and there is no other employment requirement in this location. Therefore, request the policy is for housing only, or is amended to mixed use where employment provision can be demonstrated at the time of a planning application submission There is a factual error in relation to the criteria for a landscape edge but that this issue will be addressed at the planning application stage. Given the distance between the site and existing heritage assets, there is no requirement to list them within the allocation. They would already be addressed through the other policies of the Plan.	204704 (Vistry)
Subject to the above comments, FPC supports this policy There is no indication why the site should integrate with the adjacent Science Park. Development will be dependent on the consent of the owners of the existing Science Park to achieve this creating a possible ransom situation. Housing density should be appropriate for village dwellings and recognise the beneficial effects of private outdoor space and the spaciousness which people expect and seek in villages. Generally, supports commercial development where sensibly located. Designating this site for such development, being situated alongside the existing science park, clearly has significant benefits. There will also be increases in traffic along Cambridge Road, the A10 and other nearby parts of the road network. Meldreth railway station is over a mile away from the site so rail access unless supported by shuttlebus and bicycle parking on site is unlikely to be desirable. The policy could usefully specify the need to address that aspect.	209051, 209052, 209053, 209054, 209055 (Fowlmere PC)

Unnecessarily pessimistic view of the design of the development and opportunities presented by the site. Rather than requiring the development to be hidden, the policy should require a high standard of appropriate design. The proposal in the plan gives the opportunity to create a sense of entry with an elegant design and setting which could reflect the presence of science, homes and rural life	

Policy S/RRA/FID: Fulbourn and Ida Darwin Hospitals

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made by Historic England to highlight the and Settlement site by Caudle Corner Farm Scheduled Monument and welcome the HIA and points 1c and 1f of the policy.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- The policy wording has been amended to directly address the comments made by Historic England.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
This site lies within Fulbourn Hospital Conservation Area. The eastern part of the site lies opposite the scheduled monument Settlement site by Caudle Corner Farm. The site lies close to the Fulbourn Conservation Area and its listed buildings, and the grade II listed windmill sits on elevated land to the south of the site. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA. We welcome criterion 1c although we recommend that the scheduled monument is also specifically referenced in this clause. We welcome criterion 1f.	210165 (Historic England)

Policy S/RRP: Policy Areas in the rest of the rural area

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made by Papworth Everard PC to set out that Policy H/4: Papworth West Central is still relevant to the Local Plan.

Comments were made in support of the sites in the Rest of Rural Area from Gamlingay Parish Council.

Response to the main issues raised in representations

Policy H/4: Papworth West Central of the 2018 Local Plan was first introduced in the South Cambridgeshire Site Specific Policies DPD adopted in 2010. At that time the village was undergoing considerable change. In addition to the news the hospital would be relocating, there were a range of redundant or soon to become redundant sites. A policy area was identified to ensure a coordinated approach to delivery of a mix of uses. Since then, the majority of those land parcels have been redeveloped or have gained planning permission. Whilst there are some small areas which may provide future development opportunities, and there may be other buildings that in future come forward for redevelopment, a standalone site specific policy is no longer required. Other policies in the local plan can ensure that they make proper contribution towards infrastructure to make development acceptable.

Support noted from Gamlingay PC.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Papworth Everard Parish Council cannot see that Policy H/4: Papworth West Central has been carried forward from the adopted Local Plan 2018. Policy H/4 of the adopted Local Plan 2018 remains 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 the maintenance of Policy H/4 for sites in the policy area.	205094 (Papworth Everard PC)
Support the proposals of development in the rest of the rural area- land associated with Papworth Hospital - reuse of brownfield land.	201378 (Gamlingay PC)

Policy S/AMC/IWM: Imperial War Museum, Duxford

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Broad support for the policy area from Twenty5 Planning Ltd on behalf of Henry Boot Developments Limited.

Concerns were raised around reflecting the AvTech proposals in the policy area.

Comments were made by Historic England to reflect the heritage assets nearby and a need for an HIA to be completed.

Comments were made by Cambridgeshire County Council to refer to the Duxford Water Recycling Centre and the Cambridgeshire and Peterborough Minerals and Waste Local Plan.

Gonville & Caius support the designation, and suggest that point 5 be added to reflect aviation development in NPPF, and that the masterplan requirement be amended.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- In response to reflecting AvTech proposals within the policy area, the policy wording been amended to set out that - A masterplan for development focused on aviation and other complementary uses to support the future of the museum site, must align with the wider masterplan for IWM Duxford. This is also in response to Gonville & Caius College.
- In response to Gonville & Caius, support is noted, and NPPF requirements are not duplicated in the Local Plan, this is an approach taken across the Local Plan.
- In response to Historic England, the suggested amendments have been made.

- In response to Cambridgeshire County Council, the suggested amendments have been made.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
There are multiple designated assets on this site including Duxford Airfield Conservation Area, five grade II* listed buildings and over 20 grade II listed buildings. The Conservation Area is on the Heritage at Risk Register. Often the best use for an asset is its original use. However, this clearly has implications for development in the surrounding area. Development in this policy area has the potential to impact these designated heritage assets and their settings. We welcome the reference to the need for a site wide masterplan for the site as well as references to the historic nature of the airfield and heritage assets. Criterion 2 should specifically mention the Conservation Area and listed buildings.	210166 (Historic England)
The policy should state that the masterplan should be informed by a Heritage Impact Assessment. The potential uses for the land in the west end of the site should be set out in the policy and/or supporting text. Historic England is keen to support the ongoing use of the site as a museum which is an important visitor attraction, educational, commercial and aviation facility.	210166 (Historic England)
Support for the policy, which identifies the special case of the site. • It is requested that the policy be amended to allow for a specific masterplan for the IWM Lab and AvTech as part of an application at land promoted (HELAA Site Ref: 40095, Site ID 115178). • The wording on the masterplan-led approach should be amended to state that the existing Imperial War Museum masterplan is sufficient and a wholly new masterplan for the whole site is unnecessary.	205225, 206940, 206941, 206942, 206943, 211453, 211454, 211455 (Twenty5 Planning Ltd on behalf of

• Infrastructure requirements are already covered by other policies.	Henry Boot Developments Limited)
Proposals for the AvTech research and technology park represent a major employment-led development, with the potential to accommodate a substantial number of employees and generate significant traffic movements, breaching NPPF paragraphs 20, 22 and 31. The absence of AvTech from the Plan prevents a holistic assessment of cumulative impacts, particularly in relation to the A505 corridor and surrounding villages. This undermines the justification of the spatial strategy and risks leaving significant impacts to be addressed in a piecemeal manner through planning applications.	206691 (Cllr R Williams)
Support for the policy.	208279 (Imperial War Museum)
Site is partly located within the Consultation Area for the Duxford Water Recycling Centre. This should be identified as a constraint in the supporting text. The following supporting text is recommended for inclusion. "This site is near to the Duxford Water Recycling Centre. An odour assessment may be required. Please refer to Policy 16 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) for further information."	210605 (Cambridgeshire County Council)
SCDC have omitted comments regarding any impact on the A505 running through to Junction 10 and beyond. The additional encroachment from the expansion of operations at the site needs careful consideration.	209060 (Fowlmere PC)
It is requested that the draft policy be amended to: 2. ‘Development of the site will be masterplan that masterplan led which will enable…….’ This minor	210576 (Imperial War Museum)

alteration of the wording covers all future development proposals in the AMC and accommodates the existing IWM Duxford masterplan and the AvTech 1 / IWM Lab masterplan currently in preparation.	
Caius welcomes and supports the inclusion of Policy S/AMC/IWM and the extension of the “red line” designation at Figure 122. • Aviation uses should be recognised in part 1 of the policy/ • A new policy point 5 be added to recognise further aviation development opportunities in line with NPPF paragraph 111(f). • The wording on the masterplan-led approach should be amended to state that the existing Imperial War Museum masterplan is sufficient and a wholly new masterplan for the whole site is unnecessary. • Detailed amendments are suggested to policy and supporting text.	211421, 209028, 209029, 209030, 211450, 211451, 211452 (Gonville & Caius College)

Policy S/AMC/PH: Papworth Hospital, Papworth Everard

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Broad support for the policy from Papworth Everard Parish Council.

Comments were made to raise concerns about the marketing restrictions placed on replacement healthcare uses.

Concerns were raised by Historic England to change the name of the allocation and reflect the heritage assets onsite.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- The title of the policy has been amended to say Papworth Hospital, Papworth Everard in response to comments from Historic England.
- The marketing requirement of two years to prioritise finding replacement healthcare uses is required to maintain healthcare related uses on the site, and there is general support for this from the local community.
- The requirement for a HIA and the reference to the Grade II* and Grade II Listed assets onsite has been amended in the policy wording in response to Historic England.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue

The statement "after the site has been marketed for healthcare for a period of no less than 2 years would other employment uses ... be permitted" makes no sense. The NHS has been trying to offload the site since the hospital moved to Cambridge around 6 years ago. At one point, they had a sale in principle agreed with a Chinese company, which eventually disappeared. Has the "marketing" period therefore already started or when will it begin? Also, there is a covenant on the site which prevents its use for non-healthcare purposes.	201409 (South Cambridgeshire DC Cllr P Sandford)
Support for the policy.	204223 (Papworth Everard PC), 205498 (Papworth Everard PC),
We recommend add the words Papworth Everard to the Policy title to avoid any confusion with the New Papworth Hospital at CBC. This site includes the part of the Papworth Everard Conservation Area and lies adjacent to and in the setting of the grade II* listed Papworth Hall, scheduled monument moated site and close to the grade II listed Lodge. Development in this policy area has the potential to impact these designated heritage assets and their settings. The policy should require the preparation of a Heritage Impact Assessment for the Site. The HIA should be used to inform a masterplan for the site. The policy should specifically reference the fact that the hall is Grade II*, the scheduled moated site and the grade II Listed Lodge.	210167 (Historic England)

Policy S/AMC/FD: Fen Drayton Former Land Settlement Association Estate

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made to extend the Fen Drayton Land Settlement Association Estate boundary to include Land West of Mill Road

Comments were made by RSPB to review the removal of the Wildlife Reserves from the allocation.

Concerns were raised by Historic England to reflect the heritage assets onsite.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- The existing policy area is to enable development within the existing plots rather than to expand the settlement. This aligns with the Local Plan's strategy seeks to deliver housing in what it considers to be sustainable locations, as opposed to promoting the extension of development in locations with poorer public transport options.
- In response to RSPB, the site allocation boundary has been amended to remove the Fen Drayton Lakes RSPB Reserve and Fen Drayton Gravel Pits County Wildlife Site from the allocation.
- In response to Historic England, their suggested amendments have been made.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue

The RSPB objects to the current mapping of the allocation, as it includes part of the Fen Drayton Lakes RSPB Reserve and Fen Drayton Gravel Pits County Wildlife Site, which should not be designated for infill development. The RSPB emphasizes that the area around Springhill Lagoon is integral to the Reserve and will not be sold for development, requesting the council to amend the allocation accordingly. The respondent notes the adopted SPD requires control of surface runoff from developments, highlighting its importance for preventing surface water pollution to the lagoon, particularly for new developments along Springhill Road.	201507 (RSPB)
The respondent highlights the potential for sustainable rural development at Land West of Mill Road, Fen Drayton, which has been submitted for consideration in the call for sites. The surrounding land has been allocated under Policy S/AMC/FD for the 'rest of the rural area' and has a Supplementary Planning Document guiding sustainable living since 2011, but no changes have occurred. The proposal suggests allocating Land West of Mill Road as an extension to the Land Settlement Area, promoting a sustainable living agenda and enhancing the character of Mill Road.	205328 (Varsity Town Planning Ltd on behalf of O&H Land)
The Fen Drayton Conservation area and associated listed buildings lies to the east of the site. Any development of the site has the potential to impact these designated heritage assets and their settings. There is currently no reference to these heritage assets in the policy. Reference should be made in the policy and supporting text to nearby heritage assets and the need to conserve/sustain or where appropriate enhance the significance of heritage assets (noting that significance may be harmed by development within the setting of an asset). The policy should include some reference to the need to consider views into and out of the Conservation Area. Any required mitigation should be included within the policy wording.	210168 (Historic England)

Policy S/AMC/HIS: Mixed Use Development in Histon & Impington Station Area

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made to raise concerns about the marketing restrictions placed on replacement healthcare uses.

Concerns were raised by local residents about loss of amenities and parking provision.

Comments were raised that the proposals should comply with the Histon and Impington Neighbourhood Plan 2021.

Concerns were raised about alignment with nearby sites and the use classes being overly restrictive.

Historic England made comments on the need to make reference to heritage assets in the policy wording.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- Parking standards for development are set out in Policy I/EV: Parking and electric vehicles. this is a location in close proximity to public transport and close to residential areas, and therefore a low car parking plan is suitable in this location.
- The Histon and Impington Neighbourhood Plan 2021 forms part of the development plan alongside the Local Plan and therefore development will need to be in compliance with it.
- The loss of local amenities is mitigated by the policy area specifying that community uses are suitable in this location.
- The suggested changes from The Land Development Limited have been made.
- The suggested changes to the policy from Historic England have been made.
- In response to Quod, Eg i and ii have been added into the policy wording.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
I worry the development will remove the local shops and facilities (the general store, cafe and pub). Impington has very few truly local retail businesses; they are vital to our community. Being without them — even if only during the development would be a great loss.	201183 (J Dent)
The 'low car' parking plan is not reassuring. As new families grow, they will heap pressure on surrounding streets — a poor outcome for those new residents, their families, visitors, and those living nearby. Better for all would be to invest, to provide sufficient parking for the development in its own right.	205549 (J Dent)
Proposals should comply with the Histon and Impington Neighbourhood Plan 2021 or any successor documents. All schemes must integrate with surrounding uses, respect local character, and maintain the vitality of the village centre while preserving 'The Copse'. The Histon & Impington Station Area is over 1 mile from the Cambridge City boundary and should not support development intended for Cambridge City, as it is classified as a Rural area. Any loss of employment or business premises must adhere to the justification outlined in Policy J/PB, particularly point 1.a.ii. The Kendal Court site, currently at 1,100sqm, will be lost if application 25/04793/FUL is approved, and there has been no effort to advertise or develop it for commercial use, thus supporting Policy J/PB point 1.a.ii.	201435 (Histon and Impington PC)
There are no designated heritage assets within the site boundary but the Histon and Impington Conservation Area and associated listed buildings lies to the north of the site as well as other listed	210169 (Historic England)

buildings to the south (Impington Windmill grade II* and Mill House grade II). Any development of the site has the potential to impact these designated heritage assets and their settings. There is currently no reference to these heritage assets in the policy. Reference should be made in the policy and supporting text to nearby heritage assets and the need to conserve/sustain or where appropriate enhance the significance of heritage assets (noting that significance may be harmed by development within the setting of an asset). The policy should include some reference to the need to consider views into and out of the Conservation Area. Any required mitigation should be included within the policy wording.	
Support the policy as it marks the area around the former Histon & Impington Railway Station and Guided Busway as an Area of Major Change through mixed use redevelopment and this will help create conditions for business investment, expansion and adaptation, as per paragraph 85 of the NPPF 2024. These uses are needed to support a modern economy as set out in paragraph 86c of the NPPF 2024 although, we highlight this site does not exist in isolation and is spatially linked to Compass House and Vision Park.	204488 (Stantec on behalf of The Royal London Mutual Insurance Society Ltd)
Consider the policy wording should be amended to include ensuring the development aligns, in collaboration with Land at Compass House, Chivers Way (policy S/RRA/CH) and with Vision Park (owned by our client). This will help to deliver coherent masterplanning, high-quality design outcomes and long-term deliverability with a comprehensive approach to placemaking across Vision Park, Compass House and Histon & Impington Station Area holistically. It is considered this amendment to the policy is required to ensure it is effective as set out in paragraph 36 of the NPPF 2024.	204488 (Stantec on behalf of The Royal London Mutual Insurance Society Ltd)

This Land Development Ltd supports the principle of mixed use development within the Histon & Impington Station Area and welcomes the continued recognition of this location as an opportunity for redevelopment. However, as currently drafted, Policy S/AMC/HIS introduces unnecessary constraints that risk reducing the flexibility and deliverability of future development when compared with the adopted Local Plan framework. The amendments proposed in this representation would strengthen Draft Policy S/AMC/HIS by ensuring it remains justified, and consistent with both the adopted policy framework and the intent of the updated Use Class Order.	201885 (Bidwells on behalf of This Land Development Ltd)
The draft policy's replacement of B1 with only E(g)(iii) is overly narrow, excluding offices (E(g)(i)) and research & development (E(g)(ii)) and therefore limits commercial flexibility. It is also contrary to the Government's intention behind the consolidated Use Class E, which was introduced to support adaptability, economic resilience and mixed-use regeneration. Given that the policy area is explicitly intended to support mixed-use development, it is important that the full range of compatible employment uses is retained.	206003 (Bidwells on behalf of This Land Development Limited)
Replace the term "align" with "complement" in Draft Policies S/AMC/HIS and S/RRA/CH to remove ambiguity and avoid overly prescriptive requirements.	206005 (Bidwells on behalf of This Land Development Limited)
S/AMC/HIS: Mixed Use Development in Histon & Impington Station Area This draft policy encompasses the southern part of the Site and has aspirations to rejuvenate the area around the former railway station in Histon and Impington to create a vibrant gateway into this community, which features a mix of commercial, community and residential uses. Adding this additional	211110 (Quod)

point as 1d. d. Employment uses including office and research and development (Use Classes E(g)(i) and E(g)(ii)).	

Policy S/AMC/GT: Optimisation of Gypsy and Traveller Sites

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Comments were made to raise concerns about safety on sites, and the potential for expansion of the sites and what this means for local communities.

Concerns were raised by local residents about the need for better enforcement to ensure that G&T sites are safe and are occupied by Gypsy and Travellers.

Comments were raised that the proposals should comply with the Histon and Impington Neighbourhood Plan 2021.

Concerns were raised by Cambridgeshire County Council about reference to the Waste Plan.

Historic England made comments on the need to make reference to heritage assets in the policy wording.

EWR request a minor amend to the policy area.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- The purpose of optimising Gypsy and Traveller sites is to safeguard Gypsy and Traveller sites for use by Gypsy and Travellers. The policy's purpose is predominately to reconfigure sites to provide an improvement in health, safety and living conditions for Gypsy and Travellers and to make pitches available for those meeting the definition of Gypsy and Traveller. This process may result in the creation of new pitches, however new pitches are also allocated on strategic sites to address the accommodation needs of Gypsies and Travellers.
- At the time of the Draft Local Plan publication in Autumn 2026 we reported that officers were investigating the occupancy of

these pitches, and are gathering other necessary information, to enable the Council to consider whether it is appropriate to take enforcement action to make these pitches available for occupancy by Gypsies and Travellers. Officers had also developed a protocol for dealing with any issues of homelessness that may result from any enforcement action taken. The Council have since continued with enforcement action and this is set out in the Strategy Topic Paper in Appendix 12.

- The policy has been amended to clarify what a suitable density is for pitches per hectare to ensure that it is clear what the aim of the policy is, to ensure safety of pitches and ensure that all pitches have sufficient amenity space.
- Amendments have been made to the policy to widen it more generally to optimisation of all sites, instead of just focusing on Chesterton Fen, Smithy Fen and Cottenham. Point 1 has been revised to include all sites of half a hectare and above.
- Amendments to policy wording have also the reflected the need to ensure there is sufficient capacity to utilities, including waste, electricity and water.
- In response to concerns about expanding these sites, especially where Northstowe and Waterbeach have new allocations, the policy is about optimising these sites for the intended occupants in a safe way, with sufficient utilities, infrastructure and amenity. New sites are needed as well as optimisation to meet the identified need for Gypsy and Traveller pitches.
- Suggested amendments have been made to address Historic England's comments.
- Suggested amendments have been made to address Cambridgeshire County Council's comments.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
In January 2026, it has been suggested, by members of the Gypsy & Traveller communities living on Smithy Fen, that development of land, covered by injunction, on Water Lane has been affected with	201521 (S Bristow)

South Cambridgeshire District Council (SCDC) officer(s) approval. While the claim is now under investigation and whether or not officers involved are complicit remains to be seen. Irrespective of the allegation the 'reality' of the development has relevance in that it demonstrates, SCDC's lack of awareness of what is going on. My husband has in his objection to the expansion of the sites has already set out to SCDC that they are already failing to enforce breaches of other injunctions. The aim of the policy, in order that it might be supported has to be capable of being delivered in that 'Intensification, expansion or reconfiguration of authorised pitches creates a positive, balanced and attractive environment with a material improvement in health, safety, living conditions and amenities for the existing residents and neighbouring occupiers' I do not believe that this aim is deliverable as SCDC has neither the power, the money or resource to sustain these conditions of expansion.	
Question as to whether the statutory duty under the terms of the Equality Act 2010 has been fulfilled. In discharging this Public Sector Equality Duty (PSED) the PSED shall have 'due regard' for the 'Equality Impacts' of its decisions, taking into account both the positive and negative impacts. Does the policy fully account for these impacts?	201522 (S Bristow)
The LPA has carried out an Accommodation Needs Assessment and identified the G&T communities require more pitches through the period to 2040/41. A minimum of 130 pitches may indeed turn out to be more, especially if birth trends in the communities improves the general performance of the British public, but this acknowledgement of accommodation need', takes no account of social or dependence requirements including the general problem of successful community integration.	201523 (S Bristow)

The 130 + pitches are required for persons from across the Greater Cambridge Region not just areas around Chesterton and Smithy Fens and so umpteen person will be displaced from, from their preferred residential area without regard to social need. By not seriously considering or proposing that first each and every existing Gypsy, Traveller, or Showman, site should be prioritised for proportionate expansion, in an effort to seek to satisfy needs and opportunities whilst ensuring equality, before expansion of already large and existing sites (which may not be suitable for many), is a failure of the PSED. At Smithy Fen there has been no attempt to discuss proposals or opinions with the Parish Council, any local settled community members, nor even travellers themselves. This is a second failure of the PSED.	
In the short to medium term, at least, the Smithy Fen sites are neither suitable for, nor in need of, expansion. Until SCDC can re-house/rehome the plethora of those renting chalets and re-establish the boundaries of lawful pitches, demonstrate it can control existing pitches and licenses and uphold terms of injunctions. Until then there should be thought of, nor consideration for, any expansion at Smithy Fen.	201527 (S Bristow)
I think that the village has been overwhelmed with new homes in recent years and the supporting infrastructure has not been improved to support this growth. There should therefore be no additional development on any village site until there are sufficient services that are able to cope with increased demand	200998 (D Smith)
We do not support any expansion of the site in Smithy Fen. The site appears to have plots that are not currently occupied by those who identify as Gypsy and Travellers. The one entrance into the Fen and road infrastructure is not sufficient for additional plots. Given previous history and intimidation of local	201327 (J Dixon)

residents this is of major concern and may impact police resources. Additional sites in Cambridgeshire should be identified in line with planning policy	
Re. expansion of gypsy site on Smithy Fen. It's an appalling idea! We already have enough anti-social behaviour. This will cause more!!! The site is too big already. You will just cause more misery!!!! JUST STOP!	201462 (I Johnson)
Commenting on Smithy Fen (Cottenham). Site has a history of over use and adverse impact on surrounding countryside/environment (e.g. fly tipping, crop damage, fires) and settled communities (e.g. anti-social behaviour, over loading local services, frequent police intervention). Current lower and more sustainable occupancy has created harmony and co-existence of travellers and settled community. The consultation lacks detail on whether it will (i) intensify and increase occupancy or (2) enforce use by genuine travellers so site meets traveller needs. If point 1, I wish to object (intensification risks a return to past negative impacts). If point 2 I support the plans.	201532 (M Davis)
In 2003, Cottenham Residents Association (CRA) was formed specifically to press South Cambridgeshire District Council to take seriously its responsibilities in managing the relationship between settled communities and the Smithy Fen Traveller Site. At that time, residents experienced several problems including anti-social behaviour, theft. These issues have had a significant lasting impact on residents. Twenty-three years on, it is deeply disappointing that concerns remain. Currently there is a lack of visible and effective enforcement at Smithy Fen, that does not inspire confidence that the Council has learned from the past experience. I am particularly concerned to the potential intensification at existing sites. At Smithy Fen, many pitches are now occupied by individuals who don't meet the definition of Gypsies and Travellers. This raises the question If existing pitches are not being	201625 (Fen End farm)

occupied by the intended community, what evidence is there that additional pitches are required at this location. It also suggests that Gypsies and Travellers themselves may not be choosing to live at Smithy Fen, which in turn raises questions about the site's suitability.	
Cottenham has suffered greatly in the past years of bad decision and ineffective management/enforcement by SCDC and its officers regarding Smithy Fen. The policy talks about the Intensification, expansion or reconfiguration of authorized pitches creates a positive, balanced and attractive environment with a material improvement in health, safety, living conditions and amenities for the existing residents and neighbouring occupiers," I am impressed with the wording give past events, I have little faith that should the expansion be authorised that the necessary steps would be put in place to manage an increase or reconfigure pitches. Given the amount of non-gypsy traveller occupation at Smithy Fen, this highlights the lack of control and enforcement. If enforcement was to be properly implemented there would be plenty of unoccupied pitches available, without the need for further expansion. Injunctive action was taken against a part of the site and further land on the Fen to stop further illegal expansion as it was out of control and illegal pitches had been created. This land should never be free from injunction, for the same reasons it was enforced at the time. Currently breaches of these injunctions are taking place. You state vehicular access is to be considered. Smithy Fen site access is over a single track bridge, it cannot contend with the traffic movement now let alone a significant increase.	201582 (C Simms)
The Plan further states " The proposed development meets the requirements of Policy H/GT: Gypsy and Traveller pitches and Travelling Showpeople plots." Do I take from this that the proposed developments are the only ones which are under consideration throughout Greater Cambridge Local	201583 (C Simms)

Plan areas? I find it hard to believe that no other current or new sites are suitable to meet the expected future need. I request that you provide a full disclosure of what other sites were investigated prior to publication and deemed not suitable.	
Concerns around the physical characteristics of the site, as Smithy Fen is low-lying and immediately adjacent to a watercourse that is regularly subject to flood alerts. Intensification or expansion at the site would place more residents at increased risk of flooding.	201626 (Fen End Farm)
The consultation document implies that site optimisation has been considered across the district. If this is the case, I would ask SCDC to make public the details of any studies undertaken into alternative Gypsy and Traveller sites	201627 (Fen End Farm)
It is my understanding that new major developments are expected to make provision for Gypsy and Traveller Communities. I have seen no evidence that such provision has been made, or meaningfully planned, within developments such as Northstowe or Waterbeach. If this understanding Is incorrect, I would welcome clarification; If it is correct, that the apparent failure to deliver such provision undermines the rationale for further intensification at existing, problematic sites such as Smithy Fen.	201628 (Fen End Farm)
Concern regarding the potential implications to the increase the size of the site located at Smithy Fen, Cottenham. Since 2003, we have burnt out cars dumped in hedgerows and we constantly have fly tipping which could be attributed to anyone, but the lack of security down the Fen does not enable this behaviour to be monitored. It is disappointing to see that despite all the enquiries, local injunctions and various representations from those in settled community on Fen that we are now again facing the expansion of this site.	201852 (S Dixon)

Concern that yet again there appears to be a lack of visible and effective enforcement at Smithy Fen and does nothing to give us confidence that the Council has not learned from past experience. Any intensification or expansion of this site must be viewed in the context of a long history of inadequate management and enforcement. There is also a local of oversight to ensure current plots are being used by those who meet the definition of Gypsies and Travellers as many appear to be sub-let to various ethnic groups. I question the suitability of the site, given that Gypsies and Travellers are choosing not to live on Smithy Fen. Smithy Fen does not have the infrastructure to make it a suitable site for expansion or intensification. Access to the Fen is by a single track, the site does not have street lamps. The site is also in an area of a local flood plain and therefore this also needs to be carefully considered.	201858 (S Dixon)
Fen Road is facing a high volume of speeding traffic and heavy goods vehicles, posing risks to residents, cyclists, and pedestrians, as well as causing damage to homes. Current traffic calming measures are inadequate; speed bumps exacerbate vibration and noise, and effective solutions like chicanes have not been implemented. The railway level crossing is no longer suitable for industrial traffic and closing it while providing a new traffic bridge would enhance safety for businesses and reduce HGV traffic through residential areas. There is an urgent need for action to prevent further harm to the community.	202159 (B McCann)
When in the consultation have you considered looking at other areas in Cambridgeshire for additional sites for Gypsies and Travellers? We cannot find any public documents that show assessments have been undertaken in line with local planning policy to consider additional sites in other villages. It was my understanding that major new developments such as Northstowe and Waterbeach should have made such a provision. Please confirm if that is the case.	201861 (S Dixon)

The cadence and pace of enforcement at Smithy Fen has not been able to constrain unauthorised development, development on injuncted land or to ensure that occupation is in-line with policy. The ability to meet and sustain the optimisation objective is extremely limited, thus intensification would remain the only option. The red lines shown in Figure 126 include land with existing injunctions precluding general occupation of redevelopment. Existing injunctions and site constraints are not recognised within the proposed policy. There have been increasing incidents of flooding on neighbouring properties and farmland coinciding with unplanned development within the boundary of the site	204478 (Cottenham PC), 208509 (Cottenham PC), 208510 (Cottenham PC), 208511 (Cottenham PC), 208512 (Cottenham PC),
There are circa 45-50 legal pitches if you include Setchell Drove and Water Lane. If these were to be filled, it would help the council fulfil their need, but what about the 14 Settled families that live in Smithy Fen. We would dread the situation the local residents found ourselves back in 2003. There is a concentration of travellers sites within a five mile radius of Smithy Fen, at Cottenham, Rampton, Willingham, Histon, Landbeach and Chesterton Fen. This should be quite enough for local services to have to absorb. You have two large new developments at Northstowe and Waterbeach that would be land set aside at each development (24 plots) for travellers provision. Is this not the case?	207686 (R Jones), 208474 (R Jones), 208476 (R Jones)
Concerns raised that there is a history of under-enforcement of the existing plots and I know of at least one family of non travellers living there. So the current plots and their use are not being adequately enforced to prevent their being used by non-travellers.	202105 (C Ward)
Concerns about safety, traffic and amenity raised, and a need for long-term infrastructure.	202157 (B McCann)

Concerns raised about SCDC to focus on enforcing injunctions and addressing the illegal allocation of existing sites to non-travellers and that the burden on rural communities, feeling neglected as SCDC and the police fail to provide assistance.	202810 (I Koutoudis)
Concerns raised about the absence of mains sewage at the Fen Road site is concerning, especially given its proximity to the wastewater treatment plant. The local authority and Anglian Water should collaborate to address this issue promptly, as the current situation is unsanitary and poses health risks.	202929 (Fen House Property Ltd)
The ANA concludes a need for a minimum for 130 additional Gypsy & Traveller 2040/4- the Planning Authority are minded to adhere to the findings of the ANA. While the ANA is available to public scrutiny under Appendix A(i) and Appendix A(ii) is withheld as confidential and sensitive containing the details of site locations. This decision alone confirms a lack of transparency in the plan.	201572 (Turks Head Farm)
The levels of proposed increased pitches would be totally unacceptable given the Fen has just 20 homes. The Smithy Fen should not be considered in the same light as Moor Drive, Chesterton or even Primrose Meadow, Rampton, where the extended family is cultural and controlled size increase is justifiable.	201572 (Turks Head Farm)
The ANA authenticity is not in question, but in compilation it did not, seek the views of the Cottenham Parish Council (CPC), seek the views of the traveller's living on the Smithy Fen sites and has not sought to upgrade statement on pitch 'under-utilisation'. The sites at Smithy Fen are within the Parish boundary and as such CPC should have been consulted.	201573 (Turks Head Farm)
Concerns raised about the ANA and how many pitches are considered on each site.	201573 (Turks Head Farm)

Smithy Fen has privately owned G&T pitches, and whereas full-time occupancy may exist at other sites in Cambridgeshire, this has not been the case for Smithy Fen. Travellers on Smithy Fen move places to place and the ANA should reflect this reality and the conclusions on vacancy and under-utilisation are no longer accurate.	201574 (Turks Head Farm)
Concerns raised about officers are withholding information that the plan for Smithy Fen is a large expansion.	201575 (Turks Head Farm)
Concerns raised about conditions not being enforced and not having adequate amenity and utilities arrangements.	201575 (Turks Head Farm)
SCDC need to ensure that licensing is correct at all times and regulate unit numbers, and spacing of such on all pitches meet standards for fire prevention. Lastly there needs to be a full liaison with the police/appropriate authorities before decisions are finalised.	201576 (Turks Head Farm)
Cottenham has enough traveller/gypsy sites and if more are required then look for alternative areas, spreading the load to other communities, our facilities are already bursting at the seams.	203867 (J Welford)
Support for the approach. The plan is completely inadequate in addressing the heavy industrial usage in the area, especially waste.	204491 (T Woodcock)
Concerns raised about enforcement.	205139 (E Wilson)
Concerns raised about needing this approach when sites are allocated on Northstowe and Waterbeach.	208475 (R Jones)
The Chesterton Fen Road site is located across the river from the Fen Ditton and Riverside and Stourbridge Common Conservation Areas. Any development of this site has the potential to affect these heritage assets and their settings. This policy should therefore reference the nearby Conservation Area and the need to conserve and where appropriate enhance the Conservation Area and its setting.	210170 (Historic England)

Site is partly located within the Consultation Area for the Cambridge Northern Fringe Aggregates Railheads and the Cambridge North Water Recycling Centre. Any proposals must demonstrate that they are compatible with the existing railhead and waste management uses and will not be adversely affected by their proximity. An additional criterion to policy S/SMC/GT should be added, suggested text: "The Chesterton Fen Site located near to the Cambridge Northern Fringe Aggregates Railheads and the Cambridge North Water Recycling Centre, any proposals must demonstrate compliance with Policy 16 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) (or any successor policies)."	210606 (Cambridgeshire County Council)
EWR Co has identified that a small area of land within the Chesterton Fen Road site is required for railway infrastructure works for EWR. This land is included in the safeguarded area. To avoid a conflict between the Chesterton Fen Road AMC and the EWR Safeguarding Directions, EWR Co requests that draft S/AMC/GT is amended.	211905 (East West Rail)

Consultation Statement

Appendix 8: Response to Representations - Climate change



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

Climate Change

Climate Change Introduction

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the ambition in the planning policy relating to climate change. The ambition of both Cambridge City and South Cambridgeshire District Councils relating to climate change targets and wanting to deliver sustainable development was noted.

Concerns were raised about rise in urban heat island effect and need for mitigation in policy. Comments were made about concerns about transport emissions not being considered in policy and that development more generally was generating a lot of carbon emissions, including the carbon emissions from concrete. Comments also queried why the Councils had identified net zero by 2050 and had not set an earlier target such as 2030.

Whilst there was support for the policy standards some said they should go further. It was also proposed that they should be clear that if national or other standards improve beyond the standards referenced in the plan, they should be applied. The need for standards not only to be set but also development to be certified was referenced. Others questioned whether polices would make development unviable, particularly in rural areas.

Concerns were raised about flood risk, management of water and water efficiency, noting the issues of low-lying land and water pressure in this area of the country. There was concern that development would put pressure on chalk streams. Loss of trees, hedges and grass lands should also be considered.

Some supported the circular economy approach, while others questioned whether it could be applied in all circumstances. It was questioned whether the cooling hierarchy could be applied effectively to minor developments, and that cross ventilation was not always possible. The practicality and viability of the water efficiency standards were challenged. Requiring sustainability statements was also considered by some to be unnecessary as information was already provided in other documents.

There was reference to cultural venues, which has been raised on a number of themes, highlighting opportunities for venues to reflect climate change policies. It was also questioned why the Councils send recycling to Northern Ireland rather than processing it locally. There were calls for the creation of an inclusive transport network, including for horse riders. One comment expressed support for the development of a low-carbon heat network in Cambridge City Centre.

Response to the main issues raised in representations:

Comments supporting the broad approach to climate change policies in the draft plan are noted.

Both Cambridge City Council and Cambridgeshire District Council have set out their net zero targets and a climate strategy to set out how they will reduce carbon emissions to meet their respective targets. Planning policy have done further work in the Carbon Budget Assessment (2025) to set out what this means for the Local Plan and how carbon emissions will be reduced.

There is a need for development in Greater Cambridge that the Councils are required to respond to, and the Councils intend to deliver this as sustainably as possible. This includes ensuring that homes are mitigated against heat risk, have high energy efficiency, renewables, and re-use materials and consider whole life carbon emissions in development. Emissions from development are inevitable but the Councils are doing all they can to reduce carbon emissions from growth, by prioritising energy demand reduction, sustainable construction and active travel and public transport to reduce carbon emissions. The plan addresses emissions from transport through identification of a development strategy which focuses development where there are opportunities for active travel and public transport and reducing the reliance on the car.

The climate chapter proposes an ambitious but proportionate approach to reducing carbon emissions and delivering sustainable development. Additional evidence has been set out in the Net Zero Topic Paper Addendum to set out the considerations for the application of policy and how it is implemented considering what could be some alternatives that could be negotiated as part of the planning balance. The policies in the climate chapter have been tested in the Whole Plan Viability Assessment and this has set out that these policies are viable to deliver. Additional technical notes and the Sustainability Checklist will support the consistent implementation of these policies and provide guidance for unique typologies and circumstances where climate mitigation may be more challenging.

Water Supply issues have been carefully considered during the preparation of the Local Plan. Working with the Water Scarcity Group which was established by the government, the Local Plan is supported by a Water Supply evidence base exploring the availability of sustainable water supply alongside the anticipated development trajectory. Infrastructure is planned which will bring new supplies to Greater Cambridge in order to reduce the reliance on water from the chalk aquifer. However, it also remains vital that water is used efficiently in this area therefore water efficiency policies are proposed which set more stringent levels than are applied nationally.

With regard to flood risk, further evidence has been prepared to understand the implications of flood risk in future climate scenarios, and this flood risk data has also informed the site selection through the HELAA process as well.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for climate policies including water reduction, reuse of materials and reducing carbon emissions.	204737 (Optimis Consulting Ltd on behalf of Croudace Homes), 205702 (Newnham Labour), 202645 (C McQuitty), 202957 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 208286 (Turley on behalf of the Imperial War Museum), 210549 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
Cultural venues support low-carbon placemaking and should be reflected in climate policy. Cultural infrastructure contributes to climate outcomes and this should be recognised and embedded in the chapter.	202052 (H Chamberlain) 202137 (Cambridge Junction) 202195 (H Tam) 202397 (T Shaw) 202399 (Kettle's Yard) 202682 (T Altmann) 202712 (W Townsend) 202777 (S Lee) 202864 (Cambridge Junction) 202924 (R Terry) 202978 (T Flinders) 203014 (The Arts Theatre Cambridge) 203323 (N Ellis) 203429 (S Ashworth) 203490 (L Heap) 203506 (D Lever) 203623 (University of Cambridge) 203847 (N Yeni) 203865 (University of Cambridge) 204385 (New International Encounter)

Summary of issues raised in comments	Comments highlighting this issue
	204934 (Wysing Arts Centre) 205025 (H Paterson) 205026 (University of Cambridge, L. Sheerman) 205115 (J Walsh) 205312 (L Howse) 205349 (A Seiglow) 204674 (NEBAU Architecture Ltd) 204692 (A Giarlis) 204819 (L Matthews) 204934 (Wysing Arts Centre) 205278 (A C de Azevedo Lamha) 205290 (N Oakley) 205381 (Cambridge Junction / Create Cambridge), 202012 (H Chamberlain)
I support Cambridge Junction and Create Cambridge in asking that: • cultural infrastructure's contribution to climate outcomes (adaptive reuse, shared spaces, walkable places) is explicitly recognised • culture is embedded within this chapter, not treated solely as a social outcome Cultural venues support low-carbon placemaking and should be reflected in climate policy.	202382 (J Webber), 202300 (Cambridge Junction), 202807 (Cambridge Junction), 204692 (A Giarlis), 202307 (Cambridge Junction / Create Cambridge), 205278 (A de Azevedo),

Summary of issues raised in comments	Comments highlighting this issue
The Councils have declared a climate crisis but still send recycling 400miles to Northern Ireland which emits tonnes of CO2.	201221 (S Williams) 201240 (S Williams)
Concrete generates lots of carbon emissions and the strategy for development is not correctly located for where people needs jobs and where there is space for development, Cambridge does not have capacity for more development.	201240 (S Williams)
Flood projections at 2050 must have a massive impact on any growth projections for Greater Cambridge. While there are clearly opportunities in the immediate future, beyond this timeframe any significant growth is very questionable.	201806 (K Rhodes)
While building at relatively high densities is recognised as generally being 'environmentally friendly', the health impacts for individuals of urban living with temperature rise are considerable. Action to mitigate the effects of the existing climate crisis on residents to prevent health disasters and the surrounding biosphere to prevent negative impacts on biodiversity	201806 (K Rhodes) 202448 (Dr J. Neal)
The Climate Change emphasis of the plan is all about future carbon control. This is very important but there is no acknowledgment of the impacts of 'baked in' climate change that takes effect as the plan develops to 2045. While the plan hopes to build with the lowest level carbon impact possible, development of this scale is necessarily carbon intensive. Essentially the less we build, the better for the environment.	201806 (K Rhodes)
Support for development of low carbon heat network in Cambridge City Centre.	202172 (R Lambert)

Summary of issues raised in comments	Comments highlighting this issue
The carbon intensity associated with new development needs to be better reflected in policy as well as acknowledging impacts of extreme water stress and additional pressure caused by new development.	202172 (R Lambert)
The plan's climate change strategy is for 'Greater Cambridge to transition to net zero by 2050', however the City of Cambridge's Climate Change Strategy is for Cambridge to be net zero carbon by 2030. There is no apparent discussion on why the 2050 ambition has been chosen, despite the 2030 target. Given the impact of the local plan on the city's climate strategy, a 2030 target is required.	202345 (H Brown)
I strongly support the new Net Zero Carbon buildings policy. This is necessary to facilitate a net zero city. I strongly support the policy to protect peatland from development. Wind development on peatland should be included	202476 (I Morris)
The policy on design for a changing climate should provide a stronger steer to developers to deploy the full range of potential design solutions in planning.	202476 (I Morris)
Support the high standards of these policies. It is important that all the climate policies allow for changes in national regulations so when a policy is mentioned (e.g. "Good Homes Overheating Toolkit") this is caveated with something like "and appropriate future updated standards" or "successor documents". This will ensure that our policies keep up with the fast changing climate agenda which will have moved on before future local plans are published.	202882 (Cambridge City Council Liberal Democrat Group)

Summary of issues raised in comments	Comments highlighting this issue
The climate change policies are ambitious and welcome, particularly on energy efficiency and water use. However, rural implications are not fully explored. Tighter building standards may affect viability of small rural schemes and conversions. Water neutrality measures could constrain development in villages without clear mitigation pathways.	203165 (Cambridgeshire ACRE)
Whilst I support what is proposed for new houses as a sound and good idea I am concerned that South Cambridgeshire's District Carbon Zero plan is only based on reducing 'new omissions'. Carbon net zero measures makes no account of the Carbon Dioxide absorbed by existing Trees, Hedges or Grasslands and as such it is inaccurately reporting/measuring progress that is or isn't being made.	204995 (M Jordan)
There is not enough of a focus on emissions from transport. Electric vehicles are not a type of sustainable travel. Net zero assessments should include lifetime transport emissions, not just building emissions. Major development should be required to meet measurable mode share targets.	204496 (D Potts), 204988 (S Webster), 204356 (F Sanchez Garcia), 204654 (P Colledge)
Construction is a very high emissions activity. The policies above don't require embodied, whole life and whole life cycle emissions from developments are predicted before construction and calculated afterwards, so decisions are made in ignorance. There's no requirement ghg emissions should be minimised at the construction stage. The govt's target of 1.5m houses is breaching interim carbon	203692 (A Copping)

Summary of issues raised in comments	Comments highlighting this issue
targets, and building-in high future emissions which will breach the 2050 target, The Cambridge plan is part of this.	
The net zero by 2050 target is welcome but insufficient to limit warming to 1.5°C. The Plan should aim for net zero before 2050. Developments should minimise carbon through location, high energy and water efficiency, low-carbon materials, retrofit, climate resilience and avoidance of high-emission activities, while pursuing net negative carbon. The Local Plan focuses too much on end-state emissions at the expense of cumulative impacts.	203659 (Cambridge Green Party)
The Climate Change emphasis of the plan is all about future carbon control. This is very important but there is no acknowledgment of the impacts of 'baked in' climate change that takes effect as the plan develops to 2045. While the plan hopes to build with the lowest level carbon impact possible, development of this scale is necessarily carbon intensive. Essentially the less we build, the better for the environment. Managing flood risk is important to.	201806 (K Rhodes)
The policies above are required for mitigating Climate Chaos for EXISTING settlements, not taking responsibility for NEW, unnecessarily attracted to this ultra-fragile Riverlands/prime agricultural region suffering extreme Water Stress. I support the development of a low-carbon heat network in Cambridge City Centre.	202173 (R Lambert)

Summary of issues raised in comments	Comments highlighting this issue
The Draft Local Plan addresses climate change but lacks a strong focus on transport, which is the largest source of carbon emissions in Greater Cambridge. There are no binding targets to increase walking, cycling, and public transport use, risking continued car-dependent development. To meet climate commitments, the Plan should include transport emissions in net zero assessments and set clear mode-share targets for major developments.	203191 (G Orwell), 209066 (Camcycle), 203554 (P Tribble), 201707 (L Passmore), 201708 (J Anderson), 202166 (M MacGinley),
Policy CC/SD lacks specific penalties for noncompliance, making it likely to be ineffective.	203270 (Horseheath PC)
Policy CC/WE requires dramatic reductions in water usage; we are concerned about how this will be policed and how developers will be encouraged to fund greywater recycling.	203272 (Horseheath PC)
Development should be promoted for higher environmental standards, not just proximity to public transport. Principles of climate change mitigation need to be embedded into all new development.	204737 (Optimis Consulting Ltd on behalf of Croudace Homes) 202759 (A. Bragg)
Concerns that the proposed level of growth is unsustainable in terms of the sub-region's water resources. Concerns raised about impacts of development on chalk streams and water scarcity.	205726 (F Goad), 205777 (Rustat Neighbourhood Association C Cameron), 205815 (R Perucchini), 207964 (S Trueman),

Summary of issues raised in comments	Comments highlighting this issue
	202698 (S Berridge), 202597 (Bedfordshire, Cambridgeshire and Northamptonshire Wildlife Trust),
We support the plans for moving to net zero but calls for more focus on transport in the discussions about sustainable new housing. Evidence from other new developments suggests that even if vehicle spaces are radically reduced people buy cars and park all over the sites. Investment in public transport and 'active travel' modes counters this. This involves more penetration of housing developments by buses that offer commuters a real alternative; safe walking routes to bus stops; and safe cycling routes. Cars are the biggest source of air pollution, and we need to highlight how they damage air quality.	201629 (Cambridge living streets)
Non-motorised infrastructure in rural areas should consistently include equestrian provision, not just cycling and walking. Current Active Travel projects often exclude horse riders, despite rural roads being high-risk for them due to 40–60 mph traffic and the lack of safe alternatives. Bridleways make up less than 15% of the county’s Rights of Way network and are highly fragmented, so new rural schemes are crucial opportunities to improve safety and connectivity. Since most equestrians are women, providing safe, joined up access to the countryside also supports equality and health benefits, much like cycling infrastructure has done for cyclists—who in rural settings are predominantly men.	203937 (S Rogers)

Summary of issues raised in comments	Comments highlighting this issue
Ensuring equestrians are fully included would create a more balanced, inclusive and effective rural Active Travel network.	
CC/CE Support for policy and use of circular economy principles to reduce embodied carbon.	203524 (Cambridge Ahead)
CC/CE Pleased to note that LAs broadly acknowledge and grasp this concept therefore the aim should be to increase the net number of carbon-rich Old Builds long-term through support packages that will combat the Climate Crisis, provide economic benefit and improve Conservation in a pioneering fashion that may draw wider funding opportunities for the area.	210349 (Community Campaigner D Barton)
CC/CE The policy does not appear to consider a scenario where a dwelling is proposed to be demolished to enable access through to land which is being developed.	204735 (Abbey Properties Limited)
The scale of new development will make it impossible to meet the NetZero carbon target by 2050 and will worsen climate change.	209168 (R Smith)
The plan's climate change strategy is for 'Greater Cambridge to transition to net zero by 2050', however the City of Cambridge's Climate Change Strategy is for Cambridge to be net zero carbon by 2030. There is no apparent discussion on	202345 (H Brown)

Summary of issues raised in comments	Comments highlighting this issue
why the 2050 ambition has been chosen, despite the 2030 target. Given the impact of the local plan on the city's climate strategy, a 2030 target is required.	
ECC notes and supports that a climate emergency has been declared by the Greater Cambridge authorities, and that climate change is a strategic priority for the Local Plan. ECC strongly support developments which seek higher energy performance standards for new homes than the requirement to be in accordance with Building Regulations and go beyond Future Homes Standard (FHS). Similarly to Essex, it is recognised and welcomed that the Local Plan is seeking to address the challenge of the availability of water supplies. Attention is drawn to Uttlesford District Council's Local Plan (examination hearings held June 2025 and found sound in January 2026 – adoption scheduled soon).	210461 (Essex County Council)
As an energy specialist, I also strongly support the Plan's policies on climate change and energy efficiency. Applying Passivhaus standards to all new housing is excellent, although I would note that insisting on the standard is not sufficient, and Passivhaus homes must be certified to ensure that they truly meet the standard. (Building Control Officers alone do not have the time or the experience to assess whether a dwelling complies with Passivhaus standards.)	203283 (J Palmer)
CC/DC Support for Policy CC/DC. Clarification is sought on the application of the cooling hierarchy, requesting that it be limited to major developments only to avoid	204210 (Brookgate Land Ltd and Network Rail Infrastructure)

Summary of issues raised in comments	Comments highlighting this issue
disproportionate burdens on minor developments. Concerns are raised regarding the supporting text on cross ventilation, which is seen as overly restrictive; a case-by-case assessment is recommended for the appropriateness of single-aspect dwellings based on site-specific constraints. Specific site constraints that may necessitate single-aspect dwellings include proximity to railway lines or major roads, heritage assets or conservation areas, and constrained urban sites.	
CC/DC Point 3 of the policy states that “All new dwellings shall be designed to benefit from cross ventilation where possible.” While the inclusion of the phrase “where possible” is welcomed and introduces an appropriate degree of flexibility, the supporting text goes on to state that “single aspect dwellings should be avoided for all schemes as effective passive ventilation can be difficult or impossible to achieve.” This supporting text is overly restrictive, and the rigid application of dual-aspect requirements can reduce significantly the number of homes capable of being built within developments, limit density or lead to an undesirable trade-off with habitable space. The policy also does not sufficiently recognise site-specific constraints that may make cross-ventilation or dual-aspect layouts inappropriate or unachievable. Matters are also already addressed by building regulations.	204251 (Bellway Strategic Land) 204723 (Vistry)
CC/WE	204556 (Redrow South Midlands)

Summary of issues raised in comments	Comments highlighting this issue
The respondent objects to Policy CC/WE, stating it is unsound due to lack of justification, proportionality, and deliverability based on the Integrated Water Management Study (2025) and Climate Change Topic Paper (2025). The 100 unit threshold for water efficiency requirements is not supported by technical rationale, leading to confusion about differing standards for schemes of varying sizes. The requirement for 80 litres/person/day is more stringent than national Building Regulations, potentially increasing build costs significantly due to the need for complex systems like dual pipe installations and greywater recycling. The policy's reliance on future legislative changes makes it premature and potentially unenforceable, as it cannot impose requirements dependent on uncertain amendments. The application of stringent BREEAM water credits for non-residential developments lacks flexibility and does not consider the viability impacts or operational requirements of various sectors. The cumulative requirements of the policy have not undergone whole plan viability testing, risking constraints on development and the delivery of homes and employment premises.	
CC/WE Objects to the wording of draft Policy CC/WE regarding potable water, questioning the rationale for applying stricter internal water-use requirements solely based on development size. The respondent supports the aim of reducing water consumption but argues that internal water use is influenced more by occupant	204259 (Bellway Strategic Land)

Summary of issues raised in comments	Comments highlighting this issue
behaviour and dwelling specifications than by the scale of development. The policy is seen as potentially arbitrary and not meeting the water efficiency targets set by the Planning Practice Guidance, specifically the optional requirement of 110 litres/person/day. The policy should either apply a consistent, evidence-based standard across all residential developments or provide clear justification for higher requirements for larger schemes.	
Cambridge Water say they currently abstract 60 million litres a day more than the 'sustainable' abstraction limit, which is depleting chalk streams and underground aquifers. Any additional homes will increase the abstraction. Cambridge Water's optimistic modelling says they will reduce this to zero – i.e. sustainable abstraction. Climate change is already making summer droughts more likely, and this will continue until 2050 at least under all emissions scenarios. The planned new reservoirs around Cambridge and the link to Grafham Water will help to meet the current water deficit, but they are not sufficient to meet additional demand from new homes and businesses in Cambridge and South Cambs (or the growth in neighbouring areas).	203289 (J Palmer)
CC/SD Objects to Policy CC/SD, stating it is overly prescriptive, insufficiently justified, and risks undermining deliverability. The requirement for a Sustainability Statement for all non-householder applications is deemed excessive and unnecessary,	204543 (Redrow South Midlands)

Summary of issues raised in comments	Comments highlighting this issue
particularly for minor developments. Remove the standalone Sustainability Statement requirement and to allow major developments to include sustainability information within existing documents.	
The Plan's emphasis on active travel to combat climate change is more challenging in rural South Cambs compared to Cambridge, raising concerns about its practical application.	210448 (P Deer)
ECC is also mindful that a climate emergency has been declared by the Greater Cambridge authorities, and that climate change is a strategic Priority for the Local Plan. ECC strongly support developments which seek higher energy performance standards for new homes than the requirement to be in accordance with Building Regulations and go beyond Future Homes Standard (FHS). We provide the following information which shows what Essex authorities are doing in this area and see this as an approach the Greater Cambridge authorities could also adopt. Please refer to the Open Legal Advice B briefing note which can be viewed here. This advises that Local Planning Authorities can require higher building fabric and energy efficiency standards than those set in Building Regulations for new development coming forward now and crucially in advance of adopted local plan ‘net zero’ policy. The advice highlights that the model policies and evidence base can also be used by those drafting and bringing forward neighbourhood plans in advance of up to date Local Plans.	210469 (Essex County Council)

Summary of issues raised in comments	Comments highlighting this issue
Embedding micro rain-gardens and small green spaces within new developments is endorsed to manage surface water and reduce flood risk.	208006 (Cambridgeshire County Council)
Climate policies omit household extensions from Sustainability Statements, lack albedo considerations, do not apply water-efficiency standards to refurbishments, and assume integrated water management without funding for the wastewater-treatment plant relocation.	208099 (Great Shelford PC)
Consideration should be made for Rainwater harvesting, Grey Water Recycling and Battery Storage and Local Energy Grids for new developments, and clarification is needed on whether funding for sustainability initiatives will be spread across Greater Cambridge or concentrated only in new development. Local heat grids with Ground Heat Pump Energy Storage should be considered.	208007 (Cambridgeshire County Council). 208735 (Cambridgeshire County Council)
Concerns that conflicts between heritage and sustainable adaptation creates barriers to real progress in climate change action.	202631 (T Pfaff)

Policy CC/SD: Sustainable development and the climate emergency

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy and the need to address climate change in development.

Concerns were raised about needing flexibility in the policy to relate to different types of development, but on the other hand some respondents were wanting householder development to do more. One representor considered it was overly prescriptive, insufficiently justified, and risks undermining deliverability. Sustainability Statement for all non-householder applications was excessive and unnecessary, particularly for minor developments

Many of the comments focused on the impact of transport, and the absence of measuring, monitoring and reducing emissions from transport, and the need for this to be included in these documents. There was concern that focusing on a move to electric vehicles would not address climate issues. The plan should support active travel and include measurable mode share targets.

On water efficiency there was some concerns targets being too low, or not being clear how they related to different types of development and occupancy of buildings. The water management elements of the policy were welcomed by the Environment Agency, Anglian Water, and Cambridgeshire County Council as Lead Flood Authority. Cambridgeshire County Council noted that all sources of flood risk should be listed out in policy.

Concerns from local residents and local cultural institutions have raised that culture must be integrated in all chapters and not just confined to the Wellbeing chapter. There was also support for inclusion of the project around the Elizabeth Way

underpass, also raised in a number of policy themes.

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approaches, are noted.

The policy sets out an ambitious but proportionate approach to tackling the climate crisis through managing heat risk and ensuring that long term adaptation to the climate crisis is achieved in buildings with regard to managing heat risk. This is reflected in Policy CC/SD which sets out the requirements for Sustainability Statements to ensure that all climate related issues are demonstrated as assessed and mitigated against in the planning application submission.

Some comments sought greater detail and specificity on the requirements. The Councils have previously published a sustainability checklist to accompany the adopted local plans. An updated Sustainability Checklist has been prepared, and is provided as an appendix to the Climate Change Topic Paper. Some comments challenged the requirement to provide a Sustainability Statement. It is considered vital that developments demonstrate they have responded effectively to climate change and the polices in the Local Plan. The requirement to provide a statement provides a consistent and clear mechanism for achieving this, and detail can be proportionate to the scale and nature of the proposal.

In response comments on the need to include Transport Carbon Emissions in the sustainability and / or energy assessment, the purpose of the energy statement and sustainability statement is to cover operational carbon emissions and whole life carbon emissions which predominately focus on Scope 1 and 2 emissions using the standard RICS methodology that is used for assessing whole life carbon. The inclusion of Scope 3 emissions from transport in these documents is not common practice. There is a separate policy on transport in the infrastructure chapter which prioritises active travel and has low car

usage which contributes to the wider climate objectives of this local plan. The strategy for the allocation of sites is also led by how much carbon is generated by journeys to key employment sites and amenities from across Greater Cambridge. It is acknowledged that the shift to electric vehicles is only part of the answer, and support for active travel must be central to the aspirations of the plan.

The approach to water standards, the use of litres per person per day design standards is an appropriate and recognised way of delivering water efficacy. The standards respond to local issues by going beyond national standards. It is not necessary to list out all of the sources of flood risk in this policy, but reference to the sequential approach to flood risk has been included.

Other polices in the plan address the issue of cultural infrastructure provision. The opportunities for the Elizabeth Way project have also been recognised on S/PRIA/EG Eastern Gateway.

Table of representations:

General policy comments

Summary of issues raised in comments	Comments highlighting this issue
Support for the policy.	202177 (R Lambert), 202896 (Cambridge City Council Liberal Democrat Group (Cllr Katie Porrer)), 204231 (Cambridge Investment Partnership), 208287 (Imperial War Museum),

Summary of issues raised in comments	Comments highlighting this issue
	202955 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)
We support the intent of policy. Support CC/SD(2) which applies a proportionate approach to sustainability statements. However, we request the addition of the words “where appropriate” when listing the range of issues to address in sustainability statements, to provide the flexibility intended here. The list of content described in paragraph 2 will need to be amended to reflect the final approved policies post examination which may include the need to remove the requirement for ‘net zero carbon’ should the proposed NPPF changes be implemented.	204714 (Vistry)
Policy is supported insofar as it reflects the aspirations of Paragraph 162 of the Framework which establishes that Local Plans should take a proactive approach to mitigating and adapting to climate change. However, the draft Policy text is considered to be ambiguous in its current format, whereby the measures that the Councils are expecting developments to implement are not identified. Further guidance should be published.	211280 (Woolsington One Ltd)
Replace changing climate with climate crisis, remove proportionately from point 1, in point 2 address the impact of development on surrounding townscape and biosphere and reflect urban heat island effect and in point 3 delete the words where possible.	201870 (J Brightman), 201505 (B Greig)

Summary of issues raised in comments	Comments highlighting this issue
I fully support these measures. Any attempts by developers to cut corners because of cost should be resisted. The inclusion of solar EV and/or solar hot water on all new build roofs is long overdue.	201899 (R Pargeter)
The respondent expresses broad support for Policy CC/SD but raises concerns about clause 1's exclusion of individual household applications from Sustainability Statement requirements, particularly for sizeable extensions or knock-down-rebuild projects. They highlight this exclusion as a missed opportunity to enhance the sustainability of existing properties and suggest that many households would benefit from guidance on prioritising resources for sustainability during renovation or building work.	201561 (Stapleford Parish Council)

Comments highlighting impacts of transport

Summary of issues raised in comments	Comments highlighting this issue
Transport is the major source of emission in Cambridge but is not well included or sufficiently addressed. Transport is the largest part of Cambridgeshire's carbon burn – net zero has to include the transport contributions (not just building emissions) so that it is systematically addressed. Big developments should be enforced to meet targets for share of different transport modes.	201810 (J Baumberg); 201698 (R. MacDonald), 203361 (Great Wilbraham Parish Council), 201819 (T McKeown) 203661 (Cambridge Green Party), 203714 (D. Peters),

Summary of issues raised in comments	Comments highlighting this issue
Policies to help satellite villages improve walking and cycling connections. Without these to increase walking, cycling and public transport use, car-dependent development risks undermining the sustainability goals.	204653 (R. Humphrey), 205143 (D. Stoughton), 205258 (S. Nuttall), 205599 (A. Kirchgaessner),
Transport is a major source of emissions and needs binding outcomes, not general support. Net zero assessments should include lifetime transport emissions, not just building emissions. Major development should be required to meet measurable mode share targets. Assessment of proposed developments should include the whole-life emissions produced by residents driving to distant locations for work, shopping and all other purposes Private electric vehicles are not a type of sustainable travel and should be seen as a last resort - they contribute to Cambridge's terrible congestion problem, damage roads, and can be a danger to vulnerable road users.	204779 (K Brightwell), 203657 (T Preud'homme), 205112 (J Grantham), 203308 (L Dassy) , 201801 (C Barker), 201705 (M. Hickford), 202504 (H. Brown), 201241 (S. Williams), 203184 (A. Hoare) 203195 (G. Orwell) 203657 (T Preud'homme), 203031 (S. Hughes), 201737 (T Burford), 202533 (A Brown), 202853 (J Williams),

Summary of issues raised in comments	Comments highlighting this issue
	203710 (A Hofer), 203105 (K. ap Garth) 204742 (Mothers CAN Cambridge), 204756 (R de Beaux), 203883 (J Prince), 205603, 205604 (L Dassy) 203660 (Dr V. Ashton) 204554 (Dr R. Hoadley), 205251 (A. Williams), 205408 (A. Kirchgaessner),
We need binding commitments on emissions from transport and net zero assessments should include emissions from transport to/from the building rather than just the building itself. Major developments need to be required to meet specific mode share targets. Therefore, this policy should have explicit, strong, measurable requirements, e.g. build only homes that are net-zero, and development must meet mode share targets. Electric vehicles, though preferable to fossil fuel cars, have a variety of issues including imbedded carbon, tyres and brakes, and so should not be considered be	201987 (D Langley), 203883 (J Prince), 205495 (R. Humphrey)

Summary of issues raised in comments	Comments highlighting this issue
considered a primary form of “sustainable transport”, However, reference to EV charging is welcomed.	
The Sustainability Statement requirements omit consideration of public rights of way and equestrian users, despite their relevance to low-carbon travel, health and wellbeing, and green infrastructure delivery. Rights of way, including bridleways, enable sustainable, non-motorised movement and access to green spaces, reducing reliance on motor vehicles.	203566 (British Horse Society)
I support the overall climate goals and the sustainable development policies for building fabric. However, I do not feel emissions around transportation are. . The distribution of development into satellite villages and towns requires commuting to and from the major employment centres. I would like to see binding targets for improved active and public transport.	201819 (T McKeown)

Comments relating to water and flooding

Summary of issues raised in comments	Comments highlighting this issue
Anglian Water fully supports the policy requirements to ensure sustainable and resilient development embeds the principles of climate change mitigation and adaptation. We agree that a proportionate Sustainability Statement should be submitted to demonstrate how these policy requirements have been met, and these may be supported by separate assessments or strategies including flood	210198 (Anglian Water Services)

Summary of issues raised in comments	Comments highlighting this issue
risk assessments and surface water drainage strategies. The inclusion of integrated water management, nature-based solutions and circular economy fully align with the sustainable use of water resources, that contribute towards "Enabling Water Smart Communities" www.ewsc.org.uk .	
We welcome this policy and the requirement for Sustainability Statements to be submitted for major development proposals. In particular, we support the requirement for statements to include how water management has been considered in an integrated way which protects and enhances water quality and the reference to the use of ‘nature based design solutions’ in point 2. We recommend adding the following wording to bullet 8 on what a Sustainability Statement should include: ‘Demonstrate that flood risk from all sources has been avoided or managed if it is not possible to sequentially locate all development outside areas of flood risk.’	211132 (Environment Agency)
Policy places emphasis on how new developments should demonstrated flood risk from all sources has been avoided or managed. It would be beneficial to list all sources of flood risk. Sources include rivers and the sea, direct rainfall on the ground surface, rising groundwater, overwhelmed sewers and drainage systems, reservoirs, canals and lakes and other artificial sources (Paragraph 001 PPG).	210575 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
As with energy usage targets, the assumptions regarding usage of the properties are not clear, which make it difficult to judge the targets objectively. Not clear how they reflect different occupancy patterns or use in gardens.	201927 (R Pargeter)

Comments on Policy Requirements and Implementation

Summary of issues raised in comments	Comments highlighting this issue
Comments requesting the requirements of the policy are strengthened, noting that the supporting information should clarify that statements must, at minimum, show how developments meet the standards set out in relevant policies, rather than addressing issues only “where relevant.”	203661 (Cambridge Green Party)
Concerns raised whether it is proportionate and appropriate that all applications will be required to submit a sustainability statement without any consideration of the type of development or the context such as where large-scale development is delivered in phases and sustainability is addressed strategically, further suggesting that the policy is amended to acknowledge that where site-wide or phased sustainability strategies are in place already a conformity statement should be submitted rather than a standalone sustainability	209205 (Urban & Civic), 208332 (Gladman Developments), 208351 (T. Elbourn), 208960, 208961 (Persimmon Homes East Midlands)
Suggestions that the draft Policy is amended so that the flexibility applied to minor applications is extended to major applications to ensure details are commensurate	209206, 209207 (Urban & Civic), 203153 (ESCO Prospect), 208962 (Persimmon Homes East Midlands),

Summary of issues raised in comments	Comments highlighting this issue
with the proposed development, and the requirements set out are clarified for the different scales of development.	208986 (Barratt Homes Northampton), 210913 (Great Shelford Parish Council),
Comments emphasising the need for flexibility to adapt to changes in national climate change policy and good practice throughout the Plan's lifetime.	203041 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners), 204289 (Tritax Big Box Developments) 204093 (E. W. Pepper Ltd.), 208287 (Imperial War Museum) 208351 (T. Elbourn), 210279 (Vistry Group),
Concerns that requirements exceed national standards, creating inconsistency with the sector agreed pathway set out in the Future Homes Hub One Plan and the Net Zero Transition Plan.	204755 (Hill), 208986 (Barratt Homes Northampton), 210280 (Vistry Group),
Comments noting that the policy should be strengthened with a suggested length for the sustainability statement, and we would like to see householders also be required to demonstrate some level of engagement with the range of sustainability issues, particularly water management, climate change adaptation and zero carbon.	204742 (Mothers CAN Cambridge), 204756 (R de Beaux), 203883 (J Prince), 205603, 205604 (L Dassy), 203129 (Cambridge Past, Present and Future), 204048 (B. Young),

Summary of issues raised in comments	Comments highlighting this issue
	204444 (Max Fordham, Ms H. Bennett),
Comments highlighting that the strategy requires 'ensuring that development is sited in places that help to limit carbon emissions'. This policy needs to follow that strategy requirement, requiring planning permission to only be granted if development is sited in places that help to limit carbon emissions, as even if the development itself is sustainable, that sustainability is lost if high emissions are required in order to meet transport needs. In addition to the items listed in 4.11, the Sustainability Statement should outline how the proposed location of the development enables the use of sustainable transport.	203546 (P. Tribble)
The policy must ensure compliance with the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981, as required by NPPF paragraph 174.	208951 (CPRE Cambridgeshire and Peterborough)

Comments on specific types of development

Summary of issues raised in comments	Comments highlighting this issue
Cultural venues support low-carbon placemaking and should be reflected in climate policy. Cultural infrastructure contributes to climate outcomes and this should be recognised and embedded in the chapter. I support Cambridge Junction and Create Cambridge in asking that: • cultural infrastructure is embedded across strategic chapters, not confined to Wellbeing • culture is treated with parity alongside housing, transport and utilities as core civic infrastructure • Create Cambridge is engaged as advisor/consultee on the further development of the Cultural Infrastructure Strategy and the Local Plan where this relates to cultural infrastructure and embedding Culture across the city's plans.	202064 (H Chamberlain), 202750 (Cambridge Junction/Create Cambridge), 204155 (Cambridge Junction/Create Cambridge), 202765 (Cambridge Junction/Create Cambridge), 202946 (R Terry), 202965 (T Flinders), 202469 (K Jones), 202893 (Cambridge Junction), 202151 (Cambridge Junction) 202206 (H Tam), 202318 (Cambridge Junction) 202400 (J Webber), 202419 (T Shaw), 202692 (T Altmann) 202722 (W. Townsend), 202895 (Cambridge Junction, R. Tinkler), 202064 (H Chamberlain), 203368 (N. Ellis) 203450 (S. Ashworth) 203500 (L. Heap)

Summary of issues raised in comments	Comments highlighting this issue
	203551 (D. Lever) 203646 (University of Cambridge, Dr Svendsen) 203857 (N. Yeni), 203878 (University of Cambridge, Dr J. Fritsch), 204193 (Cambridge Junction / Create Cambridge, M. Burman) 204417 (New International Encounter, Ms L. Elmer), 204859 (L. Matthews), 205074 (University of Cambridge, L. Sheerman), 205138 (H. Paterson), 205219 (J. Walsh), 205373 (L. Howse), 205424 (Cambridge Junction / Create Cambridge (E. Hine), 205439 (A. Seiglow),
support: principles of sustainable development / retention of concrete infrastructures in a climate emergency: with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project, I object to proposals	204282 (L. Cooke), 204516 (T. Woodcock), 205113 (M. Cleminson),

Summary of issues raised in comments	Comments highlighting this issue
to demolish the Underpass, proposals were rejected during the 2023 consultation. It would cause unnecessary disturbance and high-carbon emissions to backfill and level the underpass drum 70's transport infrastructure which contains existing biodiversity and has proven potential as an inviting public square. I support minimal environmental footprint / maximum impact redevelopment of the as-found underpasses and under crofts, greening of the public realm in and around the transport infrastructure.	205197 (T. Ziromskas), 205228 (Cambridge Junction / Create Cambridge (M. Burman),

Policy CC/DC Designing for Climate Change

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for a climate change adaptation policy with inclusion of the cooling hierarchy from a range of comments.

Comments were made that while the policy was supported, it needed to be strengthened in relation to the role of green infrastructure in reducing the impacts of the Urban Heat Island effect, consideration of the albedo of materials and ensuring that external shading was prioritised to reduce overheating risk in new homes. Those responding suggested that reference to specific measures could usefully be added to the policy.

Concerns from local groups and residents were raised in relation to the wording around cross ventilation, with a concern that this could allow for too many single aspect units to be brought forward. Some developers raised concerns that the wording in relation to requiring cross ventilation where practicable was too prescriptive and felt that consideration of overheating should be left to Part O of Building Regulations.

Some developers also raised concerns about the importance that the policy enables sufficient flexibility to accommodate changes in climate change policy and good practice over the plan period given the Climate change scenarios predict extensive changes by 2050, much of which is dependent on government and human action so there is substantial uncertainty over outcomes. Reference was also made to the need for all policies to be subject to viability testing. Another comment said it

should include an exception for buildings of unique type and nature.

Further responses raised the need for policy CC/NZ and policy CC/DC to be combined as both dealt with climate change mitigation.

Response to the main issues raised in representations:

In response to comments relating to the Urban Heat Island Effect and the role of nature based solutions and greening for cooling, the policy wording has now been amended to include specific reference to the role of both green and blue infrastructure, the definition of green infrastructure in the glossary includes blue and green infrastructure, to provide evaporative cooling, enhancement of tree canopy cover to provide shade and the use of cool materials. Further detail is provided in the supporting text and a new policy with requirements related to the urban greening factor has been included in the local plan (policy BG/UGF). Further guidance on mitigating the urban heat island effect will also be provided in a future technical guidance note building on guidance already included in the adopted Greater Cambridge Sustainable Design and Construction SPD (2020).
In response to the various comments suggesting amendments and strengthening of the cooling hierarchy and prioritisation of passive design measures to help mitigate overheating risk, the cooling hierarchy has now been embedded within the policy wording as opposed to being within the supporting text. Additional requirements in relation to the need for glazing ratios needing to respond to orientation and the avoidance of floor to ceiling glazing on exposed elevations unless accompanied by external shading and a secure means of providing natural ventilation has also been added to the policy. Further guidance on issues such as external shading will be provided in a future technical note.

In response to calls to strengthen the policy in relation to avoiding single aspect units, while we recognise the concerns regarding single aspect dwellings, it is not always possible to design out all single aspect dwellings, and there is a need for policy to provide some flexibility to developers especially where it can be demonstrated that schemes are compliant with Building Regulations Parts F and O. The policy requires evidence in the form of detailed thermal modelling that schemes can be delivered that meet Part O requirements with consideration also given to future climate scenarios. The policy wording has been strengthened so that where single aspect units remain, applicants must clearly demonstrate that their design has followed the cooling hierarchy and prioritised the use of passive design measures and the use of external shading to reduce internal solar gains.

In response to comments relating to leaving the consideration of overheating to Building Regulations and concerns about viability and the flexibility of the policy, paragraph 162 of the NPPF is clear that plans should take a proactive approach to mitigating and adapting to climate change, including consideration of the risk of overheating. The draft Placemaking and Design PPG also sees a clear role for the planning process in considering the risk of overheating in new homes and buildings and noting the vital role that local design policies can play in addressing the challenge posed by our changing climate. The guidance set out in the PPG for addressing overheating and thermal comfort follows that set out in policy CC/DC. The policy does not seek to require additional modelling beyond that required for Part O compliance. It does, however, seek to ensure that measures to reduce overheating are considered early in the design of development, in order to ensure that priority is given to passive design measures, reduce costs and to ensure that schemes can be delivered post approval without the need for changes to facade design after Part O assessment has been undertaken, which usually takes place after planning permission has been granted. This is a continuation of the approach already set out in the current Cambridge and South Cambridgeshire Local Plans and the Greater Cambridge Sustainable Design and Construction SPD, which provides sufficient flexibility to applicants in relation to the measures implemented as part of the design of proposals and is already being successfully applied to developments across Greater Cambridge for both residential and non-residential development with no impact on the viability of development.

With regards to the calls to combine policies CC/NZ and CC/DC, this is not considered appropriate as policy CC/NZ specifically deals with climate mitigation and metrics to deliver net zero carbon development, while policy CC/DC relates to climate change adaptation. Buildings of a unique nature are capable of being considered as a material consideration.

Tables of representations:

Support for the Policy Approach

Summary of issues raised in comments	Comments highlighting this issue
Support for the designing for a climate change policy, including use of the cooling hierarchy. Comments highlighting that the principles are both appropriate and capable of guiding development that meets local and regional needs.	205514 (BCN Wildlife Trust), 201562 (Stapleford PC), 202841 (Dr Cook), 202771 (A Bragg), 202839 (Carbon Neutral Cambridge), 203158 (ESCO Prospect), 203664 (Cambridge Green Party), 204449 (Max Fordham), 204746 (Mothers CAN Cambridge) 210578 (Cambridgeshire County Council), 204299 (Tritax Big Box Developments) 202405 (University of Cambridge, Mark Parsons),

Summary of issues raised in comments	Comments highlighting this issue
	204235 (Cambridge Investment Partnership), 211536 (Martin Grant Land Limited)
Very supportive of the need for cross ventilation and avoidance of single aspect homes	202903 (Cambridge City Council Liberal Democrat Group)

General Policy Comments

Summary of issues raised in comments	Comments highlighting this issue
The policy needs to be made significantly more detailed, with stronger requirements. It must learn from countries that already have the sort of climate we are likely to have here in future. Designing for a changing climate states that “development proposals should reflect the cooling hierarchy priority order”. In our view this is inadequate, because overheating is already a serious problem and climate change is going to significantly increase the risk. Solar Shading (for summer months) should be a top priority. The report by the Committee on Climate change “Risks to health, wellbeing and productivity from overheating in buildings July 2022” points out that “around a fifth of homes in the UK are already overheating in summers today”, while the	203098 (Carbon Neutral Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
Environment Agency warns that we need to prepare for heatwaves temperatures to be 6.6C higher by 2100	
Residents and the Cambridge Green Party have raised concerns about development of sites worsening the urban heat island and to leave vegetation on waste ground to enable transpiration. All applications to evaluate and then actively and effectively reduce existing and/or future UHI effect (including impacts on surrounding townscape and biosphere) and integrate blue and green infrastructure as connected cooling corridors to reduce UHI and ensure equitable access to cooler environments.	201242 (S Williams), 201878 (J Hurst), 202180 (R Lambert), 203664 (Cambridge Green Party), 205652 (S Buckingham), 205665 (D Storey), 207651 (Duxford PC)
Consider that the policy is essential but needs strengthening. Remove reference to cross ventilation where possible as this may allow projects to implementing it on viability grounds. Demonstration of compliance with future weather files should be required and clarification of what passive design solutions mean to ensure implementation of external measures.	204449 (Max Fordham), 204746 (Mothers CAN Cambridge)
The scale of development must be drastically reduced – the region has already exceeded its carbon emissions budget for 2030.	205657 (S Buckingham)
The longer the heatwave, the hotter houses become, even when taking exemplary passive measures to reduce overheating. As heatwaves will become hotter and longer in duration, it's important that planning policy requires developers to design for this. Representation includes evidence for the results of	203127 (Carbon Neutral Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
research into the effectiveness of taking all reasonable passive measures to reduce overheating in an Edwardian terraced house in Cambridge, but also the steady rise in temperature day-by-day.	
Sustainability Statements must account for all GHG emissions (embodied or otherwise, directly and indirectly)	205657 (S Buckingham)
The policy should be strengthened to explicitly address the impact of any development not only on future edifices but (more importantly) on surrounding townscape and biosphere	201878 (J Hurst), 202180 (R Lambert), 205652 (S. Buckingham), 205665 (D Storey), 207651 (Duxford PC, Cllr Ian Walters) 201548 (T. Neal) 201341 (J Neal), 205440 (C Aman), 202976 (Cambridge G Self), 203522 (Federation of Cambridge Resident's Associations), 201548 (T. Neal) 201735 (Dr J. Neal), 201742 (J. Johnson) 201868 (J. Brightman)

Comments about Specific Design Measures to Address Urban Heating

Summary of issues raised in comments	Comments highlighting this issue
Design should include outdoor spaces as well. Should be more directive about outdoor space design and ensuring spaces have ample shading etc., rather than just requiring standards for individual dwellings.	202841 (Dr Cook), 203008 (M Cleminson), 202618 (C. Pointon), 203201 (P. Tribble),
The Wildlife Trust supports the use of Natural England's Urban Greening Factor in urban areas but concerns about how this will be used for standalone new settlements and rural development locations (raised in relation to policy BG/GI but some crossover).	205514 (BCN Wildlife Trust)
Policy needs strengthening – solar shading must be a top priority and external shading on all south and west facing glazing, with a means to maintain it should be required. White surfaces should be encouraged to reduce heat buildup. Attempt to plan for a global temperature rise of 4 degrees.	202771 (A Bragg), 203109 (Carbon Neutral Cambridge)
Policy should explicitly encourage and support the use of low carbon materials in construction (e.g. timber)	202839 (Carbon Neutral Cambridge)
Reference to value of low-emissivity glass to reduce solar gain in summer and heat loss in winter and vacuum glazing	203133 (CPPF)
The policy should explicitly apply to all forms of development, including buildings, streets, spaces, places, redevelopment and refurbishment.	203664 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
Incorporate specific measures to mitigate the urban heat island including shading and cool materials.	204449 (Max Fordham), 204746 (Mothers CAN Cambridge), 201548 (T. Neal)
White walls help reduce overheating in summer heatwaves and will also help reduce urban heat island effects, so should be encouraged. The south facing external surface of houses with a brick facing averaged 50.1C, 14.3C hotter than the white painted ones	202816 (A Bragg)
Retrofit Ventilation is a key point that should warrant future new construction utilising higher ceilings through the reconstruction of Old Builds outfitted for the modern day with retrofitted energy supplies, etc that will also serve to break down societal dives regarding perceived good and bad areas where streetscapes are harmonious yet distinctly unique in beauty like any one Conservation Area. Embodied energy and embodied carbon- must remain a central priority and so influence new construction to readopt TVA principles as this will be pivotal towards the area's future green credentials as outlined in many existing auxiliary planning documents approved presently with Carbon Studies taken of existing architecture, notably buildings saved from demolition.	210350 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
Support for the policy but should refer to green roofs and how surface water systems should be designed with an allowance for climate change (Climate change allowances for peak rainfall).	210578 (Cambridgeshire County Council)
Rural active travel routes should be bridleway to include equestrians	203938, 203942 (S Rogers)
Please ban wood burners which the press in particular have stated create more pollution than cars. Please preserve as many trees in private ownership as possible to shade properties and absorb carbon.	202376 (S Hegarty),
Comment regarding possible conflicts between “cool roofs” and using roof spaces for other development purposes, such as generating electricity and solar hot water.	201900 (R. Pargeter)
We note that the Net Zero Carbon Building Standard results are not yet published, so our comments on the Designing for a Changing Climate policy may be revised at the Regulation 19 stage.	208294 (Trinity College)

Comments Suggesting Changes to Policy Wording

Summary of issues raised in comments	Comments highlighting this issue
Delete the words "where possible" from the policy.	201878 (J Hurst), 202180 (R Lambert), 203664 (Cambridge Green Party), 205652 (S Buckingham),

Summary of issues raised in comments	Comments highlighting this issue
	205665 (D Storey), 207651 (Duxford PC, Cllr Ian Walters) 201548 (T. Neal) 201341 (J Neal), 205440 (C Aman), 202976 (Cambridge G Self), 203522 (Federation of Cambridge Resident's Associations), 201548 (T. Neal) 201735 (Dr J. Neal), 201742 (J. Johnson) 201868 (J. Brightman)
Replace changing climate with climate crisis throughout and change the wording to "respond proportionately and actively to the emerging climate crisis" (not "positively respond to our changing climate").	201878 (J Hurst), 202180 (R Lambert), 203664 (Cambridge Green Party), 205652 (S. Buckingham), 205665 (D Storey), 207651 (Duxford PC, Cllr Ian Walters) 201548 (T. Neal) 201341 (J Neal),

Summary of issues raised in comments	Comments highlighting this issue
	205440 (C Aman), 202976 (Cambridge G Self), 203522 (Federation of Cambridge Resident's Associations), 201548 (T. Neal) 201735 (Dr J. Neal), 201742 (J. Johnson) 201868 (J. Brightman)
Include consideration of albedo effect of new development at paragraph 4.17, which can be mitigated through building design.	201562 (Stapleford PC), 210914 (Great Shelford Parish Council)
The policy should be amended to include the following text: 'Buildings which have heritage and/ or specific functional constraints will be provided additional commercial or technical flexibility with these requirements subject to the provision of evidence'.	208250 (Kings College)
The policy should be amended to include the following text: "Buildings of a unique nature and type (e.g. visitor attractions) may be provided additional commercial or technical flexibility."	208288 (Imperial War Museum), 208303 (Girton College)
We suggest replace the hierarchy with: "Developments must demonstrate that they have appropriately assessed and mitigated the risk of overheating using a	208963 (Persimmon Homes East Midlands)

Summary of issues raised in comments	Comments highlighting this issue
performance based approach (e.g., CIBSE TM59), applying passive, active and hybrid cooling measures as appropriate to site context".	

Comments raising Concerns about the Policy and Implementation

Summary of issues raised in comments	Comments highlighting this issue
Vistry have concerns regarding the prescriptive nature of part 3 of the policy, which states that "all new dwellings shall be designed to benefit from cross ventilation where possible, and take passive, design-led approaches to reducing excess solar gain." While the intent of this requirement is understood, matters relating to overheating risk, ventilation and internal environmental performance are already comprehensively addressed through the Building Regulations (part O) and associated guidance. Vistry consider that this Policy should be deleted to reduce reporting and administration associated with the Draft Plan.	204844 (Vistry Group)
While the intent of this requirement is understood, matters relating to overheating risk, ventilation and internal environmental performance are already comprehensively addressed through the Building Regulations (part O) and associated guidance. Some of our buildings may require large open spaces such as lecture theatres which present unique challenges to issues such as ventilation and overheating.	208250 (Kings College), 208288 (Imperial War Museum), 208303 (Girton College), 210281 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
It is important to ensure the policy enables sufficient flexibility to accommodate changes in climate change policy and good practice over the plan period. Climate change scenarios predict extensive changes by 2050, much of which is dependent on government and human action so there is substantial uncertainty over outcomes. The Local Plan will therefore need to build in suitable flexibility to accommodate these changes over the plan period. The Plan will also need to be informed by a viability assessment to ensure policies are achievable, and the cumulative cost of policies will not undermine deliverability of the Plan – Policy CC/DC should be revised to provide a more flexible, evidence-based and proportionate approach to climate-resilient design.	203353 (Babraham Research Campus), 203043 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners), 208963 (Persimmon Homes East Midlands), 208988 (Barratt Homes Northampton),
Policy CC/DC sets out how developments in terms of design and placemaking should mitigate against the challenge of climate change, including overheating. Hill acknowledges the importance of new developments to be climate efficient as possible. However, the principles set out under Policy CC/DC largely replicate the principles listed under draft Policy CC/NZ. It is suggested that the two policies are combined to avoid unnecessary repetition.	204757 (Hill)
Object to use of must at CC/DC (1) as leaves little to no discretion for decision makers – should would be more appropriate in reaching a balanced judgement	204097 (EW Pepper Ltd)

Policy CC/NZ: Net zero carbon new buildings

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was strong support for the policy from residents and parish councils, political groups, organisations such as the Cambridgeshire and Peterborough Integrated Care Board, the Passivhaus Trust and Carbon Neutral Cambridge and some developers and consultants. Notably East of England Ambulance service commented that EEAST recommend building all homes and commercial buildings to BREEAM standard or PASSIVHAUS, as this would provide significantly long-term environmental savings for residents who are more likely to be from the most deprived backgrounds or have limited disposable income.

Comments were made to suggest areas for clarification to the policy including in relation to the area metrics used to calculate space heating demand. There were also suggestions that schemes targeting compliance with certain construction methodologies such as Passivhaus should be seemed to be in compliance with the policy without the need for additional modelling.

Cambridge Past Present and Future called for the supporting information should reflect national targets and local authorities should estimate their carbon budget share. They also suggested the addition of battery storage to Part C of the policy and the need to clarify the practical implementation of energy offsetting including updates to the Planning Obligations SPD.

Concerns from some developers were raised as to the implementation of the policy with calls for further guidance and a need

for flexibility in application, particularly in relation to energy use intensity figures for some types of non residential development with high energy demands, such as research and development and biotechnology uses. There were calls for a phased transition for policy implementation to ensure a steady build-up of skills for delivering higher standards as well as a consistent technical framework approach to maintain consistency in building performance assessment.

Concerns are raised about the requirement for whole life carbon assessment, for which there is no support in the NPPF, noting that these are onerous assessments and there can be significant inconsistencies in approach across assessments

Some in the house building industry objected to the policy on the grounds that it is not needed on the basis of the Future Homes Standard, would not be viable and was not technically feasible and questioned whether the policy was supported by appropriate evidence. Some argued that proposals in the draft NPPF (PM13) meant that such policies could not be implemented by local planning authorities.

There was a suggestion that escalating targets over the plan period could accommodate technological advancements, providing clarity on development costs over time.

Other concerns included that requiring net zero operational emissions at the shell and core stage is impractical without knowledge of future end users and operational profiles, and that requirements of the policy would lead to overly simple building designs in order to achieve the operational energy metrics required by the policy.

With regards to embodied carbon there were calls for the policy to explicitly require the demonstration of lean design and require demonstration of optioneering having taken place during design. Another comment challenged the approach, and said the plan should follow national regulatory requirements.

A number of respondents called for the calculation of transport related emissions both before and after development as well as

the calculation of carbon emissions from infrastructure proposals.

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach, are noted.

Regarding calls for clarification on some elements of the policy and guidance on implementation, a number of changes have been made to the policy have been made including clarification of the area metric used for the space heating demand and energy use intensity calculation, which is Gross Internal Area. Support for the inclusion of battery storage to help maximise the use of onsite energy generation has also been added to Part C of the policy. To provide further clarification on the implementation of the policy, an addendum to the Climate Change topic paper has been prepared to provide additional guidance on how the energy metrics should be calculated, guidance on how the policy will be applied in situations where full compliance with the policy targets cannot be met, for example for building types with very large energy demands, and guidance on elements including the implementation of the energy offset mechanism in cases where this requirement is triggered. Further technical guidance notes will be prepared to aid the implementation of the policy and consideration is also being given to developing a route for compliance using SAP (or the Home Energy Model once adopted for those schemes not able to utilise PHPP, CIBSE TM54 or NABERS modelling. This approach is similar to that already being implemented to support the Central Lincolnshire Local Plan.

In some cases, schemes being delivered to specific construction standards will be deemed to comply with the requirements of policy CC/NZ. Clarification on this point has been added to the supporting text of the policy alongside details of the evidence that would need to be submitted for this approach to be taken.

Regarding the concerns raised by the Home Builders Federation regarding the requirement for Whole Life Carbon

Assessment, it is recognised that such assessments do require the use of specialist software and consultants, access to which is not always available to smaller scale development. As such the policy has been amended, introducing a threshold at which a Whole Life Carbon Assessment should be undertaken, which for homes is set at 100 units and 10,000 square metres of non-residential floorspace. Below this, it will still be important for schemes to look to reduce embodied carbon through lean design, choice of materials and material efficiency, reference to which has been added to the policy in response to representations, and measures to address this should be demonstrated through the Sustainability Statement. Further guidance on reducing embodied carbon and Whole Life Carbon Assessment will be provided within a future technical note that will site alongside the Local Plan on adoption and support implementation of the policy.

With regards to the objections raised by developers that the policy is not justified in light of the Future Homes Standard, and not supported by evidence of viability and technical feasibility, policy CC/NZ is supported by a full suite of evidence prepared by Bioregional, Etude and Currie and Brown. This includes technical feasibility and modelling and a range of development types and an assessment of viability, assessing the costs of achieving the requirements of the policy as an extra over cost on top of Part L Compliance (updated in 2025 to account for the changes made by Part L 2021), which has been fed into the wider Local Plan evidence base. The requirements of the policy are both technically feasible and viable.

A number of respondents suggested that setting metrics for net zero carbon is not a role for local planning authorities and should be left to the Future Homes Standard (FHS). While representing a significant step forward in energy performance standards for new homes, it is important to note that the FHS does not set a requirement for net zero carbon operational emissions, unlike Greater Cambridge's proposed Policy CC/NZ. Instead, the FHS seeks to ensure that new homes (and non-residential buildings) have low carbon, gas-free heating and slightly improved levels of energy efficiency, becoming net zero carbon in use once the electricity grid is fully decarbonised. Carbon budgets analysis carried out to support the emerging local plan has concluded that if Greater Cambridge was to reply on the Future Homes Standard alone, the areas carbon budget

available for all housing, derived from the national UK carbon budgets, would be exceeded meaning that we would not be able to contribute our share towards the national carbon budgets needed to meet the legally binding target of net zero by 2050. It is only via the application of the energy based metrics and onsite renewable energy generation requirements set out in policy CC/NZ that true net zero carbon housing can be delivered in Greater Cambridge.

Regarding the draft NPPF and the proposals set out in PM13 regarding stopping local planning authorities from setting standards for new homes, it must be noted that at the time of writing, the proposals in the draft NPPF were only draft proposals. It is also noted that the most recent draft NPPF, published for consultation in December 2025, sought views on ending the ability of local planning authorities to set standards for energy efficiency in new homes that go beyond Building Regulations requirements (and on dissuading the setting of any other numerical targets that cover any matters that are addressed by regulation). While the outcome of this consultation is awaited, the Councils' position aligns with the open legal advice published by Essex County Council, which notes that while the NPPF is policy guidance to which regard must be had during plan-making, deviation from it can be justified so long as there is clear evidence that demonstrates the reason for doing so and the viability of the proposed policies. As set out in the 2025 Climate Change Topic Paper, the significant evidence base for Policy CC/NZ, which includes viability assessment, technical feasibility and carbon budget analysis, provides the justification for this departure from the NPPF.

With regards to the calls for a phased approach to targets, this approach would still hamper Greater Cambridge's ability to contribute its fair share towards meeting national carbon budgets. The approach set out in policy CC/NZ has been subject to technical feasibility work and viability assessment all of which demonstrates that these requirements are achievable now. It should also be noted that these requirements are in line with requirements set out in other adopted Local Plans which are already being successfully implemented including in Central Lincolnshire, Cornwall and Bath and North East Somerset.

Concerns were raised that it would be difficult to apply the requirements of the policy to shell and core schemes where the precise end user is not known. However, the general use class of schemes will be known, so the recommended approach would be for modelling to be undertaken using the closest possible use class allowed for in the energy modelling software e.g. TM54. Where considered necessary, a planning condition could then be applied to require the submission of more accurate modelling once the final end user is known.

With regards to concerns that the application of the policy would lead to an over simplification of building design due to stringent performance criteria affecting design elements like elevational design and fenestration, the technical feasibility work undertaken to support the development of the policy used existing permitted housing schemes to model the achievement of the policy requirements, schemes that included elements such as former windows. While it is recognised that simpler building forms will make compliance with the policy simpler to achieve, it is not necessary and as such we would dispute claims that the policy will lead to homogenised architectural forms.

Tables of representations:

Support for the Policy Approach and Requirements

Summary of issues raised in comments	Comments highlighting this issue
Comments expressing support for the policy approach.	201395 (Gamlingay PC), 204054 (B Young), 205515 (BCN Wildlife Trust), 201166 (M Clarke), 202905 (Carbon Neutral Cambridge), 203214 (P Tribble),

Summary of issues raised in comments	Comments highlighting this issue
	203644 (Passivhaus Trust), 203665 (Cambridge Green Party), 204240 (CIP), 204753 (Mothers CAN Cambridge), 205118 (NHS Cambridgeshire and Peterborough Integrated Care Board), 201379 (Gamlingay PC), 201405 (M Rokoszak), 202742 (A Bragg), 201563 (Stapleford PC), 204240 (Carter Jonas on behalf of CIP), 204458 (Max Fordham), 205127(D Stoughton), 203323 (N Ellis), 203429 (S Ashworth), 201406 (M. Rokoszak), 210915 (Great Shelford Parish Council)
Welcome extra to Building Regs. Lean Design and the Circular Economy.	202184 (R Lambert)
Fully support policies that promote carbon neutral development and the securing of financial contributions where on-site carbon mitigation requirements cannot be met. We would highlight that NHS property could benefit from carbon/energy	205118 (NHS Cambridgeshire and Peterborough Integrated Care Board)

Summary of issues raised in comments	Comments highlighting this issue
offset funds supporting the NHS to reach the goal of becoming the world's first net zero healthcare provider.	
Support the requirement of draft Policy CC/NZ Part 2.	210285 (Vistry Group)
The policies for embodied carbon are supported as they are not unduly prescriptive.	211540 (Martin Grant Land Limited)

Comments on the Policy Approach and Requirements

Summary of issues raised in comments	Comments highlighting this issue
Monitoring and enforcement of the policy is essential. The issue of quality control needs to be raised to ensure figures are from a reputable source.	202844 (H Cook), 203013 (M Cleminson), 203271 (Horseheath PC), 207420 (A Copping)
The policy should explicitly require the demonstration of lean design and require demonstration of optioneering having taken place during design.	204753 (Mothers CAN Cambridge)
Transport carbon (lifetime transport emissions) should be included within net zero assessments not just building emissions. Operational carbon emissions must consider vehicle movement emissions generated by developments.	203144 (CPPF), 205216 (Dr Thomas), 207524 (Dr Lawrence), 205127 (D Stoughton), 207420 (A Copping)

Summary of issues raised in comments	Comments highlighting this issue
Need to recognise biodiversity and climate crisis and need to adapt to climate change and address urban heat island and mitigate effects of new structures.	202454 (J Neal)
Home working has impacted on energy demand and EV charging has also changed energy demand in residential and non-residential properties, energy generation should be local.	201926 (R Parteger)
Policy should explicitly encourage and support the use of low carbon materials such as timber and rendered surfaces.	202905 (Carbon Neutral Cambridge)
Policy should take account of the evolution of sustainable housing and energy technology in a way that enables the standards to rise in the future.	203214 (P Tribble)
With regards to assessing building performance must be within a consistent technical framework approach to maintain consistency in building performance assessment.	205174 (Home Builders Federation)
Rural Active travel routes should be bridleway to include equestrians.	203944 (S Rogers)
If policy is deliverable, consistency will be required across other policies in the plan notably design as the approach will inevitably lead to less variety in built form in order to reduce the surface area of the building.	205174 (Home Builders Federation)
The Passivhaus Trust advocate for the use of the Passivhaus standard as a reliable method to ensure projects meet the performance outcomes set out in the Local Plan, noting the risk of performance gaps without such quality assurance.	203644 (Passivhaus Trust), 204753 (Mothers CAN Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
Projects targeting Passivhaus certification should be considered as 'deemed to comply' with Local Plan requirements, similar to proposed practices in Scotland.	
EEAST recommend building all homes and commercial buildings to BREEAM standard or PASSIVHAUS. As a minimum EEAST recommends the proposed 40% affordable/social housing are built to Passivhaus or BREEAM Excellent standards, as this would provide significantly long-term environmental savings for residents who are more likely to be from the most deprived backgrounds or have limited disposable income.	210327 (East England Ambulance Service NHS Trust)
Calls for a phased transition for policy implementation to ensure a steady build-up of skills for delivering higher standards.	205174 (Home Builders Federation), 208964 (Persimmon Homes East Midlands)
Encouraging alignment with the UK Zero Carbon Buildings Standard is meaningless.	202614 (C Pointon)
A policy is needed for transport infrastructure to achieve net negative cumulative carbon emissions by 2050. The plan should have binding targets for the proportion of journeys walked/cycled and by public transport. Major developments should have targets for mode share and permeability.	203144 (CPPF), 207524 (Dr Lawrence)

Summary of issues raised in comments	Comments highlighting this issue
Comments question whether the policy is not needed as the Future Homes Standard is being progressed by Government and they will change legislation to prevent local authorities from setting standards above Building Regulations. Need for careful consideration of the outcomes of the draft NPPF consultation and in particular PM13.	205174 (Home Builders Federation), 204845 (Vistry Group), 207442 (Bidwells on behalf of Pioneer Group Ltd), 208272, 211541 (Martin Grant Land Limited), 208289 (Imperial War Museum), 208314 (Churchill Retirement Living with McCarthy and Stone) 210282 (Vistry Group),
The council should consider deleting the policy and aligning the Council's requirement for carbon neutral development with those of Government, including embodied carbon, as new development will often be far more sustainable in many circumstances including building fabric by use of modern methods of construction but also extending beyond that, such as sustainability through optimisation of use of a site.	208314 (Churchill Retirement Living with McCarthy and Stone)
Strongly object. Whilst the UK's legally binding requirement to achieve net zero carbon by 2050 is recognised; it is considered that the proposed requirement for new development to achieve net zero operational carbon emissions far exceeds current building regulations requirements.	211281 (Woolsington One Ltd)

Summary of issues raised in comments	Comments highlighting this issue
It should be recognised that the UK is currently in the process of transitioning towards net zero carbon, through the implementation of the Future Homes Standard. Written Ministerial Statement made in December 2023 established that any planning policies which propose local energy efficiency standards for buildings that go beyond current or planned building regulations should be rejected at examination if they do not provide a well-reasoned and robustly costed rationale which ensures that development remains viable	

Comments Regarding Space Heating and EUI Targets

Summary of issues raised in comments	Comments highlighting this issue
Need clarity on the target (explicitly state the area metric required) as different reporting methods (PHPP, SAP, IES) yield varying Energy Use Intensity results, largely dependent on area metrics and thermal bridging.	204054 (B Young), 204753 (Mothers CAN Cambridge)
Suggestion that escalating targets over the plan period could accommodate technological advancements, providing clarity on development costs over time.	203048 (Bidwells on behalf of Barrat Homes)
Energy consumption targets much include a standard reference to room temperature for reliable measurability.	203144 (CPPF)
Carbon budgets for construction should align with national targets, include battery storage and account for embodied carbon including setting of targets.	203144 (CPPF)
Emissions associated with heating and cooling should be included.	207524 (Dr Lawrence)

Summary of issues raised in comments	Comments highlighting this issue
It should be noted that it is not clear what the targets are exactly unless the modelling methodology is more clearly defined. For example – PHPP reports EUI differently than SAP or IES does unless a conversion is added. Please explicitly state the area metric required. Passivhaus certification should be accepted as compliance with the policy without additional modelling to limit conflict and cost to developers	204458 (Max Fordham)
The energy metrics are inconsistent with the Written Ministerial Statement and the Planning and Energy Act. Any local standard should be expressed as a percentage uplift on the Target Emission Rate.	205174 (Home Builders Federation)
Comments highlighting that net zero operational emissions at the shell and core stage is impractical without knowledge of future end users and operational profiles. Requirements could deter occupier delivery or investment due to the impractical obligations imposed. Concerns are raised regarding the reliance on CIBSE TM54 modelling, which overlaps with existing energy performance assessments in BREEAM requirements, potentially reducing certainty without providing significant environmental benefits. The respondent advocates for a proportionate, evidence-based approach that considers realistic delivery stages and aligns with existing standards.	204314 (Tritax Big Box Development)

Summary of issues raised in comments	Comments highlighting this issue
Comments highlighting the approach is unsupported by sufficient evidence, failing to demonstrate that proposed performance thresholds are achievable across various building types and site contexts	204548 (Redrow South Midlands), 203352 (BMR Granta Park PropCo Limited),

Comments Raising Suggestions about the Policy Wording

Summary of issues raised in comments	Comments highlighting this issue
Some points of the policy require strengthening particularly point 8 which merely requires 'demonstrating action'. The policy should set clear expectations for prioritising recycled and low carbon materials, apply to retrofit as well as new buildings and include standards for buildings lifetime. Amendments to the wording are suggested. Critical of use of language like where appropriate and encourage.	203665 (Cambridge Green Party), 201744 (J Johnson), 203013 (M Cleminson)
Supporting information should reflect national targets and local authorities should estimate their carbon budget share.	203144 (CPPF)
Amendments required to ensure greater flexibility of application of policy. The space heating targets may be challenging in certain circumstances, and flexibility is therefore needed to reflect built form, design, urban design, placemaking and viability principles. Similarly, the EUI targets need to be	203164 (ESCO Prospect), 205085 (Lichfields on behalf of Lolworth Developments Limited), 204104 (EW Pepper Ltd), 208267 (Martin Grant Land Limited),

Summary of issues raised in comments	Comments highlighting this issue
adaptable to ensure they can respond appropriately to differing site contexts and design constraints. Policy should be amended to be proportionate to the size of scheme to which it is being applied.	208304 (Girton College), 210286 (Vistry Group)
Comments seeking clarification on the use of ‘maximise’ for the draft Policy wording which relates to generating on-site renewable energy (Part C, bullet no.5). This should be quantified.	211755 (Urban & Civic)
Question whether the policy should read that 'new buildings should be limited in design to use 'less than' 20kWh per m2 per year.	201379 (Gamlingay PC)
Part 2 and onsite renewable energy may not be achievable for buildings of more than 2 floors and should be updated to read “Proposals must seek to maximise opportunities to generate on-site renewable energy to serve the development”.	204012 (ARU)
Part C: the renewable-energy provision wording “where possible” should be interpreted flexibly, and the policy should be amended to read: "Proposals should maximise the deployment of renewable energy where appropriate / feasible and viable".	208252 (Kings College), 209748 (Endurance Estates), 208291 (Imperial War Museum), 210286 (Vistry Group)
Part C should mandate battery storage alongside onsite energy generation to manage electricity demand effectively.	203144 (CPPF)

Summary of issues raised in comments	Comments highlighting this issue
Part D also requires new development to calculate whole life carbon emissions through a nationally recognised whole life carbon assessment tool and demonstrate actions to reduce embodied carbon where possible. The College therefore requests that the following text be inserted into this draft Policy: "The Whole Life Carbon Assessment undertaken should be proportionate to the nature and scale of the application".	208252 (Kings College)
There is no mention in the draft Policy of the need for flexibility where sites are impacted by heritage designations, which of course significantly impact the College. We therefore suggest that the following wording should be inserted into the draft Policy: “It is recognised that buildings impacted by heritage designations may have specific constraints and this will be considered in the context of the targets within this Policy.”	208251 (Kings College)
Objection raised to the word “must” at CC/DC(1) as this creates a requirement leaving little to no discretion for decision makers. The word “should” would be more appropriate, setting out an expectation unless justified otherwise, which aids decision makers in reaching a balanced judgement. The requirements regarding these matters are addressed through the Building Regulations and planning policies should not duplicate this legislation.	204469 (Bellway Strategic)
The requirement to follow a hierarchical approach of reduction heat and power demand, however, raises concern with flexibility on the subsequent requirement	205085 (Lichfields on behalf of Lolworth Developments Limited)

Summary of issues raised in comments	Comments highlighting this issue
to supply all energy demand through on site energy generation, as there may be some instances where this is not possible and/or an alternative off-site solution may be preferable. Amendments to the wording should be introduced to allow flexibility, where it can be justified: “Where appropriate new development must achieve net zero operational emissions by following a hierarchical approach of reducing heat and power demand then supplying all energy demand through onsite energy generation, unless, satisfactorily justified otherwise”	
Overall the policy aligns with the ARU Design Principles document, but some parts of the policy require clarification. Part B and requirements for Higher Education Teaching Facilities requires clarification within the supporting text so that is based on the sub-typology that best applies to different extents of the proposed floorspace.	204012 (ARU)
Concerns are raised about the requirement for whole life carbon assessment, for which there is no support in the NPPF. These are onerous assessments and there can be significant inconsistencies in approach across assessments (noting that not all products will have an Environmental Product Declaration). This requirement should be deleted.	205174 (Home Builders Federation), 211757 (Urban & Civic)
Amend policy as follows: 1. Introduce flexibility by replacing fixed space heating and EUI thresholds with performance targets “where technically feasible and demonstrated to be viable”,	204548 (Redrow South Midlands)

Summary of issues raised in comments	Comments highlighting this issue
supported by site specific evidence. 2. Align targets with national policy, including the Future Homes Standard, and avoid imposing Passivhaus equivalent requirements unless justified by robust local evidence. 3. Allow compliance through multiple routes, not solely Passivhaus style modelling tools (e.g. TM54, PHPP), to accommodate a wider range of building types and construction approaches. 4. Remove the requirement for onsite renewable generation to meet all energy demand; instead require developments to maximise feasible onsite generation and supplement through local low carbon energy sources. 5. The proposed offsetting fund should be removed as it is beyond the remit of planning policy and should be left to the Building Regulations regime. 6. Ensure whole plan viability testing is carried out, and the results shared and consulted upon to enable full review of the policies in that context. This would confirm that CC/NZ can be implemented without compromising housing delivery or affordable housing provision. 7. Avoid duplication by clarifying how CC/NZ interacts with CC/SD, CC/IW, CC/DC and CC/CE, ensuring applicants only submit one coordinated set of climate related evidence.	

Summary of issues raised in comments	Comments highlighting this issue
Comments highlighting the challenges for new dwellings to deploy sufficient renewable energy to meet all its energy demands on site, particularly given the substantial power requirement from Electric Vehicles (EV'). Recommendation for the draft policy to be amended to: "Proposals should maximise the deployment of renewable energy where feasible and viable."	210287 (Vistry Group)
The current proposed policy ignores the fact that solar energy generation rarely matches energy demand at the time it is produced, therefore leading to excess energy generated that is not consumed on-site. The policy wording should suggest that this should be balanced over the course of a year for a net zero carbon development. It would not be reasonable to expect all schemes to provide at least all of their energy requirements on site and through renewable resources, especially for speculative developments where the end user is not known. Different tenants will use energy in different ways.	211537 (Martin Grant Land Limited)

Comments Raising Concerns about the Policy and its Implementation

Summary of issues raised in comments	Comments highlighting this issue
Need to clarify the practical implementation of energy offsetting including updates to the Planning Obligations SPD.	203144 (CPPF)
Parts A and B of the policy include requirements that may not be enforceable, and the policy should clarify that these are hypothetical. Building Regulations requirements should suffice.	204509 (Abbey Properties)
Part D is inconsistent with national policy by proposing a tariff on all developments and would complicate the process due to the need for a Section 106 Agreement.	204509 (Abbey Properties)
The policy's approach to net zero is not aligned with national planning policy as net zero can be achieved by various means and properties will require backup power when renewable energy source are insufficient.	204509 (Abbey Properties)
Part D and local energy offsetting would seem to duplicate energy users funding the installation of renewable energy generation through their bills. Renewable energy procurement should be included within this policy as a route to achieve net zero carbon buildings, as it is within the UK Net Zero Carbon Buildings Standard used for Part C of this policy.	204012 (ARU)
In relation to the "Energy Offset Fund" raise in Part D, concerns were raised that the policy does not give any detail with respect to the cost of the fund and therefore this part of the policy is unsound and not in accordance with Paragraph	208304 (Girton College), 208964 (Persimmon Homes East Midlands), 208987 (Barratt Homes Northampton), 210059 (Endurance Estates),

Summary of issues raised in comments	Comments highlighting this issue
59 of the NPPF, which requires local plan policies to be accompanied by up-to-date viability assessments. Contributions must also meet CIL/S106 legal tests.	210288 (Vistry Group), 210594 (Imperial War Museum), 211538 (Martin Grant Land Limited), 211756 (Urban & Civic)
Policy imposes space-heating (15-20 kWh m^{-2}) and EUI (35 kWh m^{-2} yr^{-1}) targets equivalent to Passivhaus standards, which are financially and technically onerous; the draft should be amended or withdrawn, with a heritage-flexibility clause and targets aligned to construction year rather than a fixed 2030 benchmark.	208251 (Kings College), 208289 (Imperial War Museum), 210282 (Vistry Group), 211754 (Urban & Civic)
Part B is unenforceable as it is beyond the control of developers, with space heating being the only standardisable element. While a methodology can be required, the council cannot enforce actual in use performance outcomes as these will never fully align with design intent	203144 (CPPF), 211539 (Martin Grant Land Limited)
Concerns about the viability implications of policy requirements as it goes beyond national Building Regulations and Future Homes Standard for operational carbon and whole life carbon. The requirements would also conflict with NPPF PM13.1. The cumulative impacts of the policy have not been accounted for, posing risks to housing viability, affordable housing delivery, and overall development rates.	203048 (Bidwells on behalf of Barrat Homes), 203381 (Bidwells on behalf of Babraham Research Campus) 204227 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure) 204248 (Bidwells on behalf of Bellway Strategic Land)

Summary of issues raised in comments	Comments highlighting this issue
Onerous requirements have the potential to impact on housing affordability and delivery rates for new homes.	204473 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure) 204548 (Carter Jonas on behalf of Redrow South Midlands) 204738 (Bidwells on behalf of Vistry) 204770 (Carter Jones on behalf of Hill) 205041 (Savills UK on behalf of Endurance Estates), 205174 (Home Builders Federation), 204548 (Redrow South Midlands), 204104 (EW Pepper Ltd), 208267 (Martin Grant Land Limited), 208987 (Barratt Homes Northampton), 210059 (Endurance Estates), 210283 (Vistry Group), 211753, 211754, 211757 (Urban & Civic)
Concerns that the proposed energy targets are not technically feasible for certain types of uses (e.g. life sciences laboratories) and that greater flexibility is needed.	203352 (BMR Granta Park PropCo Limited), 208290 (Imperial War Museum),

Summary of issues raised in comments	Comments highlighting this issue
Concerns that the policy does not provide sufficient consideration for the unique nature of some historic buildings or heritage designations or other unique cases where gas supply may be necessary.	208290 (Imperial War Museum), 208304 (Girton College) 210284 (Vistry Group) 208251 (Kings College)
As the measures are not monitored, it will be unlikely to be followed.	202614 (C Pointon), 202844 (Dr Cook)
Support the principles of Policy CC/NZ but concerned that the proposed energy standards exceed the Future Homes Standard, effectively mandating Passivhaus performance. Risk of homogenised architectural forms due to stringent performance criteria affecting design elements like elevational design and fenestration. Practical issues related to procurement, buildability, and the construction supply chain are highlighted, including potential shortages of materials and skilled labour. Cost uplifts of 10-20% identified by the Future Homes Hub may not align with the Council's evidence base, necessitating further viability testing. Inflated costs could lead to delayed housing delivery or reduced affordable housing output, impacting overall housing viability. Emerging policy PM13 from the NPPF draft may render Policy CC/NZ inconsistent with national policy once adopted, limiting its weight in decision-making. While acknowledging that local planning authorities can set higher standards, the respondent argues that such policies must be justified and demonstrate maintained development viability. Policy does not align with the requirements of	204770 (Hill)

Summary of issues raised in comments	Comments highlighting this issue
the 2023 Written Ministerial Statement, Planning – Local Energy Efficiency Standards Update and that the consequences have not been adequately tested.	

Policy CC/WE: Water efficiency in new developments

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for a robust water efficiency policy that goes beyond Building Regulations from a range of bodies including the Environment Agency and individuals. Cambridge Water and Anglian Water supported the Plan's strategy to phase growth at new strategic sites to align with the delivery of new strategic water supply options. However, there were also objections from developers and landowners saying that the policy goes beyond national and industry guidance, can't be realistically delivered in the short term and needs more flexibility in the policy wording. There were comments that the requirements of the Shared Standards document produced by water stakeholders should be followed.

Concerns were raised about part 1 of the policy, which several respondents said puts responsibility on the developer to demonstrate that there will be adequate water supply rather than water companies who have legal obligations under the Water Industry Act 1991.

There were a number of comments that the 90-100 l/p/d level for smaller residential schemes should not be a range but should be 90l/p/d as an achievable level and to prevent schemes actually building to 100 l/p/d. There was some concern that the five BREEAM credits is challenging and often unfeasible and would necessitate commercial developments to engage a qualified BREEAM assessor.

The Environment Agency recommended a section dealing specifically with data centres as an emerging sector with high water consumption. They also made detailed comments on the Water Supply evidence that was published to accompany the Draft Local Plan.

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach and phasing of growth in the plan to align with new strategic water supply are noted.

Concerns that the policy is setting unreasonable requirements on developers to produce evidence have been addressed by removing paragraph 1 of the policy so that the policy is focused on achieving high water efficiency design levels in new development.

Evidence in the Shared Standards in Water Efficiency for Local Plans (2025), Future Homes Hub Water Ready report (2024), Water Reuse in New Housing report (2024), and the Greater Cambridge Local Plan Viability Assessment (2026) has shown that the standards proposed are achievable and viable. They are supported by water stakeholders. Given the water scarcity position in Greater Cambridge, and the development aspirations for the area, it is vital that water is used efficiently.

In relation to comments saying that the Shared Standards should be followed, the Councils considered the 85 l/p/d water efficiency level recommended in the Shared Standards for all housing but considered that it may be hard to achieve this level purely with fixtures and fittings and that further work is needed to test the specifications suggested. As a result the policy

requires a lower level of 80 l/p/d for large developments over 100 houses where evidence has shown that community scale stormwater reuse is more cost effective and could be implemented in addition to water efficient fixtures and fittings. A level of 90 l/p/d is required for developments below 100 houses which can be achieved through water efficient fixtures and fittings. The previous range given for developments below 100 houses of 90-100 l/p/d has been replaced with the more water efficient 90 l/p/d in order that development is designed to be as water efficient as possible.

In relation to objections to the levels of water efficiency proposed for non-household development, BREEAM is an industry standard certification scheme to assess the environmental performance of buildings. This standard is in the current adopted Local Plan policies and has been practical to use and it is also used in the Shared Standards. As such it seems an appropriate tool. Additional wording has been added to show that the equivalent reduction in water use in non-household developments would also be acceptable as an alternative to BREEAM. The wording 'unless demonstrated impracticable' allows for some flexibility depending upon the exact circumstances, but the onus is on the developer to demonstrate within the Sustainability Statement the reasons why the full BREEAM credits required in the policy would not be achievable.

It is recognised that data centres have a high water consumption and an additional section has been added to the policy to ensure they are designed to be as water efficient as possible.

Prioritising reuse of rainwater for outdoor space irrigation is an appropriate and achievable response to water scarcity issues facing the area.

Environment Agency comments on the Water Supply Evidence Report have been reviewed by the consultants who produced the study. An Addendum Report has been published, responding to the comments, and updating the assessment to take account of

updated development trajectories, including updating growth anticipated in the Huntingdonshire part of the water resource zone. A Statement of Common Ground has also been agreed with the Environment Agency and Cambridge Water on this issue.

Table of representations:

General policy comments

Summary of issues raised in comments	**Comments highlighting this issue**
Support for a robust water efficiency policy.	202619 (C Pointon), Cambridge City Council Liberal Democrat Group (202908), 204475 (Max Fordham), 204764 (Mothers CAN Cambridge), 203018 (M Cleminson), 209160 (Anglian Water Services), 202468 (Dr J Neal), 211133, 211141 (Environment Agency), 208305 (Girton College),

Summary of issues raised in comments	Comments highlighting this issue
The policy is generally supported, but the requirements sought should be proportionate to the development.	203168 (ESCO Prospect)
Strongly support parts 1, 4 and 5 of the policy	203667 (Cambridge Green Party), 205210 (Cam Valley Forum)
It is noted that Greater Cambridge faces significant challenges in respect of water scarcity and provision of wastewater recycling facilities. We share your concerns about this matter and consider it to be another area where there is scope for joint action and collaboration across the Ox Cam corridor geography.	208229 (Bedford Borough Council)
As identified by this section of the draft Local Plan, Anglian Water is already working with Cambridge Water to deliver strategic water supply options to address the water resource needs of the area, and enable more water to remain in the environment, to protect internationally important chalk stream habitats. We support the Plan's strategy to phase growth at new strategic sites to align with the delivery of strategic water supply options. It is important that these water supply options are also underpinned by demand management solutions, and tighter water efficiency standards for new development. Opportunities for integrated water management, including reuse, are significant factors for consideration in new development proposals coming forward, and align with the measures the Cambridge Water Scarcity Group has been developing	209160 (Anglian Water Services)

Summary of issues raised in comments	Comments highlighting this issue
Encourage GCSP to commit to monitoring reports that give periodic updates on the policy's effective implementation.	211133 (Environment Agency)
The final Water Resources Management Plan (WRMP) for 2025-2050 has been published, with reviews every 5 years to adapt to changes. Demand forecasts for water are based on current local plans and strategic developments, with significant reductions in abstractions planned for 2033 and 2037. Increased growth beyond adopted plans may raise demand above forecasts, necessitating additional supply and demand options to maintain water supplies. Non-household connections are restricted to below 20m3/day, and there is advocacy for domestic water consumption standards of 110 litres per person minimum. The growth forecast to 2032 aligns with previous plans, providing stability, while growth from 2032-2045 is elevated, with strategic sites beyond 2045 being considered. The Grafham transfer will help with supply concerns, but additional growth is challenging until the Fens Reservoir is operational. Certainty on growth proposals is needed for the revised draft WRMP due in 2028, with potential new water supply options to be developed if cumulative growth requires it. Significant water resources infrastructure has long lead times and must be considered in a regional context.	201578 (Cambridge Water)
All of the potable water supplying Greater Cambridge is currently obtained from nearly 100% abstraction of chalk aquifers, any increase in development has the potential to result in an adverse	208453 (The National Trust (MEE Planning Team))

Summary of issues raised in comments	Comments highlighting this issue
effect on Habitats sites susceptible to impacts from changes in water quantity in-combination with development in areas outside of the GCLP area. It will be vital for new developments to comply with the water efficiency measures, both until the new supply side measures come online, and continuing into the future to make efficient use of this constrained resource. Policy CC/WE should be amended to require all new development to provide a project level assessment of water quantity to demonstrate that it would not result adversely affect water sensitive designated sites.	
Object to Policy CC/WE as it exceeds national and industry guidance by mandating rainwater or greywater harvesting on all major developments, which may not always be appropriate or deliverable.	204110 (EW Pepper Ltd), 204748 (Vistry), 204327 (Tritax Big Box Developments), 204484 (Bellway Strategic Land), 211759 (Urban & Civic)
Object to policy as it exceeds what can realistically be delivered in the near term, lacks a credible evidence base, is unduly onerous and imposes requirements beyond national policy without demonstrating feasibility or viability.	130695 (Redrow South Midlands), 205044 (Endurance Estates)
The scale of development is unrealistic in this drought area with water supply unconfirmed; particularly commercial labs/data & AI centres.	205649 (S Buckingham), 207498 (FECRA)

Summary of issues raised in comments	Comments highlighting this issue
Need for flexibility in the policy wording. The use of 'must' in the policy creates a mandatory requirement, limiting discretion for decision makers; 'should' would allow for a more balanced judgement.	204110 (EW Pepper Ltd), 204748 (Vistry), 204249 ((Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204327 (Tritax Big Box Developments), 204484 (Bellway Strategic Land), 205044 (Endurance Estates)
The policy goes beyond national and industry guidance. Recent case law confirms that, while local planning authorities may depart from national policy or guidance where this is justified by local circumstances, such departure is not expected as a matter of course and cannot be assumed to be appropriate in the absence of robust evidence.	204327 (Tritax Big Box Developments)
The policy duplicates matters addressed in other policies (CC/SD, CC/IW, CC/NZ), creating uncertainty and undermining clarity, which is essential for soundness.	130695 (Redrow South Midlands)
Councils will need to ensure that an appropriate balance is struck between the ambition of the policy and the deliverability of development, supported by robust viability evidence.	210291 (Vistry Group)

Comments on requirement to demonstrate water supply availability

Summary of issues raised in comments	Comments highlighting this issue
Part 1 of the policy puts responsibility on the developer to demonstrate that there will be adequate water supply rather than the water companies who have legal obligations under the Water Industry Act 1991. It is inappropriate to ask developers to evidence something that they are not legally responsible for and is out of their control. Request deletion. Suggested amendment by CIP 'All development proposals (with the exception of householder applications) are required to undertake pre-application engagement with the relevant water provider to confirm water supply availability to serve the development.'	204777 (Hill), 204271 (Cambridge Investment Partnership), 205195 (Home Builders Federation), 211758 (Urban & Civic)
Part 1 of the policy is in conflict with paragraph 20 of the NPPF as the supply of water is not normally a matter for individual planning applications and would normally be addressed through authorities' strategic policies. Part 1 should not therefore be a requirement for applicants and should be deleted.	202780 (Martin Grant Land Limited)
To show that there is an adequate water supply for development will the Cambridge Water Water Resources Management Plan be accepted in determinations?	202447 (University of Cambridge)
All development proposals (with the exception of householder applications) must demonstrate that there will be an adequate water supply available to serve the development AND that any increase in water demand will not damage any chalk streams or slow the improvement in chalk stream WFD status. Add 'without harm to existing chalk stream levels'.	202437 (R MacDonald), 202494 (H Brown)
Part 1: To date, Environment Agency's concern re insufficient water has been ignored, so this statement is unreliable.	2025649 (S Buckingham)
Part 1: Encourage wording is changed from 'adequate' to 'sufficient and sustainable'.	211133 (Environment Agency)

It will be vital for new developments to comply with the water efficiency measures, both until the new supply side measures come online, and continuing into the future to make efficient use of this constrained resource. Policy CC/WE should be amended to require all new development to provide a project level assessment of water quantity to demonstrate that it would not result adversely affect water sensitive designated sites.	208453 (National Trust)

Comments on Water efficiency levels - Residential

Summary of issues raised in comments	**Comments highlighting this issue**
Part 2a. Support for 80 l/p/d for residential schemes over 100 homes to address the issue of serious water stress.	201659 (Hunts DC), 204993 (Uttlesford DC), 211134 (Environment Agency), 207617 (Natural England)
The Climate Change Topic Paper (2025) covers the reasoning behind the policy decisions and along with paragraph 6.39 explains why the 85 litres/person/day recommended by the Shared Standards in Water Efficiency for Local Plans (2025) has not currently been included for developments of less than 100 homes.	207617 (Natural England)
Part 2a. Recommend that GCSP reviews 2021 evidence base in light of the Shared Standards for Water Efficiency, and to include this within the policy justification to improve soundness at examination.	211134 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
Part 2a, suggest ‘subject to amendments to relevant water legislation’ be amended to ‘subject to amendments to relevant water re-use policy’. Clarify what the implications would be on the policy’s effectiveness if this reform does not occur.	211135 (Environment Agency)
As a partner to the Shared Standards, we would encourage the policy to go further in respect of developments of less than 100 dwellings, to use a water efficiency standard within the range set by the Shared Standards i.e. 85-95 l/p/d. It is noted that other emerging local plans across the WRE region are bringing forward tighter water efficiency standards within this range, dependent on viability. We would direct the GCSPS to review the recent Inspector's Report on the Uttlesford District Council Local Plan, where the tighter standard of 90 l/p/d for all new residential development has been demonstrated to be sound.	210199 (Anglian Water Services)
Part 2a of the policy (80 l/p/d) should also apply to householder applications and the refurbishment or change of use of existing buildings.	201564 (Stapleford PC), 210916 (Great Shelford PC)
The 80 l/p/d standard should apply to all new residential development regardless of number of dwellings	203667 (Cambridge Green Party), 205649 (S Buckingham), 205210 (Cam Valley Forum), 201745 (J Johnson)

Summary of issues raised in comments	Comments highlighting this issue
Part 2a of the policy relating to water reuse or recycling is not justified as it is subject to amendments to relevant water legislation and can only be included if these changes are made. Delete part 2a or re-word. Paragraph 4.31 also needs amending to reflect this.	(A Brand), 130695 (Redrow South Midlands), 204621 (Abbey Properties Cambridgeshire Limited)
Water efficiency level of 80 l/p/d for developments of 100 or more dwellings is considered onerous and difficult to implement, not justified and not in line with Building Regulations. Higher costs may impact viability of developments.	204777 (Hill), 204271 (Cambridge Investment Partnership), 204259 (Bellway Strategic Land), 130695 (Redrow South Midlands), 205044 (Endurance Estates), 210289 (Vistry Group), 211234 (Living Space Housing) 208268 (Martin Grant Land) 211459 (Hayfields Homes Construction), 211759 (Urban & Civic)

Summary of issues raised in comments	Comments highlighting this issue
Mandatory 80 l/p/d standard for all new residential development is not justified. As there is an existing national standard for such areas then the only sound approach is to apply that standard, which remains 110 litres per person per day.	208965 (Persimmon Homes East Midlands)
The proposed restriction on water use to 80 litres per person per day (LPPPD) in developments of 100+ dwellings, and 90-100 litres per person per day in developments of less than 100 dwellings is unduly onerous and is not consistent with national policy requirements. By Building Regulation standards, the current restriction is 125 litres per person per day (LPPPD) with an optional uplift / reduction to 110 litres per person per day. The 'Water Ready' report published earlier this year by the Future Homes Hub outlines a framework for new homes to achieve 90 LPPPD by 2035.	211234 (Living Space Housing), 211220 (Terra Strategic), 211264 (Terra Strategic)
The Future Homes Hub – Water Ready report should be used as a framework for water-stressed areas with transitional periods, such as dual supply pipework, rather than mandating on-site water recycling systems, which could pose risks.	204777 (Hill)
Upgrading existing local housing stock water related fixtures & fittings, through the incumbent water utility companies, using water-offsetting funds, offers a more equitable and lower-risk route to achieving water efficiency gains.	204777 (Hill)
A balanced, phased approach that considers flexibility around targets exceeding building regulation requirements is requested to avoid undermining deliverability and affordability.	204777 (Hill)
The policy needs to be clear on the l/p/d domestic figure where non-potable sources are unavailable. 80 l/p/d is far tighter than the government target of 100 l/p/d for water stressed areas.	202447 (University of Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
It is unclear why the policy imposes stricter internal water-use requirements for developments over 100 dwellings. Internal water use is influenced more by occupant behaviour and dwelling specifications than by the scale of development. The policy should either apply a consistent, evidence-based standard across all residential developments or provide clear justification explaining why a higher requirement is appropriate only for larger schemes.	204110 (EW Pepper Ltd), 204748 (Vistry), 204249 (Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204259 (Bellway Strategic Land), 204484 (Bellway Strategic Land), 204556 (Redrow South Midlands), 204259 (Bellway Strategic Land)
100 litres/person/day for all dwellings where practical and viable is more achievable.	204748 (Vistry), 204484 (Bellway Strategic Land), 210292 (Vistry Group)
We question how it is justified to limit people's water use by reason that they reside on a larger development site, which, given the high percentage of large-scale sites proposed for allocation, will not	208352 (T Elbourn)

Summary of issues raised in comments	Comments highlighting this issue
be a choice for many people. We would suggest that the water usage limit of between 90 to 100 litres per day applies to all residential developments, regardless of the size of site.	
HBF does not support 80 lppd noting the potential legal implications and risks of cross-contamination associated with water recycling systems, suggesting the council should not mandate given that there are no national standards.	205195 (Home Builders Federation)
If a lower water standard is implemented, it should be averaged across the site to allow flexibility for homes with varying water usage.	205195 (Home Builders Federation)
Part 2b of the policy for smaller residential schemes should not be a range but should be 90 l/p/d as an achievable level. At the moment it is no different to saying less than 100 l/p/d.	201659 (Hunts DC), Cambridge City Council Liberal Democrat Group (202908), 204475 (Max Fordham), 204764 (Mothers CAN Cambridge)
100 l/p/d is not strict enough. Dual pipes must ensure that loo flushes do not use potable water. There needs to be a change in the law.	202188 (R Lambert)
Assumptions being used to achieve these targets are not clear, including home working and irrigation of gardens and vegetable growing areas.	201927 (R Pargeter)
The proposed water efficiency standards far exceed building regulations. The Government's proposed revisions to the Water Efficiency Standard are being undertaken in consultation with DEFRA and has	211282 (Woolsington One Ltd)

Summary of issues raised in comments	Comments highlighting this issue
been informed by independent research regarding the infrastructure that needs to be in place to enable the tighter water efficiency standards that the Government is consulting on to be achieved. It is notable that the Government's target is to achieve a reduction in water use to 110 litres/person/per day by 2050. In light of this national target, it is unclear how the Council considers that the achievement of a water efficiency target 30 litres below the proposed national 2050 target will be achievable. The evidence base accompanying the Draft Plan does not address the viability, of feasibility of achieving these enhanced standards.	
The per-capita water consumption calculation (80 L/person/day) does not accommodate Managed Aquifer Recharge and could divert rainwater from natural recharge.	209042 (Marshall Group Properties)

Comments on Water efficiency levels – Non-residential

Summary of issues raised in comments	Comments highlighting this issue
Part 2c should be strengthened to reflect the recommended policy wording in the Shared Standards.	203667 (Cambridge Green Party), 205210 (Cam Valley Forum)
Support for water reuse or recycling for non-residential major development sites, which must be provided in the Sustainability Statement.	201986 (Swavesey PC)

Summary of issues raised in comments	Comments highlighting this issue
Support for requiring a full 5 credits under the Wat01 heading in the BREEAM assessment for non-residential development, but the policy should include 'unless demonstrated not practicable' to allow for flexibility in cases of refurbishment on constrained urban sites.	202447 (University of Cambridge)
Support Part 2d and that the efficiency of process water use should be part of the sustainability statement. Recommend referencing corporate water efficiency standards from larger organisations to inform policy, particularly for laboratory buildings.	204475 (Max Fordham), 204764 (Mothers CAN Cambridge)
Encouraged to see a high standard being promoted for non-household development. Regarding the phrasing “unless demonstrated not practicable”; we strongly encourage GCSP to define how “non-practicable” will be assessed. We would also encourage a minimum of 3 credits for Wat 01 where 5 credits cannot be achieved, as per the Shared Standard.	211136 (Environment Agency)
Clearly state whether point d applies in addition to point c for non-household developments which use as part of a commercial process(es).	211137 (Environment Agency)
Recommend the inclusion of a section dealing specifically with Data Centre’s water efficiency as these are an emerging sector with high water consumption.	211139 (Environment Agency)
The policy goes beyond national and industry guidance by effectively mandating rainwater or greywater harvesting on all major developments, which will not always be appropriate or deliverable. The policy requirement for commercial units to achieve all five BREEAM water credits is considered challenging and often unfeasible, with flexibility only applied to WAT 01. The draft Plan is largely silent on BREEAM, and the policy's requirements would necessitate all commercial developments to engage a qualified	203394 (Babraham Research Campus Ltd), 204249 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)

Summary of issues raised in comments	Comments highlighting this issue
BREEAM assessor, leading to additional costs and concerns about proportionality for smaller or less complex schemes. Suggest, remove requirement for rainwater or greywater harvesting being mandated in all major developments, this should only be delivered where viable or feasible. Remove requirement to comply with all 5 BREEAM water credits.	
Goes beyond minimum compliance and typically demands specialist design and technology. Wat 04 is difficult to control because it focuses on unregulated water uses, which rely heavily on end users, operational practices and decisions made after construction. As a result, even with strong design intentions, it can be challenging to guarantee performance outcomes, and the measures required may not always be feasible within the physical or operational limitations of the site. We therefore recommend that these requirements are supported by clear viability guidance or phased implementation and that flexibility is allowed where site specific constraints limit the ability to achieve the highest water efficiency standards.	208269 (Martin Grant Land)
Stringent BREEAM requirements are inflexible and one size fits all approach and there is no evidence that they can be achieved for water intensive uses such as research facilities, laboratories, food production, leisure or hospitality sectors. The policy fails to consider viability impacts, scale, use type and operational requirements.	130695 (Redrow South Midlands)
Assume that the target of 5 credits for category Wat01 of BREEAM will be relevant for student accommodation. To achieve these targets will require extensive water management and recycling facilities including potentially rainwater harvesting and greywater recycling, which will have considerable	208305 (Girton College), 210979 (Kings College) 208295 (Trinity College),

Summary of issues raised in comments	Comments highlighting this issue
commercial and technical implications, particularly with respect to maintenance. The term 'unless demonstrated not practicable' should therefore be applied to decision making and all of the water efficiency targets presented.	211760 (Urban & Civic)
The practical and viability implications of the proposed standards should be carefully considered. In particular, the requirement for non-domestic building to obtain 5 credits for category Wat 01 (BREEAM) is a challenge given the consumption of water. Request the following is added to the policy: 'Buildings in the tourism or similar sectors may warrant flexibility with these water efficiency targets subject to the provision of commercial or viability evidence'.	210595 (Imperial War Museum)

Comments on Refurbishment of buildings

Summary of issues raised in comments	Comments highlighting this issue
Part 2e: The requirement for sustainability retrofitting of an existing building being developed is commendable, but may not be financially viable, so offsetting contribution instead should be allowed.	203152 (Cambridge Past, Present and Future)
Support part 2e but should be strengthened by giving a methodology or target efficiency. It is unlikely that in most cases water recycling could be easily retrofitted to achieve 5 BREEAM credits, however referencing the methodology and a minimum number of credits will strengthen this requirement. Water efficiency proposals should be set out in the Sustainability Statement.	204475 (Max Fordham), 204764 (Mothers CAN Cambridge), 205210 (Cam Valley Forum)

Summary of issues raised in comments	Comments highlighting this issue
Part 2e: ‘should’ should be changed to ‘must’ to further the policy’s application.	211138 (Environment Agency)
Clause 2e should apply water efficiency standards to refurbishment and change of use of existing buildings, rather than merely requiring retrofitting to “increase water efficiency”.	210916 (Great Shelford PC)

Comments on Water reuse

Summary of issues raised in comments	Comments highlighting this issue
Support for water reuse and recycling rather than water credits. Eddington is currently not operating as planned because the Drinking Water Inspectorate requires non-potable supplies to be treated to potable standards due to concerns about cross-contamination.	205651 (A Sykes)
Part 3b (concerning how water efficiency is demonstrated) should be reworded to reflect the Shared Standards. Wording provided.	203667 (Cambridge Green Party), 205210 (Cam Valley Forum)
All new builds should use grey water/ non potable water for washing machines and flushing toilets, as in Eddington but has not been turned on.	202846 (H Cook)
The Topic Paper references the Shared Standards in Water Efficiency for Local Plans (June 2025) which has been prepared by several water companies and the Environment Agency. The specification	210290 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
proposed to achieve 85 l/p/d is only achieved if a bath is not supplied, which is a basic necessity for the majority of homeowners, particularly those with children or the elderly. Vistry and The Quy Estate consider the 85 l/p/d to be extremely challenging with the solutions presented in the topic paper (without greywater recycling) still not sufficient to meet the draft Policy requirement of 80 l/p/d. Greywater recycling is therefore necessary to meet the draft target and the Topic Paper estimates the cost of such a unit to be £4,000 with the Viability assessment allocating a cost of c.£6,000 per unit for the purchase of water efficiency equipment only. The Viability study does not make allowance for on-going maintenance costs which are anticipated to be significant, especially for greywater recycling systems.	
In respect of criterion 5, which requires all new dwellings with private outdoor amenity space to provide a water butt and prioritises the use of rainwater for outdoor irrigation, Vistry and The Quy Estate support the principle of encouraging rainwater harvesting. However, consideration should be given to how this requirement would be secured and monitored in practice, particularly in relation to long-term management, maintenance and enforcement. Clarification on the intended implementation mechanisms, would assist in ensuring the policy is applied consistently and effectively.	210293 (Vistry Group)

Comments on General water efficiency

Summary of issues raised in comments	Comments highlighting this issue
A requirement of new development should be water retention and adequate purification infrastructure.	201038 (P Spowart)
The policy should reflect the 2025 Shared Standards, require Water Efficient Design Statements and completion certificates, and mandate smart meters and leak detection in all new buildings.	203667 (Cambridge Green Party), 205210 (Cam Valley Forum)
Whilst the sensitivity of water availability within the Greater Cambridge area is understood, the proposed water consumption targets in policy CC/WE are ambitious and should be tested further as these may require rain/greywater harvesting. Revise Policy CC/WE to ensure that is based on evidence and does not make development unviable.	210060 (Endurance Estates)

Other Comments

Summary of issues raised in comments	Comments highlighting this issue
Water meters should be compulsory.	201774 (H Jackson)
Water usage in construction should also be considered – encourage lean design in addition to efficient usage.	204069 (B Young)
Water company privatisation limits investment in repairing and improving facilities.	201038 (P Spowart)
Freshwater supply cannot sensibly be considered without simultaneously ensuring adequate balancing wastewater management.	202468 (J Neal)
Rural active travel routes should be bridleway to include equestrians	203945 (S Rogers)

Summary of issues raised in comments	Comments highlighting this issue
Rainwater for outdoor irrigation - While we support the intent to reduce potable water consumption, the requirement as drafted is technically unclear, operationally problematic and introduces significant long-term management liabilities, particularly for multi-phase or multi-ownership residential developments.	208966 (Persimmon Homes East Midlands)
We would encourage wording in the policy's justification ("Where Government policy or legislation relating to water efficiency is more stringent or at significant variance with this policy in the future, the more stringent standard will be adopted when determining planning applications.") to be transferred as an additional point to the policy.	211140 (Environment Agency)
Recommend the inclusion in relation to aquifers and source protection are added to the supporting text. These considerations can be useful to guide decisions regarding development and water availability: - Bedrock geology from the northwest to southeast; - Principal Chalk aquifer and Source Protection Zones; Superficial deposits classified as Secondary aquifers; Aquifers that underly the area that are of high value; We also recommend referencing Groundwater Protection, and other guidance and any superseded versions.	211142 (Environment Agency)
Water Supply Evidence Detailed comments provided on the evidence, including on 'water available for use', and approaches to non domestic use. Recommend that the GCSP consider what further measures it can put in place to ensure that the most ambitious water supply and efficiency targets are met.	211205, 211206, 211207 (Environment Agency)

Policy CC/IW Integrated water management, sustainable drainage and water quality

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy from a range of stakeholders including statutory bodies, environmental groups and individuals.

There was some concern about the deliverability of the policy given issues with infrastructure at both Cambridge and Uttons Drove Water Recycling Centres and concern about overall levels of growth damaging rivers and chalk aquifers. There were representations from Cambridge Water and Anglian Water setting out their processes and plans and acknowledging that joint working has been carried out with the Councils.

There was considerable support for SuDS, but with comments that they are not suitable everywhere, such as where there is contaminated land, and that their adoption must be secured particularly as in the past unclear ownership has put maintenance at risk. There was support for the water quality part of the policy which sets out the requirements to ensure adequate wastewater treatment. A number of comments highlighted the importance of robust investigation and water quality control measures.

There was also some objection from developers that this part of the policy places responsibility on developers to demonstrate wastewater treatment capacity and that this responsibility lies with water and sewage companies.

The Environment Agency provided detailed feedback on the Water cycle Strategy with regard to waste water provision.

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach, are noted.

The policy seeks to ensure that development proposals would not cause detriment to water quality by ensuring that there is adequate wastewater treatment and conveyancing infrastructure to serve the development prior to occupation which would relate to each phase and as explained in the supporting text would be conditioned. Anglian Water's next Drainage and Wastewater Management Plan (DWMP28) will look at the growth proposed in the Local Plan and what infrastructure will be needed to protect water quality. The Councils will continue to work collaboratively with Anglian Water during the development of this plan which will look at requirements at Cambridge Water Recycling Centre (WRC), Uttons Drove WRC and the other WRCs in Greater Cambridge. The strategic sites are planned for later in the plan period which will give a longer lead in time for investment in wastewater treatment infrastructure.

The concerns about SuDS in areas of contaminated land and the adoption of SuDS has been considered in changes to the wording of the policy.

Water Supply issues have been carefully considered during the preparation of the Local Plan. Working with the Cambridge Water Scarcity Group which was established by the government, the Local Plan is supported by a Water Supply evidence base exploring the availability of sustainable water supply alongside the anticipated development trajectory. Infrastructure is planned which will

bring new supplies to Greater Cambridge in order to reduce the reliance on water from the chalk aquifer. However, it also remains vital that water is used efficiently in this area therefore water efficiency policies are proposed which set more stringent levels than are applied nationally.

Environment Agency comments on the Water Cycle Strategy have been reviewed by the consultants who produced the study. An Addendum Report has been published, responding to the comments. A Statement of Common Ground has also been agreed with the Environment Agency and Anglian Water on the approach to wastewater infrastructure.

Table of representations:

General comments

Summary of issues raised in comments	**Comments highlighting this issue**
Support policy	202706 (C Todd), 201928 (R Pargeter), 202848 (H Cook), 202911 (Cambridge City Council Liberal Democrat Group), 203668 (Cambridge Green Party), 203021 (M Cleminson), 202191 (R Lambert)

Summary of issues raised in comments	Comments highlighting this issue
Fully support bullet points 1 and 2 of the policy	202958 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)
Support the requirement to make use of nature-based solutions wherever practicable (Point 1d).	205261 (Cam Valley Forum), 203668 (Cambridge Green Party), 207618 (Natural England)
These issues must be explored during the preparation of the Plan and not left until the submission of applications. If such exploration is not evidenced, it could render allocations undeliverable.	203178 (ESCO Prospect)
Highlights major concerns about water abstraction impacting chalk streams; notes Cambridge Water already extracts above sustainable limits and warns that development should not proceed without water infrastructure. Importance of protecting chalk streams emphasised. Development should not proceed until adequate water supply and wastewater infrastructure is provided, to avoid further damage to rivers and chalk streams. New homes will increase water use and place further pressure on chalk streams which are already ecologically vulnerable.	203288 (J Palmer)
Regarding the wider groundwater crisis, and the impact of that on our chalk streams. The need to find effective ways to mitigate and reduce the additional burdens created by any new development is a matter that concerns the Trustees directly. There is NO MARGIN for further growth to allow for chalk	209016 (Hobsons Conduit Trust)

Summary of issues raised in comments	Comments highlighting this issue
stream and rivers to be restored to normal from around 2036. The Trustees therefore warmly welcome the way Policy CC/IW focuses on these issues. However, a number of the measures require progress including legislation and regulation to make targets achievable.	
Concerns about the deliverability of the policy which threatens the deliverability of the Local Plan. This is due to the lack of funding for the relocation of the Cambridge Waste Water Treatment Plant and a delay in the Fens Reservoir which could impact water supply. If Policy CC/IW and the wider strategic issues relating to water scarcity and management cannot be delivered in a timely manner, the Plan will not be able to supply even a fraction of the new jobs and new homes demanded of our region, and certainly not in the desired strategic locations. Instead, growth will occur piecemeal across the region – negatively impacting our existing communities,	201565 (Stapleford PC) 210917, 210918 (Great Shelford PC)
There are serious concerns regarding increased flood risk from developments within the Swavesey surface water catchment area, as the existing drainage system is already at capacity. Detail is provided about specific issues relating to Webb's Hole Sluice and Uttons Drove Treatment Works. Major developments should negotiate S106 contributions for onsite and offsite mitigation to address local flood risk concerns and improve existing infrastructure.	201989 (Swavesey PC)
A policy should be added to stipulate that any new development must not result in any increase in flood risk (fluvial or surface water) to any properties, buildings or infrastructure.	202439 (R MacDonald)
Support sections 1.a and 1.b. and 4.d for a whole development scale strategy for integrated water management from the earliest opportunity. This will help ensure the most efficient use of land and	211148 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
resources in a way that co-benefits biodiversity and amenity. Water re-use and infiltration aspects of the policy are crucial to protecting groundwater resources and taking pressure off the Fens where fluvial waters will, over the coming decades, be decreasingly able to discharge by gravity discharge into a rising sea level. We welcome the recognition of this challenge in the supporting information.	
New developments should not be considered unless there is sufficient water infrastructure in order to protect chalk streams and they are self-sufficient in processing their own sewage without damaging the rivers.	201295 (R King), 209676 (H Hale)
Water stress, flooding, sea level rise, over-abstraction of chalk aquifers precludes further growth in this ultra-fragile landscape.	202146 (R Lambert)
Concern about the level of growth in the Local Plan and the impact further water abstraction poses to chalk streams, which are rare and valuable wildlife habitats. The push for growth should be halted until this fundamental issue has been resolved.	203252 (Cambridge Friends of the Earth), 203288 (J Palmer), 203253 (Cambridge Friends of the Earth)
The policy places unduly prescriptive requirements on strategic employment sites, including expectations for rainwater and greywater harvesting that may not be appropriate or deliverable in all circumstances. For large-scale logistics and industrial developments, the feasibility of integrated water reuse technologies should be assessed on a site-specific basis, having regard to operational requirements, building use, viability, and infrastructure constraints.	204333 (Tritax Big Box Developments)

Comments on Sustainable Drainage Systems

Summary of issues raised in comments	Comments highlighting this issue
Support infiltration drainage as a way to promote aquifer recharge and reduce flooding, but there are risks associated with installing infiltration SuDS in areas of contaminated land. Recommend this is referred to in part 4 or 5 of the policy and in the supporting text to the policy.	211147 (Environment Agency)
The LLFA support that the policy requires SuDS to be incorporated as part of new developments. There should be reference made to the SuDS Management train. The management train is a sequence of drainage features that collect, convey, store and manage quality of surface water runoff as it drains through the development. Source control, in the management train, should prioritised.	210507 (Cambridgeshire County Council)
Support the integration of Sustainable Drainage Systems (SuDS) into developments as a way of managing surface water runoff.	211235 (Living Space housing Ltd) 211460 (Hayfield Homes construction Ltd)
New housing should minimise impermeable hard surfaces to avoid run off.	202848 (H Cook), 202621 (C Pointon), 203559 (P Tribble), 203021 (M Cleminson)
There should also be requirements that prevent residents turning soft surfaces areas into hardstanding, an action which reduces natural drainage.	203559 (P Tribble)

Summary of issues raised in comments	Comments highlighting this issue
Concerns about clause 4, which assumes SuDS are suitable for all locations. The Stapleford & Great Shelford Neighbourhood Plan had to be amended to require their use 'wherever practicable and subject to being suitable to the location'.	201565 (Stapleford PC) 210919 (Great Shelford PC)
Part 4 should be amended to read 'New development must FULLY incorporate Sustainable Drainage Systems (SuDS) as part of an Integrated Water Management approach to the design of the whole site' to ensure SuDS requirements are met in full.	203161 (Cambridge Past, Present and Future)
Section 4e, recommend changing "where reasonably practicable" to "wherever practicable" as permeable surfaces are essential for drainage.	203668 (Cambridge Green Party), 205261 (Cam Valley Forum)
Pavement verges can operate as rain gardens and help to alleviate flooding. Verges can be more than grass, add aesthetic beauty and relief, can attract pollinators and can be used strategically. Can we have greener water managing streetscapes.	203978 (Histon and Impington PC) 211008 (Cambridgeshire County Council)
Object to criterion 4(f) requesting its deletion due to a lack of evidence and viability testing regarding the requirement for green and brown roofs.	204558 (Redrow South Midlands)
Clause 4h regarding the adoption of SuDS must include specific wording to require responsibility for management and maintenance to be clearly assigned, given local experience where unclear ownership has put maintenance at risk e.g. Trinity Gate development. The word 'details' is not sufficiently specific.	201928 (R Pargeter), 203101 (K Wiemer), 203668 (Cambridge Green Party), 205261 (Cam Valley Forum),

Summary of issues raised in comments	Comments highlighting this issue
	208623 (Madingley Road Area Residents Association (MRARA)),
The policy is generally supported but there is concern that the interpretation of attenuation may obstruct innovative solutions for water harvesting.	202465 (University of Cambridge)
We would welcome reference to our Surface Water Risk Management Guidance in the supporting text. The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be conducted by the developer at their cost. Anglian Water will request a planning condition to ensure no additional flow will be connected to our surface water network until, any identified upgrades have been delivered and sufficient capacity in the network has been demonstrated.	210200 (Anglian Water Services)
fully supports the principles of integrated water management and sustainable drainage. However, we would like to raise the following points for consideration to ensure the policy is deliverable and proportionate: Mandating green or brown roofs on all flat roofs can present significant challenges, particularly for refurbishments. Structural capacity, cost implications, and heritage constraints may make this impractical in some cases. We suggest allowing flexibility where technical or viability issues arise,	208261 (Martin Grant Land)

Summary of issues raised in comments	Comments highlighting this issue
supported by alternative biodiversity measures. Designing for no runoff during small rainfall events is ambitious and may be difficult to achieve on constrained or high-density sites. We recommend considering a performance-based approach that allows equivalent mitigation measures where strict compliance is not feasible.	
Object to policy as it introduces a number of requirements that are not sufficiently justified, lack flexibility for site-specific delivery, and risk compromising the viability and timely implementation of strategic developments. The policy appears to assume that infiltration SuDS will be feasible across most development sites, yet this has not been robustly evidenced. Policy CC/IW should be revised to provide greater flexibility, clarity and proportionality. The policy should recognise that not all SuDS types are feasible on all sites and should allow developers to select the most appropriate drainage strategy based on site-specific assessments.	210504 (Barratt Homes Northampton)

Comments on Water Quality

Summary of issues raised in comments	Comments highlighting this issue
Generally support wording of wastewater part of policy. 6a should be tightened from ‘adequate’ to ensuring that there is sufficient capacity in any conveyancing infrastructure that the new network might connect to. Suggestions for the supporting text on different wastewater ‘capacity’ considerations for	211143, 211144, 211145, (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
development proposals, and if wastewater infrastructure capacity is unavailable mitigation could be delaying occupation of the development to protect water quality. If sufficient waste water infrastructure capacity is unavailable at the time of planning application submissions, risk to the environment from the development combined with wider planned growth could be mitigated by using a condition to delay occupation.	
This policy is welcomed, particularly the requirements around water quality, which will be necessary to avoid impacts to various protected sites including the Ouse Washes.	207618 (Natural England)
Object to criterion 6(a), which places the responsibility on developers to demonstrate wastewater treatment capacity. This responsibility lies with water and sewerage companies, as per the Water Industry Act 1991. Request to delete or revise the criterion. Alternative wording provided by CIP: 6. To protect and enhance water quality, all development proposals must demonstrate that: a..there is adequate wastewater conveyancing infrastructure to serve the whole development, or an agreement is in place with the relevant service provider to ensure the provision of the necessary infrastructure to support the capacity for wastewater treatment prior to the occupation of the development (where development is being phased, this must be demonstrated for each phase before first occupation).	204558 (Redrow South Midlands), 201285 and 204285 (Cambridge Investment Partnership), 204780 (Hill), 203054 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners), 205236 (Home Builders Federation), 210294, 210295 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
	210600 (Imperial War Museum)
Supports the need for integrated water management and strategic thinking and this has been considered within our site and new development activities. The College does have concerns respect to the application of paragraph 6 of the policy which risks placing an unreasonable and disproportionate evidential burden on applicants at the planning application stage. Policy CC/IW should be implemented flexibly, with appropriate reliance placed on the statutory duties of water companies and ongoing engagement through established mechanisms such as Water Resource Management Plans and Drainage and Wastewater Management Plans.	210980 (Kings College) 208306 (Girton College)
Support part 7 of the policy which outlines that foul drainage should connect to public sewers (Mains) wherever possible. It would helpful be to expand on this further within the supporting text section to clarify guidance on non-mains drainage.	211146 (Environment Agency)
Would like to see 'water quality' as a separate full policy which would need to address the many aspects of a development that contribute to poor water quality in the natural environment, with developers being required to demonstrate that any wastewater generated during construction and use of the development will not have a negative impact.	205261 (Cam Valley Forum)
As indicated in our response, Anglian Water is working proactively with stakeholders, to address current capacity constraints at some of our water recycling centres (WRC). This has been further exacerbated by the withdrawal for funding for CWWTPR, meaning that further investment will	209161 (Anglian Water Services)

Summary of issues raised in comments	Comments highlighting this issue
need to be brought forward to deliver enhancements at the existing Cambridge WRC in the short term, and in the long term if alternative funding cannot be secured for delivery of CWWTPR. Until such time as the opportunity to deliver CWWTPR expires, the Local Plan should recognise the CWWTPR project and ensure appropriate safeguarding of the consented relocation site (as requested under Policy I/SI). Anglian Water is currently preparing the DWMP28 and we will continue to engage with the Councils at various stages of the DWMP's development to ensure that this takes account of the quantum of growth proposed for Greater Cambridge.	
Chalk streams are internationally rare and highly sensitive ecosystems. Policies must provide explicit and robust protection for chalk streams.	211722 (CPRE Cambridgeshire and Peterborough)

Other Comments

Summary of issues raised in comments	Comments highlighting this issue
We are pleased to see that the detailed WCS scope covers a number of positive areas, including but not limited to summarising growth projections in relation to DWF uplift, and we welcome consideration of climate change impacts on waste water treatment. It is really important that evidence within the WCS is capable of informing growth allocations and the Plan can be positively prepared through robust	211188, 211189, 211190, 211191, 211192, 211193, 211194, 211195, 211196, 211197, 211199, 211202

Summary of issues raised in comments	Comments highlighting this issue
scrutiny of any environmental risks resulting from growth The WCS needs to be updated accordingly, and we recommend maintaining as a living document. Detailed comments on the WCS have been provided,	211203, 211204 (Environment Agency)
It has been confirmed by SCDC that there has been irreparable damage to the hydraulic ecosystem underneath our village, we must insist that no further development of any sort should be permitted within the Parish of Longstanton or the surrounding parishes without full and transparent public consultation to get ahead of any potential issues.	208467 (Longstanton Parish Council)
Rural active travel routes should be bridleway to include equestrians	203949 (S Rogers)
Water Quality must require rigorous site investigation and remediation of contaminated land, particularly where development could affect groundwater or surface water bodies. The Plan should explicitly recognise and protect private water supplies, including boreholes used by rural homes, farms, and businesses. Development proposals should be required to demonstrate that water quality and abstraction will not be compromised.	208952, 208953 (CPRE Cambridgeshire & Peterborough)
The dewatering at Northstowe demonstrates that buried rivers are capable of transporting large quantities of water away from a site but brings into question the usefulness of the BRE365 infiltration tests. Such deposits can also transport large quantities of water onto a site. To demonstrate the potential flow rates, please take a look at the size of the culverts on the Newmarket Watercourse and Saffron Walden Slades. In 2021, SCDC commissioned a Hydrogeological Assessment so I find it	208401. 208402 (R Mason)

Summary of issues raised in comments	Comments highlighting this issue
strange that there was no reference to the river terrace being a buried valley. It is an issue affecting the whole Anglian region and it is not being addressed. Part of the problem is that the watercourses map, an LLFA responsibility, has not been maintained.	
Conduit faces increasing pressure from the growing working and residential population around the Biomedical Campus, Clay Farm and the south-eastern axis. We therefore believe that the ambitions set out for the area on the northern slopes of White Hill need far greater definition and greater ambition. This would also be entirely consistent with the Trust's Vision for Nine Wells.	209015 Hobsons Conduit Trust)

Policy CC/FM: Managing flood risk

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Some comments gave general support for the policy approach, and to some specific elements pf the proposed policy.

Anglian Water supported reference to the potential for sites to deliver betterment. East England Ambulance Service NHS Trust highlighted the negative impacts of flooding and emphasised the importance of measures to address it.

The Environment Agency made detailed comments. These included being clearer about the need to consider the impacts of climate change, the need to reapply tests if flood risk evidence had changed, that modelling may be required as part of site-specific flood risk assessments, considering off site impacts, residual risks, and when emergency plans need to be provided.

Cambridge Past, Present and Future sought clarity about what information should accompany planning applications, and that management arrangements for mitigation should also be identified up front. Cambridge Green Party considered the exception for allocated sites should be removed.

Some comments suggested the policy was not consistent with national policy, and that it set disproportionate requirements. Updates to the National Planning Practice were also sited which needed to be considered.

Others considered the policy was not strong enough in light of the challenges of climate change. Requirements should be widened to require flood risk assessments in allocations. Future monitoring was also needed. The cumulative impacts of development in catchments needed to be considered. Others sited that restored water courses could end up having more water in them, increasing flood risk.

There were some general concerns about the impacts of flooding and the risk form climate change. There was concern about new developments being built on flood plains. Some people also gave examples of local drainage problems

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach, are noted.

Flood risk has been carefully assessed when preparing the Local Plan. The Local Plan has been informed by a Strategic Flood Risk Assessment (SFRA), and the application of the sequential test to the site selection process. The SFRA (including a Level 1 and a Level 2 for some sites) was prepared in consultation with the Environment Agency and provides a robust basis for plan making. This includes consideration of the impacts of climate change.

The policy appropriately reflects national planning policy regarding the sequential and exception tests but does not seek to repeat it Some comments from developers questioned whether the policy reflected government planning practice guidance, particularly the approach to surface water in sequential testing. The Local Plan does not need to repeat that advice, and the draft policy remains sound.

A number of detailed policy amendments have been made in response to comments, including to more clearly reference the need to consider climate change, and the need for information regarding future management of mitigation measures. It also identifies requirements in relation to change of use.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for the policy.	201349 (RSPB), 201994 (Swavesey Parish Council), 204040 (Hertfordshire County Council), 204335 (Tritax Big Box Developments)
Welcome the policy's emphasis on demonstrating that flood risk can be safely managed throughout the lifetime of development.	204335 (Tritax Big Box Developments)
This policy must ensure that the cumulative collection of data is assessed. Where there are large scale developments in the same area, the Local Plan needs to ensure the impact of all sites is assessed as a whole, rather than just looking at individual ones. For example, with surface water and treated foul water flowing out to the River Gt Ouse through the Swavesey drainage system. Many large sites will outflow through this (Northstowe, Cambourne, Bourn, proposed new logistics sites), these need to be considered on a cumulative basis as well as individual.	202552 (L Miller)

Summary of issues raised in comments	Comments highlighting this issue
Also need a policy for adaption to climate change, and making sure drains are maintained. Many areas have standing water on the road as drains are not maintained.	202707 (C Todd), 202479 (J Neal)
We also support policy CC/FM but would note that there is potential for increased flows in our chalk streams and higher ground water tables from a restored aquifer towards the end of this Local Plan period. How do the policies and calculations of flood risk align with healthier river systems with more natural rather than low flows? Should the starting point for assessing flood risk be to use the future restored river system with more natural flows as the starting point for analysing flood risk management?	202960 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust (M Baker, Conservation Manager)
Supports Policy CC/FM and the approach for site-specific Flood Risk Assessments (FRAs) that are appropriate to the scale and nature of the development. The respondent endorses limb 1 (a) of the Policy, which states that a sequential test is not necessary for proposals on allocated sites consistent with the allocated use, suggesting this should be assessed during the Plan Making stage. The respondent references a High Court ruling confirming that failure to undertake a sequential test does not automatically constitute a strong reason for refusal ([2026] EWHC 51 (Admin)).	203058 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
Support the policy but propose amendment to ensure full information is provided in planning applications as to what has been agreed with which relevant bodies. Amend part f by adding 'and are included as part of the planning application' at the end	203167 (Cambridge Past, Present and Future (S Nicholas)

Summary of issues raised in comments	Comments highlighting this issue
f. The ongoing maintenance and management of any necessary flood defences or flood mitigation measures have been agreed with the relevant bodies and the necessary agreements are in place and are included as part of the planning application.	
We welcome the strong precautionary approach of this policy and fully support making flooding a separate policy issue, rather than including it with the previous policy as was the case in the first draft of the Local Plan. In point 1.a, we recommend deleting the exception stating “(this is not necessary if the proposal is on an allocated site and consistent with the allocated use).” Removing this exception would ensure that flood risk is assessed consistently for all developments, recognising that allocation does not remove or reduce real and increasing flood risks under climate change.	203670 (Cambridge Green Party)
I am writing as a resident of Oakington and Westwick and Lead of the Flood Mitigation Group in the village. I am increasingly concerned about the cumulative impact that current and emerging proposals within South Cambridgeshire Local Plan will have on flood resilience in the area, particularly in our village that has, to date, received no investment for attenuation ponds, surface water storage, or related mitigation infrastructure despite repeated and significant surface water flooding events. I would welcome the opportunity to discuss this matter further or provide more input if helpful.	204991 (A Dennis)
We do not think this policy is sufficiently strong to provide adequate management of flood risk. We have provided some suggestions for improvement but would like this policy to be rethought more carefully, given the scale of development that is anticipated within the life of this plan.	205357 (Cam Valley Forum)

Summary of issues raised in comments	Comments highlighting this issue
This policy needs to make it very, very clear that the risk of flooding has greatly increased with the rapid acceleration of climate change and the unpredictable nature of rainfall as evidenced by recent events. Development must be shown to conserve Cambridge's distinctive "Rus in Urbe" character. Point 1a: we recommend deleting the exception to ensure that flood risk is assessed consistently for all developments. Points 1g. and 1h. the policy needs to require future monitoring by responsible authorities. Point 2. a site-specific Flood Risk Assessment should be a requirement for all developments in Flood Zone 1.	
Should be expanded to include reference to the need to consider the impacts of climate change and all sources of flood risk when applying the sequential and exception tests. We recommend rewording this to: '…having regard to actual and residual flood risks from all sources and taking into account the impacts of climate change'. This would be in line with the recommendations of the Level 1 SFRA. Paragraph 174 of the NPPF states that the sequential test should be used in areas known to be at risk of flooding now or in the future from any form of flooding	211149 (Environment Agency)
The wording in brackets should be caveated as the exception test may need to be reapplied at the planning application stage – e.g. if evidence on flood risk has changed significantly or the nature of the development differs significantly from the nature of the allocation (see paragraph 180 of the NPPF)	211150 (Environment Agency)
We recommend that reference is made to the need for development proposals in flood risk areas to demonstrate that all reasonable opportunities to use natural flood management techniques or nature-	211154 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
based solutions to reduce flood risk overall have been considered and taken, in line with paragraph 172 of the NPPF	
Recommend that the policy makes it clear that where hydraulic modelling of a watercourse within or adjacent to a site is not available or is out-of-date, modelling may be required as part of a site-specific FRA to define the extents and depths of fluvial flood risk at the site. This will help ensure FRAs include sufficient evidence to ensure a sequential approach is taken and to inform any proposed mitigation measures to ensure the development will be safe for its lifetime.	211155 (Environment Agency)
Recommend the policy clarifies that any development in the floodplain (i.e. within the 1% annual probability flood extent, including an allowance for climate change) that is considered acceptable must not decrease flood storage capacity or impede flood water flows. See draft policy LP13 of the draft Hunts Local Plan for suggested wording.	211156 (Environment Agency)
Recommend clarifying that if development is proposed within areas benefitting from flood defences, the FRA should assess the residual risk of a flood defence breach or overtopping and breach analysis or modelling may be required where ‘more vulnerable’ development is proposed	211157 (Environment Agency)
Recommend that the policy clarifies the Council’s position on change of use applications in flood risk areas. The PPG recommends that Local Plans outline where change of use applications will be acceptable. These applications are excluded from the sequential and exception test but may still involve	211158 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
an increase in flood risk, either due to an increase in the number of properties in flood risk areas or an increase in the flood risk vulnerability classification. We recommend that appropriate restrictions are placed on change of use applications for sites within Flood Zones 3b and 3a, and within areas of high surface water flood risk, where ‘more vulnerable’ basement or ground floor uses may not be appropriate.	
In respect of 1d, the safety of access / egress routes should be defined – i.e. Is a dry route of escape required or is some depth of flood water along the route acceptable? This point should also clarify when emergency plans need to be provided.	211153 (Environment Agency)
Support the inclusion of the policy as it covers the importance of managing flood risk in new developments. Please note we would encourage reference to the NPPF and PPG in this policy. It is appreciated the policy has a proactive approach to mitigating and adapting to climate change, with reference to surface water flooding within the local plan. Please note, in section 4.44, there is a reference to 'safe access and egress route'; however, this should be revised to read as 'safe access and escape route' in line with PPG. Level 2 Strategic Flood Risk Assessment: The term 'safe access and egress' should not be used. It should read 'safe access and escape'. This is in line with PPG updates. We appreciate the level detail presented with reference to surface water flood risk in the report. In particular, the suite of maps provided for allocated plots. However, it is unclear whether the most up to date data is used for surface water flood risk mapping.	210574, 210508 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
We particularly welcome clauses 1.c and 1.e that positively influence the potential for betterment and ensuring existing assets are not adversely impacted by proposals. As indicated in our response to Policy CC/W, our Flooding Incident Reduction Plan is available on our website and sets out how we aim to mitigation flooding risks across our region. It is essential for the effective management of our operational risk that we ensure the risk posed from surface water drainage	210201 (Anglian Water Services)
Policy does not reflect the updated Planning Practice Guidance ("PPG") (updated 17 09 2025) relating to sequential testing. Policy CC/FM states that development proposals will be supported where the sequential test has been passed. However, this is not in line with the updated PPG, which states that a proportionate approach should be taken, applying NPPF Paragraph 175. The PPG makes clear that where a site-specific flood risk assessment demonstrates clearly that the proposal would ensure that occupiers and users would remain safe from surface water flood risk for the lifetime of the development (without increasing flood risk elsewhere) a sequential test is not required. Terra therefore request that this Policy be amended to reflect the updated PPG.	211221, 211265 (Terra Strategic) 211236 (Living Space Housing) 208908 (Nightingale Land and Hill Residential Ltd) 204524 (NP Architects) 211461 (Hayfield Homes Construction Ltd)
Flooding Defences- existing and prospective hotspot areas should be clearly identified for emergency grant funding whereby Local Authorities, especially across a region may agree with the respective Government Department to distribute emergency flooding to prevent costly consequential recurrent repairs.	210352 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
Flooding significantly affects residents physical and mental health in both the short and long term. Systematic reviews show consistent increases in PTSD, depression and anxiety after flooding events. Evidence that flooding disrupts healthcare systems and emergency access, damaging infrastructure and increasing demand. EEAST therefore requests: • Sustainable Urban Drainage Systems (SUDS) • Permeable paving accessible to mobility aids • Greywater harvesting via water butts or underground attenuation • Swales and flood-protection features in Zones 2 and 3 • Care homes should NOT be located in Flood Zones 2 or 3 unless they include a fully independent evacuation plan that does not require emergency service intervention • Community centres should not be built in Flood Zones 2 or 3 as they are often used as places of refuge • Health and emergency services buildings should not be built in Flood Zone areas 2 and 3. Emergency ambulance services have to use specialised vehicles (including onboard equipment such as life jackets) and trained staff to support flood/water related incidents and these sites are strategically located around the region and my not be local to Greater Cambridge area.	210321, 210322 (East England Ambulance Service NHS Trust)
Concerns about building in the flood plain, and the impacts of climate change. Also concern about whether insurance will be available of properties within flood areas.	208760 (E. Diaz) 202201 (R. Lambert) 205235 (Federation of Cambridge Residents' Associations)

Summary of issues raised in comments	Comments highlighting this issue
For the Swavesey catchment area, onsite attenuation for new development should be capable of holding water for up to 4 weeks when the Webb's Hole sluice closes to prevent inundation of the drainage system and flood fens. Site attenuation basins must reopen in a managed manner when the water level in the River Gt Ouse drops and the Webb's Hole sluice opens to avoid overwhelming the drainage system. The unique drainage system of Swavesey requires careful management. SCDC Awarded Watercourses should be considered in the overall drainage strategy for Swavesey.	201994 (Swavesey PC)
Swavesey's drainage system is already at capacity; the plan lacks cumulative attenuation data and basins capable of holding water for up to four weeks, and does not assure that Uttons Drove Treatment Works can handle the additional demands and that the drainage system will cope.	206381 (Boxworth Parish Meeting on behalf of A14 Logistics Forum), 211434 (Boxworth Parish Meeting)
The plan fails to present a cumulative flood-risk assessment for the four logistics sites, despite the clear need for such analysis.	206371 (Boxworth Parish Meeting on behalf of A14 Logistic Forum), 207713 (Boxworth Parish Meeting)
Support, the policy reiterates the approach set out in the National Planning Policy Framework, taking into account the impacts of climate change.	208262 (Savills on behalf of Martin Grant Land Limited)
The Strategic Flood Risk Assessment omits buried valleys, failing to meet NPPF sequential-test requirements set out in paragraphs 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182.	208400 (R Mason)

Summary of issues raised in comments	Comments highlighting this issue
The concealed occurrence of buried valleys can have significant and often unexpected implications for groundwater and hydrocarbon or geothermal resources.	
What concerns me is that in August 2014 ex Hurricane Bertha resulted in flooding to the west and north of Cambridge. The villages of Caldecote, Bar Hill, Longstanton and Oakington and the local A428 all experienced flooding. Cambridgeshire LLFA's flood reports on this event went no farther than excessive surface flooding and poorly maintained drains.	208403 (R Mason)
I hope and expect that in future, any LLFA flooding reports will be both timely and meet the standards given in this document. However, the EA have completely failed to engage with these investigations or with the LLFA on these matters	208404 (R Mason)
While we support the principle of minimising flood risk and ensuring robust SuDS design, this requirement is overly prescriptive, technically unjustified, and undeliverable in many site contexts.	208967 (Persimmon Homes East Midlands)
Missing borehole data – including Busway, Northstowe, Cambourne or Bourn Airfield.	211111 (R Mason)
We support part 1b as it requires a sequential approach to be taken to the site layout, avoiding any areas of flood risk.	211151 (Environment Agency)
We support the reference to reducing flood risk overall where possible in 1c. However, we would like this to be expanded to include reference to the use of natural flood management techniques.	211152 (Environment Agency)
Explicit guidance is needed on the flood-alleviation role of micro rain-gardens and on how funding for them will be allocated.	208008 (Cambridgeshire County Council)
Rural active travel routes should be bridleway to include equestrians	203951 (S Rogers)

Summary of issues raised in comments	Comments highlighting this issue
The supporting information mentions a Strategic Flood Risk Assessment (SFRA). The 2021 modelling used to map the River Granta is not based on the River Granta, nor on its porosity and ground conditions. As a result, there are notable discrepancies with actual flood events and historic flood events. The evidence should be reviewed and properly assessed so the Plan for this and any other similar areas are based on robust evidence.	211928 (C. Newell)

Policy CC/RE: Renewable energy projects and infrastructure

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy and the specific references to biodiversity and the retention of biodiversity net gain at the end of a projects life.

Historic England broadly welcomed the policy but made some suggestions to strengthen the policy in relation to heritage assets. They also queried the approach taken to the Landscape Sensitivity Assessment and consideration given within this to heritage assets.

The Wildlife Trust welcomed the text on the loss of agricultural land loss of agricultural land and balances that must be struck between different competing land uses noting that too many solar farms could compromise nature recovery to address the biodiversity crisis by reducing land available for nature restoration and pitting nature restoration and food production against one another.

Stapleford Parish Council requested that reference to their neighbourhood plan be included in the criteria related to community energy proposals to ensure that such schemes protect or enhance landscape character.

Proposals for heat network zoning were welcomed although some raised concerns about the lack of case studies on successful projects. Max Fordhams called for a requirement for all heat networks to be low or zero carbon and have a decarbonisation strategy. Carbon intensity and efficiency of the heat network should be part of the feasibility study.

Some residents suggested that more enforcement of renewable energy projects was needed, especially in riverlands basins. There also needed to be ongoing monitoring of schemes as well as wider mitigation measures such as ecological enhancements.

The University of Cambridge requested clarification be added to the section on connection to district heating to make clear that this also applied to major refurbishment as well as new build. They also requested clarification as to what was meant by "unacceptable impacts" to avoid delays in determining applications. Of particular significance is the assessment of the impact of renewables on heritage buildings where there is significant opposition to rooftop solar on older buildings. They also called for better connection to the infrastructure chapter which referenced connections to the gas network but not district heating connections.

There was strong support for provision of photovoltaic panels to existing buildings and car parks.

Addition of a reference to energy storage was requested to enable developments to make best use of the energy generated.

CPPF suggested an amendment to the wording around the continuation of agricultural uses so that takes place both within and adjacent to projects.

Abbey Properties considered that the policy should be amended to mandate that unacceptable impacts are appropriately addressed rather than suggesting automatic refusal of planning permission. They also considered that if applied literally, part 1 of the policy if applied literally could prevent any development on agricultural land and considered part 5 of the policy unenforceable. They also suggested additional wording be added to part 7 of the policy in relation to community support for community led proposals.

Some residents raised concerns about the loss of agricultural land and Natural England raised concerns about renewable

energy projects on peat soils.

The East of England Ambulance service requested that should any data centres be built in or adjacent to the Greater Cambridge to utilise capture of heat generated to support industry or domestic heating.

While supportive of the general principle of the policy, Kingsway Solar considered that the policy was lacking in detail to enable the safeguarding of landscapes, biodiversity and community wellbeing from large-scale developments.

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach, are noted.

Changes to the supporting text have been made in response to the representations received from Historic England, to help clarify the approach that should be taken to consider the impacts of projects on heritage assets. Notably, this includes detail on the submission of detailed Heritage Impact Assessments to consider all designated and non-designated heritage assets and their settings added to paragraph 4.49 of the supporting text. Regarding the Landscape Sensitivity Assessment, this was prepared following the guidance prepared by Natural England. It is not intended to be interpreted as defining the suitability of individual sites for development and does not replace the requirement for more detailed studies, including Heritage Impact Assessment. An additional reference to Heritage Impact Assessment has been added to paragraph 4.44 of the supporting text.

Concerns about ongoing monitoring and enforcement of projects are noted, but enforcement sits outside the remit of the local plan. Where there are concerns about existing schemes not complying with their planning permissions, this should be reported to the Shared Planning Services enforcement team. Regarding the ongoing monitoring of elements such as

proposals for Biodiversity Net Gain (BNG), this forms a key part of our BNG policy and will be prescribed and secured through conservation covenants, planning conditions and / or obligations.

Regarding requests to add specific reference to Neighbourhood Plans to the policy in relation to community energy schemes, the inclusion of such a reference is not considered necessary. On adoption, Neighbourhood Plans form part of the statutory development plan for the area and as such any developments falling within the area covered by the Neighbourhood Plan would have to have consideration to both the Local Plan and the Neighbourhood Plan. As such it is not considered necessary to make specific reference to individual Neighbourhood Plans within this policy. Community led renewable energy projects would also still need to meet the requirements set out in part 1 of the policy which includes consideration of landscape impacts.

Support for heat networks is noted. In response to representations from the University of Cambridge and Max Fordhams, additional wording has been added to part 10 of the policy to clarify that connection applies to major refurbishment and that heat networks should be low or net zero carbon.

Regarding the clarification sought as to what is meant by ‘unacceptable impacts’ on heritage assets, some additional guidance has been added to paragraph 4.49 of the supporting text. Further, more detailed guidance on works to heritage assets can also be found in policy GP/HA (Designated Heritage Assets).

With regards to recommendations from Abbey Developments that the policy should be amended to mandate that unacceptable impacts are appropriately addressed rather than suggesting automatic refusal of planning permission, additional wording has now been added to paragraph 1 of the policy to clarify that proposals will be supported provided that they do not cause unacceptable impacts that cannot be mitigated and are reversible. We have also amended part 7 of the policy as suggested. We do not agree that part 1 of the policy effectively rules out all agricultural land for renewable energy as the

criteria specifically relates to the need to steer development towards lower quality agricultural land and support is also given in the supporting text to proposals that retain agricultural use both within and around the proposals. With regards to criteria 5 and the retention of biodiversity net gain works where renewable energy projects are decommissioned, this can be worked into the long term management and maintenance plans for biodiversity net gain proposals.

In response to representations from Natural England, reference to peat soils has been added to part 1b of the policy.

With regards to data centres, consideration of data centres falls outside the scope of policy CC/RE. Reference to data centres has been added to policy I/EI (energy infrastructure masterplanning) and the co-location of data centres as part of energy networks will be encouraged.

Regarding concerns about the loss of agricultural land, policy CC/RE seeks to balance the need for renewable energy generation with the need for agricultural land in food production and food security. Proposals should avoid the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a) and seeks to promote approaches that retains an element of agricultural use in and around the proposed renewable energy development.

A new addition to the policy in relation to community energy are criteria 8 and 9 which seek to encourage community benefit in the form of profit sharing or a proportion of community ownership. This responds to a government consultation on community benefits and shared ownership for low carbon energy infrastructure published in May 2025.

With regards to the policy lacking in detail as to enable the safeguarding of landscapes, biodiversity and community wellbeing, significant national policy guidance in the form of the PPG is available to assist in the determination of proposals, alongside other guidance from statutory consultees such as Natural England and Historic England. It is not necessary for the local plan to repeat this guidance.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for the policy and for renewables.	202622 (C Pointon), 202961 (BCN Wildlife Trust), 202211 (R. Lambert), 203175 (CPPF), 202624 (C Pointon), 202171 (M MacGinley), 202852 (H Cook), 211874 (Defence Infrastructure Organisation)
Support for clause 1b in relation to protection of biodiversity and bullet point 5 requiring retention of BNG at the end of a projects operational life.	202961 (BCN Wildlife Trust), 203671 (Cambridge Green Party)
Historic England is supportive of renewable energy development and supports the inclusion of a policy for renewable energy. Our advice note Commercial Renewable Energy Development Historic Environment Advice Note 15 provides further advice on Local Plans and renewable energy including site selection and development of policies and maps in plans. This needs to be set out in robust policy criteria and in supporting text which is also reflected in the key of the policies map. We welcome	208923 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
references to heritage in the policy. However, we suggest a number of changes to wording to ensure that the policy and supporting text and policies map key is clearer and more robust.	
Historic England is supportive of renewable energy development and supports the inclusion of a policy for renewable energy. Our advice note Commercial Renewable Energy Development Historic Environment Advice Note 15 provides further advice on Local Plans and renewable energy including site selection and development of policies and maps in plans. We note that you have commissioned a Landscape Assessment – Part 2 Renewable Energy Development Assessment as part of the evidence base for the Local Plan. We note that this evidence has been used for the development of maps for solar and wind turbines which have then been used on the policies map. The assessment is mainly landscape focussed and does not appear to give detailed consideration to the historic environment (though there are some mentions of heritage e.g. church spires but more in relation to the wider landscape). Recognising the challenges in preparing a detailed and thorough assessment of heritage at a strategic scale, we consider that the mapping represents a helpful starting point, although there are some limitations. However, given the limitations of the mapping it is very important that the plan includes suitable strong caveats to help explain these limitations and also to set out what further heritage assessment will be needed at planning application stage.	210171 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
This needs to be set out in robust policy criteria and in supporting text which is also reflected in the key to the policies map. We welcome references to heritage in the policy. However, we suggest a number of changes to wording to ensure that the policy and supporting text and policies map key is clearer and more robust. 1e we welcome the reference to the historic environment and the setting of heritage assets. The Policy should also include reference to the need for detailed heritage impact assessment. Parts of the policy refer to a zooming study – whilst others refer to zoning – we assume the latter? Paragraph 4.51 After (LVIA) add '…and Heritage Impact Assessment (HIA)'	
Welcome the supporting text in relation to the loss of agricultural land and balances that must be struck between different competing land uses – too many solar farms could compromise nature recovery to address the biodiversity crisis by reducing land available for nature restoration and pitting nature restoration and food production against one another.	202961 (BCN Wildlife Trust)
Suggest that criteria 7 be clarified such that community led schemes will be supported as long as they protect or enhance landscape character with reference to policy S&GS 8 of the Stapleford and Great Shelford Neighbourhood Plan	201566 (Stapleford PC)
Welcomes proposals for Heat Network Zoning	202211 (R Lambert), 203671 (Cambridge Green Party)
Enforcement of some control areas needed especially in riverlands basins where it is especially concentrated	202211 (R Lambert)

Summary of issues raised in comments	Comments highlighting this issue
There is a need for further guidance on what qualifies as “unacceptable impacts” to avoid delays in determining applications. Of particular significance is the assessment of the impact of renewables on heritage buildings where there is significant opposition to rooftop solar on older buildings.	University of Cambridge (202471)
Principles of heat network are valid but seem to relate to new build only – should this also apply to major refurbishment?	University of Cambridge (202471)
Needs better alignment with the infrastructure chapter which refers to connections to gas networks and doesn’t seem to require any statement on connecting to heat networks	University of Cambridge (202471)
Amend wording on continuation of agricultural uses to make clear that uses such as grazing can take place onsite around the equipment and is not referring to adjacent land	203175 (CPPF)
Strong support for encouragement of PV on existing buildings and above car parks	203671 (Cambridge Green Party)
Include explicit reference to energy storage and include specific reference to encouraging schemes to use energy onsite	203893 (Carbon Neutral Cambridge)
Policy should mandate that unacceptable impacts are appropriately addressed rather than suggesting automatic refusal of planning permission. The policy would also benefit from a balancing mechanism to allow for benefits to be weighed against any harm.	204724 (Abbey Properties Cambridgeshire Ltd)
Part 1 of the policy if applied literally could be seen as restricting proposals on agricultural land.	204724 (Abbey Properties Cambridgeshire Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Part 5 of the policy is unenforceable as decommissioning would take place at the end of life of the planning permission.	204724 (Abbey Properties Cambridgeshire Ltd)
Part 7 of the policy would benefit from the words ‘for such proposals’ being inserted after ‘demonstrated’.	204724 (Abbey Properties Cambridgeshire Ltd)
Concerns raised about monitoring and compliance with the policy.	202624 (C Pointon)
Policy CC/RE supports renewable energy in principle and aligns with net-zero objectives, making it relevant to proposals such as Kingsway Solar. However, KSCA considers the policy insufficiently detailed to safeguard landscapes, biodiversity and community wellbeing from large-scale developments.	201791 (Kingsway Solar Community Action)
Transformers impact affects countryside tranquillity.	201930 (R Pargeter)
Concern about impact and loss of agricultural land to renewables.	201930 (R Pargeter)
Ecological enhancements and biodiversity around solar farms needs to be properly secured.	201930 (R Pargeter)
Concerns about lack of successful case studies of district heat networks in practice.	202171 (M MacGinley)
Support for low carbon initiatives and community led renewables.	203024 (M Cleminson)
Support for renewables part of the policy. But district heating must be low or zero carbon and have a decarbonisation strategy. Carbon intensity and efficiency of the heat network should be part of the feasibility study.	204480 (Max Fordham)
Concerns about renewables on peat soils.	207619 (Natural England)
Anglian Water supports the policy to facilitate the delivery of renewable energy schemes. We use land at or close to our operational sites to create solar arrays and generate renewable energy. It is an	210202 (Anglian Water Services)

Summary of issues raised in comments	Comments highlighting this issue
efficient way of maximising the space we have. We are also trialling an energy storage solution that will allow us to store excess solar energy generated during the day in batteries and use it at other times, helping us to reduce our reliance on energy from the grid.	
Should any data centres be built in or adjacent to the Greater Cambridge to utilise capture of heat generated to support industry or domestic heating.	210324 (East England Ambulance Service NHS Trust)
The National Trust is supportive of renewable energy in principle. However, the landscape character, tranquillity, sensitive views, and future Wicken Vision ambition are all being adversely affected by the amount of solar and associated infrastructure being developed in the Vision area. We note that the policy states that these developments should not cause unacceptable impacts, including cumulative and cross-boundary impacts, but consider that this policy could be strengthened to put the onus on the developer to undertake an assessment of cumulative and cross-boundary impacts. Furthermore, any proposed renewable energy/infrastructure that is within the Greater Cambridge area and is functionally linked to designated sites should be avoided.	208454 (The National Trust)
Support for policy but note that NSIPs are decided by SoS.	210479 (Kingsway Solar Community Action)
To avoid ambiguity, the policy could include wording such as: “Support for renewable energy development will not be afforded where proposals result in significant harm to landscape character,	210480 (Kingsway Solar Community Action)

Summary of issues raised in comments	Comments highlighting this issue
biodiversity, residential amenity or heritage assets that cannot be demonstrably avoided and acceptably mitigated. The climate benefits of renewable energy generation must be balanced against, and not automatically outweigh, these considerations.”	
Policy CC/RE clause 7 – we suggest that clause 7 (community-led renewable and low-carbon initiatives) is clarified such that initiatives will be supported as long as they protect or enhance landscape character in line with other policies in the Development Plan. See Policy S&GS 8: Renewable energy schemes in Stapleford and Great Shelford for guidance.	210920 (Great Shelford PC)
Any emerging policy makes clear that, where an MOD assessment indicates that a development would have a detrimental impact on the operation and capability of defence assets or sites, that such an application would be refused or that conditions may be attached to any consent that might be issued which may include the removal of permitted development rights.	211875 (Defence Infrastructure Organisation)
Rural active travel routes should be bridleway to include horse riders.	203955 (S Rogers)

Policy CC/CE: Supporting a circular economy and sustainable resource use

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy from FECRA, Wildlife Trust, Cambridge City Council Democrat Group, ESCO Propsect, Cambridge Green Party, Mothers CAN Cambridge, Granta Park, Cambridge Green Party, Anglian Water, some developers and local residents.

Comments were made about concerns about prohibiting development coming forward and being obstructive to the development process. Concerns were raised about feasibility of the policy requirements and the consistency of their application, including about impacts on some individual developments. Concerns were also raised about Circular Economy Principles and conflation with WLC assessments, about references to nationally consistent methodologies including Part Z, and approaches to uses like life sciences which are much more unique. There were requests for practical and viable wording to show a pragmatic approach to applying and considering circular economy principles.

The County Council requested reference to the Cambridgeshire and Peterborough Minerals and Waste Local Plan and alterations to Paragraph 4.68. The Environment Agency asked for the policy to reflect more detailed consideration for post-development household waste, CL:AIRE Definition of Waste Development Industry Code of Practice (DoWCoP), water scarcity and the requirement for waste permits.

Comments were also made about food waste storage and composting.

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach, are noted.

The proposed approach to this policy draws on existing evidence and a wider need to both reduce use of materials and reduce carbon by re-using materials, building elements and where possible new buildings. The considerations of Circular Economy principles as set out in this policy are designed to be a consideration to inform good quality design decisions and contributing to reducing whole life carbon. It is not prohibiting development but ensuring relevant development goes through a consideration and assessment of what can be retained and re-used on or off site and how can the building be designed to extend the life of the building. The requirements for circular economy policies have been removed from site allocations to set out a clear position in CC/CE.

In response to the demolition of the Cambridge Leisure Park, this policy will apply to this development depending on when the planning application comes in. If the future use of the site is impeded by the current building and there is not scope for refurbishment, demolition will be accepted. The re-use of materials and building elements will be encouraged.

In response to concerns raised about monitoring and enforcement, a Sustainability Checklist is being developed to support the policies to provide both case officers and applicants details on what needs to be provided and how it will be considered and weighed up in the planning application.

In response to concerns about point 5 of the policy and the timing of the Circular Economy Statement requirement, similarly to the GLA approach to Circular Economy used successfully in London, a circular economy statement is required at submission

stage to demonstrate how the development has utilised the principles to consider the approach to the site and the re-use of buildings, building elements and details. It is asked for at this stage as these considerations will feed into the operational energy and whole life carbon calculations completed at this stage. An Outline scheme will require less detail than a Reserved Matters application and this will be set out in the supporting technical notes and sustainability checklist.

In response to Cambridgeshire County Council, suggested amendments have been made.

Definition of significant part has been added in part 4.62of the policy in response to concerns.

There is no conflation with WLC. Circular Economy principles and assessments are about the re-use of materials and buildings and these considerations will reduce WLC as monitored and assessed in the WLC assessment. The two documents should speak to each other but have different purposes.

Nationally consistent methodologies including Part Z – this will be added in supporting technical notes and sustainability checklist. This will draw on national Carbon studies.

Approaches to uses like life sciences will be addressed on a case by case basis and further detail will be set out in supporting technical notes and sustainability checklist.

In response to the Environment Agency, the supporting technical note will reflect more detailed consideration for post-development household waste, water scarcity and the requirement for waste permits. The policy wording has been revised to include CL:AIRE Definition of Waste Development Industry Code of Practice (DoWCoP).

Food waste storage and composting is encouraged and supported by the wider approach to waste management by Cambridgeshire and Peterborough Combined Authority who is the responsible body for waste.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for the policy.	205192 (FECRA), 205516 (BCN Wildlife Trust), 202917 (Cambridge City Council Liberal Democrat Group), 203185 (ESCO Prospect), 203672 (Cambridge Green Party), 204905 (Mothers CAN Cambridge), 201820 (T McKeown), 203366 (Carter Jonas on behalf of BMR Granta Park Propco Limited), 210203 (Anglian Water Services), 210296 (Vistry Group), 210603 (Turley on behalf of Imperial War Museum), 210921 (Great Shelford PC), 210891

Summary of issues raised in comments	Comments highlighting this issue
	(Turley on behalf of Kings College)
Concerns raised about proposals to demolish the Cambridge Leisure Park complex.	201243 (S Williams)
Need to be clear on who 'performance will be monitored and reported' relates to (to whom will it be reported).	202917 (Cambridge City Council Liberal Democrat Group)
Supportive of circular economy principles but object to clause 2 as it does not reflect the specialist needs of life sciences facilities which need a specialist approach as well as other development types where there is a need to consider site-specific factors and viability. A more balanced approach is needed, and it is requested that "on an exceptional basis" is removed from the policy.	203366 (BMR Granta Park PropCo Limited), 204315 (CIP)
Concerns that opportunities for reuse and retrofit are not being proactively assessed, e.g. by bringing empty or under-used buildings back into use.	203672 (Cambridge Green Party)
Include a clearer and stronger requirement on reducing embodied carbon providing more guidance on retrofit best practice and the use of low carbon and carbon storing materials to future-proof delivery.	203672 (Cambridge Green Party)
Call for clear, nationally consistent methodologies for circularity requirements, potentially through a future Part Z of the Building Regulations.	204315 (CIP)
Recommendation to strengthen the policy with reference to lean design at point 1 to reduce embodied carbon through efficient structures and avoiding basements and cantilevers.	204905 (Mothers CAN Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
Emphasise intensity of land use as a consideration for demolition where it is likely to provide buildings that might otherwise be built on virgin soil (or peat outside of the city) with reference to policy CC/CS.	204905 (Mothers CAN Cambridge)
Recommend a pre-demolition audit as part of Circular Economy Statement for major projects and for projects of any size where the materials have significant heritage value or unusual reuse potential.	204905 Mothers CAN Cambridge)
Part 1 of the policy is deemed unnecessary as this issue is addressed in part 8 of policy CC/NZ.	205200 (Home Builders Federation)
No support in the NPPF for a presumption in favour of repairing or refurbishing existing buildings over their demolition or reuse. Approach could hinder development on previously developed land, lead to lower densities and hinder ability to meet standards for outdoor space, BNG and accessible units.	205200 (Home Builders Federation)
Provision of Circular Economy Statements for developments of 150 or more dwellings is considered unnecessary and could be incorporated into Sustainability Statements instead.	205200 (Home Builders Federation)
RECAP waste Management Design Guide is not part of the development plan and as such requirement for compliance with this is problematic	205200 (Home Builders Federation)
All assessments of claimed “New Zero Carbon” buildings should include embodied carbon of demolitions (with ref to Westminster Retrofit First policy)	205395 (J Preston)
Concerns raised about circular economy and re-use of food citing Cambridge Central Market as a good example.	202485 (J Neal)
Review wording criteria 2d as it may hinder a balanced assessment of the merits of retention versus demolition.	202794 (Carter Jonas on behalf of Trinity Hall)

Summary of issues raised in comments	Comments highlighting this issue
Concerns raised about monitoring and enforcing the policy.	202855 (H Cook) 203029 (M Cleminson)
Clarity is needed relating to what constitutes a significant part of the building. Concerns are about circumstances where development may be justified being restricted.	203400 (Bidwells on behalf of Babraham Research Campus Ltd) 204301 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure Ltd)
Rural active travel routes should be bridleway to include equestrians.	203957 (S Rogers)
Concern raised that there are not enough repair shops, especially in rural areas.	203987 (Histon and Impington PC)
Objections to the proposed wording of Policy CC/CE. Supportive of objectives but the requirement for a Circular Economy Statement goes beyond best practice and risks conflation with whole life cycle carbon requirements.	204344 (Bidwells on behalf of Tritax Big Box Developments)
Support the policy but it should be strengthened by referencing lean design and the intensity of land use should be a consideration for demolition where it could be built on virgin soils.	204485 (Max Fordham) 205478 (Max Fordham)

Summary of issues raised in comments	Comments highlighting this issue
Concerns about policies impact on site viability and other factors such as affordable housing delivery. A more balanced approach is needed that allows for demolition and redevelopment to meet NPPF objectives for sustainable growth and quality housing.	204796 (Carter Jonas on behalf of Hill)
Further clarity is needed on the scope and methodology for circularity assessments and their integration with whole life carbon assessments.	204796 (Carter Jonas on behalf of Hill)
Circularity requirements should align with existing policy thresholds and be supported by clear methodologies, potentially through a new Part Z of the Building Regulations.	204796 (Carter Jonas on behalf of Hill)
Object to the proposed wording of policy CC/CE, despite supporting its objectives and circular economy principles. Request clarity on the term 'significant part' in relation to the demolition of buildings to avoid ambiguity in policy interpretation. While supporting the emphasis on retrofit, it is suggested that the policy should allow for other material benefits that may justify demolition. Recommend adding flexibility to the policy to permit demolition and redevelopment if refurbishment or reuse is not viable. Changes to plan: Confirmation on the definition of a 'significant part' Recognition in the policy that there may be other planning benefits that outweigh presumption in favour of retrofit.	204301 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
We commend the inclusion of circular-economy principles that enable operational waste management and composting for new developments.	208188 (Cambridgeshire Sustainable Food)
The circular economy policy already supports operational waste management and composting. We recommend making food waste and surplus redistribution more explicit, by requiring (particularly in major schemes and mixed-use centres):	208193 (Cambridgeshire Sustainable Food)

Summary of issues raised in comments	Comments highlighting this issue
● separate, convenient food waste storage for homes and food businesses (designed for easy collection) ● design that enables community composting where appropriate ● practical space that can support surplus food redistribution in neighbourhood hubs (small “last mile” storage/handling space can be transformational).	
We back the circular-economy principles that enable operational waste management and composting.	206958 (Cambridgeshire Sustainable Food)
Make food-waste storage, community composting and surplus-food redistribution facilities mandatory in major schemes and mixed-use centres.	206963 (Y Dignon)
A brick by brick case study of as many buildings as possible may warrant invitation of national and international academic institutions to undertake a regional or national Carbon Study further justifying the retention of prized Old Builds elsewhere across the area, region and the UK. Sustainable Materials- an approved contractor directory that could readily advise and source the necessary raw materials with realistically reduced costs substantially again deterring potential demolition-driven applicants from consuming workload time of the Planning Department. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of sustainable materials must be provided by the Local Council. Enhancement of Setting with funding grants and financial incentives from all tiers of Government for	210351 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
Private Investors especially those contributing actively towards achieving Net Zero through Embodied Energy/ Carbon Capacity rich measures, i.e. Retention of Old Builds.	
Girton College broadly supports the intent of Policy CC/CE and welcome the flexibility built into paragraph 1 of the policy, which allows proposals to demonstrate compliance with the circular economy principles where “practical and viable” to meet all requirements in full.	208307 (Turley on behalf of Girton College)
Concerns raised about point 5 – requiring a CE statement as it requires it at submission stage not detailed design stage.	210297 (Vistry Group), 208307 (Turley on behalf of Girton College), 210603 (Turley on behalf of Imperial War Museum), 210981 (Turley on behalf of Kings College)
Reference to the Cambridgeshire and Peterborough Minerals and Waste Local Plan is supported. Amendments suggested to Paragraph 4.68.	210546 (Cambridgeshire County Council)
We note the inclusion for developers to consider waste management for all proposals. However, there is a lack of detail on post-development household waste management including Persistent Organic Pollutants, hazardous or problematic waste streams and the support of the circular economy. Reference should be included on how future growth will be supported by adequate infrastructure such as	211159 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
Household Waste Recycling Centres, recycling hubs, Waste Treatment Stations, Incinerators and treatment capacity.	
It has been noted that water scarcity is a concern for the local plan, please note that water is generally required alongside waste operations for the purpose of dust suppression and fire prevention. This would need to be considered in relation to any waste management infrastructure required as per the point above. It may also be required by constructors for dust suppression during building works.	211160 (Environment Agency)
Please ensure that Contractors are aware of the potential requirement to obtain Waste Permits and/or apply under DoWCoP in relation to construction waste.	211161 (Environment Agency)
We would recommend revision to reflect the following comments for waste management in the context of land contamination/remediation: Excavated materials recovered on a development site via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste Development Industry Code of Practice (DoWCoP) subject to certain conditions being met. This is sustainable approach. However, contaminated materials that are or must be disposed of are waste and must be managed in accordance with the relevant legislation. We recommend that the following guidance be referenced: The Definition of Waste: Development Industry Code of Practice; and The Waste Management page on gov.uk.	211162 (Environment Agency)
As drafted, it is insufficiently precise, not effectively enforceable, and risks duplication with existing regimes. The policy is vague in its duties, lacking clear enforceable requirements.	208968 (Persimmon Homes East Midlands)

Summary of issues raised in comments	Comments highlighting this issue
It is important that the reference in 1. to “where practical and viable” is retained in the Policy and that “where practical and viable” is similarly referenced in Policy S/CBN: Cambourne North 48 where is states “integrate circular economy principles into design (including Zero Avoidable Waste in construction, maximising opportunities for reuse and recycling of materials across whole life-cycle) and will encourage zero waste living in operation for future residents through provision of services and facilities.	208263 (Martin Grant Land Limited)

Policy CC/CS: Supporting land-based carbon sequestration and carbon sinks

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

A number of comments expressed general support for the policy. Natural England supported in principle, but requested a number of changes, to provide detail on the approach to soil management. Concern was expressed that requirements to explore carbon sequestration duplicated other policy requirements such as biodiversity net gain. Another comment considered the policy was too vague to be appropriately implemented. Some comments highlighted the need to avoid allocations on peat areas. The Cambridge Green Party proposed that the policy to be widened to include soils, grassland, woodland, wetlands

Response to the main issues raised in representations:

Comments, including those offering general support for the policy approach, are noted.

Peatlands are a particularly important store of carbon, and need a specific policy approach. A number of amendments have been made to the draft policy, including to add detail to the approach to soil management reflecting comments from Natural England.

land-based carbon sequestration opportunities go beyond application of biodiversity net gain, and it is a reasonable and appropriate requirement to require developers to explore and implement opportunities.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for policy.	201350 (Royal Society for Protection of Birds (RSPB), 201567 (Stapleford PC), 202488 (J Neal), 204913 (Mothers CAN), 205480 (Max Fordham),205517 (Wildlife Trust BCN), 208264 (Savills on behalf of Martin Grant Land Limited), 210922 (Great Shelford PC)
The general principles of this policy are welcomed, however, Natural England does not support part 2a of Policy CC/CS which allows sites to be allocated on peat soil, or for those allocations which are later discovered to be on peat to proceed. Part 4 refers to the removal of peat soils. We advise strengthening this, along the lines of 'If there are any exceptional proposals allowed by the LPA to remove peat soils, this must only be done with the guidance and supervision of a suitably qualified and experienced soil scientist / practitioner, to an approved plan. The peat must be appropriately stored and then eventually used, all in a way that would limit carbon emissions into the atmosphere as far as possible.' We also note that part 4 refers to the DEFRA Code of Practice, however, the current (2009) version	207620 (Natural England)

Summary of issues raised in comments	Comments highlighting this issue
does not mention peat, which requires specialist handling techniques. Refer to: Broads Authority Guide to understanding and addressing the impact of new developments on peat soil. We also advise that it should be made clear that tree planting on areas of peat is not normally appropriate as this contributes to the drying and wasting of peat, therefore releasing carbon rather than storing it as intended. Please see Appendix 1 for additional comments relating to peat soils.	
There should be offsetting included in the policy where carbon sinks are damaged or removed.	202625 (C Pointon), 203033 (M Cleminson),
Policy should explicitly protect significant existing carbon stores, including soils, woodlands, grasslands and wetlands, not just peatlands or future sequestration opportunities. Concerns raised about the wording allowing harmful exceptions.	203673 (Cambridge Green Party)
Rural active travel routes should be bridleway to include equestrians.	203959 (S Rogers)
The policy reads as an extension to the Biodiversity Net Gain process rather than clearly defining requirements for carbon sequestration. The respondent suggests that opportunities for carbon sequestration should be proportionate, evidence-based, and appropriate to the site's scale and nature, considering landscape and ecological practices. There is uncertainty regarding how schemes will demonstrate a 'meaningful' level of carbon sequestration alongside significant BNG.	204357 (Bidwells LLP on behalf of Tritax Big Box Developments)
Concerns raised that allocation sites that are identified on peat based soil locations should not be supported. In this case it would be preferable to demolish an existing building on brownfield site (reference policy CC/CE) and intensify density there.	204913 (Mothers CAN), 205480 (Max Fordham),

Summary of issues raised in comments	Comments highlighting this issue
The policy should be strengthened by requiring a soil management plan on larger allocation sites regardless of whether they contain peat.	205480 (Max Fordham)
Natural England does not support part 2a of Policy CC/CS which allows sites to be allocated on peat soil, or for those allocations which are later discovered to be on peat to proceed. Part 4 refers to the removal of peat soils. We advise strengthening this. Note that part 4 refers to the DEFRA Code of Practice, however, the current (2009) version does not mention peat, which requires specialist handling techniques. Refer to: Broads Authority Guide to understanding and addressing the impact of new developments on peat soil.	620 (Natural England)
Support the principle of enhancing land-based carbon sequestration and green infrastructure but raises concerns that Policy CC/CS exceeds industry guidance and established practice. The policy reads as an extension to the Biodiversity Net Gain process rather than clearly defining requirements for carbon sequestration. Opportunities for carbon sequestration should be proportionate, evidence-based, and appropriate to the site's scale and nature, considering landscape and ecological practices. There is uncertainty regarding how schemes will demonstrate a 'meaningful' level of carbon sequestration alongside significant BNG. Policy CC/CS should allow flexibility for outcomes to align with established guidance rather than imposing prescriptive expectations that exceed standards.	204357 (Bidwells on behalf of Tritax Big Box Developments)
Support for general principles but part 2a needs to be strengthened, instead of referring to DEFRA Code of Practice in part 4 refers to the Broads Authority Guide. The policy should be clear that tree	207620 (Natural England)

Summary of issues raised in comments	Comments highlighting this issue
planting on areas of peat is not normally appropriate as this contributes to the drying and wasting of peat, therefore releasing carbon rather than storing it as intended.	
Support for policy. The wording of Policy CC/CS should include an additional numbered point to reinforce the need to consider the link between the impact of proposed development on water availability and peat condition.	208455 (The National Trust)
The policy introduces undefined obligations resulting is a policy that is overly vague, lacks objective compliance tests, and is potentially unenforceable in development management.	208969 (Persimmon Homes East Midlands)
There could be the opportunity for overall carbon benefits with a suitable peat restoration plan which should be encouraged within the policy to allow developers the flexibility to build new homes whist protecting or enhancing valuable peat soils.	210298 (Turley on behalf of Vistry Group)
The BHS objects because the policy should recognise that natural-surface public rights of way, including bridleways and restricted byways, can contribute positively to these objectives when appropriately designed and managed.	203564 (British Horse Society)
Rural active travel routes should be bridleway to include equestrians	203959 (S Rogers)

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
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.	
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.	201039 (P Spowart)
'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.	201244 (S Williams)
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.	201276 (H Painter)

Summary of issues raised in comments	Comments highlighting this issue
The Plan lacks sufficient focus on the area east of Cambridge, which includes villages like Balsham and West Wratting, highlighting its significance for green spaces and farmland. 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. 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. 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.	201442 (J Newton)
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.	201540 (N Sheffield)
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	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
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.	
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?	203373 (Great Wilbraham PC)
This summary should also include reference to geodiversity.	203433 (Cambridgeshire Geological Society)
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.	203681 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
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. New Local Plan's measures to protect and enhance biodiversity commended but believes an opportunity has been missed regarding local designations. 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). '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.	204698 (Girton Neighbourhood Plan Team)
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.	202169 (J Neal)
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	203594 (T Neal) 202279 (B Grieg)

Summary of issues raised in comments	Comments highlighting this issue
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.	
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.	203170 (Cambridgeshire ACRE)
What to amend of the policy: • 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.	203219 (Forestry Commission), 203248, 203249, 203250, (Fulbourn Swifts Group),

Summary of issues raised in comments	Comments highlighting this issue
• 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.	
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.	203757 (G Chamberlain)
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.	205614 (C Dunbar), 205615 (C Dunbar)
Threat to the chalk streams: • 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
• Cumulative impacts – including existing abstraction, climate change effects and inadequate assessment of mitigation – have not been properly evaluated, breaching the precautionary principle.	
Support and protection of green space and biodiversity: • 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.	205960, 205962, (Histon and Impington Community Land trust), 205988 205969, 205987 (R Randle), 206007 (M Goldberg), 206066 (A Marns), 206122 (Elsworth PC)
Rural active travel routes should be bridleway to include horseriders	203962 (S Rogers)
[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.	206563,206564, 206566 (Great Wilbraham PC)

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
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. Policies relating to green infrastructure and connectivity should: -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)
The 20 % biodiversity net gain requirement exceeds the statutory 10 % and lacks justification; a more realistic target is recommended.	209041 (Marshall Group Properties)
Consider: • 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
be good to understand and reduce the barriers to young women accessing these spaces and engaging in sport or exercise.	
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.	211075 (The National Trust)

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 rational 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
major sites contradicts the goal of doubling BNG within Cambridge (a disconnect between policy and aspiration).	
Support for the policy. • 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	202808 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 202921 (Cambridge Liberal Democrat Group), 204636 (M Cleminson), 207621 (Natural England), 208452 (National Trust), 210578 (Cambridgeshire County Council)
Support the requirement to secure 20% BNG as part of major developments. 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	210558 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
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.	
Policy should set higher targets and go further than 20% BNG for major development.	204636 (M Cleminson), 205226 (E Green)
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	210204 (Anglian Water Services)
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.	204915 (Mothers CAN Cambridge)
General support for policy intent/overall objective of policy to protect and enhance biodiversity. Specific comments that: • 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.	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-

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.	
Comments received which support the policy intent but which suggested specific amendments to the policy requirements for 20% BNG for major development: • 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	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)

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
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.	205205 (D Stoughton)
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 (he 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.	205250 (Home Builders Federation)
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.	210234 (Turley on behalf of Vistry Group)
Comments received about the evidence base upon which the draft plan Viability Assessment (2025) considers that the 20% threshold is viable: • 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	205250 (Home Builders Federation), 208909 (Nightingale Land on behalf of

Summary of issues raised in comments	Comments highlighting this issue
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, • 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	Nightingale Land and Hill Residential Ltd-132041)
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.	205250 (Home Builders Federation)
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. • 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	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-

Summary of issues raised in comments	Comments highlighting this issue
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. • 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. 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	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

Summary of issues raised in comments	Comments highlighting this issue
up delivery. 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. • 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	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

Summary of issues raised in comments	Comments highlighting this issue
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. • 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	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

Summary of issues raised in comments	Comments highlighting this issue
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. • 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 many not be appropriate.	(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)
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.	201675 (Stantec on behalf of British Land), 203933 (Bidwells on behalf of Emmanuel College (Wilberforce Road)-131570)

Summary of issues raised in comments	Comments highlighting this issue
The policy requirement of 20% Biodiversity Net Gain is not consistent with the National Requirements for BNG.	209701 (Lanpro Services on behalf of B Homent, J Tee and R Smith), 211237 (Living Space Housing), 211283 (Woolsington One Ltd)
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.	211237 (Living Space Housing)
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.	209701 (Lanpro Services on behalf of B Homent, J Tee and R Smith)
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%. 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	208280 (Turley on behalf of Imperial War Musuem), 208302 (Turley on behalf of Girton College), 2111405 (Persimmon Homes East Midlands),

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
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. 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.	201167 (M Foote), 201208 (M Foote), 203118 (M Foote)
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.	209026 (Hobson's Conduit Trust)

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
The additional requirement for major development to provide a minimum of 20% should only be an aspirational target (where sites can reasonably accommodate this)	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)
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'.	201458 (T Stone)
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.	201476 (H Brown)
Comments received on policy approach to Suitable Alternative Natural Greenspaces (SANGs): ➢ 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	201514 (RSPB)

Summary of issues raised in comments	Comments highlighting this issue
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.	
Support for inclusion and application of the mitigation hierarchy in the policy.	201514 (RSPB), 203194 (Cambridge Past, Present and Future)
Support for inclusion of reference to geodiversity and sites of geological importance such as Local Geological Sites in policy	203461 (Cambridgeshire Geological Society)
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.	201568 (Stapleford PC- Chair of the Stapleford and Great Shelford Neighbourhood Plan Steering Group)
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.	201568 (Stapleford PC-Chair of the Stapleford and Great Shelford Neighbourhood Plan Steering Group)

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)
Policy should be added to require wildlife enhancing features in all new development/ all new housing development, including: • 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
2) favour BNG offsite over onsite for any development if it a) enhances green belt land or b) adds to adjacent habitats increasing the landscape scale connectivity and/or contributes to specific habitat or species priorities	
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.	203065 (Bidwells on behalf of Barrett David Wilson Homes and the North West Cambridge consortium of landowners)
Rural active travel routes should be bridleway to include equestrians.	203964 (S Rogers)
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. Buglife has produced a general guidance note on practical measures to achieve this and is developing site-specific profiles. Solar panels adjacent to running water can also attract aquatic invertebrates with reflected polarised	207622 (Natural England)

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)
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. 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.	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
CSET is built on its currently proposed route. There appears to be a glaring inconsistency between the strategies for transport and for green infrastructure.	
Broad support for policy. However, clause 3: • 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	210923, 210924 (Great Shelford Parish Council)
Three key factors contribute to the success of the farmland birds and other wildlife in the fields around Nine Wells: • 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.	210886 (J Meed)

Summary of issues raised in comments	Comments highlighting this issue
• 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.	
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.	204461 (Swifts Local Network: Swifts Planning Group)
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	205272 (Swifts Local Network: Swifts Planning Group)
Policy supported but could be made stronger in the following areas. ➢ 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). 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.	204521 (Max Fordham)

Summary of issues raised in comments	Comments highlighting this issue
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. The respondent argues that the uplift is not supported by a robust evidence base and does not demonstrate proportionality or deliverability across all sites. The national BNG framework should guide local requirements, which must be justified, flexible, and based on site-specific ecological capacity. While biodiversity enhancement is supported, a blanket approach could hinder site delivery and overlook the merits of individual sites. 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.	203933 (Emmanuel College, Wilberforce Road), 204137 (Emmanuel College, Long Road)
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. 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	211163, 211164 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
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.	
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.	210927 (Great Shelford Parish Council)
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	211004 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
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.	
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.	211283 (Woolsington One Ltd)
The green spaces that separate Longstanton from the new Northstowe development are of historic significance and should not be re-classified for housing.	208461 (Longstanton PC)
Support for policy but concerns about applying to healthcare uses.	205111 (NHS Cambridgeshire and Peterborough Integrated Care Board)

Summary of issues raised in comments	Comments highlighting this issue
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".	211397 (Bidwells on behalf of Pemberton Family and Pemberton Family Trusts), 211398 (Quod on behalf of Cambridgeshire County Council)
Concerns raised about impact on SME developers of the higher 20% BNG, policy should be consistent with 10% in national guidance.	211462 (Hayfield Homes Construction Ltd)
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".	211086 (National Trust)

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: • 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
• 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.	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

Summary of issues raised in comments	Comments highlighting this issue
	Barton Road Landowners Group)
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). 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. 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). 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	207625, 207624,207625,207628 (Natural England)

Summary of issues raised in comments	Comments highlighting this issue
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. Projects that seek A-WINEP match funding must address two primary outcomes: • the reduction of nutrient pollution into rivers and • mitigating the impact of low flow. 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	210205 (Anglian Water Services)
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.	207626 (Natural England)

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)
Specific comments received in relation to Gog Magog Hills (in Policy BG/GI clause 5(3)): 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. 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: • 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.	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),

Summary of issues raised in comments	Comments highlighting this issue
• 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.	
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)	209680 (Stapleford PC), 208100 (Great Shelford PC)
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.	201592 (Stapleford PC)
Specific comments received in relation to Public Rights of Way (PROWs): • 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.	201718 (S Jeggo)
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	202813 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust)
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: • No.4 Enhancement of Eastern Fens • No.3 Gog Magog and Chalkland Fringe	201956 (Carter Jonas on behalf of KG Moss Will Trust & Moss Family), 202584 (Ely Diocesan Board of Finance), 203326 (Carter Jonas on

Summary of issues raised in comments	Comments highlighting this issue
• No.5 Great Ouse Fenland Arc • No.7 West Cambridge GI Buffer-Coton Corridor • No.2 River Cam Corridor 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.	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)
Concerns about its effectiveness in delivering strategic GI across Greater Cambridge, not clear at present how the policy aspirations will be delivered. 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. 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	202815, 202819 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust), 203210 (Cambridge Past, Present and Future)

Summary of issues raised in comments	Comments highlighting this issue
are aware of this as, however addressing this missing aspect of the local plan will be critical in determining whether the plan is sustainable.	
Plan must facilitate delivery of the strategic GI required through both policy and appropriate site allocations now. Immediate action is required to increase capacity for accessible natural greenspaces to prevent damage to existing nature sites, including SSSIs.	202815, 202819 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust), 203210 (Cambridge Past, Present and Future)
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.	202815, 202819 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust), 203210 (Cambridge Past, Present and Future)
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. 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	202819 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust), 203210 (Cambridge Past, Present and Future)

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
In principle support for Urban Greening Factor but specific points/suggestions for changes as follows: • 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.	202475 (University of Cambridge), 203074 (Bidwells on behalf of Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners),
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. 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)	204331 (Carter Jonas on behalf of Cambridge Investment Partnership), 208315 (The Planning Bureau Ltd on behalf of Churchill Retirement Living with McCarthy and Stone)

Summary of issues raised in comments	Comments highlighting this issue
Objection to 0.4 UGF target as minimum for major development: • 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.	204812 (Carter Jonas on behalf of Hill), 205257 (Home Builders Federation)
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.	203358 (Carter Joans on behalf of BMR Granta Park Propco Ltd.)

Summary of issues raised in comments	Comments highlighting this issue
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.	202831 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust)
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.	204852 (Turley on behalf of Vistry Group), 210237 (Turley on behalf of Vistry Group)
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	202813 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust)
All development should contribute to strategic GI and therefore the Local Plan must include strategic GI within a CIL requirement for new developments.	202837 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust),

Summary of issues raised in comments	Comments highlighting this issue
	203210 (Cambridge Past, Present and Future)
Suggestion to clarify areas targeted in BG/GI by relating them to the boundaries for the Landscape Character Types, for example: · 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. 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).	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. his 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
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.	
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: • 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.	208166 (Cambridgeshire Local Access Forum)
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.'	211165 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
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. 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.	202930 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)
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. 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. 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	202843, 202850, 202916 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)

Summary of issues raised in comments	Comments highlighting this issue
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. 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. 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? The Wildlife Trust welcomes the commitment to undertake further work on a SANGS. 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.	
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	211284 (Woolsington One Ltd)

Summary of issues raised in comments	Comments highlighting this issue
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.	
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.	210627 (Cambridgeshire County Council)
Concerns raised about introduction of UGF with no evidence base, viability and NPPF requirements for clarity and enforceability.	211406 (Perisimmon Homes East Midlands)
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.	210933 (Great Abington PC)
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	210932 (Great Shelford PC), 209683 (Stapleford PC),

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
Redrow requests that the Greening Factor requirement is reviewed and amended as follows: 1. Replace the mandatory Greening Factor of 0.4 (residential) and 0.3 (non residential) with a flexible, evidence based standard, such as: “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.” 2. Require the Local Planning Authority to produce a technical evidence base demonstrating: 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.	204578 (Carter Jonas on behalf of Redrow South Midlands)
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. It requires developments to achieve a number of ‘initiatives’ and ‘objectives’: Urban Greening Factor,	209209 (Urban & Civic)

Summary of issues raised in comments	Comments highlighting this issue
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.	
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. 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. Purpose, method and a clear demonstration of it could work is absent and very necessary if this approach is to be considered further.	209210 (Urban & Civic)

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**
Recommendation for increased buffer zones: ➢ 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)	202850 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 201354 (RSPB), 201382 (Gamlingay PC)
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.	204002 (Savills on behalf of Anglia Ruskin University-131574), 204864 (Abbey Properties Cambridgeshire Ltd), 205107 (Lichfields on behalf of Lolworth Developments Ltd-129685)
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	210206 (Anglian Water Services)

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	
General support for the policy. 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.	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)
Support specific points of the policy, that it: • Requires development to demonstrate how it will protect 'space below ground'	201508 (B Greig), 201700 (J Neal), 201837 (T Neal),

Summary of issues raised in comments	Comments highlighting this issue
• 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)
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. Suggestion that hedgerows should meet Wildlife Trust size standards.	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

Summary of issues raised in comments	Comments highlighting this issue
	Buckingham), 205667 (D Storey), 207650 (Duxford PC)
Support for policy requirement for minimum tree canopy cover for major development. 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.	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)

Summary of issues raised in comments	Comments highlighting this issue
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).	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)
Ancient and woodlands tree should be explicitly defined as by the Woodland Trust.	201508 (B Greig), 201700 (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-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
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: ➢ 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)
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.	202353 (R Lund)
Suggestions that policy should encourage the planting of fruit trees (in residential neighbourhoods)	202836 (Dr H Cook), 208875 (R Lambert)
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.	202940 (Cambridge City Council Liberal Democrat Group)
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).	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)
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. Detailed comments: • 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
and does not strike the appropriate balance between landscape enhancement and the delivery of strategic growth. • 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	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

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)
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. 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.	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),

Summary of issues raised in comments	Comments highlighting this issue
Suggestion that a possible policy distinction between the City and area beyond may be appropriate.	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

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
	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

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 grater 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)
Point 1: + 30% minimum is supported, with adequate monitoring and enforcement. 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) Point 3a: hedgerows should meet Wildlife Trust size standards Point 3b support protecting "space below ground" Point 4a change text to "climate crisis" THROUGHOUT Point 4b support "long lived trees" Point 6 strongly support Point 7: ancient and woodland trees must be explicitly defined as by the Woodland Trust	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
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.	208990 (Barratt Homes Northampton)
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.	210238 (Turley on behalf of Vistry Group)
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.	210239 (Turley on behalf of Vistry Group)
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	21040 (Turley on behalf of Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
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.	
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.	210496 (Forestry Commission)
We are generally supportive of this policy but surprised to see no reference to prioritising native trees and hedgerows.	210934 (Great Shelford PC)
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.	210935 (Great Shelford PC)
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. 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.	210936 (Great Shelford PC)

Summary of issues raised in comments	Comments highlighting this issue
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.	211399 (Bidwells on behalf of Pemberton Family and Pemberton Family Trusts), 211400 (Quod on behalf of Cambridgeshire County Council and Prologis)
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.	211407 (Persimmon Homes East Midlands)
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.	(210240 Turley on behalf of Vistry)

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
We generally support this policy but would like to see the following amendments: We strongly recommend a re-ordering of policy criteria to reflect their significance and priority. As worded, the implication is that ALL development must demonstrate the requirements in the list. We would like the tourism and recreation clause removed. 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. 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.	205461 (Cam Valley Forum)
“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.	131415 (M Cleminson)
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.	8820 (RSPB)
Support for 15 m water buffer; suggest referencing flood zone boundaries within policy.	7618 (Gamlingay PC)

Summary of issues raised in comments	Comments highlighting this issue
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.	131255 (Girton PC)
Development should consider the global and local importance of chalk rivers, not only water supply issues.	131341 (S Berridge)
Strong support for policy; reiterates the suggestion to replace “river corridors” with “river meadows”. Recommends using rivers to spread tourism to wider heritage locations.	131356 (Riverside Area Residents Association)
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.	131723 (Cam Valley Forum)
Recommends 50 m buffer rather than 15 m, citing LNRS guidance for chalk streams. Wider buffer necessary to reduce nutrient run□off and bank erosion.	131762 (I Walters)
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	131790 (D Spiegelhalter)
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.	7033 (Federation of Cambridge Residents’ Associations)

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
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.	
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.	203464 (Ickleton PC)
This policy is well supported.	210674 (Newnham Labour)
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. 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.	204405 (Tritax Big Box Developments)

Summary of issues raised in comments	Comments highlighting this issue
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. This approach lacks proportionality and may reduce developable area, constrain site layouts, and undermine development capacity, conflicting with national policy objectives. The respondent recommends amending Policy BG/RC to adopt a more flexible, site-specific approach that differentiates between natural watercourses and engineered land drains. 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.	
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.	202498 (H Brown)
We argue the 10 m ditch-buffer requirement exceeds national guidance and could sterilise land.	208356 (Mr T Ebourne, Sworders)
We welcome the inclusion of this policy and are generally supportive of the wording. 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	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
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.	201337 (H Dawson)
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.	201355 (Royal Society for the Protection of Birds)
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.	201611 (Stapleford PC)
Girton's Washpit Brook and Beck Brook are locally critical river corridors for ecology, flood paths, and connectivity; they must be explicitly protected.	202221 (Girton PC)
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.	203216 (Cambridge Past, Present and Future)

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**
Comment that Protected Open Space is of vital importance and should be protected and enhanced • 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.	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)

Summary of issues raised in comments	Comments highlighting this issue
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.	203690 (Cambridge Green Party), 204747 (Maria Cleminson)
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. • 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.	201317 (Cambridge Architectural Research Ltd (CAR)), 202215 (L Fleming), 202956 (Cambridge City Council Liberal Democrat Group), 203560 (P Tribble)
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.	204943 (North Newnham Residents' Association), 208619 (Madingley Road Area Residents Association)

Summary of issues raised in comments	Comments highlighting this issue
Concern about criteria 2b, which requires replacement open space to be operational before the loss of existing space. • 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.	204345 (Cambridge Investment Partnership), 205283 (Home Builders Federation), 204828 (Carter Jonas on behalf of Hill)
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. • 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	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)

Summary of issues raised in comments	Comments highlighting this issue
• 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.	
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.	201361 (M Blackburn)
Comment that sites are missing or should be amended: • 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
• 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	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),

Summary of issues raised in comments	Comments highlighting this issue
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. • 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)
We support this policy and the reference to Natural England's Accessible Greenspace Accessibility Standards to guide the location of replacement open spaces. 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.	207631 (Natural England)
Land use, nature and orchards: some losses are irreversible Orchards, mature trees, historic green spaces and productive landscapes are non-renewable assets. Once removed, they cannot be meaningfully replaced within a generation. Any proposal that: • removes orchards; fragments countryside; or damages established ecosystems; must clear an exceptionally high bar of necessity, not convenience. 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.	208839 (D Smith)
Point 1: Inclusion "undesignated areas" – strongly support. Point 1 (Add) Where loss permitted, agree replacement should be like for like or better. Point 1 (Add): 'Cultural character & Biodiversity, including that relating to semi-natural areas and	204065 (Federation of Cambridge Resident's Associations)

Summary of issues raised in comments	Comments highlighting this issue
informal green space, should be key in assessing open space quality Point 2a: Open spaces in this policy already subject to official evaluation. Needs more compelling argument to allow evaluation to be overridden. Point 2b: “before” – strongly support. Point 3 Strongly object. Delete. Undermines whole purpose of strategy. Why should educational establishments be privileged? Points 4 & 5: – strongly support	
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.	204854 (Vistry Group)
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	209228 (Sports England)

Summary of issues raised in comments	Comments highlighting this issue
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.	
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.	209229 (Sports England)
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.	209230 (Sports England)
Where new development is likely to increase recreational pressure on the countryside, CLAF supports: •Proactive mitigation measures, including improved access infrastructure and circular routes, to disperse recreational use and reduce impacts on sensitive landscapes.	208169 (Cambridgeshire Local Access Forum)

Summary of issues raised in comments	Comments highlighting this issue
•Securing access improvements through planning agreements to ensure timely delivery and long-term maintenance.	
We welcome the proposed standard of 0.4 ha of allotment space per 1,000 population.	206957 (Y Dignon)
We welcome the updated Girton Policies Map and see it as a significant improvement on the 2018 version. • 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. 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.	206158, 206159, 206160, 206163 (Girton Neighbourhood Plan Team)
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.	204421 (Cllr T Bygott)

Summary of issues raised in comments	Comments highlighting this issue
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)	201695 (P Harradine)
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. 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	208462, 208463, 208464 (Longstanton Parish Council)

Summary of issues raised in comments	Comments highlighting this issue
We support the principle of a mixed□use development at North Cambridge Academy delivering about 150 homes and a community sports hub. 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.	206130, 206140 (Meridian trust)
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. 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.	203941 (Bidwells on behalf of Emmanual College)
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	206189, 206190, 202285 (I Cooper)

Summary of issues raised in comments	Comments highlighting this issue
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). 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.	
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?	205900 (P Harradine)
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. 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. 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.	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□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**
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	201385 (Gamlingay PC)
General support for policy: • 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	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)

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
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.	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)
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.	202223 (Girton PC)
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.	202352 (R Lund)
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	202357 (R Lund)

Summary of issues raised in comments	Comments highlighting this issue
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.	
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.	202480 (University of Cambridge)
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.	202934 (Bedfordshire, Cambridgeshire and Northamptonshire Wildlife Trust)
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.	207171 (Stantec on behalf of British Land)
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.	207632 (Natural England)
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.	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)
Concern about the accuracy of: • 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
Objections made due to policies lack of clarity on: • 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.	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)
Policy is too rigid and does not account for the varied operational and spatial needs of employment and commercial development in Greater Cambridge. 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.	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

Summary of issues raised in comments	Comments highlighting this issue
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. Railpen suggest that “hectares per employee” requirement is removed.	Ltd), 204435 (Bidwells on behalf of Tritax Big Box Development)
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). Suggestion from Redrow South Midlands that the policy should be reviewed for potential overlap with other requirements.	207173 (Stantec on behalf of British Land), 204857 (Carter Jonas on behalf of Redrow South Midlands)
The policy could inadvertently create an informal open space tariff through off-site financial contributions without a clear CIL compliant methodology.	204857 (Carter Jonas on behalf of Redrow South Midlands)
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. 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.	205302 (Home Builders Federation)

Summary of issues raised in comments	Comments highlighting this issue
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.	203536 (British Horse Society), 203794 (S Rogers)
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.	203693 (Cambridge Green Party)
Long-term maintenance of biodiversity values and nature, and funding must be secured, including replacement of failed planting and ongoing habitat management.	203693 (Cambridge Green Party)
Comments relating to support for integration youth and young people with open space, children's play space and public realm provisions: • 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)	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),

Summary of issues raised in comments	Comments highlighting this issue
• 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)
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).	204258 (A Giarlis), 204261 (L Cooke), 204375 (NEUBAU Architecture Ltd), 204523 (T Woodcock), 204768 (M Cleminson), 205221 (Cambridge Junction/Create Cambridge), 205420 (Z Svendsen)
In principle support for the provision of open space with new developments but that such provision needs to 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	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
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	208621 (K Weimer)
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.	210845 (Sports England)
We endorse the proposed standard of 0.4 ha of food-growing/allotment space per 1,000 people within open-space requirements.	208187 (Cambridge Sustainable Food)
Attenuation ponds should not be counted as accessible green space in the green space provision calculations.	203261 (Cllr C Hofman)
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.	203273 (Horseheath PC)
LSH supports the inclusion of public open spaces within future developments, as part of creating high quality functional spaces for residents to enjoy.	211238 (Living Space Housing)
Open spaces should include bridleway perimeter routes or cross routes so that horse riders are included.	203974 (S Rogers)

Summary of issues raised in comments	Comments highlighting this issue
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.	203357 (B Greig)
Labelling of the policy is incorrect.	210175 (Stantec on behalf of British Land)
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.	208270 (Savills on behalf of Martin Grant Land)
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.	208457 (The National Trust)
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.	210242 (Turley on behalf of Vistry Group), 211761 (Urban & Civic)

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.	
EEAST recommends for both physical and mental health and wellbeing: • 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 Quy 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)

Consultation Statement

Appendix 10: Response to Representations - Wellbeing and social inclusion



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

Wellbeing and Social Inclusion

Wellbeing and Social Inclusion Introduction

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The importance of measures to address access to sport, to support good health, fostering community cohesion, community safety, and delivery of cultural infrastructure were raised in a range of general comments on this theme. It was identified that these issues apply to rural areas as well as urban areas. There was concern that some recent developments had not been supported by the right infrastructure to address these issues. The need for specific types of infrastructure, from skate parks to swimming pools were raised.

Some comments were concerned about developers not providing sufficient funding for new infrastructure, whilst some developers raised concern about the range of policies and their cost to implement. Comments made by ESCO Prospect raised concerns about

the policies being are too detailed and that the additional impact and costs to provide the information required will have on the viability and content of planning applications. A more considered approach should be taken to the amount of information sought for smaller schemes below 100 dwellings.

Comments made by Cambridgeshire County Council cited the need for new towns to safeguard land for high-quality municipal swimming pools and leisure centres to meet future demand and reduce car trips. Concerns were also raised about a number of social issues, many related to criminal activity. Other comments related to the provision of health care services, burial/cremation facilities, sustainable, well-designed places, green infrastructure and realistic alternatives to private car use to encourage walking, cycling, wheeling and use of public transport. No specific provision or uses for young people, either within sports and leisure or cultural hubs. Other comments noted the omission of supporting locally grown food, larger developments should provide affordable units for community food enterprises and design space for small walkable food retail. Essex County Council cited their keen interest to inform, shape, support and help refine development strategy and policies delivered by Local Planning Authorities within and adjoining Essex.

Comments made by Cambridge Past Present and Future suggested whether this section should include policy and/or supporting information on Assets of Community Value. One member of the public requested clarification about how CIL/s106 funds will benefit the parishes affected by development, which should be addressed to ensure local communities gain from the expansion.

There was considerable support, with reference to S/PRIA/EG that the Elizabeth Way bridge and Underpass(es) become a cultural hub project and benefits this project would bring to the local community. Great Wilbraham PC highlighted how restrictive development prevents villages from benefiting from new residents joining the village community to offset rural decline. One member

of the public commented on the poor provision of amenities and services in Great Abington which are inadequate to serve what would eventually be a vastly increased population within easy reach.

Comments made by Cambridge Sustainable Food asked for larger developments to include space for small, walkable food retailers and affordable units for community food enterprises, so everyday food is readily available. Cambridgeshire Constabulary highlight the need for policies to address crime prevention measures. The British Horse Society highlighted the need for public rights of way and provision for equestrians. Comments made by CPRE Cambridgeshire and Peterborough cited the need for Policy SC/1 (Health and Wellbeing) to comply with the Equality Act 2010, the UN Convention on the Rights of Persons with Disabilities, and NPPF paragraph 8.

Comments made by Cam Skate raised the need for a permanent accessible, high-quality indoor skate space in the city and explained the benefit such a facility can bring to the community. Their current facility is a short-term meanwhile use with a lease expected to expire in July 2026. The update to the 2016 Indoor Sports Facility Strategy should include reference to the need for a ‘restricted access skatepark’ would be offering an invaluable social resource for young people in the Cambridgeshire area. Research shows that skateboarding is not simply a recreational hobby—it is a reliable and evidence-backed tool for youth development, public health, and community cohesion. Comments made by Sport England support the plan’s overarching objective to protect, enhance and provide new sport opportunities, insisting that any loss of playing field be replaced with equivalent or better quantity, quality, accessibility and management.

Response to the main issues raised in representations

The Localism Act requires the Council to keep a 'List of Assets of Community Value' which will help to identify what facilities and services local communities consider to be valuable, however this is a separate process to the draft Local Plan which is informed by a series of evidence documents covering a range of uses including: indoor and outdoor sports; cultural and community facilities; retail; and leisure activities. These documents highlight how these facilities are important to local communities and have been used to inform draft local plan policies. The loss of any facility, important to the local community will normally be resisted.

A series of sports strategies have been developed to identify the need for future sports facilities including the retention of existing facilities to meet the needs of existing residents. These have also identified how new development should provide for a range of sports to support healthy lifestyles, including new swimming pools and sports halls. Any loss of a playing field would normally be resisted unless it could be re-provided in accordance with the policy's requirements.

Policy J/RC: Retail and other complementary town centre uses supports smaller food shops in smaller centres meeting day-to-day small-scale retail and service needs for local areas.

While all residential development is expected to contribute to infrastructure requirements, only larger developments of +200 dwellings are expected to submit more detailed assessments to inform infrastructure provision. Normally, off-site contributions will be spent on local infrastructure with the decision on what the money is spent on normally resides with the Parish Council in South Cambridgeshire or by Cambridge City Council.

Policy WS/NC: Meeting the needs of new and growing Communities had also been amended to include the provision of leisure routes. These would be suitable for people of all ages and abilities and for a variety of uses, to allow them to exercise outdoors and access nature and the wider countryside. Policy GP/PP: People and place responsive design includes requirements for development to remove the threat or perceived threat of crime and improve community safety. Policy BG/EO: Providing and enhancing open spaces includes the provision for new development to provide food growing spaces.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Strongly supports a ban on vans with unhealthy food near the schools, especially the ice-cream van near Mayfield school with put parent under pressure to buy their children what is bad for them, and just before lunch - because their peers are getting some. Sugar is addictive and is known to cause multiple health problems, to be pushed so aggressively. Same for vans driving around playing loud music	201033 (E Mitenko)
It should be noted that there are no allocations identified in the draft GCLP for Hardwick that could make financial contributions or provide land for new or additional services and facilities. It is not clear how additional services and facilities, including the aspiration for health services to be provided within the village, would be delivered in the absence of any related development.	204213 (Hill Residential Group Hardwick site)
Every person living with hydrocephalus & cerebral palsy in this city would disagree with the things you have highlighted as positives. This city is designed for cyclists, and no-one else.	201297 (M Bond)
I support Cambridge Junction and Create Cambridge in asking that:	202061 (H Chamberlain), 202136 (Cambridge

Summary of issues raised in comments	Comments highlighting this issue
• The Cultural Infrastructure Strategy strengthens its focus on delivery pathways, not only mapping of need • Clearer links are made to planning obligations, capital funding routes and operating models • Partnership/shared-service capacity is resourced • Creative Commons approaches are included as part of long-term stability, not only meanwhile use • Create Cambridge is engaged as advisor/consultee on the further development of the Cultural Infrastructure Strategy	Junction), 202194 (H Tam), 202204 (H Tam), 202315 (Cambridge Junction), 202396 (J Webber), 202417 (T Shaw), 202431 (Kettle's Yard), 202690 (T Altmann), 202720 (W Townsend), 202789 (S Lee), 202880 (Cambridge Junction), 202886 (Cambridge Junction), 203038 (The Arts Theatre Cambridge), 203855 (N Yeni) 203876 (University of Cambridge), 205010 (Wysing Arts Centre), 205065 (University of Cambridge), 205120 (H Paterson), 205213 (J Walsh), 205326 (A C de

Summary of issues raised in comments	Comments highlighting this issue
	Azevedo), 205359 (L Howse), 205362 (N Oakley), 205417 (Cambridge Junction), 205418 (A Sieglow), 201011 (H Chamberlain), 202761 (Cambridge Junction/Create Cambridge), 202762 (Cambridge Junction/Create Cambridge) , 204712 (A Giarlis), 202298 (Cambridge Junction), 202941 (R Terry), 202968 (T Flinders), 203635 (University of Cambridge), 203547 (D Lever), 203480 (L Heap), 203446 (S Ashworth), 203363 (N Ellis), 202466 (K Jones), 202329 (Cambridge Junction/

Summary of issues raised in comments	Comments highlighting this issue
	Create Cambridge), 204185 (Cambridge Junction/ Create Cambridge), 204697 (NEUBAU Architects)
Suggest that security and crime prevention measures be embedded in planning policies to promote health, wellbeing and community cohesion, supporting the Wellbeing and Social Inclusion objectives.	201336 (Cambridgeshire Constabulary)
We support these policies and their commitments to wellbeing and social inclusion.	203026 (Cambridge City Council Liberal Democrat Group)
The British Horse Society supports the Plan's objectives for improving wellbeing and social inclusion. However, there is a lack of clarity between policies promoting "active travel" and those relating to the public rights of way network. Active travel is largely framed around walking and cycling, while rights of way are not consistently recognised as a distinct and valuable health and wellbeing asset in their own right. Public rights of way provide accessible opportunities for physical activity, social connection and contact with nature for a wide range of users, including equestrians.	203571 (British Horse Society), 203613 (British Horse Society),
The introductory overview to this theme is lacking in explicit recognition of class, disability, chronic illness and economic inactivity, risking exclusion of people who are not young professionals. We recommend amending the list of policy aims to include providing opportunities with no barrier to entry for	203697 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
leisure, sport, arts and socialising. We also recommend revising the introduction to emphasise the importance of community spaces and adding an aim to foster community across ages and backgrounds. This will help to ensure that development supports genuinely inclusive communities rather than simply an 'ideal' lifestyle for the individuals who live there.	
Permeability and access to shops, doctors, schools and leisure facilities within walking distance is critical to both the formation and continuity of community and the health of its members. People meet each other at shared facilities or while walking to and from them are more inclined to form cohesive communities.	205181 (D Stoughton)
Our focus is on walking/wheeling as the healthiest form of sustainable local travel, so our main concern is that new settlements and developments deliver this as a primary priority. If there are good local shops and control of unhealthy fast food retail outlets as you suggest then this is a major boost for people's health. They are more inclined to walk and meet others walking, helping to build a sense of community. We would be happy to organise walks in developments that are being constructed providing it is safe to do so - see our attachments in Great Places section.	201631 (Cambridge Living Streets)
You're trying to mix a huge range of very different people together which clearly doesn't work. Cambourne is already a disaster. Antisocial behaviour, council housing, famous for being on 24 hours in police custody. And yet you think it's a good idea to build more of this? And even closer to villages, which have listed buildings and people who have lived there for generations.	201755 (K Smith)

Summary of issues raised in comments	Comments highlighting this issue
I agree what you say about supporting communities. But remember housing must be affordable for all. All communities need houses. It is not sufficient to say in general that housing should be appropriate. It is necessary to spell out that the low paid, often essential workers, need affordable housing. It is an obligation on us to ensure that affordable housing is always planned for.	202174 (M MacGinley),
The focus on healthy, inclusive communities is positive, but the policies appear geared mainly toward larger developments and urban style neighbourhoods. Rural health inequalities, isolation and access to services in smaller villages are not clearly addressed. Expectations around local facilities and sustainable travel may be harder to achieve in dispersed settlements without targeted support. There is little reference to community led provision or the role of village halls and outreach services. Stronger rural proofing would recognise rural delivery models, support multipurpose community hubs and ensure transport and digital access underpin inclusion.	203173 (Cambridgeshire ACRE)
Rural active travel routes and PROWs should be bridleway for social inclusion of females (mainly) who ride horses but also some men ride horses too.	203979 (S Rogers)
No recognition of or protection for local neighbourhoods who are going to disproportionately (in comparison to wider area) by developments, which will result in a decline in their quality of life and well-being.	204923 (M Jordan)
Support: Comment relating to a new cultural hub: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, a mix of uses will create employment opportunities for graduates, start-ups, makers and creatives seeking affordable workspace.	205310 (University of Cambridge), 204324 (Cambridge Junction/

Summary of issues raised in comments	Comments highlighting this issue
• creative hub helps to promote a sustainable, resource-efficient neighbourhood. • I support integration of young people with the arts and public realm • include youth outreach and education programmes, apprenticeships and learning opportunities, informed by council/ market research and needs/gaps. • provide commercial and self-organised recreation, open access sports provisions including urban skating, active landscaping a.o	Create Cambridge), 204214, 204219, 204232 (L Cooke), 204254 (A Giarlis)
Wellbeing and social inclusion sounds great but planning requirements such as section 106's are just a 'must look at' they have no legal standing and there a developer can promise to provide at some time in the future. Can you learn from examples such as Northstowe and the large new developments in St Ives, no facilities, not even a shop. This policy fails to mention sport facilities.	202823 (S Durman)
We must give more consideration to places for people to die peacefully and with as much dignity as possible. You mention that the demographic will include more elderly people but you don't say enough about how their health and death will be supported. Much more consideration needs to be given to the provision of both.	202703 (S Berridge)
Great Wilbraham residents have a huge love for their village, its historic homes and buildings and, crucially, a shared knowledge of the families who have lived in them over the years. This is based on continuity of people and place over hundreds of years and enables rapid integration of newcomers. We believe this ethos exceeds anything in a new development and is very hard to replicate. It should be cherished in all the South Cambridgeshire villages. However, it requires some refreshment or people	203377 (Great Wilbraham PC)

Summary of issues raised in comments	Comments highlighting this issue
and planned, thoughtful small development in the villages, rather than simply preservation of the status quo.	
No plans have been presented to increase doctor surgeries or NHS dentist capacity to match the new housing, putting extra pressure on existing health services. Do you have any plans to amend this and to do the same for further developments that are planned in other locations?	209170 (R Smith)
Great Wilbraham is an inclusive and caring community, in touch with a high proportion of its residents. However, our current facilities (School, Memorial Hall with social activities, Recreation Ground and sports facilities, public house, shop, quarterly magazine etc.) are jeopardised by a dwindling number of volunteers. Old people prefer to stay in the village, and with a policy of highly restricted development there is little refreshing of the population; our village community seems condemned to unmanaged decline. There are also poorer households in Great Wilbraham, but there is no indication through the strategy of how they will be assisted.	203378 (Great Wilbraham PC)
I know 15-minute neighbourhoods are politically toxic, but to meet active travel goals, there should be a requirement that no development will be permitted where reaching a food shop, doctor's surgery, school or community space requires the use of a car for the average adult in any of the houses in the development.	202633 (C Pointon)
Support this policy Point d regarding food growing should be strengthened to actively encourage integration of food bearing landscapes for urban foraging. This will become increasingly important with respect to future climate and	204935 (Mothers CAN Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
food security impacts recently cited in the government paper: Nature security assessment on global biodiversity loss, ecosystem collapse and national security. This policy should also include opportunities for playable landscapes	
In reviewing this chapter of the local plan, the policies stated are too detailed and provide significant overlap with national planning policies. The Plan does not recognise that the additional impact and costs which providing the information required will have on the viability and content of planning applications. Some of this information may be appropriate for a large application but for smaller schemes below 100 dwellings a more considered approach should be taken to the amount of information sought.	203212 (ESCO Prospect)
The Plan does not clarify how CIL/s106 funds will benefit the parishes affected by development, which should be addressed to ensure local communities gain from the expansion.	210455 (P Deer)
Support the plan's overarching objective to protect, enhance and provide new sport opportunities, insisting that any loss of playing field be replaced with equivalent or better quantity, quality, accessibility and management.	209214 (Sport England)
Expect larger developments to provide affordable units for community food enterprises and design space for small walkable food retail, ensuring healthy food is not an afterthought	206965 (Y Dignon)
Welcomes the focus on the creation of "healthy, sustainable and inclusive communities". ECC is keen to inform, shape, support and help refine development strategy and policies delivered by Local Planning Authorities within and adjoining Essex and would expect the Greater Cambridge councils to recognise ECC's role as neighbouring infrastructure and service provider. This is of particular interest to ECC	210463 (Z Smith, Essex County Council)

Summary of issues raised in comments	Comments highlighting this issue
given the potential cross border impacts for ECC and involvement is necessary and beneficial and ECC's statutory roles and responsibilities. Attention is drawn and an example of a relevant facility is at London Stansted Airport and the pioneering training campus - Stansted Airport College (STAC). The college opened in 2018 following an extensive partnership working with ECC, Harlow College and Manchester Airport Group (MAG).	
Consider whether this section should include policy and/or supporting information on Assets of Community Value.	203999 (Cambridge Past Present and Future)
I commend Greater Cambridge for the Draft of the Local Plan which has excellent proposals and detailed intentions that are well communicated. However, in my opinion, there is a huge omission to the plan. That of the provision for attitudinal change towards affordable, sustainable, healthy, local food.	205079 (Y Dignon)
New towns must safeguard land for high-quality municipal swimming pools and leisure centres to meet future demand and reduce car trips.	207999 (Cambridgeshire County Council)
None or little reference of crime, antisocial behaviour, domestic violence, county lines (growing), faith, tourism, those seeking sanctuary, transport, resident voice, integrated neighbourhoods, parish council opportunities. What will the added pressures be to the health support available? Will there be enough school places? enough activities for youth? extra curricular activities to allow parents to work, public toilets - accessibility and dignity? With health, one of the biggest themes is mental health, which links with outcomes for employment, citizenship, family etc.	210534 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
There is nothing that looks at specific provision or use for young people, which could be within either sports and leisure or within cultural hubs where perhaps a aim around supporting new and aspiring artists could be made there is very little in relation to youth or families.	210535 (Cambridgeshire County Council)
Public health welcome that health and wellbeing will be embedded throughout the plan e.g., that new development that creates sustainable, well-designed places which facilitate improving health, wellbeing and social interaction to reduce inequalities, promote inclusivity and support a sense of community will be prioritised. That there will be high quality new homes to meet the needs of all the community, including older people, those with care needs and younger people. That there will be investment in new or improved healthcare, public open spaces, community buildings, and active travel infrastructure making healthier lifestyles achievable. That there will be an extensive network of green infrastructure, green corridors and open spaces to increase the value of the environment for people and wildlife. That there will be realistic alternatives to private car use to encourage walking, cycling, wheeling and use of public transport.	210548 (Cambridgeshire County Council)
Expect larger developments to include space for small, walkable food retailers and affordable units for community food enterprises, so everyday food is readily available.	208195 (Cambridge Sustainable Food)
Our Sewage Plants can't take more bodily fluids as it is struggling currently. It's a major Health Hazard during predictable summer droughts when there's no 'flow' - just smell the drains in the Civic Quarter in July/August. Our streetscapes are dirty, water-less, unhygienic, ugly, bollarded and dangerously	208874 (R Lambert)

Summary of issues raised in comments	Comments highlighting this issue
potholed - it's shameful, it's a 'con' inviting overseas Visitors to see and experience closed public 'conveniences', 'disappointing'.	
For wellbeing and Social Inclusion, interaction with Nature, Soils, Seasons, Countryside is vital; don't fill new Developments with Betting Shops - Screen-Free Community activities should be our aspiration to balance mental health in ongoing CRISES of Climate, Cost of Living directly caused by depressing geopolitics and deliberately-stoked Wars which make millions for some.	208876 (R Lambert)
Cam Skate raise the need for a permanent accessible, high-quality indoor skate space in the city. Cambridge is an active, growing city, which has hugely benefited from the recent addition of The Warehouse indoor skatepark which was first opened in September 2024 on Coldham's Lane. Indoor skateboard facilities are a critical part of social infrastructure. Our community of skatepark users spans children, teenagers, adults, women and girls, neurodivergent people, and beginners who rely on supportive, safe environments to participate safely and confidently year-round. The current lease is a short-term meanwhile use (at the time of writing lease period ends July 2026) and only made possible through the constructive and community supporting outlook from landowners.	210560 (Cam Skate)
We welcome the reference to skateboarding in the Wellbeing and Social Inclusion Topic Paper, but the table sets out a response that references open space policy which lacks a clear reference in regards to indoor skateboarding. Open space policy is not relevant to indoor skatepark provision and should instead be addressed through the Indoor Sports Facility Strategy. A 'restricted access skatepark' would be offering an invaluable social resource for young people in the Cambridgeshire area.	210568 (Cam Skate)

Summary of issues raised in comments	Comments highlighting this issue
National and academic research demonstrates that skateboarding facilities improve wellbeing, reduce antisocial behaviour, and build stronger communities. This could be evidenced in topic papers: - Written evidence submitted to the UK Parliament reports, - Research by Iain Borden shows that skateparks produce clear social, cultural, health, and economic benefits, including significant reductions in antisocial behaviour. - A recent academic study on girls and non-binary young people found that skateparks act as “communities of care”. - Research from the Highlands shows skateparks contribute positively to identity formation, wellbeing, resilience, and community connection, highlighting their importance for youth and community health. These findings show that skateboarding is not simply a recreational hobby—it is a reliable and evidence-backed tool for youth development, public health, and community cohesion.	210569 (Cam Skate)
Cambridge’s success and identity has always been inseparable from its surrounding rural communities and landscape. If Greater Cambridge wishes to protect the city’s character, wellbeing and global reputation, it must also stand up for the rural communities beyond the Green Belt that help give it context, sustain and define it. As such, the Greater Cambridge Local Plan must recognise public access, tranquillity and landscape quality as critical health infrastructure, not optional extras.	209121 (S Hepworth)
Current amenities and services in Great Abington, for example school, Post Office/store, recreation ground, public house, Village Institute etc are inadequate to serve what would eventually be a vastly increased population within easy reach.	207977 (G Brown)

Summary of issues raised in comments	Comments highlighting this issue
Policy SC/1 (Health and Wellbeing) must ensure compliance with the Equality Act 2010, the UN Convention on the Rights of Persons with Disabilities, and NPPF paragraph 8.	211723 (CPRE Cambridgeshire and Peterborough)

Policy WS/HD: Creating healthy new developments

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was general support for the policy. The objections received included duplication with other policies, HIA thresholds, a belief that the policy is not supported by appropriate evidence or viability testing and the omission of equestrian activities, with the suggestion that policy should focus on high-level principles with topic-specific policies and site-specific assessments securing detailed requirements. A number of respondents supported the policy but with concerns regarding threshold levels, a desire to strengthen the policy, and requests for the inclusion of end of life services and facilities, Active Design, health hubs, the Public Rights of Way network, provision of sporting, play, recreational and mental health supporting green and blue spaces in policy wording. It was also requested that policy wording include and emphasize healthy, vibrant and connected communities, onsite and offsite infrastructure provision and increase emphasis on food security with provision of allotments and growing spaces, food hubs

and markets in new neighbourhoods, people first communities anchored in active lifestyle provision and mental health and amenity for existing and new residents. Comments also requested further evidence on harm from gambling and betting, and the inclusion of restrictions on gambling premises in the policy. Some comments questioned the need for elements of the policy, and repetition with other parts of the plan.

Health impact assessments (HIA)

A number of comments included concerns regarding HIA threshold levels and the application of Healthy New Town Principles with more flexibility and proportionality requested. The inclusion of HIA requirements at validation rather than in policy was suggested. Others supported HIAs, considering them to be a useful tool for planning applicants and for the Local Planning Authority to make informed decisions for healthy and safe communities. Additionally, comments requested that HIAs include a requirement to food access and food environment assessment and that older people's housing be explicitly excluded from the HIA requirements and instead the policy should recognise the health benefits that delivering older people's housing can bring to individuals.

Hot food takeaways

Concerns included the need for a hot food takeaway policy and repetition with national policy. A lack of formal identification, definition in glossary or Use Class was raised and the omission of retail or food destination centres from the restrictions. Whilst others support further strengthening of policy wording to prevent community asset loss to hot food takeaways, greater management where outlets are near schools with, for example, opening time restrictions and further clarity needed on threshold distance from

schools was requested as was a ban on advertising for High in Fat, Salt and Sugar foods. Public Health would like to be consulted on any planning applications for HFTs.

Active travel and lifestyles

Reference to active travel was welcomed but there were concerns that the policy should focus on wider forms of active travel, including equestrian activity, and provision to and from developments, and recognise that it is important for physical activity and social connection. A need for seating and toilets to facilitate active lifestyles for all and climate change mitigation measures such as water fountains were also raised. It was requested be more wide-ranging, not only referring to employment areas, that the policy include reference to public transport including requiring the inclusion of a good bus network at an affordable ticket cost and that it recognise that non-motorised user routes to leisure spaces can contribute to healthier lifestyles. Comments noted that the PPS is currently only at Stage C and listed as key supporting evidence.

Other comments

Other concerns include that the policy duplicates principles already covered in other draft policies related to housing, biodiversity, and green spaces.

Response to main issues raised in representations:

Comments on the policy are noted.

The policy seeks to highlight the importance of place in the health and wellbeing of individuals and communities and to outline how Local Plan policies seek to help to create healthy places. It is recognised that clarity is required that the policies listed in part 1 are not standalone policies and amplify rather than duplicate policies elsewhere in the plan. As such, many of the issues raised,

including in respect of active travel, are addressed in policies in other themes such as Great Places and Infrastructure. Evidence behind each element of the policy can be found in the Health and Wellbeing Topic Papers at each stage of the Plan as well as in the Consultation Statement. Including the policy requirements in an overarching policy prevents duplication and ensures consistency.

The Health Impact Assessment Supplementary Planning Document was consulted on in November 2024 to January 2025 and adopted in April 2025, this confirmed the thresholds for HIAs in Greater Cambridge. It is considered appropriate that the Plan requires their application across Greater Cambridge. The SPD HIA checklist includes a number of areas raised by respondents including Access to Healthy Food and older people as a protected group. The HIA process ensures that impacts on all groups are considered in the HIA process including residents, workers and visitors. It is expected that the application of Healthy New Town Principles will be proportionate to the nature of the site.

Recognising the remit and the tools and resources available to the local planning authority, with respect to the policy element on hot food takeaways and fast food outlets, the policy seeks to implement national policy and manage harmful concentrations in retail areas, at the same time responding to concerns around food poverty and the provision of healthy alternatives. The need for clarity in the policy requirements is acknowledged and a number of changes seek to address the issues raised. The policy element preventing community asset loss to hot food takeaways has also been strengthened.

Representations requested that control of gambling premises be included in the policy. As set out in the Wellbeing and Social Inclusion Topic Paper, evidence indicates that the demographic make-up of Greater Cambridge is such that that the risk of problem gambling is high. A new policy requirement has therefore been introduced risking harmful concentrations.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support selected	202090 (J Flynn, Great Shelford Village Charity), 202482 (M Parsons, University of Cambridge), 203028 (K Porrer, Cambridge City Council Liberal Democrat Group), 204571 (H Bennett, Max Fordham), 203142 (P Tribble), 203886 (T Burgoine), 204935 (H Tardrew, Mothers CAN Cambridge)
Object selected	204595 (Redrow South Midlands), 204847 (Hill), 203589 and 208658 (L Warth, British Horse Society)

Summary of issues raised in comments	Comments highlighting this issue
The Policy is supported subject to the thresholds at which different complexities of statements is retained.	203215 (ESCO Prospect)
Support the policy which sets out how place and space have a significant impact on health and wellbeing.	202482 (M Parsons, University of Cambridge)
I would like to have more walking routes - for me and for my child, maybe something more interesting than ordinary sidewalks - with paintings on the pavement, or some stories on the side. Maybe some sand	201034 (E Mitenko)
A stronger policy is needed to ensure that new properties are designed to enhance mental health and amenity of existing and future residents, particularly in higher density locations.	201386 (Gamlingay PC)
Broadly support but with the following caveats: • It does not consider the growing demand for end-of-life care services and facilities (e.g. hospices) that will sit alongside an expanding population. Providing for more and better end-of-life care is critical to overall quality of life. Recent pushback on a proposed reduction in bed capacity at Arthur Rank Hospice is testament to local strength of feeling on this matter and is one illustration of the local impact of a lack of joined up planning between health and social care. • Clause 1c of the policy should be expanded to read, “Providing, protecting and enhancing accessibility to green and blue open spaces FOR SPORTING, RECREATIONAL AND MENTAL HEALTH PURPOSES (Biodiversity and Green Spaces).” The benefits of access to green and open spaces are noted in supporting para 6.8 but should also be explicit in the policy’s wording.	201615 (Stapleford PC), 208101 (N Webster, Great Shelford PC)

Summary of issues raised in comments	Comments highlighting this issue
Recommend revising the stated aim of the policy to emphasize healthy and vibrant communities, not just individual healthy lifestyles. Point 1 should explicitly support compact, well-connected neighbourhoods to enhance sustainability and social interaction. Suggest: • Adding a new clause 1.j to ensure that homes are integrated with accessible local employment and services where appropriate. • Amending point 2 to place a clearer responsibility on developers to contribute to health strategies and • Strengthening point 7 to protect essential community assets from being lost to hot food takeaways.	203699 (R Comins, Cambridge Green Party)
it is questionable whether the hot food takeaways section is required as there is clear and unambiguous advice provided in the current and draft NPPF. It is unnecessary repetition of national policy	203215 (ESCO Prospect)
Strongly welcomes management of hot food takeaways near schools. Greater neighbourhood exposure to takeaways is linked to poor diet and health. Research has also demonstrated that managing takeaways near schools can reduce proliferation and achieve long-term positive population health impacts at no local economic cost. However: • The council will need to defend their regulation of “fast-food” outlets, which lack formal definition. • Evidence shows that exempting designated centres from regulation will substantially diminish potential health benefits. Other (more) profitable retail uses do exist. • Clarity on whether 400m is from the school boundary or otherwise, would aid implementation.	203886 (T Burgoine)

Summary of issues raised in comments	Comments highlighting this issue
Part 6 of the policy refers to a concentration of hot food takeaways and fast food outlets. Fast food outlets are not defined in the glossary nor in the Use Classes Order. Applying this to a food retail destination may not be appropriate given the nature of the use and destination.	204898 (A Brand, Abbey Properties Limited)
The control of fast-food takeaways - this does not match recent planning of 'retail parks' which have primary been fast-food takeaways, the one in St Ives is a prime example.	207435 (S Durman)
Supports the principle of new developments promoting healthy lifestyles but Part 1 of Policy WS/HD duplicates principles already covered in other draft policies related to housing, biodiversity, and green spaces. It is suggested that Policy WS/HD should explicitly reference the relevant existing policies to avoid redundancy and unnecessary wording or it paragraph 1 should be deleted.	204363 (Cambridge Investment Partnership), 204847 (Hill)
Supports the requirement for Health Impact Assessments (HIAs) for major developments as stated in Part 2 but requests an increase in the threshold for full HIAs from 100 to 500 dwellings. A proposal is made for a rapid HIA for developments of 200-500 dwellings, while no HIA should be required for schemes of 200 or fewer dwellings.	204363 (Cambridge Investment Partnership), 204847 (Hill)
The requirement for a full Health Impact Assessment at 100+ dwellings further adds technical cost and complexity for a mid sized scheme, despite the Topic Paper not providing evidence that such developments generate impacts warranting this level of assessment. Without clearer thresholds, proportionality tests, or a mechanism to rationalise overlapping requirements from related policies (open space, GI, active travel, climate adaptation), WS/HD risks imposing unrealistic expectations on smaller residential sites. The policy should therefore be amended to provide size based flexibility, proportionate	204595 (Redrow South Midlands)

Summary of issues raised in comments	Comments highlighting this issue
HIA requirements, and clear alignment with the Topic Paper's intent, ensuring that non strategic developments are not held to standards only deliverable in strategic growth locations.	
Supports a policy that supports healthy lives and the requirement for health impact assessments to focus on major developments with the potential for significant health impact. There is an established connection between planning and health and the planning system has an important role in creating healthy communities. The planning system is essential for improving health services and infrastructure to meet evolving healthcare needs and addressing wider determinants of health. Health impact assessments are considered to be a useful tool for planning applicants and the Local Planning Authority to make informed decisions for healthy and safe communities.	205125 (NHS Cambridgeshire and Peterborough Integrated Care Board)
Cambridge, like much of the UK, is heading towards a food security crisis. Local and organic food production needs greater emphasis in the Local Plan.	205658 (F Samuel)
Point d regarding food growing should be strengthened to actively encourage integration of food bearing landscapes for urban foraging. This will become increasingly important with respect to future climate and food security impacts recently cited in the government paper: Nature security assessment on global biodiversity loss, ecosystem collapse and national security.	204571 (H Bennett, Max Fordham), 204935 (H Tardrew, Mothers CAN Cambridge)
This policy should include opportunities for playable landscapes	204571 (H Bennett, Max Fordham)
Shisha lounges, including in restaurants, should be restricted. A clear policy would help enforcement on the unauthorised change of use to Sui Generis: shisha lounge.	201713 (K Mak)

Summary of issues raised in comments	Comments highlighting this issue
Mentally healthy communities are connected communities, those where social iterations are possible, easy and part of everyday life. How traversal a community is a big part of this. Residents traveling door to door inside private motor vehicles do not have incidental opportunity to connect with their neighbours. A community where it is easy, safe and convenient to walk and cycle has these connections. This policy should include need for people first design within the development.	201823 (T McKeown)
The policy should: prioritise local recreation and wellbeing spaces within/adjacent to Girton; ensure health infrastructure is village-scale, not only district-scale as village-scale provision improves mental health, reduces loneliness, and encourages safe activity; and anchor healthy development criteria to Active Travel connections and accessible community facilities. Health outcomes depend on safe cycling/walking routes, the Pavilion upgrade, and green space protection.	202224 (Y Murray, Girton Parish
Support the requirement for development to facilitate, encourage and to prioritise walking, wheeling and cycling and promote accessibility for all. Request that it go further and incorporate such provision for access to sustainable travel to and from the development, not just active travel within the development.	203142 (P Tribble)
Support the intent of Policy WS/HD, but objections to the policy include: • The policy's (and plan's) focus on walking and cycling as the primary forms of active travel is overly narrow and risks excluding other legitimate users. It is inconsistent with national transport and health evidence, which recognises horse riding as a physically active mode of travel that delivers significant physical and mental health benefits. • Public rights of way, including bridleways, are established health and wellbeing assets and provide inclusive opportunities for physical activity and social connection.	203589 and 208658 (L Warth, British Horse Society)

Summary of issues raised in comments	Comments highlighting this issue
• The majority of riders are women, often in age groups with traditionally lower rates of physical exercise, meaning improved equestrian access supports wider health equity. The omission of equestrian access creates an imbalance that is inconsistent with inclusive and equitable placemaking. Request that the policy: • Explicitly include equestrian activity within the definition of active travel, unless there is an exceptional justified reason for exclusion. • Recognise the contribution of equestrian access to physical activity, mental wellbeing, and social inclusion by improving accessibility for diverse demographic groups, including women and older adults. • Apply design criteria that allow safe horse movement alongside other users. • Signage and wayfinding must be clear for multiple user groups.	
Rural active travel routes and PROWs should be bridleway to include equestrians.	203980 (S Rogers)
Support the policy but would like evidence to be gathered around gambling and betting harm and restrictions on outlets to be added into the policy to avoid large concentrations in one area.	203028 (K Porrer, Cambridge City Council Liberal Democrat Group)
The Local Plan should recognise that a good bus network with affordable tickets is vital to make Greater Cambridge a place where everyone can thrive, including people who can't drive, disabled people and people with low disposable incomes. A good bus network ensures everyone can access education, employment, key services, large shops (cheaper supermarket as opposed to expensive village shop),	203107 (S Hughes)

Summary of issues raised in comments	Comments highlighting this issue
social networks and sports/leisure activities. It is particularly important for young people. Bus travel is therefore a vital tool to boost health, wellbeing and social inclusion.	
Support the objectives of the policy and the Council's proposed approach to creating healthy new developments. The site at Balsham Road, Linton will meet daily needs within walking distance to the services and facilities in Linton, encouraging active travel. This would reduce reliance on the private car, promote social interaction and contribute positively to both environmental quality and residents' physical and mental health. The proposed development would make a positive contribution to nature and deliver long-term health and wellbeing benefits for future residents.	204857 (S Boyd, Vistry Group)
Land north of Barton Road and at Grange Farm supports the aims of Policy WS/HD by including a local centre with potential healthcare services, extensive green space and recreation areas, and strong walking and cycling links to nearby sustainable transport routes	205185 (North Barton Road Landowners Group)
Supports policy WS/HD and recommends explicit reference to Active Design within it.	210846 (C Howe, Sport England)
Strong support for the direction of travel of the healthy place-making approach and the requirement for new development to provide access to healthy food through allotments and community growing spaces.	208185 (S Dyer, Cambridge Sustainable Food), 206955 (Y Dignon)
Welcome the policy intent to manage the local food environment, including controls on hot-food takeaways and fast-food outlets to protect children's health.	208186 (S Dyer, Cambridge Sustainable Food), 206956 (Y Dignon)

Summary of issues raised in comments	Comments highlighting this issue
Recommend tightening delivery by requiring food access as part of Health Impact Assessments: Where HIAs are required, include a simple “food environment” assessment: walkable access to affordable healthy food; quality of the local food offer; and measures to avoid concentrating unhealthy uses. (This builds directly on the Plan’s approach to health and takeaways.)	208191 (S Dyer, Cambridge Sustainable Food), 206961 (Y Dignon)
The plan should require space for community food assets in new neighbourhoods to support delivery of community-scale assets that make healthy food practical and affordable: neighbourhood food hubs, community kitchens, food co-ops/social supermarkets, and periodic markets (especially in larger allocations and growth areas). This aligns with the Plan’s stated intent to enable access to local services and support social enterprise.	208192 (S Dyer, Cambridge Sustainable Food), 206962 (Y Dignon)
Section 1e of this policy discusses how new developments should facilitate walking, wheeling and cycling and promote accessibility for all, but does not mention public transport. A new subsection should be added below 1e: Ensuring that developments provide easy access to bus stops, mobility hubs or railway stations for easy onward travel across the wider area.	203237 (R Wood, Cambridge area Bus Users)
To what extent is health provision considered in the Local Plan. Cambridge planning dept and Addenbrooke’s are commissioning a joint study about how planning can help to deliver a new model of healthcare (hub model).	205784 (Rustat road Neighbourhood Association)
Propose following text addition to policy 1.a: The design of new developments should include appropriate and sufficient seating spaces in open spaces, play areas, and footpaths alongside the development as well as ensuring there are public toilet facilities spread across the development.	208053 (J Turner, Northstowe TC)

Summary of issues raised in comments	Comments highlighting this issue
Propose following text addition to policy 1.g: The design of open spaces of new developments should encompass climate change mitigation measures at early phases of development where tree canopy has not yet developed sufficiently to provide shelter. Open spaces should include public drinking water fountains to facilitate healthy habits across the entire population, including those most at risk of being affected by dehydration in heat waves such as older and younger population.	208054 (J Turner, Northstowe TC)
Note that there is a common misconception that older person's housing places an additional burden on healthcare infrastructure and therefore rather than requiring applicants of older person's schemes to show that there is capacity in healthcare systems and to show that the scheme will not have a health impact, the policy should instead recognise the health benefits that delivering older people's housing can bring to individuals. For the plan to be in line with national policy and effective the following wording should be added the policy to recognise the health benefits of older persons housing: "Specialist Housing for older people has a number of health benefits and proposals for such schemes will not be required to submit a Health Impact Assessment".	208317 (Churchill Retirement Living with McCarthy and Stone)
This policy requires a Health Impact Assessment (HIA) to be prepared for development proposals for between 20 to 100 dwellings. This seems particularly onerous for smaller sites, and we suggest that a higher dwelling threshold, such as 50 dwellings and above would be more appropriate.	208357 (T Elbourn)
Object to Policy WS/HD because it is overly broad, prescriptive and insufficiently justified, placing significant and sometimes unrealistic burdens on developments of all scales. In its present form, the policy risks duplication with other parts of the Plan, lacks proportionality, and has not been supported by	208991 (L Robinson, Barratt Homes Northampton)

Summary of issues raised in comments	Comments highlighting this issue
appropriate evidence or viability testing. The policy should focus on high-level principles that support healthy placemaking, while relying on topic-specific policies and site-specific assessments to secure detailed requirements. Proportionality must be embedded through clear thresholds and flexibility for non-strategic sites. The HIA requirements need to be revised to only apply to major strategic developments, with rapid assessments or no assessment required for smaller schemes. The policies expectations must be tested through whole-plan viability analysis before the next iteration of the Plan.	
Policy would benefit from greater flexibility in its application to reflect local circumstances. In particular, it is suggested that the policy more clearly recognises that health principles should be applied to new development ‘wherever possible’ and ‘as appropriate’, drawing on the ten principles of creating healthy places from the Healthy New Towns programme or any future equivalent. This would ensure the policy remains proportionate and adaptable across a range of site types and scales.	210245 (Vistry Group)
Policy lacks clarity regarding the requirement for Health Impact Assessments (HIA). Where the Councils intend to undertake a plan wide HIA, it is considered unnecessary for development proposals that accord with the Local Plan to be required to submit a separate HIA, as such proposals should already be addressing the health outcomes identified through the plan-making process. Requiring additional HIAs at the application stage in these circumstances risks unnecessary duplication. If the Councils consider that HIAs should be required for individual development proposals, Vistry and The Quy Estate suggest that this is more appropriately addressed through application validation requirements rather than embedded within policy.	210246 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
Public Health are supportive of Policy WS/HD that HIAs should form an integral part of preparing a development proposal and undertaken early to inform the proposed design and layout. Topics that could form the HIA and that can affect the health and wellbeing of different groups within a community. PH acknowledge that an HIA needs to be proportionate to the development proposed.	210551 (C Fitzsimons, Cambridgeshire County Council)
Public health fully support the inclusion of 'Hot Food Takeaways'. However, public health is disappointed that it is implied that hot food takeaways will be supported in Greater Cambridge's designated centres irrespective of its distance from a primary or secondary school, further education college or youth centre, as there is evidence that promoting unhealthy eating habits, particularly high-fat, high-sugar and high-salt diets contribute to childhood obesity and poor oral health. They can lead to increased consumption of fast food over healthier school meals and a rise in health inequalities. Public Health would like to be consulted on any planning applications for HFTs as we would like to see restrictions on opening hours to reduce the accessibility to school children at the end of the school day which could be achieved by the imposition of planning conditions.	210552 (C Fitzsimons, Cambridgeshire County Council)
Public health recommends that Gambling is also included within this policy. Gambling presents significant public health issues, causing individual, family, and societal harm, including debt, mental health crises (anxiety, depression, suicide), relationship breakdown, substance misuse, and crime.	210553 (C Fitzsimons, Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
Public health recommends that advertising for High in Fat, Salt and Sugar (HFSS) is also included within this policy. This has been done by other councils. HFSS are a major public health issue because their excessive consumption drives obesity, type 2 diabetes, heart disease, and certain cancers, leading to increased mortality and burden on health systems; they are heavily marketed, especially to children, influencing poor diets, and their affordability/ promotions encourage overconsumption creating a cycle of poor health and growing non-communicable disease rates.	210554 (C Fitzsimons, Cambridgeshire County Council)
Paragraph 1.h. - Ensuring employment areas have the facilities for active travel (Jobs) - why is this for employment areas only? Suggest the following amendment: Ensure that developments are designed to encourage healthy lifestyles with high quality active travel routes which, for employment areas, connect to nearby population centres and for residential developments connect to key destinations.	210584 (C Fitzsimons, Cambridgeshire County Council)
The facilities to promote non-motorised access for all should seek to provide connectivity to the PROW network. To increase accessibility any existing barriers to access such as stiles or gates should be removed wherever possible.	210619 (C Fitzsimons, Cambridgeshire County Council)
Active travel facilities should be designed to link to networks beyond the development.	210620 (C Fitzsimons, Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
Support providing and enhancing accessibility to green and blue spaces, but the policy could recognise that non-motorised user routes to leisure spaces can contribute to healthier lifestyles.	210624 (C Fitzsimons, Cambridgeshire County Council)
The policy could support the establishment of PROW to enable and encourage users to connect to the wider PROW network, which can provide much greater opportunities for exercise than that available within one single development.	210625 (C Fitzsimons, Cambridgeshire County Council)
is welcome that Policy WS/HD 1.e and Policy GP/PP 1.b.ii. contain important principles for active travel.	210633 (B Serin, Transport 2000 Cambs & West Suffolk)
The aspirations of Policy WS/HD are supported in principle in accordance with the provisions of Chapter 8 of the Framework. However, Part b of the draft Policy text requires new developments to deliver community and health facilities to meet the needs generated by the development. Whilst it is recognised that it is essential that development is supported by the requisite infrastructure, it is recommended that the policy text is amended to identify that this infrastructure could be secured through on-site provision or by financial contribution towards off-site provision. It is considered that the reference at Part f of the Policy towards ensuring that developments are designed to mitigate the impact climate change is removed, given that the Draft Plan already contains extensive policies relating to climate change and the mitigation measures that are required of development.	211286 (Woolsington One Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Support the principle of addressing health impacts through development. However, a threshold of 20 dwellings is unusually low and risks being disproportionate, particularly on small or medium sized sites where impacts can be addressed through standard planning tools and contributions. We recommend raising the threshold to align with national practice (for example 200 units) or alternatively apply HIAs only where a screening assessment identifies specific health impacts that require further work. A higher site threshold of circa 200 units is much more likely to make the policy sound. Where sites allocated for development are consistent with the policies in the local plan the council should be clear that an HIA is not required.	208970 (T Vincent, Persimmon Homes East Midlands)

Policy WS/NC: Meeting the needs of new and growing Communities

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Policy was broadly supported by both individuals and organisations including Anglian Water Services Ltd

Comments made by Stapleford PC broadly supported the policy, only that it omitted to mention palliative or hospice care. Great Shelford Village Charity cited their uncertainty about the applicability of the policy to their charitable almshouse association and suggests it could deter future expansion of almshouse units. Other individual comments made included: ensure infrastructure is provided with new housing; the need for community 'muster' points which a community recognises as a gathering point in emergencies.

Comments were made by many individuals and organisations recommending amendments to the policy: placing clearer responsibility on developments to fully mitigate impacts and maximise contributions to local facilities; requiring assessments to consider capacity, quality and accessibility alongside other planned developments, and to ensure infrastructure was delivered when it is needed.

Cambridge Investment Partnership (CIP) requested the merger of the policy's paragraphs 3 & 5 for clarification purposes. CIP should also suggested paragraph 5 be better aligned with other draft policies to ensure feasibility in meeting housing and infrastructure requirements.

Girton PC requested the Local Plan require school–parish shared-use agreements in new development proposals, support land identification for youth, sport, community space, and active recreation and embed localised service-provision expectations for Minor Rural Centres like Girton.

Comments made by Pioneer Group recommended the Council should follow the model as set out in emerging national decision-making policy HC3 to ensure ongoing consistency. Comments made by Redrow South Midlands and Railpen questioned the soundness of the policy requirements, imposing disproportionate and duplicative obligations on development. The requirement for developments of 200+ dwellings to conduct detailed community needs assessments is not supported by robust evidence or clear thresholds. The requirement for 129m² of indoor community space per 1,000 population lacks sufficient evidence and imposes a rigid quantitative standard that may not reflect local needs, it may also threaten the viability of development schemes. The policy's lack of clarity regarding on-site provision and its interaction with planning obligations and the Community Infrastructure Levy may lead to a cumulative financial burden on developers.

Comments made by the Homes Builders Federation also requested clarification for the assessments of community needs, these should focus on additional needs created by the development, rather than addressing existing shortfalls in the area. While Vistry Group supported the overall aspirations of the policy and suggested minor clarifications regarding the requirements in paragraph 4, specifically whether assessments of community needs should be included in existing documents or if they represent a separate requirement. They suggested the need for flexibility in the application of the requirement for on-site facilities, advocating for consideration of site-specific circumstances, viability, and the capacity of existing or planned off-site facilities; in certain situations, off-site provision or financial contributions may be a more effective and sustainable way to meet community needs, especially when

developments are well integrated with existing settlements. Bellway Strategic Land echoed these concerns. Woolsington One Ltd considered the policy unnecessary as is duplicated other policies.

NHS Cambridgeshire and Peterborough Integrated Care Board suggested referencing the emerging Planning Obligations SPD in policy/supporting paragraphs to ensure consistency in securing developer contributions for health infrastructure.

Other comments included the need for a modern health centre in Cottenham, the policy made no allowance for farming, equestrians, country sports and heritage. Provision should be made for public transport and active travel access.

Comments were made by many individuals and organisations supporting Cambridge Junction's and Create Cambridge's request that: cultural infrastructure's ongoing revenue and organisational capacity needs are recognised, not just physical buildings; culture is embedded in cross-cutting outcomes (innovation, health, education, community resilience); partnership frameworks between councils, cultural organisations and communities are referenced as delivery mechanisms.

Response to main issues raised in representations:

Policy WS/ND has been written in accordance with the current NPPF and informed by a number of studies including the Community Infrastructure Study and Cultural Infrastructure Strategy which will also inform the Infrastructure Delivery Plan to support the Local Plan. These studies recommend Community and Cultural Plans be developed, respectively to inform the type of infrastructure that should be provided and whether this should be on site or off site, or a combination of both. This will provide a flexible approach that takes into account local considerations and opportunities nearby to maximise investment in these facilities

and make the best use of development land. The policy has been amended to clarify how indoor and outdoor community and cultural facilities should be provided and secured.

The provision and location of healthcare facilities should aim to meet the need of existing and new residents, which may include the need for community-based, out-of-hospital facilities. The Local Planning Authorities have engaged with the relevant health organisations in developing the Infrastructure Delivery Plan that accompanies this Local Plan. Developers of large-scale sites and new communities will also need to engage with health providers to understand and respond to healthcare needs.

Policy WS/CH: Cultural and Creative Hubs, paragraph 2(l) includes a clause requiring new creative or cultural hubs to have a Management Strategy to ensure it will be viable in the long-term. This should outline, as a minimum, its long-term vision, objectives, market sector within the wider cultural or creative market, and financial resourcing. Where policy WS/NC: Meeting the needs of new and growing communities requires the provision of cultural infrastructure, Cultural Plans will need to be submitted as part of the planning submission process. These will need to demonstrate a robust, evidence-led and locally responsive approach to their provision and long-term viability. These plans will be secured through Section 106 agreements.

Policy WS/NC: Meeting the needs of new and growing Communities had also been amended to include the provision of leisure routes. These would be suitable for people of all ages and abilities and for a variety of uses, to allow them to exercise outdoors and access nature and the wider countryside. On or off-site contributions towards improved leisure routes would include supporting Public Rights of Way or providing leisure routes.

Some comments challenge the approach to requiring assessments to accompany development proposals of over 200 dwellings or 5000sqm of employment. Whilst the Councils have explored needs through topic studies and the Infrastructure Delivery plan, it is important that community needs are explored at the site specific level when detailed schemes come forward, including engaging with local communities. This ensures delivery is based on the most up to date information. It will also be particularly important for windfall proposals.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Please learn from Northstowe! There is nothing except houses and temporary infrastructure. The community has had to organise food swap, community pantry and other local amenities for the residents. Infrastructure (school, healthcare, shops, pub) needs to be built at the same time as the houses. Bar Hill benefited from having all these things in place before the village was expanded	201040 (P Spowart)
The respondent expresses broad support for the policy but highlights the absence of consideration for the increasing demand for end-of-life care services, such as hospices, due to population growth in Greater Cambridge. The respondent emphasises the importance of providing adequate end-of-life care as essential for overall quality of life and believes it should be explicitly included in the draft Local Plan. The recent community pushback regarding proposed bed capacity reductions at Arthur Rank Hospice illustrates local concerns about the lack of integrated planning between health and social care. The respondent notes that while para 6.25 of the supporting text to Policy WS/NC lists necessary facilities for new communities, it fails to mention palliative or hospice care, despite including provisions	201616 (Stapleford PC)

Summary of issues raised in comments	Comments highlighting this issue
for burials. Para 6.33 discusses healthcare facilities but also omits any reference to end-of-life care, indicating a gap in the planning policy	
Anglian Water is supportive of the policy approach which enables onsite delivery of services and facilities in new communities. This provides flexibility and offers different options and pathways for delivering key infrastructure that may better align with the pace of development and viability - depending on the specific circumstances and challenges the new community might present. We agree that such provision should be determined in consultation with the service providers and, where necessary, relevant regulators.	210209 (Anglian Water Services Ltd)
The respondent expresses uncertainty about the applicability of the policy to their charitable almshouse association and suggests it could deter future expansion of almshouse units. The respondent highlights the lack of provisions for housing provided by charities in the draft Local Plan, arguing that almshouse charities should be treated differently from developers. The respondent notes that almshouse charities serve financially disadvantaged individuals of all ages, contributing significantly to affordable housing numbers. The respondent emphasises the importance of maintaining charity properties for those in need and asserts that these houses will not be subject to right to buy or otherwise cease to be available. The respondent argues that planning obligations or CIL contributions could misuse charitable funds, benefiting individuals not entitled to those funds. Debates and disputes about such obligations/contributions might require expert input and consequent unnecessary use of charity funds.	202094 (Great Shelford Village Charity)

Summary of issues raised in comments	Comments highlighting this issue
The respondent requests that charities be exempt from the same demands placed on commercial developers.	
I support the weight being given to prioritizing the health and activity of communities and contribution to community centres where developments are large enough. I would like to suggest smaller housing developments, or existing street communities, include or identify 'muster' points which a community recognises as a gathering point in emergencies and would include a noticeboard for information, perhaps also a bench. This is a resilient back-up to Street WhatsApp groups and more inclusive, allowing the potential for face to face interaction	202367 (J Hobohm)
I support Create Cambridge in asking that: • cultural infrastructure's ongoing revenue and organisational capacity needs are recognised, not just physical buildings • culture is embedded in cross-cutting outcomes (innovation, health, education, community resilience) • partnership frameworks between councils, cultural organisations and communities are referenced as delivery mechanisms • This aligns community infrastructure with lived cultural use.	202394 (Kettle's Yard), 202681 (T Altmann), 202711 (W Townsend), 202776 (S Lee), 202860 (Cambridge Junction), 202922 (R Tarry), 202979 (T Flinders), 203012 (The Arts Theatre Cambridge), 203846 (Naz Yeni), 203864 University of Cambridge) 204906 (Wysing Arts Centre), 205106 (J

Summary of issues raised in comments	Comments highlighting this issue
	Walsh), 204668, 204665 (NEUBAU Architecture), 202288 (Cambridge Junction), 202381 (J Webber), 202393 (T Shaw), 202011 (H Chamberlain)
We recommend strengthening this policy by placing clearer responsibility on developments to fully mitigate impacts and maximise contributions to local facilities, to reduce the risk of cumulative strain from multiple schemes. We also recommend improving clarity and consistency in wording, requiring assessments to consider capacity, quality and accessibility alongside other planned developments, and correcting minor drafting errors. Finally, we call for clearer explanations of different facility types within the local plan itself, to improve transparency, accessibility and effective community infrastructure planning.	203700 (Cambridge Green Party), 205284 (N Oakley), 205306 (L Howse), 203620 (University of Cambridge, Z Svednsen), 204814 (L Matthews), 204154 (Cambridge Junction/Create Cambridge)
Policy WS/NC aims to ensure new development contributes to services and facilities for growing communities, including education, health, sports, libraries, and community uses. The made Fulbourn Neighbourhood Plan identifies aspirations for additional open space and health provision. Hill promotes Site Ref. 40271 in Fulbourn for housing and supports enhancing local facilities. The site could provide land for extending the recreation ground or allotments and make financial contributions if allocated. As	203903 (Hill Residential, (Fulbourn site))

Summary of issues raised in comments	Comments highlighting this issue
no sites are allocated in Fulbourn, it is unclear how these needs will be met. Directing growth to sustainable villages such as Fulbourn would help deliver required services. No changes to the policy are requested.	
It should be noted that there are no additional allocations identified in the draft GCLP for Sawston that could make financial contributions or provide land for new or additional services and facilities.	203956 (Hill Residential (Sawston site))
The respondent supports Policy WS/NC in principle but finds the wording regarding the delivery of on-site facilities vague, particularly the threshold for 'Developments of sufficient scale' which should be clearly defined. There is a request to merge Parts 3 and 5 of Policy WS/NC to avoid overlap and enhance conciseness. The requirement for on-site indoor community facilities under Part 5 is seen as restrictive against other policies, potentially impacting density uplift and housing numbers, as well as site viability for affordable housing and infrastructure delivery. The respondent requests that Part 5 of Policy WS/NC be better aligned with other draft GCLP policies to ensure feasibility in meeting housing and infrastructure requirements.	204371 (Cambridge Investment Partnership)
Objects, he principles of Policy WS/NC for delivering community facilities, emphasising their importance for community cohesion. The wording in paras 3 and 5 regarding on-site facility delivery is vague and requests a clear definition of 'Developments of sufficient scale' and a combination of overlapping requirements. Concerns are raised about the lack of clarity in para 4 regarding the geographic area for	204865 (Hill)

Summary of issues raised in comments	Comments highlighting this issue
assessing cumulative impacts of smaller developments, suggesting that the requirement for such assessments be deleted. The respondent argues that the requirement for on-site indoor community facilities in para 5 may restrict housing density and site viability, impacting affordable housing delivery. There is a call for better alignment of para 5 with other draft GCLP policies to ensure deliverability of community facility provisions. The respondent stresses that smaller sites should not be obligated to provide facilities beyond their own demand and that requirements should not delay site delivery. Clarification is requested regarding the adoption and funding of the long-term operation of on-site community facilities. The respondent suggests including wording to allow for improvements to existing facilities in lieu of new on-site delivery when more efficient.	
To meet active travel goals, there should be a requirement that no development will be permitted where reaching a food shop, doctor's surgery, school or community space requires the use of a car for the average adult in any of the houses in the development.	204750 (M Cleminson)
Objects, the policy is deemed unsound due to insufficient justification from the Wellbeing and Social Inclusion Topic Paper (2025), imposing disproportionate and duplicative obligations on development. The requirement for developments of 200+ dwellings to conduct detailed community needs assessments is not supported by robust evidence or clear thresholds.	204589 (Redrow South Midlands)

Summary of issues raised in comments	Comments highlighting this issue
The policy's 'one size fits all' approach contradicts the Topic Paper's recommendation for flexible, place-based strategies, risking unnecessary costs and delays. The presumption that larger sites must provide new on-site facilities does not align with the Topic Paper's view that enhancing existing facilities is often more effective. The requirement for 129m² of indoor community space per 1,000 population lacks sufficient evidence and imposes a rigid quantitative standard that may not reflect local needs. The cumulative impacts of the policy have not been viability tested, raising concerns given the existing obligations on development in the emerging Plan. The policy fails to meet the tests of being justified, effective, and deliverable, and should be revised to ensure flexibility and comprehensive viability testing	
Vistry supports the overall aspirations of the policy but suggests minor clarifications regarding the requirements in paragraph 4, specifically whether assessments of community needs should be included in existing documents or if they represent a separate requirement. Vistry suggest the need for flexibility in the application of the requirement for on-site facilities, advocating for consideration of site-specific circumstances, viability, and the capacity of existing or planned off-site facilities. Vistry believes that in certain situations, off-site provision or financial contributions may be a more effective and sustainable way to meet community needs, especially when developments are well integrated with existing settlements.	204861 (Vistry Group)
Other than Part 4 the policy appears to apply to all new development as opposed to just major housing developments. This should be refined.	204903 (Abbey Properties Cambridgeshire Limited)

Summary of issues raised in comments	Comments highlighting this issue
Draft Policy WS/NC outlines requirements for new facilities, mandating on-site delivery for larger developments unless off-site benefits are proven. The respondent supports the need for consultation with service providers to ensure appropriate facility provision. The inclusion of a section for healthcare facilities is welcomed, emphasising the need to meet local health service requirements. Flexibility for healthcare providers in determining mitigation is advocated, with encouragement for ongoing engagement with relevant health bodies at the earliest stages and throughout the planning process. The respondent suggests referencing the emerging Planning Obligations SPD in policy/supporting paragraphs to ensure consistency in securing developer contributions for health infrastructure	205133 (NHS Cambridgeshire and Peterborough Integrated Care Board)
The North Barton Road Landowners Group—including University of Cambridge, Corpus Christi College, Cambridge, Downing College, Cambridge, Jesus College, Cambridge, and St John's College, Cambridge—has promoted land north of Barton Road and at Grange Farm for a landscape-led urban extension known as South West Cambridge. Draft GCLP Policy WS/NC seeks to ensure development delivers services and facilities such as education, health, community, and sports provision. The promoted development would provide a primary school, community centre, health services, local centre, and outdoor sports facilities to serve new and existing communities. No changes to the policy are requested.	205190 (North Barton Road Landowners Group)
The healthcare needs of growing communities, such as Cottenham, must be addressed as local primary healthcare provision is insufficient due to increased population from speculative development.	205270 (E Wilson)

Summary of issues raised in comments	Comments highlighting this issue
Existing GP practices are overwhelmed, leading to difficulties in obtaining appointments, which causes frustration for patients and may result in them giving up on seeking care. There is a need for a modern health centre in Cottenham that is fit for purpose to adequately serve the community's healthcare requirements. Failure to improve healthcare facilities may lead to increased demand on all levels of health services due to neglected healthcare needs.	
Objects, the council's definition of the area for assessing the impact of smaller developments is unclear, and the practicality of requiring the first development to assess impacts before others is questioned. It is recommended that the requirement for smaller groups of sites to assess community needs be removed due to impracticality and potential conflicts with planning obligations outlined in paragraph 58 of the NPPF. The policy should clarify that assessments of community needs should focus on additional needs created by the development, rather than addressing existing shortfalls in the area. The current wording suggests a broader assessment of community needs, which may lead to the requirement of infrastructure not directly related to the development, necessitating clearer policy language.	205319 (Homes Builders Federation)
I support Cambridge Junction and Create Cambridge in asking that: • Cultural infrastructure's ongoing revenue and organisational capacity needs are recognised, not just physical buildings • culture is embedded in cross-cutting outcomes (innovation, health, education, community resilience)	205334 (A Sieglow), 205367, 202749, 202806 (Cambridge Junction/Create Cambridge, 205273 (AC de Azevedo Lamha), 205022 (University

Summary of issues raised in comments	Comments highlighting this issue
• partnership frameworks between councils, cultural organisations and communities are referenced as delivery mechanisms. This aligns community infrastructure with lived cultural use	of Cambridge), 205035 (H Paterson), 204688 (A Giarlis), 203502 (D Lever), 203491 (L Heap), 203426 (S Ashworth), 203321 (N Ellis), 202456 (K Jones),
NIE strongly support Cambridge Junction and Create Cambridge in asking that: • cultural infrastructure's ongoing revenue and organisational capacity needs are recognised, not just physical buildings • culture is embedded in cross-cutting outcomes (innovation, health, education, community resilience) • partnership frameworks between councils, cultural organisations and communities are referenced as delivery mechanisms, This aligns community infrastructure with lived cultural use.	204379 (New International Encounter)
National planning policy requires that development plans, not planning applications identify shortfalls in the availability of community facilities and infrastructure. Reforms to the NPPF include a proposed requirement for developments which significantly increase local populations to provide for community facilities and improvements to public service infrastructure – either by delivery or financial contribution. The Council should follow the model as set out in emerging national decision-making policy HC3 to ensure ongoing consistency.	207445 (Pioneer Group Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Objects, wishing to fund the NHS (including Social Care) and Defence from increased growth rather than increased per capita taxation is understandable (whether we think it unrealistic or not) and it is equally expedient to disperse the responsibility for that growth across local authorities. However, largely because of climate change, central government investment and policy in this time-frame will move north and to higher ground. This is not to say that Cambridge and Cambridgeshire shouldn't grow and have a comprehensive development plan, but it needs to be understood in this context and would be more sensible laid out in a much more modular way.	207343 (K Rhodes)
Rural Active Travel routes and PROWs should be bridleway to include horseriders.	203983 (S Rogers)
As a largely rural and farming county, this policy makes no allowance for the following: Farming; Equestrians; Country sports; Heritage. As has already been established in many of the recent developments Section 106 Agreements has no legal standing and are to be treated as a 'will do at some time in the future'. We need to ensure we can feed ourselves.	202828 (S Durman)
Provision should be made for public transport and active travel access to enable easy access from surrounding communities and settlements to help sustain the facilities and amenities in new and growing settlements. Provision should be made to absorb further growth. Provision should be made to cluster facilities around public spaces close to public transport hubs.	204703 (A Carpen)
Girton's needs revolve around youth provision, shared-use facilities, and accessible recreation land, reflecting its existing and emerging community profile. Parish councils spend up to 85% of budgets on	202225 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
youth/sport — signalling real need. Shared-use agreements with Girton Glebe and local schools will unlock vital space. Growth without matching community infrastructure risks further strain on limited local assets. GPC Requests to the Local Plan: Require school–parish shared-use agreements in new development proposals. Support land identification for youth, sport, community space, and active recreation. Embed localised service-provision expectations for Minor Rural Centres like Girton.	
It should be noted that there are no allocations identified in draft GCLP for Fulbourn that could make financial contributions or provide land for new or additional services and facilities. It is not clear how additional services and facilities, including open space and health facilities identified in the made Fulbourn Neighbourhood Plan, would be delivered in the absence of any related development.	201957 (KG Moss Will Trust & Moss Family)
Objects to Policy WS/NC, specifically part 4, stating that detailed assessments of community needs for residential sites of 200 or more dwellings should be the responsibility of the Councils, not developers. In relation to part 5, the respondent questions the clarity of the study informing the standard of 129 m2 of floorspace per 1,000 additional population for indoor community facilities, noting a lack of corresponding study for Cambridge city. The respondent highlights that the supporting text in paragraph 6.31 mentions ongoing preparation of further evidence by the Councils to assess community facility needs, suggesting that the current standard for indoor community facilities is not adequately justified.	203089 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
Object to Policy WS/NC, particularly Point 4, which requires detailed assessments of community needs for residential developments of 200 or more dwellings. They argue that these assessments should be	204510 (Bellway Strategic Land)

Summary of issues raised in comments	Comments highlighting this issue
the Council's responsibility, not the developers. The respondent references Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, stating that obligations must be necessary, directly related, and fairly related to the development. They assert that new developments should not be responsible for addressing existing community needs and that the policy's ambiguous wording creates uncertainty and potential additional burdens on developers. The respondent recommends that if the Council pursues this policy, it must clarify that developments are only required to address needs that align with the CIL Regulations tests.	
Minor clarification is required in relation to the requirements set out in paragraph 4 of the policy. In particular, the policy states that proposals for residential developments of “200 or more dwellings (or groups of smaller sites which cumulatively exceed this figure)” must be informed by detailed assessments of community needs and include strategies demonstrating engagement with local communities and stakeholders. It is unclear whether this requirement is intended to be addressed through existing submission documents, such as a Statement of Community Involvement or Statement of Community Engagement, or whether it represents an additional and separate requirement. Clarification on this point would assist in ensuring the policy is applied consistently and proportionately.	210247 (Vistry Group)
Support the principle of ensuring that larger developments respond to community needs, however, the wording in limb 4, could be construed to place the onus on the applicant to assess community needs and produce a strategy to meet them. The policy would be more effective and proportionate if it required	208971(Persimmon Homes East Midlands)

Summary of issues raised in comments	Comments highlighting this issue
that major applications demonstrate how they have engaged with the LPA and relevant providers to meet identified needs, rather than placing the responsibility on applicants to determine those needs. Suggested amendment to read: “For developments of 200 dwellings or more, applicants should engage with the Council and relevant service providers at pre-application stage to ensure that proposals address identified community needs and contribute to any site-wide strategy”	
Object. Policy WS/NC requires large residential and employment developments to conduct community needs assessments and engage local stakeholders, but lacks clarity on the specifics of these requirements, creating uncertainty for developers. The respondent argues that the burden of community needs assessments should be on the Council, not developers, to ensure clarity and consistency in planning. The proposed requirement for indoor community facilities may threaten the viability of development schemes due to its inflexible application of a fixed floorspace standard of 129m² per 1,000 additional population. The policy's lack of clarity regarding on-site provision and its interaction with planning obligations and the Community Infrastructure Levy may lead to a cumulative financial burden on developers. The respondent highlights that the policy conflicts with the National Planning Policy Framework and Planning Practice Guidance by imposing potentially onerous and duplicative requirements that could undermine the deliverability of the Local Plan. Changes to plan: Railpen therefore requests that the policy parts are removed.	204158 (Railpen)

Summary of issues raised in comments	Comments highlighting this issue
There needs to be awareness that not all health and emergency services can be provided locally due to capital and revenue cost implications. The NHS 10-Year Plan aims to provide more health service in communities and this will require a strategic change for health facilities and where services are provided from outside of the acute setting. This may be in a community hub or existing health care facility.	210344 (East of England Ambulance Service NHS Trust)
Developers are expected to provide community facilities alongside housing, but past performance has been poor, necessitating rigorous oversight from local authorities.	210453 (P Deer)
It should be noted that there are no allocations identified in draft GCLP for Great Shelford that could make financial contributions or provide land for new or additional services and facilities. It is not clear how additional services and facilities, including those identified in the made Stapleford and Great Shelford Neighbourhood Plan, would be delivered in the absence of any related development.	201977 (Shelford Investments)
Support this policy but note that the timely delivery of services and facilities in early phases (para 6) is critical to new developments and must be resourced and enforced. We are currently lacking means to enforce delayed infrastructure which has knock on effects for our new communities so the LPA and the local plan needs to be clearer about penalties that could be applied for delays in bringing key facilities forward.	203034 (Cambridge City Council Liberal Democrat Group)
Object to the wording of Policy WS/NC, stating it is primarily focused on residential growth and not suitable for large-scale commercial development. The requirement for employment developments over 5,000 sqm to undergo detailed community needs assessments and stakeholder engagement is disproportionate and not justified by national policy. Policy lacks clarity on the expected services and	204441 (Tritax Big Box Developments)

Summary of issues raised in comments	Comments highlighting this issue
facilities from commercial development, leading to uncertainty and viability risks. Commercial developments already contribute appropriately through CIL and Section 106 obligations, where impacts are clearly evidenced. The policy should differentiate between residential and commercial development, ensuring that requirements for community facilities and engagement are proportionate and evidence-based.	
The policies do not identify any demographic groups (including young people, older people, vulnerable adults, families, or disabled residents) and age-specific needs that should be catered for; this is particularly important in new developments for young people.	208052 (Northstowe TC)
Policy states that “developments of sufficient scale to generate the need for new on-site facilities will be required to do so, unless it can be demonstrated that there would be advantages in off-site delivery”. While Vistry and The Quy Estate support the principle of providing appropriate community infrastructure, it is important that this requirement is applied flexibly and takes full account of site-specific circumstances, including viability considerations and the capacity of existing or planned off-site facilities. In some cases, off-site provision or financial contributions may represent a more effective and sustainable means of meeting community needs, particularly where developments are well integrated with existing settlements.	210248 (Vistry Group)
Object to policy WS/NC as currently drafted. The policy is ambiguously worded, creating uncertainty that may impose an additional and unwarranted burden on development. Specifically, point 4 states that proposals for residential developments of 200 or more dwellings (or	204378 (Brookgate Land Ltd and Network Rail Infrastructure)

Summary of issues raised in comments	Comments highlighting this issue
multiple smaller sites that cumulatively exceed this threshold), as well as employment developments over 5,000 m², must be informed by detailed assessments of community needs and include strategies to address those needs. It is understood that these assessments should be prepared by the Council as part of their Infrastructure Delivery Plan, and the responsibility should not fall on developers to determine which community needs a development should meet.	
Objects to Policy WS/NC, particularly point 4, which requires residential developments of 200 or more dwellings to be informed by community needs assessments prepared by the Council. The respondent argues that it should not be the responsibility of developers to determine community needs that a development should meet. The respondent references Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, highlighting the necessary tests for obligations related to planning permissions. The respondent contends that new developments should not be responsible for addressing existing community needs and that the policy is ambiguously worded, potentially imposing an undue burden on developers. The respondent requests clarity from the Council that developments only need to address matters that meet the CIL Regulations tests.	204277 (Bellway Strategic Land)
Large developments should have discounted council tax as they are paying for services that others get free.	210497 (Cllr C Hofman)
Our assessment of the proposed allocations confirms that early years and school needs can be met through a combination of existing facilities and the new provision planned for each of the major developments. There is little reference to children SEND, with what there is focused mostly on housing	210528 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
being able to accommodate people with disabilities. There is a need for more SEND provision across the area through a mixture of more provision in mainstream schools and additional places in special schools. Similarly, there is limited reference to early years provision beyond what is planned within new developments. Demand is expected to rise due to the extension of free childcare eligibility to children from nine months of age. Meeting this need will require a combination of expansions at schools and by voluntary and private sector providers.	
The traveller policy mentions - be located where the needs of the residents can be met without placing undue pressure on existing local services and facilities. I could not see this reference as explicit as this in any other area e.g. a new housing estate is often built without thorough reference to this. We are consistently looking at career paths and opportunities for young people, the volume of work within this plan could provide opportunities within this area. Whether there was any opportunity within this to focus on a local workforce percentage or a commitment to apprenticeship, training opportunities for local young people as part of this whole process	210539 (Cambridgeshire County Council)
Paragraph 6.25 - There is no reference to special needs provision. Paragraph 6.32 - There is no reference to special needs provision. The inclusion of the reference to discourage the use of restrictive covenants that would restrict the ability to use homes for childminding business use is supported.	210592 (Cambridgeshire County Council)
The land south of the A428 (Kingsfields) demonstrates clear potential to accommodate residential development that aligns with the Plan’s spatial strategy and Policy WS/NC. The scale of the land allows	210618 (Church Commissioners for England)

Summary of issues raised in comments	Comments highlighting this issue
for the coordinated and timely delivery of homes, education provision, community facilities and green infrastructure, supporting inclusive, healthy and sustainable communities and enabling infrastructure to be planned holistically.	
We are broadly supportive of this policy, with the following caveat: nowhere in the policy or its supporting text is consideration given to the growing demand for end-of-life care services and facilities (e.g. hospices) that will sit alongside an expanding population. Arthur Rank Hospice is testament to local strength of feeling on this matter and is one illustration of the local impact of a lack of joined up planning between health and social care. Para 6.25 of the supporting text lists examples of the facilities and services which could be required to meet the needs of new and growing communities; provision for burials is included in the list but nothing relating to palliative/hospice care provision; para 6.33 is explicitly about healthcare facilities but, again, does not mention end-of-life care.	210941 (Great Shelford PC)
Policy WS/NC of the Draft Plan identifies the requirement for new developments to include or contribute to the delivery of services and facilities necessary to meet the needs of the development. Whilst this is supported, it is considered that Policy WS/NC represents an unnecessary duplication of Policy WS/HD which already incorporated the requirement for developments to address the infrastructure requirements they generate. As such, it is recommended that the requirements of these policies is consolidated into a single policy, to ensure that each of the policies contained within the Draft Plan serves a clear purpose as required by Paragraph 16 of the Framework.	211287 (Woolsington One Ltd)

Summary of issues raised in comments	Comments highlighting this issue
While the Draft Plan refers to schools and health facilities, it does not provide clarity on:When facilities will be delivered; Whether they will be accessible to existing village residents as well as new residents; How needs will be met for early years, special educational needs, adult social care, and older people. This creates uncertainty for residents and risks services lagging behind population growth. Include policy wording to ensure that healthcare and education services and facilities are delivered prior to or alongside housing occupation, with clear triggers and monitoring. Include a clear delivery and monitoring framework for Waterbeach Parish, identifying responsible bodies, funding mechanisms, and review points to ensure timely implementation.	208978 (J Williams)
It is recognised that services and facilities necessary to meet the needs of the development are a key element of a successful community.	211542 (Martin Grant Land Limited)

Policy WS/CF: Community, sports and leisure facilities

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The policy was supported by The Theatres Trust.

Concerns were raised by Sport England about the reliance on dated evidence sports strategies. They have requested an up-to-date indoor and outdoor sports facility strategy be issued. Comments made by Cam Skate referenced the reprovision of an indoor skatepark facility within the Cambridge urban area. No reference to skateboarding or skateparks were made in the 2016 Indoor Sports Facility Strategy, the revised strategy update should include reference to the need for an indoor skatepark as a distinct facility type. A permanent year-round indoor facility in Cambridge would create continuity, safety, and inclusive access that outdoor spaces alone cannot deliver. Further comments included how the venue could be managed by the local community and the benefits such a facility would bring to the wider community.

Other individual comments made included the policy not referencing Public Rights of Way, not having sufficient ambition to deliver a stadium, rowing lake and 50m swimming pool. Sports facilities should take precedence over transport schemes.

One member of the public commented on the lack of high-end sports facilities that can be used for playing high level sports matches. Any plans to increase the residential population in Cambridge should consider providing a suitable space for national

league volleyball, basketball, handball, korfball etc, rather than just more of the same inadequate facilities. Cambridge needs an opera house and a new large lifelong learning college for the purposes of skills; tackling loneliness; tackling poor health and increasing the range of options for residents. An outdoor cycle race track, a BMX track and further cycling, 'town' athletics track and high impact sports should also be provided. Every major settlement should have a public venue / performing arts space. It is important that sports facilities can be accessed using sustainable and affordable forms of transport. There was a lack of accessible swimming facilities in Great Shelford with a request for a local pool that does not require driving. Great Shelford PC noted their Leisure facilities were limited. The co-location of related public services and at Easter Gate (Policy reference S/PRIA/EG) the Elizabeth Way bridge and Underpass(es) should be considered for indoor and outdoor sports uses. Another member of the public requested that the policy include play. Play areas are an important part of diverse, healthy and sustainable communities.

Cambridgeshire County Council commented on the difficulty of replacing services in multi-functional community centres and flexibility is needed to avoid imposing requirements that mandate replication of a traditional, standalone library model. Public Rights of Way are an existing leisure and cultural asset which can be maximised and the policy could do more to recognise and promote these. It also noted South Cambridgeshire has no public leisure centres and relies heavily on village college sports facilities and on Cambridge City to meet demand and new towns include high-quality municipal swimming pools. While operation through secondary schools may be acceptable initially, this approach is unlikely to be sufficient as towns grow.

Histon and Impington PC cited they were under resourced in terms of sports and recreation facilities. Local opportunities exist to expand these. New facilities should provide both subscription sports and ad hoc play at no charge. Girton PC requested the Local Plan to allocate land for youth, sport, community wellbeing facilities in/near the village, require shared access to school facilities and prioritise village-scale investment.

Comments from Pioneer Group objected to the policy approach as it was in conflict with emerging national planning policy. National decision-making policy HC6 which provides a simplified policy that should be applied. One member of the public commented that the policy's paragraph 2(c) lacked a requirement for public transportation (as in 2018CLP Policy 73). Comments by the Cambridge Green Party requested a number of amendments to the policy. Comments made by NHS Cambridgeshire and Peterborough Integrated Care Board supports the provision of quality community facilities but were concerned paragraph 5 may hinder NHS's ability to deliver essential services.

Comments made by Cambridgeshire Local Access Forum objected to the policy approach not being more explicit about protecting, enhancing and integrating public rights of way and access networks across Greater Cambridge. One member of the public cited the need for improved footpaths which the Local Plan omits while the Cambridge Group of the Ramblers commented on the policy omitting reference to the evidenced benefits of leisure walking for both physical and mental health wellbeing; the main infrastructure required for enjoyable, leisure walking is the public rights of way network. Another member of the public requested rural active travel routes and Public Rights of Way be bridleways so they can include horse riders. The East of England Ambulance Service NHS Trust requested community facilities and infrastructure include all emergency services (ambulance, fire and police) and be supported by s106/CIL monies to mitigate population growth and to improve emergency health equipment.

North Herts Council referenced need for sporting facilities arising from Royston.

Response to main issues raised in representations:

The Councils are updating both the GC Playing Pitch Strategy and Indoor Sports Facility Strategy to the support the emerging Local Plan. These follow Sport England's methodology and cover a range of outdoor playing facilities (football, rugby, cricket and hockey) and indoor sports facilities (swimming pools and sports halls). A separate Outdoor Courts & Rinks Strategy is also being prepared to cover many outdoor sports not covered by the Playing Pitch Strategy including bowling rinks, outdoor tennis courts and smaller Multi-Use Games Areas. Together, these form the evidence base informing WS/CF: Community, sports, and leisure facilities. The strategies will endeavour to reference additional sports needs beyond those required by Sport England, however without specific funding / delivery mechanisms in place for these additional sports, expectations about their implementation will need to be reflected in their funding prioritisation. Funding gathered by applicable developments will normally be directed to implementing the core sports needs identified in the respective strategies.

Policy WS/CF has been written in accordance with the current NPPF which requires polices to positively plan for the provision of a range of publicly accessible facilities. The policy takes account of proposals for new or replacement community, sports or leisure facilities, including city-wide or sub-regional facilities. Paragraph 1(a) refers to local need and not demand because of the difference in their meaning. Need relates to a deficit in provision while demand is a market driven concept based on preference and ability to pay. The policy is focused on providing for publicly accessible facilities. The inclusion of demand would broaden out the policy to include facilities already provided elsewhere in the area (including beyond Greater Cambridge) and as such may have the unintended consequence of undermining existing provision and lead to its displacement. This would include commercially or privately managed facilities that are also accessible to the local community. Paragraph 1(e) will ensure consideration is given to providing co-located facilities with other, complementary services and uses. Paragraph 1(f) has been worded to allow for new

facilities to provide multi-functional spaces that are open to the wider community. However, there may be circumstances where it is not suitable or appropriate to require proposals to provide these or provide access to the wider community.

In terms of protecting community, sports or leisure facilities, the policy's supporting text explains how the loss of a facility will need to demonstrate, both quantitatively and qualitatively, that the facilities are surplus to requirements and that the proposal will not cause significant negative impacts on the vitality of other local facilities (such as through demand pressures created by displaced users of the lost facility). In most cases, this will require a marketing exercise for a sustained period of at least 12 months to demonstrate a lack of demand; exceptions to this requirement include the loss of healthcare uses as the ongoing need for these facilities will need to be determined with the relevant Health Authorities.

Public rights of way are footpaths, bridleways and byways which have public access. They are protected by law and are maintained by the local highway authority (Cambridgeshire County Council). To support accessible community, sports and leisure facilities, Policy WS/CF paragraph 2(c) requires proposals for new, or replacement city-wide or sub-regional community, sports or leisure facilities to be provided in a sustainable location that supports sustainable travel. Sustainable travel is covered by policy I/ST: Sustainable transport and connectivity which would be applicable for new community, sports and leisure uses. The policy sets out how the transport impacts of development should be managed, and how new development should be located, designed and connected to the transport network to enable travel by sustainable modes. Policy WS/NC: Meeting the needs of new and growing Communities had also been amended to include the provision of leisure routes. These would be suitable for people of all ages and abilities and for a variety of uses, to allow them to exercise outdoors and access nature and the wider countryside. On or off-site contributions towards improved leisure routes would include supporting Public Rights of Way or providing leisure routes.

Officers have held discussion with North Herts Council and prepared a statement of common ground.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
This policy does not mention Public Rights of Way. PRoW 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. Especially for bridleways, these are used mostly by women and children who are the main riders of horses and often feel excluded where footpaths and cycleways are created.	201719 (S Jeggo)
Support this policy: The protection it affords the valued facilities in line with paragraph 98 of the NPPF (2024)	202018 (The Theatres Trust)
The draft plan for new community, sports and leisure facilities is disappointing and reactive rather than proactive. The Cambridgeshire Councils focus mainly on criteria to assess third-party proposals, offering little vision or leadership to deliver new facilities themselves. Apart from opposing hot food outlets near schools, there is no clear strategy. Ambitious projects proposed in 2005, including a stadium, rowing lake and 50m pool, have largely failed to materialise, with only the ice rink completed. Funding remains absent for others. It is suggested that taxpayers money should be used to prioritise sports facilities over transport schemes and believes residents would support this approach.	202453 (S Biggin)

Summary of issues raised in comments	Comments highlighting this issue
It's vital these can be accessed easily and affordably by bus (otherwise many people won't be able to use them, especially young people). This policy should ensure this comes about.	203113 (S Hughes)
In particular, the requirement in 2.c to support sustainable travel minimises climate impact and enables access for everyone.	203148 (P Tribble)
Please state clearly that Cambridge needs a new large lifelong learning college for the purposes of: Skills; Tackling loneliness; Tackling poor health; Increasing the range of options for residents.	203795 (A Carpen)
The former county adviser for music, Ludovic Stewart, who taught at the Cambs holiday orchestra for decades, had a dream for a new opera house for Cambridge. The parents of the late Dame Olivia Newton John (born in Cambridge) met at the guildhall in Cambridge where her father Brinley, later Headmaster of what is now Hills Road Sixth Form College, was singing as a baritone. Let's get that opera house built for their legacies. It must be in an accessible location i.e. not NW Cambridge. The opera house must be a first class work of art.	203796 (A Carpen)
Every major settlement should have at their heart a public venue / performing arts space that isn't simply a bland minimal cost 'multi-use' hall that Clay Farm has. Make provision for a general template of a main public transport interchange spilling out onto a civic square with a performing arts venue on the opposite sides, and facilities for whatever the local residents of the settlements choose should be on the other remaining sides / in the vicinity. It can be scaled up/down according to size of settlement population.	203799 (A Carpen)

Summary of issues raised in comments	Comments highlighting this issue
The GCSP needs to commission a survey and study to find out what attractions, facilities and amenities there are in other towns and cities that could be built in Cambridge or the surrounding new towns. The public and in particular children, teenagers, and people with lived experience of living in other cities and countries should be engaged with. Then survey the public to see what they want, and encourage groups to champion whatever choice they would like - especially where we don't have local provision. Eg an indoor roller rink (where 100 years ago Cambridge had three).	203800 (A Carpen)
Consideration should be made for the facilities mentioned in the abandoned Cambridge United Trumpington facilities application of the early 2010s which included an outdoor cycle race track, a BMX track and further cycling and high impact sports. See https://www.cambridgeunited.com/news/2013/november/plan-b-unveiled---grosvenor	204732 (A Carpen)
support point 2a-d- catchment area and wider community - with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, I support community facilities that help to meet the day-to-day needs of local residents. With reference to the above community project, I support a range of affordable facilities to be made accessible to local graduates and creatives, as well as target demographic groups (pupils, youth, students etc)	204791 (M Cleminson), 204713 (T Woodcock), 204362 (NEUBAU Architecture Ltd), 205211 (Cambridge Junction/Create Cambridge), 204254 (A Giarlis)
The respondent highlights the lack of accessible swimming facilities in Great Shelford, expressing a desire for a local pool that does not require driving.	204911 (A Sykes)

Summary of issues raised in comments	Comments highlighting this issue
The nearest public swimming option is Sawston Village College Sports Centre, which has limited availability and requires pre-booking. The pool at the Strawberry Fields development in Stapleford has a capped membership of 100 external members, which is currently full. Residents from recent Trumpington developments share similar issues regarding access to swimming facilities. The respondent suggests that the under-used pool at the Frank Lee Centre on the Cambridge Biomedical Campus could be repurposed as a more widely available leisure centre.	
We again consider there to be conflict with emerging national planning policy. National decision-making policy HC6 provides a simplified policy which should be applied.	207446 (Pioneer Group)
Provision should be made for sites that incorporate green space for outdoor purposes whether as private property or spilling out onto public green space	207457 (A Carpen)
Provision for allied public services (GPs, dentists, creches, health clinics, public libraries, performing arts facilities) to be co-located should also be made. Create awe-inspiring places where people would choose to go and be	207458 (A Carpen)
Histon and Impington are under resourced with regards to sports and recreation facilities. Areas such as Site ID: 115407 has the opportunity to provide these facilities. There is also additional land not owned by Histon and Impington Parish Council near to the current recreation ground which has the potential to increase facilities. New facilities should be not only for subscription sports but should also be available for ad hoc play at no charge.	201440 (Histon & Impington PC)

Summary of issues raised in comments	Comments highlighting this issue
Walking as a leisure activity might be expected to be covered by Chapter 6, Wellbeing and social inclusion. Policy: WS/CF: Community, .. places great emphasis on the need for sports facilities, but makes no reference to the benefits of walking the countryside for exercise or for wellbeing. The implication is clear: to exercise you should go to the gym. The front cover of the plan is very encouraging showing images of cyclists, wheelchair user, buggy user, dog walker and runners. And all of these activities need footpaths and open spaces. However, the Plan pays virtually no attention to improving footpaths.	201636 (P Cutmore)
My concern is the exclusion of walking in the countryside as a recreational activity in Chapter 6, Wellbeing and social inclusion. Policy WS/CF makes no reference to the evidenced benefits of walking for both physical and mental health wellbeing. And the main infrastructure required for enjoyable, leisure walking is the public rights of way network. The network is mainly soft surface, close to and amongst green infrastructure - but has shortcomings, because it is fragmented and there are some significant areas of housing which are cut off from access to public rights of way.	201792 (Cambridge Group of the Ramblers)
I would like explicit inclusion of play within this policy. Play areas are an important part of diverse, healthy and sustainable communities. However, it is an area often neglected as children and young people are not completing consultations.	201825 (T McKeown)
Sporting and leisure are required for all age groups, all abilities, indoors and outdoors.	202176 (M MacGinley)
Cambridge has a distinct lack of high end sports facilities that can be used for playing high level sports matches. Cambridge has several high performing sports teams competing at a national level who	202010 (R Noka)

Summary of issues raised in comments	Comments highlighting this issue
currently do not have easy access to suitable facilities with adequate playing area, home and away changing rooms, spectator space, and safe sprung sports floors (as opposed to concrete/tile). Any plans to increase the residential population in Cambridge should consider providing a suitable space for national league volleyball, basketball, handball, korfball etc, rather than just more of the same inadequate facilities.	
Rural active travel routes and PROWs should be bridleway to include horseriders	203986 (S Rogers)
1.a should be amended to read: “there is a local need or demand for the facility […]”, as there may be, e.g., no health need for a football pitch if there are already tennis courts, but there may well be high demand for both. In 1.f, “where appropriate” should be amended to “where possible.” This makes clear that developments including spaces open to the wider community are to be prioritised in planning. It also brings 1.f in line with the same “where possible” language in 2.d.	203703 (Cambridge Green Party)
Cambridge does not have a 'town' athletics track despite calls for one since the end of WW2. Could one be incorporated as part of a wider sports complex? (I wrote more in 2021 at https://cambridgetownowl.com/2021/09/14/how-do-we-secure-the-future-of-public-sport-and-leisure-services/)	203824 (A Carpen)
Girton’s identity and wellbeing depend on local sport and leisure, especially the Pavilion, recreation ground, and youth activity spaces. Key Points: Strong public support for Pavilion upgrades, youth sport, and accessible recreation. Active Travel enhances access to facilities and reduces parking stress.	202226 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
Shared school use is essential to meet rising demand. GPC Requests to the Local Plan: Allocate land for youth, sport, community wellbeing facilities in/near the village. Require shared access to school facilities. Prioritise village-scale investment, not only large district centres.	
Community facilities and infrastructure need to include all emergency services (ambulance, fire and police) and s106/CIL made available to mitigate population growth.	210329 (East of England Ambulance Service NHS Trust)
Given the national push toward early intervention and the ambulance sector's expanding role in community public health, defibrillator installation is a critical feature. EEAST would request: • S106 funding for community AEDs, including: AED device; Heated, outdoor-rated cabinet; 10-year consumables and maintenance; Placement near power sources and high-footfall areas; An AED every 800 metres (best-practice community resuscitation standard).	210330 (East of England Ambulance Service NHS Trust)
We are concerned the Council's 2016 Playing Pitch and Indoor Sport Strategies are a decade old and do not meet NPPF 103; assessments should be refreshed at least every five years and PPS updated every three years, and we request an up-to-date indoor and outdoor sports facility strategy before publication. A clear understanding of current and future community sports facility needs, including playing fields, is essential for informing and justifying a local plan policy such as Policies BG/EO and BG/PO which covers the protection, enhancement and provision of sports facilities. To address these concerns, it is requested that the Council issue an up-to-date indoor and outdoor sports facility strategy.	209232 (Sports England)

Summary of issues raised in comments	Comments highlighting this issue
CLAF objects to Policy WS/CF: Community, sports and leisure facilities.	208171 (Cambridgeshire Local Access Forum)
S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, the project sits in catchment area of 5 adjacent wards, connected by a shared infrastructure link, the Elizabeth Way bridge and related underpasses. The area sits within a public realm improvement area with potential to adapt leftover indoors and outdoors spaces for cultural and sports programmes, which would work well in line with the Cambridge tradition of skating and urban skating, providing indoors and outdoors recreation and youth engagement.	202037 (Skateboard Cambridge CIC)
1a "local need" strongly support; 1b "appropriate" strongly support; a "complement" strongly support; 2b "not have a negative impact" very strongly support; 2c lack of requirement for public transportation (as in 2018CLP Policy 73); 4 support; 5 support. Note that this proposed Policy would be thoroughly breached by the current (controversial and extremely badly received) Planning Applications to redevelop the essential central Cambridge Market Square… effectively changing it into an outdoor cafe/entertainment space catering for tourists and students instead of continuing to provide a circular-economy-rich food-, service- and employment-hub for local residents, craftspeople and farmers.	202519 (J Neal)
Community, sports and leisure facilities only benefit those who can travel to them easily and affordably. This policy should prioritise access to those facilities by walking, cycling and public transport. This will both reduce the negative impacts of increased car traffic and ensure they can be used by all.	203328 (Cambridge Area Bus Users)

Summary of issues raised in comments	Comments highlighting this issue
The respondent supports the provision of quality community facilities but finds the proposed policy approach ineffective, particularly regarding Point 5, which may hinder NHS's ability to deliver essential services. Flexibility in the use of NHS estate is crucial for delivering patient care and funding improvements, and the requirement for exploring alternative community uses for NHS disposals causes delays in reinvestment. NHS land disposals must maintain or enhance local healthcare services, with decisions made by local health commissioners and NHS England, ensuring that properties are only disposed of when they are surplus. The respondent argues that if health facilities are surplus or part of NHS reorganisation, policies should support alternative uses without requiring excessive information or marketing. The proposed modification to Draft Policy WS/CF adds new wording to facilitate that the loss of healthcare facilities if formally declared surplus to NHS operational requirements or identified as surplus in an estates strategy.	205160 (NHS Cambridgeshire and Peterborough Integrated Care Board)
We are looking to co-locate and work the Libraries harder, making the library flexible enough to host the library offer, targeted support (children's centres), community centres (well established in the City with Clay farm, Cherry Hinton and East Barnwell) and could do more under cultural hubs, NHS delivery etc.	210531 (Cambridgeshire County Council)
The application of building class to ensure facilities within a development is noted. However, experience indicates that this approach can be restrictive when delivering a modern, flexible community building or library. Such facilities often accommodate diverse activities, including hosting community banks, providing arts and creative spaces, supporting live sports events, offering room hire, and enabling NHS	210532 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
service delivery. In some cases, protracted negotiations with landlords have been required to permit these activities due to class restrictions. Flexibility is essential when replacing services to avoid imposing requirements that mandate replication of a traditional, standalone library model.	
Policy does not recognise the health and wellbeing benefits offered by the PROW network. This network enables people to make a connection with the natural environment, providing an opportunity to enhance mental wellbeing, and enables users to exercise at the same time as travelling to a destination. They offer clean, traffic free journey opportunities. PROW are an existing leisure and cultural asset which can be maximised and the policy could do more to recognise and promote this.	210623 (Cambridgeshire County Council)
It is essential that new towns include high-quality municipal swimming pools. While operation through secondary schools may be acceptable initially, this approach is unlikely to be sufficient as towns grow. Even if funding through Section 106 or CIL is not prioritised, land should still be safeguarded for future provision. Swimming pools are vital community assets: they support children, young people and older residents, help build a strong sporting culture, and can significantly reduce car dependency when provided locally. A lack of local pools is a major driver of car travel.	211001(Cambridgeshire County Council)
Leisure centres are critical for public health and for fostering a culture of sport and physical activity. South Cambridgeshire is the only district without its own leisure centres, relying heavily on village college sports facilities and on Cambridge City to meet demand. Purpose-built leisure centres offer higher-quality facilities and a wider range of activities. The current shortfall undermines participation in sport, increases car journeys, and leaves some residents unable to access facilities at all.	211002 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
The Protection of Existing Facilities is particularly relevant to our current site and a new location within central Cambridge must be identified to avoid losing an invaluable community sports facility and social resource for young people. Due consideration should be given for the reprovision of an indoor skatepark facility within the Cambridge Urban Area.	210566 (Camskate)
In the 2016 Indoor Sports Facility Strategy there is no reference to skateboarding or a skatepark. "Informal spaces" is not sufficient as a reference and does not accurately capture the proven demand for an indoor skatepark facility. In line with the document's recommendations, when the strategy is next reviewed (this is due for a review now), an indoor skatepark should be included as a distinct facility type within the strategy.	210567 (Camskate)
Without long term security of a permanent indoor facility for skateboarding, the ability of the city to deliver excellent year-round benefit to young people is significantly compromised. A permanent year-round indoor facility in Cambridge would create continuity, safety, and inclusive access that outdoor spaces alone cannot deliver.	210570 (Camskate)
At Cam Skate or community includes skaters of all ages, coaches, and volunteers ready to support structured programmes, but without a permanent indoor space, these cannot be delivered consistently. A permanent indoor venue would become a positive, stable anchor for community engagement, helping young people build identity, resilience, and supportive peer networks. This reflects findings from both national research and local case studies across the UK.	210571 (Camskate)

Summary of issues raised in comments	Comments highlighting this issue
An indoor skatepark would advance key Local Plan objectives by: • Improving health and wellbeing Skateboarding provides accessible physical activity for diverse groups, including those underserved by traditional team sports. • Supporting inclusive and resilient communities Evidence shows skateparks foster belonging, reduce antisocial behaviour, and encourage cross-age and cross-cultural interaction. • Providing essential youth and social infrastructure Cambridge lacks affordable, accessible indoor recreation for young people—an indoor skatepark would fill a clear infrastructure gap. • Enhancing social value and urban vibrancy Skate spaces contribute to inclusive place-building, urban regeneration, and community engagement.	210572 (Camskate)
I strongly encourage the Greater Cambridge Local Plan to: 1. Recognise a permanent dedicated indoor skateboarding facility as a critical element of social and community infrastructure within Cambridge and highlight the value The Warehouse indoor skatepark has brought to Cambridgeshire. 2. Allocate or support land allocation for an indoor skatepark within Cambridge city, ensuring active travel accessibility. 3. Collaborate with community organisations, Skateboard GB, and youth groups to co-design a space that is inclusive, sustainable, and future-proof. 4. Integrate this project into wider strategies for youth provision, health, and community wellbeing.	210573 (Camskate)
Leisure facilities in Great Shelford are limited.	210942 (Great Shelford PC)

Summary of issues raised in comments	Comments highlighting this issue
We note a significant deficit of outdoor sports facilities in the Royston area and request that the draft plan consider provision of such infrastructure to meet cross-boundary health and wellbeing objectives.	203258 (North Herts Council)
Community, sports and leisure facilities only benefit those who can travel to them easily and affordably. This policy should prioritise access to those facilities by walking, cycling and public transport. This will both reduce the negative impacts of increased car traffic and ensure they can be used by all.	203238 (Cambridge Area Bus Users)
It is recognised that community, sports and leisure facilities are a key element of a successful community.	211543 (Martin Grant Land Limited)
It should be recognised that football stadia are not Main Town Centre Uses, and that Part C does not apply to ancillary retail, food and beverage provision. The supporting information confirms that sports stadia are to be considered through this draft policy. It should be explicitly stated in the supporting text that the redevelopment or relocation of the Cledara Abbey Stadium is addressed under a specific allocation, and Policy WS/CF does not apply to the current Stadium or a relocation site.	211870, 211871 (Cambridge United Football Club)

Policy WS/CH: Cultural and creative hubs

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Comments were made by many individuals and organisations supporting Cambridge Junction's request that: operational sustainability (management, revenue, long-term viability) is explicitly required alongside spatial and design briefs; flexibility is embedded to allow culture to evolve over time; and stronger links are made to delivery mechanisms, including the Cultural Infrastructure Strategy and partnership model. These should ensure cultural hubs are viable, adaptable and resilient. Other supporting comments raised the matter of funding these needs.

Comments about the definition of a cultural or creative hub were made by the Cambridge Green Party who supported the policy and recommended all the policy criteria in paragraph 1 be satisfied and not just 'most of'.

Brookgate Land Ltd & Network Rail Infrastructure Ltd. objected to this policy as currently worded. The policy should define what constitutes a 'cultural and creative hub', providing expected quantum, floorspace thresholds and relevant use classes.

Comments were made by many individuals and organisations supporting Create Cambridge's request for: the Agent of Change principle be explicitly embedded, placing responsibility for mitigation on new residential development, not existing venues; and major developments demonstrate access, including late-evening transport for the wider region, not just immediate residents.

There was considerable support, with reference to S/PRIA/EG that the Elizabeth Way bridge and Underpass(es) become a cultural hub project and benefits this project would bring to the local community.

Girton PC requested the Local Plan support local, flexible cultural hubs integrated into existing community buildings; recognise Girton's heritage assets as cultural anchors; and ensure cultural provision strengthens a distinct village identity, not urbanisation. The importance of libraries was also cited with Cambridgeshire County Council highlighting the opportunity to co-locate library operations in arts/cultural hubs.

Other comments included one member of the public stating that the policy lacked a reference to sustainable travel. Every new town, and district/area in Cambridge should have access to a neighbourhood centre and Cambridge North should have an equivalent "The Junction" style venue. Comments included the need for additional affordable and flexible cultural facilities, including 'makerspaces' or 'fablabs', available for booking by community groups and individuals. An indoor skatepark was also suggested which would provide enormous value to the mix of leisure and cultural facilities within the city. Recent creative graduates and young creatives should have access to shared workspaces, exhibition and networking spaces. The policy should also safeguard existing cultural and creative spaces. Workshop spaces should function as. Design processes for new cultural facilities should demonstrate serious public engagement at design stage.

Response to main issues raised in representations:

Policy WS/CH's paragraph 2(l) includes a clause requiring new creative or cultural hubs to have a Management Strategy to ensure it will be viable in the long-term. This should outline, as a minimum, its long-term vision, objectives, market sector within the wider

cultural or creative market, and financial resourcing. Where policy WS/NC: Meeting the needs of new and growing communities requires the provision of cultural infrastructure, Cultural Plans will need to be submitted as part of the planning submission process. These will need to demonstrate a robust, evidence-led and locally responsive approach to their provision and long-term viability. These plans will be secured through Section 106 agreements.

Cultural and creative hubs can take various forms and are generally defined by their unique combinations of uses, activities and cultural/commercial focus. For this reason, not all proposals would be expected to meet all the policy criteria. Regarding their expected quantum, floorspace thresholds and relevant use classes, it is difficult to define cultural and creative hubs in these traditional land use terms. Traditional examples would include: an arts centre, a performance venue, a national and, or internationally recognised museum which support cultural activities within the community and or provide training/learning opportunities. More diverse examples would might include a creative workspace space supporting independent yet related creative businesses. They might be separate sole-traders or entrepreneurs, but they all work in the same creative industry e.g. ICT or CGI digital post-production activities. There could be mix of small private businesses working with a public sector cultural organisation or a third-party provider, again working on similar or related projects. The size of these hubs may vary depending on the financing arrangements. These could include spaces secured via Policy J/AW: Affordable workspace and creative industries which seeks to seeks affordable workspace in large commercial developments. Cultural and creative hubs would have sufficient capacity to bring together and support an ecosystem of cultural activities and, or creative artists or creative/cultural organisations (public or commercial). The Local Plan is seeking to establish the policy criteria that would encourage new, genuine cultural and creative hubs to come forward that are sustainable over the long-term. That does not mean proposals such as Elizabeth Way bridge and underpass could not form a cultural hub in the future, subject to planning permission.

Policy J/RC: Retail and other complementary town centre uses, paragraph 4(b) explains that residential development in centres will only be supported where there are no nearby businesses linked to the evening / night-time economy and, or alternative cultural / live music / performance venues, which would be likely to attract noise complaints or have their operations restricted due to the development. Policy J/SA: Cambridge City's Primary Shopping Area (PSA), paragraph 5, reflecting the role of the PSA as a sub-regional centre for retail and other town centre uses, including the nighttime economy, proposals for residential development within the PSA (except for hotels) will be resisted to protect the wide range of existing cultural venues from residential uses that would put such spaces at risk from noise complaints or have their operations restricted from the development. New developments will normally contribute to transport improvements however they are unlikely to be large enough to support specific late-night transport.

Policy WS/CH explains the requirements that need to be satisfied for new cultural / creative hubs in new and existing designated centres. While the integration of cultural hubs into a community build may be feasible including heritage buildings, outside a designated centre this form of proposal may not be an appropriate sustainable location. New and enhanced cultural facilities are supported by Policy WS/CF: Community, sports, and leisure which sets out the policy guidelines for such proposals.

Policy J/RC: Retail and other complementary town centre uses establishes Greater Cambridge’s Hierarchy of Designated Centres. These should ensure all communities have access to a ‘local’ centre commensurate in size and function to their catchment area. It also includes emerging centres which will come forward during the plan period. The Junction is a sub-regional facility serving not just Cambridge but South Cambridgeshire residents and the wider surrounding area. These facilities also often need some sort of financial assistance to keep them open. Providing a second venue like ‘The Junction’ in terms of size and type would lead to direct competition with ‘The Junction’ and undermine its long-term viability. These types of facilities need to be carefully planned such that new cultural facilities, often supported by public subsidy do not undermine similar facilities.

Sustainable travel is covered by policy I/ST: Sustainable transport and connectivity which would be applicable for new cultural or creative hub. It should be noted that cultural hubs are only supported in Designated Centres listed under Policy J/RC. The location of designated centres and their constituent town centres uses are very much determined by their accessibility, as such their location is inherently central to the area they serve and highly accessible by a variety of sustainable forms of transport. Cultural facilities are protected under Policy WS/CF: Community, sports, and leisure facilities.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
I support Cambridge Junction in asking that: • operational sustainability (management, revenue, long-term viability) is explicitly required alongside spatial and design briefs • flexibility is embedded to allow culture to evolve over time • stronger links are made to delivery mechanisms, including the Cultural Infrastructure Strategy and partnership model This ensures cultural hubs are viable, adaptable and resilient. I support Create Cambridge in asking: • the Agent of Change principle is explicitly embedded, placing responsibility for mitigation on new residential development, not existing venues • major developments demonstrate equitable access, including late-evening transport for the wider region, not just immediate residents	202134 (Cambridge Junction), 202192 (H Tam), 202680 (T Altmann), 202710 (W Townsend), 202775 (S Lee), 202858 (Cambridge Junction), 202920 (R Tarry), 202980 (T Flinders), 204799 (M Cleminson), 202008 (H Chamberlain), 202746 (Cambridge Junction / Create Cambridge), 204662

Summary of issues raised in comments	Comments highlighting this issue
	(NEUBAU Architects), 205279 (N Oakley), 205385 (L Howse), 203618 (University of Cambridge, Z Svendsen), 204151 (Cambridge Junction / Create Cambridge), 202287 (Cambridge Junction / Create Cambridge), 202295 (Cambridge Junction / Create Cambridge), 202380 (J Webber), 202385 (Kettle's Yard), 202391 (T Shaw), 204811 (L Matthews), 205268 (AC de Azevedo Lamha), 204366 (New International Encounter), 203494 (D Lever), 203470 (L Heap), 203425 (S Ashworth), 203319 (N Ellis), 202805

Summary of issues raised in comments	Comments highlighting this issue
	(Cambridge Junction), 202457, 202455 (K Jones), 204685 (A Giarlis), 205003 (H Paterson)
I support Cambridge Junction in asking that: • Operational sustainability (management, revenue, long-term viability) is explicitly required alongside spatial and design briefs • Flexibility is embedded to allow culture to evolve over time. • Stronger links are made to delivery mechanisms, including the Cultural Infrastructure Strategy and partnership models. • This ensures cultural hubs are viable, adaptable and resilient.	203845 (N Yeni), 204899 (Wysing Arts Centre), 205017 (University of Cambridge), 205098 (J Walsh), 205338 (A Seiglow), 205356 (Cambridge Junction),
I support Create Cambridge in asking that: the Agent of Change principle is explicitly embedded, placing responsibility for mitigation on new residential development, not existing venues major developments demonstrate equitable access, including late-evening public transport, so hubs serve the wider region, not only immediate residents.	203863 (University of Cambridge), 207588 (N Yeni), 207521 (N Ellis)
Support the proposal to transform the Elizabeth Way underpass into a cultural and creative hub. This space is currently under-used and unwelcoming, acting as a physical and psychological barrier rather than a connector. Reimagining it as a place for culture, creativity and community activity would significantly improve the public realm while addressing safety, accessibility and wellbeing.	204972 (C Sharman), 205294 (Z Svendsen, University of Cambridge), 204350 (Cambridge Junction / Create

Summary of issues raised in comments	Comments highlighting this issue
	Cambridge), 204349, 204342, 204337, 204334, 204330, 204328 (Cambridge Junction / Create Cambridge), 204347 (Cambridge Junction/Create Cambridge), 204239 (A Giarlis), 204312, 201849 (NEUBAU Architect), 207918 (K Fisher) 205274 (R Good)
We welcome the policy's support for cultural infrastructure and affordable creative workspaces and recommend amending 2.a to require delivery of most or all criteria in paragraph 1. With reference to S/PRIA/EG and the Elizabeth Way bridge and underpass project, we support reusing bridge, underpass and leftover public realm spaces for affordable community and youth facilities, arts and culture, indoor and outdoor sport, markets, food and business uses that support learning, networking and employment.	203704 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
Support Point 1a: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, recent creative graduates and young creatives should have opportunities within the urban creative environment to afford shared workspaces, exhibit and network.	204464 (K Fisher)
Support Point 1b: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, combining Arts with an integrated Youth programme could generate natural overlaps and opportunities for Learning between youth and young adults including students and creative groups and individuals, this could include outreach programmes to include youth and young people requiring social integration.	207911 (K Fisher)
Support Point 2h: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I support proposals that seek public realm improvements and regenerate for use the empty spaces underneath the Elizabeth bridge and underpasses, for use as a cultural/creative, urban sports and community hub. This could diversify local cultural offerings and facilitate affordable, creative workspaces as well as promote a new urban identity for this currently neglected 70s site. Improvements of the adjacent public realm would seek public engagement with urban sports and recreation and link these offerings with existing and desired pedestrian and cyclist movements, between the wards and along the river promenade, linking back to the centre.	207912 (K Fisher)
Support Point 2i: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I support local labour and the provision of workspaces for local SMEs to promote Cambridge local small to medium size businesses and start ups through affordable space provisions	207913 (K Fisher)

Summary of issues raised in comments	Comments highlighting this issue
including Artists workshops, makespaces, exhibition spaces, shops a.o. as well as offering apprenticeships and access to the creative industry and opportunities for youth and young people / students and graduates.	
Support Point 2j: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I support a cultural hub which adopts external spaces attached for an active, outdoors programme and spontaneous public engagement. The Underpass project has already shown that an existing space can be re-imagined with active cultural engagement. This has worked well with artists seeking an urban venue or vessel for various installations, as an alternative to programmed spaces. Creative expression and engagement can be in the form of physical, audio, visual, digital, theatre or other modes of engagement for public events.	207914 (K Fisher)
Support Point 2k: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, research into demand for offerings should coordinate efforts with the council and the wider creative community active in Cambridge. Early feedback indicates a need for affordable, flexible and large cultural spaces which are not subject to market economical constraints.	207915 (K Fisher)
Support Point 2l: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I strongly support proposals that seek out commercial and community uses compatible with sustainable development and operations of a cultural/creative hub. Proposals should complement the nature and style of the 70s concrete infrastructure and programmes should support	207916 (K Fisher)

Summary of issues raised in comments	Comments highlighting this issue
new cultural provisions on the basis of market research and demand. A vision statement is required to identify early ambitions and long term operational viability of the venture.	
With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I support the reversal of public space uses to allow for spontaneous and active engagement, including reversal of common urban prejudice when it comes to urban sports and creativity, and encouragement such as ‘play ballgames here’, ‘paint this wall’ and ‘skater friendly furniture’.	207917 (K Fisher)
With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, a cultural hub can also include external spaces attached to an active internal programme.	207918 (K Fisher)
With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, a cultural hub can also include external spaces attached to an active internal programme.	204452 (K Fisher)
Buildings hosting cultural and creative facilities should be distinctive externally. Avoid the 'Clay Farm' model of a bland box with bland expensive abstract sculpture plonked in front. Such buildings should be landmark/wayfinding buildings that make it easy for people to find each other in what can be a sea of identikit buildings. Design processes should demonstrate serious public engagement *at design stage*.	203809 (A Carpen)
Support for the arts across the District should be widespread to ensure access for all residents, as individuals, small groups and potential businesses. The Plan should include provisions for community and ad-hoc groups in strategic new developments, ensuring access to cultural resources.	205447 (R Stobart)

Summary of issues raised in comments	Comments highlighting this issue
A performance and workshop space should be funded through S106 contributions, with staff support for a period of 12, 24, or 36 months to get the activity to a sustainable state. Workshop spaces should function as 'makerspaces' or 'fablabs', supporting activities like Lego and crafts, and be available for booking by community groups and individuals. Performance spaces should be well-equipped, bookable, and designed to accommodate a small audience.	
Cultural identity in Girton stems from heritage assets, village history, and community-led spaces rather than large cultural complexes. Pavilion and Rec serve as community gathering points. Heritage-based identity (e.g., Girton Gap, village form) must guide cultural development. Community-scale creative activity thrives in flexible, multi-use spaces. GPC Requests to the Local Plan: Support local, flexible cultural hubs integrated into existing community buildings. Recognise Girton's heritage assets as cultural anchors. Ensure cultural provision strengthens a distinct village identity, not urbanisation.	202227 (Girton PC)
Should insert into this policy that genuine efforts should always be made to reach out to, engage with, enrich and support activities that are already underway (or that would be valuable if they *were* underway) at local schools, diverse local community centres, youth groups, clubs, social clubs of all kinds - including for older residents or those with disabilities, and other elements of the community across the generations. Wouldn't it be good to try to build community - not just supplant it with something new?	202527 (J Neal)
This policy does not quite go far enough. It is missing the requirement for sustainable travel (such as in Policy WS/CF) or active travel (as in Policy WS/HD).	203150 (P Tribble)

Summary of issues raised in comments	Comments highlighting this issue
Rural active travel routes and PROWs should be bridleway to include horseriders.	203989 (S Rogers)
Opportunity to co-locate or better still make buildings work harder. Many libraries operate 28 hours a week, can the shelving fold away to be used as an arts/cultural hub outside – see Fore Street Living Room Library – Jan Kattein Architects | Architecture, planning & communities. Or at a smaller level Melbourn hub, Gamlingay Eco hub and EverySpace Everyplace – Jan Kattein Architects | Architecture, planning & communities. Trying to link up better quality community spaces that are sustainable through multi use and investment upfront inflexible buildings.	210533 (Cambridgeshire County Council)
An indoor skatepark offers a completely new piece of cultural infrastructure within Cambridge and through creative programming it provides a dynamic and varied offer within the city. From skate lessons to roller disco, to pop-up sauna and wellbeing events, an indoor skatepark can add enormous value to the mix of leisure and cultural facilities within the city	210565 (Cam Skate)
Policy should quantify the scale of need and recognise the need for major new cultural attractions and infrastructure to offset the pressures on city centre attractions. The policy should safeguard existing cultural and creative spaces.	203365 (Cambridge Past, Present and Future)
Libraries are an essential part of any community. This not just an education issue. Libraries are an introduction for children to our culture, a sources of information for all, a recreational facility, and a link between the past, present and future.	202178 (M MacGinley)
Strongly support, but this needs funding to be realised. This sort of arts environment is generated from the ground up, so needs a way to be bootstrapped by individual artists and small collectives.	202829 (H Cook)

Summary of issues raised in comments	Comments highlighting this issue
Every new town, and district/area in Cambridge should have access to a neighbourhood centre - one that has excellent public transport links that enables access beyond the immediate neighbourhood to help sustain them. An equivalent of "The Junction" should be built in North Cambridge with easy access to residential communities and close to medium-density housing and/or schools. There should be extensive meeting rooms and rehearsal spaces given the significant shortage in Cambridge. There should also be provision for large dance and exercise classes given the loss of affordable community hall space (eg St Columbas) in recent decades.	203802 (A Carpen)
Object to this policy as currently worded. Overly broad and lacks sufficient clarity, contrary to the requirements of the NPPF for policies to be clear and effective. In particular, the policy fails to define what constitutes a ‘cultural and creative hub’, providing no indication of expected quantum, floorspace thresholds, or relevant use classes.	204389 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
It is recognised that cultural/creative hubs are a key element of a successful community.	211544 (Martin Grant Land Limited)

Policy WS/MU: Meanwhile uses during long term developments

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy and the important role of meanwhile uses in: providing flexibility; site activation and vibrancy; the maintenance and creation of activity in particular in addressing community needs; the promotion of inclusive growth; masterplan implementation and placemaking; the facilitation of efficient land use; helping with the logistics of setting up a new community; and the deliverability of allocations.

A large number of comments supporting Create Cambridge ask that: the policy is a requirement for Areas of Major Change and large scale phased developments; meanwhile strategies address the activation of vacant sites, governance and exit pathways; cultural / community uses are included throughout construction periods; long-term vacant units are proactively enabled for cultural use & artists are involved in shaping terms; and trust-style models are explored to secure permanent affordable space.

There was concern that the policy should allow flexibility in the duration of meanwhile uses on differing sites and ensure that meanwhile uses consider compatibility with surrounding uses and not impede long term site objectives. Increased clarity on what is considered “a long period of time” was requested, as was a site-specific based policy which in some circumstances may be to leave land unused.

Suggestions included strengthening of policy wording, to further encourage the efficient use of buildings and land, to support meanwhile uses that enable continuity of access to community, sports and youth facilities and to provide safe routes for horse riders. A gap in the provision of skate parks and their importance as social infrastructure, enhancing wellbeing, social cohesion, safety, and community belonging was raised. One comment made highlighted the importance of partnership working to ensure success of meanwhile use schemes. Another highlighted mixed results for meanwhile uses on sites in Cambridgeshire.

Response to main issues raised in representations:

Comments supporting the policy approach are noted.

A number of comments supported the principle but sought clarify and certainty on its implementation. The policy wording has been reviewed to address these points, including providing clarity on phased development where a meanwhile use strategy will be required.

The potential for cultural or employment uses at the Elizabeth Way bridge and Underpass(es) is noted. Policy S/PRIA/EG: Eastern Gate has been amended to reflect the opportunities of this area.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support selected	202483 (M Parsons, University of Cambridge), 203084 (Trinity College, Cambridge), 203354 (BMR Granta Park Propco Limited), 204446 (Tritax Big Box Developments), 204680 (B Lenz, NEUBAU Architecture Ltd)
Supportive of the policy as: • Meanwhile uses can provide flexibility during phased development, activate sites ahead of permanent development, and support the effective implementation of the overall masterplan strategy. • Meanwhile uses play an important role in maintaining activity, meeting community needs, and enhancing the vibrancy of sites during phased delivery. • For long-term, strategic development, for example, for whole-site outline applications at North East Cambridge, the ability to accommodate meanwhile uses is integral to the deliverability of the allocation.	202483 (M Parsons, University of Cambridge), 203084 (Trinity College, Cambridge), 203354 (BMR Granta Park Propco Limited). 203526 (E Pritchard, Cambridge

Summary of issues raised in comments	Comments highlighting this issue
• The supportive approach to meanwhile use (as put forward by Cambridge Ahead's Young Advisory Committee) is welcome, recognising its role in promoting inclusive growth and contributing to placemaking, particularly within large-scale developments. • The policy appropriately recognises that some large-scale development proposals may remain temporarily undeveloped for extended periods of time.	Ahead), 204446 (Tritax Big Box Developments)
Support for Create Cambridge's asks that: • a Meanwhile Strategy is required at validation for Areas of Major Change and large phased developments • strategies set out activation of vacant sites, governance arrangements, exit pathways to permanent provision • cultural/community uses are embedded throughout long construction periods, not only at completion • long-term vacant units are proactively enabled for cultural use; artists involved in shaping terms • clear exit pathways prevent displacement when redevelopment proceeds • creative commons/Creative Land Trust-style models are explored to secure permanent affordable space • Create Cambridge is engaged as a key consultee on delivery models, drawing on national and international precedents	202197 (H Tam), 202303 (L Mills, Cambridge Junction, 202314 (S Yusuf, Cambridge Junction/Create Cambridge), 202752 (C Woods, Cambridge Junction/Create Cambridge), 202866 (R Tinkler, Cambridge Junction), 204166 (M Burman, Cambridge Junction/Create Cambridge), 202384 (J Webber), 202869 (B Groisman, Cambridge Junction), 205394 (E Hine),

Summary of issues raised in comments	Comments highlighting this issue
	202406 (Kettle's Yard), 202408 (T Shaw), 202459 (K Jones), 202714 (W Townsend), 202781 (S Lee), 202928 (R Tarry), 202975 (T Flinders), 203020 (V Beechey, The Arts Theatre Cambridge), 203334 (N Ellis), 203432 (S Ashworth), 203488 (L Heap), 203514 (D Lever), 203627 (Z Svendsen, University of Cambridge), 203849 (N Yeni), 203869 (University Cambridge), 205033 (L Sheerman, University of Cambridge), 204992 (Wysing Arts Centre), 203869 (J Fritsch, University

Summary of issues raised in comments	Comments highlighting this issue
	of Cambridge), 204680 (B Lenz, NEUBAU Architecture Ltd), 204699 (A Giarlis), 204827 (L Matthews), 205064 (H Paterson), 205129 (J Walsh), 205287 (A C de Azevedo Lamha), 205303 (N Oakley), 205320 (L Howse), 205370, 205384 (A Seiglow)
The University supports this policy for suitable meanwhile uses during long term developments	202483 (M Parsons, University of Cambridge)
Partnership working between organisations, asset owners, developers and local authorities will be important to ensure the success of meanwhile use schemes.	203526 (E Pritchard, Cambridge Ahead)
Welcome this policy's encouragement of the efficient use of existing buildings and land. To further strengthen this encouragement, recommend amending "where appropriate" in point 2 to "where possible." This more clearly prioritises the accommodation of meanwhile uses.	203705 (R Comins, Cambridge Green Party)
Point 3 contains a typo: "meanwhiles" should be "meanwhile".	203705 (R Comins, Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
In the supporting information, we recommend adding a sentence immediately after the first paragraph to state “Meanwhile uses can be applied to any temporarily vacant property, whether commercial or residential, as well as to vacant land.” This encourages the efficient use of all types of buildings and land.	203705 (R Comins, Cambridge Green Party)
The policy should allow flexibility in the duration of meanwhile uses to reflect differing site circumstances, development phasing, and market conditions. Meanwhile uses must remain compatible with surrounding uses and should not impede the long-term development objectives for the site. A flexible, supportive approach will ensure sites contribute positively throughout the redevelopment period.	203354 (BMR Granta Park Propco Limited)
TCE is supportive of the principle of meanwhile uses, however clarification is needed in the policy wording as to what is considered “a long period of time”. The policy is currently too open ended; for instance an underused/vacant site or building for a period of 5 years in a 15-20 year masterplan might not be considered “a long period of time” on the context of the wider masterplan.	203587 (The Crown Estate)
The policy is not written well but it is a good idea.	201248 (S Williams)
The policy should require continuity of access to community, sports, and youth spaces during works and allow temporary recreation facilities where needed to keep social inclusion intact.	202228 (Girton PC)
Support community-led meanwhile uses that strengthen engagement.	202228 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
Meanwhile uses can include permissive bridleways to provide much needed safe routes for horseriders which walkers and cyclists can also enjoy.	203992 (S Rogers)
The application of the policy must be considered on a site-specific basis to ensure that the most appropriate strategy is pursued, which in some circumstances may be to leave land unused.	204446 (Tritax Big Box Developments)
When Cam Skate's current meanwhile use lease is finished at 3-5 Coldham's Lane, this will result in a major gap in year-round youth provision, physical activity access, and inclusive recreation. Evidence from national government, academic research, and community development studies strongly supports the role of skateboarding spaces as vital social infrastructure, enhancing wellbeing, social cohesion, safety, and community belonging.	210561 (Cam Skate)
Mixed success with this, we have had it at Northstowe, Alconbury and Waterbeach to help create new hubs for communities to engage with. However, things like building in spaces for visit from food trucks and the mobile library can help with logistics of a new community as it sets up before permanent facilities are in place (learning from Northstowe).	210596 (Cambridgeshire County Council)

Policy WS/IO: Creating inclusive employment and business opportunities through new developments

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was general support for the policy with a recognition that successful places are shaped not only by physical development but by inclusive, healthy and socially connected environments. It will help ensure that existing residents will be able to benefit from the economic growth of the area. Suggestions were made for the use of any funds received including education facilities and support for students and an offer was made of working with the Adult Education Service in the area.

A number of respondents supported the policy but with the caveat that it be applied in a flexible and proportionate manner, having regard to the nature, scale and phasing of individual developments, as well as the operational requirements of occupiers to ensure that is effective and deliverable.

There was also concern that policy thresholds, and the requirement for an Employment and Skills Plan could impact construction commencement and deliverability particularly if this is important for site viability, placing additional administrative burdens becoming barriers to commencing construction programmes. Concerns were also expressed the impact on the business plans of SMEs alongside requests that the threshold requirements for housing developments be raised. It was requested that construction not be halted if there are difficulties in implementing a plan.

Where there were objections, with one respondent stated that the policy lacks an evidence base, justification and consistency with national planning policy, potentially discriminating against those living outside Greater Cambridgeshire.

A number of comments support the creation of new hub at the Elizabeth Way bridge and Underpass(es), supporting cultural uses and artists enabling employment, training and outreach opportunities for young people.

Response to main issues raised in representations:

Representations supporting the policy and its approach are noted.

The policy approach is justified by national and local policy considerations, in to address local inequalities and skills shortages. Further information on both of these areas was set out in our Wellbeing and Social Inclusion Topic Paper in 2025. There are a range of examples of similar policies being operated in other areas where these issues are also present. Evidence for the need for a policy has been clearly established. Further details have been added to the Proposed Submission Local Plan to clarify elements of its implementation.

Some comments highlight opportunities regarding how the policy could be delivered, and linkages to other schemes. The policy is flexible enough that specific opportunities can be responded to during implementation. The policy also includes a mechanism for in lieu payments where measures cannot be delivered on site. Some comments raised issues regarding site specific implementation, but the policy has sufficient flexibility to respond to site specific circumstances.

One comment questions the threshold applied in the policy. The policy seeks to learn from examples of good practice in the implementation of Local Plan policies across the UK. 1,000 sqm of non-residential floorspace and 10 homes are considered a reasonable starting point for the requirement for Employment and Skills Plan. The use of the recently updated CITB benchmarks at construction stage ensures that the asks from developers are proportionate to the nature and scale of development. The asks at occupation stage will be similarly proportionate.

The potential for cultural or employment uses at the Elizabeth Way bridge and Underpass(es) is noted. Policy S/PRIA/EG: Eastern Gate has been emended to reflect the opportunities of this area.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support selected	202487 (M Parsons, University of Cambridge), 203037 (K Porrer, Cambridge City Council Liberal Democrat Group), 203088 (Trinity College, Cambridge), 204219 (L Cooke), 204243 (A Giarlis),

Summary of issues raised in comments	Comments highlighting this issue
	204326 (B Lenz, NEUBAU Architect), 204450 (Tritax Big Box Developments), 204726 and 204793 (T Woodcock), 204804 (M Cleminson), 205203 (M Burman, Cambridge Junction/Create Cambridge), 207447 (Pioneer Group Ltd), 211545 (Martin Grant Land Limited)
Object selected	202486 (M Parsons, University of Cambridge), 204989 (A Brand, Abbey Properties Cambridgeshire Limited)
Requests the plan: safeguard space for local enterprise, small business units, co-working. Residents favour small enterprises, retail, co-working, and shared community hubs; support community-scale	202229 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
enterprise hubs within Girton's development framework as this supports rural economic resilience; and recognise landowner diversification as part of inclusive employment.	
Some opportunities to work with Adult Education to support this offer and specifically the Business and Intellectual Property to support new opportunities that can develop in new community. Business & IP Centre Cambridgeshire (BIPC) | Cambridgeshire County Council. Potential to buy into specific project work in a community to support ambitions.	210597 (Cambridgeshire County Council)
No evidence is provided at this stage to assess the soundness of this policy. Evidence base needs to be provided prior to the next stage of plan.	202486 (M Parsons, University of Cambridge)
The University support the policy which keeps the special quality of Cambridge and the surrounding area, ensuring that it continues to be a place where people want to live, learn, work and play.	202487 (University of Cambridge)
We strongly support this policy with the new Employment and Skills plan at both construction and occupation stages.	203037 (K Porrer, Cambridge City Council Liberal Democrat Group)
The requirement for new developments of 1,000 sqm or more of floorspace within commercial and flexible use classes to submit and implement an Employment and Skills Plan at both the construction and occupation stages is SUPPORTED. In supporting this requirement, it is considered important that Employment and Skills Plans are applied in a flexible and proportionate manner, having regard to the nature, scale and phasing of individual	203088 and 211490 (Trinity College, Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
developments, as well as the operational requirements of occupiers. An appropriately tailored approach will ensure that Employment and Skills Plans remain effective, deliverable and aligned with existing initiatives across the Cambridge Science Park, while continuing to provide meaningful benefits to the local community and workforce.	
From a socio-economic perspective, a key factor affecting social inclusion is access to education and training opportunities for existing residents, which in turn facilitate the ability of those residents to access and reap the benefits of the jobs delivered by economic growth. Ensuring that residents have the opportunities to develop their education and training levels, such as those that would be afforded by Cambridge Science Park North (HELAA Reference 40096) through job opportunities, apprenticeships and the development of the Cambridge Regional College (CRC), would be key to promoting wellbeing and social inclusion for Greater Cambridgeshire residents. Without skilled manufacturing opportunities in Cambridge, there will be a shortage of job opportunities for people who want to work in a technical or engineering environment but do not have the qualifications to undertake the roles that require a university degree. These include students at the Cambridge Regional College and North Cambridge Academy. If Cambridge allocate sufficient space to accommodate the manufacturing space required by these companies in a sustainable location, a real opportunity exists to develop and nurture this category of jobs.	211483 (Trinity College (CSP) Limited)
Provision should be made for firms/developers to contribute towards	203804 (A Carpen)

Summary of issues raised in comments	Comments highlighting this issue
• a capital fund to pay for a new large lifelong learning college and similar facilities. • a fund that offers maintenance grants for people willing but unable to retrain/switch careers into sectors where the local economy has chronic skills shortages • facilities for the circular economy including repair centres and local reuse centres.	
Whilst the objectives of this policy are laudable it is contended that the threshold at which this policy applies should be set higher. In the case of schemes of 10 dwellings it is likely that the scheme would be built by a small contractor who has an established workforce in under a year from approval. The threshold should be raised to +50 dwellings.	203343 (ESCO Prospect)
Applaud the policy's intention to address the poverty and skills gap in Greater Cambridge and to support community wealth building. To better support these aims, amending 3.c is recommended to read: "How these opportunities will be made available and actively communicated to local residents […]" so that the onus is on the developer to make residents aware of new business, employment and training opportunities. This will help to ensure that jobs and training created by development genuinely benefit the local community.	203706 (R Comins, Cambridge Green Party)
The policy appropriately recognises that successful places are shaped not only by physical development but by inclusive, healthy and socially connected environments. The policy's emphasis on social inclusion, health and wellbeing, through accessible services, community facilities, inclusive design and connectivity, aligns with national planning policy and the Local Plan's placemaking objectives.	204450 (Tritax Big Box Developments)

Summary of issues raised in comments	Comments highlighting this issue
Inclusive design and community wellbeing as integral to sustainable development. Tritax Park, Cambridge will seek to incorporate measures that support social interaction, accessibility and active lifestyles, helping to create healthy, resilient and socially inclusive places.	
Support in principle. Concerns that the requirement for an Employment and Skills Plan could impact construction commencement and deliverability particularly if this is important for site viability. Mandatory training, apprenticeships, and supply-chain commitments could introduce administrative burdens, unforeseen S106 style costs and procurement complexity particularly difficult for smaller urban schemes with short construction programmes. A change is requested to allow flexibility in the policy wording, ensuring that construction can commence or not be halted due to difficulties concerning the implementation of an Employment and Skills Plan.	204855 (Hill), (Carter Jonas).
The policy lacks justification and consistency with national planning policy, potentially discriminating against those living outside Greater Cambridgeshire. Part 2 of the policy sets a low threshold for the Employment and Skills Plan, which may force small and medium-sized businesses to deviate from their business plans for developments of 10 dwellings, potentially deterring project progression. Part 4 references local residents, specifically those in Greater Cambridgeshire, but lacks a specified target. This could disadvantage workers in closer locations to developments but outside the district boundary. This seems unsustainable. Is the intention for such sites to have a lower target? The policy lacks clarity.	204989 (A Brand, Abbey Properties Cambridgeshire Limited)

Summary of issues raised in comments	Comments highlighting this issue
Active Travel corridors for commuting are also widely used for leisure. Therefore, they should be public bridleway to include horseriders.	203997 (S Rogers)
We support the Councils in seeking to maximise local economic opportunities through major developments	207447 (Pioneer Group Ltd)
Support for creating a new cultural hub at the Elizabeth Way bridge and Underpass(es) (S/PRIA/EG), a mix of uses will create employment opportunities for graduates, startups, makers and creatives seeking affordable workspace • A creative hub helps to promote a sustainable, resource-efficient neighbourhood. • Support integration of young people with the arts and public realm. • Include youth outreach and education programmes, apprenticeships and learning opportunities, informed by council market research and needs/gaps • Provide commercial and self-organised recreation, open access sports provisions including urban skating, active landscaping	204219 (L Cooke), 204243 (A Giarlis), 204804 (M Cleminson), 205203 (M Burman, Cambridge Junction/Create Cambridge), 204326 (B Lenz, NEUBAU Architect),
Support local retention of labour and SMEs with reference to S/PRIA/EG and Elizabeth Way bridge and Underpass(es) cultural hub project, Key to future-proofing operational sustainability is to promote Cambridge local small to medium size organisations through affordable space provisions including Artists workshops, makespaces, exhibition spaces, shops a.o. as well as offering apprenticeships and access to the creative industry and opportunities for youth and young people /students and graduates. Commercial anchor functions could include local, ethical food + beverage offerings as well as local	204726 (T Woodcock)

Summary of issues raised in comments	Comments highlighting this issue
sports clubs, entertainment, recreational provisions supporting day and nighttime economies, in line with local demand.	
With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project, the retention as a noteworthy 70's Heritage asset is supported. In 1950 the architect / town planner Lord William Graham Holford produced a report for Cambridge County planning, proposing a comprehensive road framework the scale of which was unprecedented in the history of Cambridge transport planning, leading to construction of the infrastructure in 1969. This introduced environmental and social challenges to the local residential area. I support regeneration and re-use of the EW Bridge and underpasses as a pedestrian/cycle friendly, cultural hub.	204793 (T Woodcock)
We propose securing the Employment and Skills Plan through a pre-commencement condition rather than at outline stage.	208358 (T Elbourn)
It is recognised that inclusive employment and business opportunities are a key element of a successful community.	211545 (Martin Grant Land Limited)

Policy WS/HS: Pollution, health and safety

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

A number of representors expressed broad support for the policy. Great Shelford and Stapleford Parish Councils supported the approach to addressing light pollution. Anglian water highlighted the need to ensure proposals do not put at risk the operation of existing infrastructure.

Natural England said the policy should include consideration of environmental impacts in relation to air pollution. On light pollution they advised the plan should reference impact in protected sites including Eversden and Wimpole Woods. The Cambridge Green Party suggested it should reference soil and water, and be clear the policy applies to construction and end use. Cambridgeshire County Council proposed adding reference to overheating. The Environment Agency request reference to various guidance documents that should be considered when assessing proposals. They also recommend greater emphasis and encouragement for the redevelopment of land affected by contamination as this is a sustainable approach which provides an important opportunity for environmental improvement via remediation.

Others thought the policy was not strong enough. North Newnham Resident's Association considered the policy did not have a clear enough approach to light pollution, which was a significant problem in Cambridge. Another representor expressed concern that the policy did not reference consideration of indoor air quality. The impact of air pollution in Cambridges narrow streets was also mentioned, as well as the noise impact from vehicles and heat pumps. It was asked whether more could be done to address noise insulation.

Other comments considered the policy too onerous. It needed to recognise issues covered by other regimes, or some of the matters covered were not necessary, such as indoor lighting. Requiring air quality statements for minor development was not

proportionate. Reference to ‘sensitive residential premises’ was ambiguous and not defined. Some matters could be addressed in the Councils’ validation list.

Response to main issues raised in representations:

A number of comments offer support for the policy in general or specific aspects of it, these are noted.

The policy provides a robust policy framework for ensuring appropriate consideration of air quality issues.

Additional clarification has been added to the policy and supporting text regarding consideration of the impacts of light pollution on wildlife. Air quality consideration of environmental impacts is already stated in the policy. There was a request to add reference to soil, but the protection of soils is addressed by other policies. Construction management is also addressed by a separate policy, as is water quality.

The Environment Agency request recommend greater emphasis and encouragement for the redevelopment of land affected by contamination as this is a sustainable approach which provides an important opportunity for environmental improvement via remediation. National Planning policy (the NPPF) says planning policies and decisions should support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. The draft policy does this, but supporting text can be added to highlight the opportunities development can provide for delivering remediation. Reference to technical guidance documents were also added in the supporting text.

Representors questioned why the policy referred to internal lighting, but indoor lighting can still have external impacts on wildlife, so in appropriate circumstances impacts need to be considered. Reference in the consideration of lighting to sensitive residential uses is also an appropriate approach. Some comments question the requirement for submission of Air Quality Statements. Air Quality Statements are a requirement in the adopted Cambridge Local Plan, supported by the Sustainable Design and Constriction SPD 2020. They provide a proportionate and effective method of identifying the impacts of a proposal. To enable this, templates have been published appropriate to different scales of development. They are also an appropriate method of identifying where full air quality assessment may be required.

Further guidance sources suggested by the Environment Agency have been added to the policy.

There was a suggestion that requirements could be made through validation lists. While they are a useful tool, it is important requirements are also made in planning policy.

Some comments raise concerns about the strength of the policy in preventing pollution. The policy is considered to provide a robust approach to considering applications. It takes an appropriate approach to taking account of the opportunities for mitigation. Another comment queries the coverage of policies from the adopted Cambridge Local Plan. The lighting policy approach is broadly similar but additional detail is included in the new local plan. The visual pollution policy is now addressed by policies in the Great Places theme. There were queries around the noise requirements, including noise insultation, but the policy is considered to go to the appropriate level of detail.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
We are broadly supportive of this policy, most notably those clauses relating to light pollution, which tally well with the aims of Policy S&GS 15: Preserving our dark landscape	201617 (Stapleford PC) 210943 (Great Shelford PC)
Local Plan should include indoor air quality standards. Filtering indoor air and providing sufficient ventilation will reduce harmful PM2.5 pollution and will remove airborne disease causing viruses and bacteria. Guidance should follow the ASHRAE standard, which requires a minimum of 6 air changes per hour. This is extremely hard to retrofit, so should be required in new builds.	202800, 202825 (H Cook)
Objects to Policy WS/HS. The requirement for major development proposals to submit an assessment of the impact of new external and internal lighting, and requirements in part 7 for all major and minor planning applications to submit an Air Quality Statement, are overly prescriptive and unjustified. Contributes unnecessary cost and burden on applicants	203085 (Barratt David Wilson Homes and North West Cambridge consortium) 204007 (Anglia Ruskin University)
The policy refers to the need for Noise Impact Assessments and Air Quality Assessments where relevant. These requirements should be referenced within the Council's validation requirements instead of being included in the policy.	210250 (Vistry)
Clarification is requested in relation to paragraph 2 of the policy, which refers to "sensitive residential premises". As currently drafted, this term is not defined and introduces unnecessary ambiguity.	210249 (Vistry)

Summary of issues raised in comments	Comments highlighting this issue
Policy is too extensive and needs to recognise that some of the adverse impacts can be mitigated by suitably worded conditions or via validation checklists. There is also a need to recognise that other regulatory regimes can rectify some of the issues specified. The policy could result in unnecessary cross-over between regimes.	203360 (ESCO Prospect)
Anglian Water supports the policy section regarding environmental nuisance/pollution and the agent of change principle. We consider that this provides a robust approach to managing development proposals for sensitive uses, including residential development, near our water recycling centres or sewer pumping stations, to ensure such proposals do not put at risk the operation of our existing infrastructure, and that the Agent of Change Principle will apply.	210210 (Anglian Water Services)
The proposed policy requires that new developments must not cause significant adverse environmental effects. However, it inadequately addresses pollution, appearing to accept its increase as inevitable and focusing only on mitigation. Light pollution is already a serious issue in Cambridge and should be reduced, not allowed to worsen. The policy relies on subjective judgments about what constitutes “significant” or “unacceptable” impacts, rather than clear evidence. Mitigation should be required for any demonstrable adverse effect. It assumes development should proceed even if it causes pollution, provided mitigation is possible. Yet, some impacts, especially from light pollution, can cause irreversible harm to wildlife and humans. The policy should not be based on the inevitability of increasing pollution, particularly given the negative effects of strong LED lighting. Developments that	205027 (North Newnham Resident’s Association)

Summary of issues raised in comments	Comments highlighting this issue
conflict with sustainability, environmental protection, health, or community objectives should not be permitted.	
The importance of emissions from vehicles involved in development and the potential amplification of these when travelling through narrow, canyon streets should be born in mind.	205194 (D Stoughton)
The draft Local Plan does not seem to include policies equivalent to Local Plan 2018 Policy 34: Light Pollution Control and Policy 65 Visual Pollution. The requirements in these policies should be carried forward	208628 (Madingley Road Residents Association)
Rural active travel routes and PROWs should be bridleway to include horseriders.	204000 (S Rogers)
Should include wording within this Policy about assessing environmental impacts, particularly in relation to Air Pollution. Your authority should follow Natural England's new Air Quality standard advice for guidance on this matter (see Appendix 2). Additionally, the Cambourne GBI document (page 13) refers to a buffer of 100m between Woodlands and Major Roads. Please note however that Habitats Sites and SSSIs (and woodland) at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition and/or acidification. The HRA includes an assessment of air pollution in relation to Habitats Sites (using a 200m buffer), but SSSIs should also be assessed by your authority as part of the	207633 (Natural England)

Summary of issues raised in comments	Comments highlighting this issue
The Light Pollution section of this Policy could also specifically mention the Eversden and Wimpole Wood SAC Impact Risk Zone (IRZ) and have requirements specific to this area, for example to follow the Institute of Lighting Professionals GN08 Bats and Artificial Lighting.	207634 (Natural England)
Make the content on eliminating light pollution - especially from poorly-designed street lighting strong. Strengthen the content on noise pollution especially from motor vehicles and generators - and air source heat pumps. Can provision be made for their sound insulation? Can improved provision on noise pollution and noise insulation in shared buildings and flats be strengthened?	203806 (A Carpen)
In this policy's stated aim, "odour, and/or light pollution" should be amended to "odour, soil, air, water, and/or light pollution" and "suitable for the end use" should be amended to "suitable for both the construction process and the end use." These make the aim more comprehensive. We recommend adding a new criterion 4.e to state "proposed development will not lead to excessive noise and/or vibration pollution during the development process" to address the risk of pollution during the construction process. The section "contaminated land" should be re-titled "contaminated land and water," as 10b discusses impacts on controlled waters.	203708 (Cambridge Green Party)
Health and safety in Girton depends heavily on safe Active Travel, reduced road danger, and flood-resilient environments. Unsafe severance points (Huntingdon Road, NIAB bridge area) undermine health. Flood-risk areas (Washpit, Beck Brooks) pose safety and wellbeing risks. Pollution reduction aligns with better cycling/walking infrastructure. GPC Requests to the Local Plan: Address unsafe	202230 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
junctions and severance points under WS/HS. Embed flood-risk mitigation in health and safety policy expectations. Prioritise active mobility safety measures.	
Infrastructure assessments should be fully outlined, such as Air Quality risk from new construction at presently congested areas, hence the case for Traditional Architecture that will confer longevity benefits in the long-term with as much free car parking as possible.	210372 (Community Campaigner D Barton)
Public health support Draft Policy WS/HS that seeks to ensure amenity for new buildings and neighbours. Would like to see water pollution and overheating included within this policy.	210608 (Cambridgeshire County Council)
Supports Policy WS/HS. The policy recognises the importance of ensuring that new development does not result in unacceptable impacts on health, amenity or safety arising from pollution, including noise, vibration, odour, light and air emissions.	204453 (Tritax Big Box)
Land south of Coldhams Lane is a very toxic old tip. Multiple piles are planned to be drilled through many metres of waste during construction. This WILL release toxic leachate into the chalk stream BELOW the site (Cherry Hinton brook) and probably will cause leachate also to flow SIDEWAYS into neighbouring land. It will also greatly increase traffic on Coldhams Lane.	201249 (S Williams)
EWR route is the worst route that could possibly have been chosen. It travels too close to local houses, it is insensitive, destructive, scarring, it will create mental stress and anxiety for thousands of local people, the noise pollution will be unbearable and the damage to the countryside and wildlife will be horrific. A new route should be chosen.	201586 (P Brown)

Summary of issues raised in comments	Comments highlighting this issue
We would recommend greater emphasis and encouragement for the redevelopment of land affected by contamination as this is a sustainable approach which provides an important opportunity for environmental improvement via remediation.	211167 (Environment Agency)
We are pleased to see these included and that Plan highlights the necessity for soil and groundwater investigations and mitigation of any contamination prior to development. Any development proposed on brownfield sites, historic landfill sites, or sites suspected to have been affected be contamination, should follow the requirements of our Land Contamination Risk Management (LCRM) guidance. This would initially require a Preliminary Risk Assessment, which would likely be followed by intrusive site investigation, and potentially detailed quantitative risk assessment to assess whether remediation can be undertaken to ensure the protection of the surface water and groundwater environments.	211168 (Environment Agency)
We recommend that the following guidance be referenced: Paragraphs 123, 146, 180, 189 and 190 within the National Planning Policy Framework (NPPF); Part IIA of the Environmental Protection Act 1990; The Land Contamination Technical Guidance on gov.uk including the Land Contamination Risk Management (LCRM) guidance. Our guidance is regularly revised, and therefore, throughout the plan's duration, the most recent version or replacement guidance for superseded versions should be consulted.	211169 (Environment Agency)
We question the justification for requiring an Air Quality Statement in respect of all development sites, particularly those that are not within any Air Quality Management Area. We consider it therefore unnecessary for the policy to require planning applicants to also provide an assessment of air quality.	208359 (T Elbourn)

Summary of issues raised in comments	Comments highlighting this issue
Further, a CEMP is a standard condition for new development, and this typically contains information on dust and air quality, including monitoring provisions throughout the construction phase. As such, this policy requirement represents duplication of both air quality assessments within the district and information contained in a CEMP which will add unnecessary burden to applicants.	
It is recognised that successful development should take account of sources of pollution.	211546 (Martin Grant Land Limited)

Policy WS/PH: Public houses

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The policy was supported by Cambridge Past, Present and Future and other individuals. The Cambridge Green Party suggested amendments to allow for more than just one public house to serve a wider range of clientele. One member of the public was concerned that the policy made no specific requirements for new public houses in any large developments and that the caveat of the policy b(iii) is too wide (1000m) which would not protect Cambridge based public houses where they are more concentrated in

areas like Mill Road. Girton PC requests the Local Plan: treat pubs as essential social infrastructure; resist their change of use unless equivalent social value is demonstrated; encourage partnerships between pubs and community groups.

Comments made by one member of the public stated there are now too many public houses, those not being used should be closed. Another requested safe inclusive of horse rider routes to/from rural pubs to enable horse riders to support public house business by frequenting them.

Response to main issues raised in representations:

In response to the comments submitted, the policy has been amended to clarify the circumstances where proposals will be supported for new or enhanced public houses, wine bars, and other drinking establishments where food is ancillary to the premises' use. It should be noted that even when planning permission is granted for a public house or equivalent establishment selling alcohol, both the premises and operator will still need to have a licence to sell alcohol in to operate and the licensing process is separate to planning.

The policy has also been amended to reference a List of Safeguarded Public House Sites (listed in the Appendix J) to clarify the list of public houses including their curtilage that the policy will apply to. The list will be reviewed periodically.
Further clarification about the evidence needed to support the loss of a safeguarded public house has also been provided in the policy along with additional guidance regarding public house viability appraisals (featured in Appendix G). While there is no specific requirement to provide a public house in the area's large development sites, the revised policy provides greater clarity about their provision including other forms of drinking establishments where food is secondary. The broader range of drinking establishments should also provide greater flexibility for such operators to open in new settlements and urban extensions.

Policy WS/NC: Meeting the needs of new and growing Communities had also been amended to include the provision of leisure routes. These would be suitable for people of all ages and abilities and for a variety of uses, to allow them to exercise outdoors and access nature and the wider countryside.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Times have changed. There are now too many public houses. Close them where they are not being used. Move on.	202179 (M MacGinley)
Support the protection of Public Houses.	203372 (Cambridge Past, Present and Future)
The caveat of the policy b(iii) is too wide (1000m) areas of Cambridge would not have the benefit of this policy protection, for example the many existing pubs on Mill Road would not be protected. Greater policy protection wording required to help preserve the pub landscapes within the city.	202502 (H Brown)
So far as I know, you have not required new pubs in any of your large developments.	201250 (S Williams)
Supporting the diversification of public houses to help them remain viable within the Local Plan is essential. Denying permission for change of use will not work unless they can remain financially viable.	202026 (S Williams)
Safe inclusive of horserider routes to/from rural pubs enables horseriders to support pub business by frequenting them.	204003 (S Rogers)
We welcome this policy's recognition of public houses as community infrastructure rather than just commercial assets. However, in point 1, "need for the public house" should be amended to "need or significant demand for the public house." In cases where one public house is available but of a character unsuitable for some residents' usage, there is no community-wide need for an additional public house, but there may be significant demand from those residents who are under- or un-served by the existing provision.	203709 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
GPC Requests to the Local Plan: Treat pubs as essential social infrastructure, not optional amenities. Resist change-of-use proposals unless equivalent social value is demonstrated. Encourage partnerships between pubs and community groups.	202231 (Girton PC)
It is recognised that public houses are a key element of a successful community.	211547 (Martin Grant Land Limited)

Consultation Statement

Appendix 11: Response to Representations - Great places



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan - Regulation 19 consultation (August 2026 - September 2026)

GREATER CAMBRIDGE
SHARED PLANNING

Summaries of Draft Plan Representations, and Response to Main Issues Raised

Great Places

Great Places Introduction

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

General comments on the Great Places theme were made on a wide variety of issues. A large number of comments focused on the importance of culture and investment in cultural venues. Investment in cultural infrastructure should be reflected across the plan and not just in the great places or the wellbeing section, and should be considered alongside other important types of infrastructure.

Cambridgeshire Constabulary requested that Secured by Design Principles be reflected in planning policies, and clearer policies on security and crime prevention. Cambridgeshire Acre highlighted the importance of considering design in rural areas as well as urban forms of development. The Cambridge Green Party highlighted the importance of community engagement and involvement

in decision making. Cambridge Past, Present and Future sought greater clarify on the approach to public art, and clearer policies regarding lighting design. Several comments highlighted the importance of creating walkable neighbourhoods, and the importance of public rights of way. Camcycle made comments and policy suggestions to support active travel, particularly regarding connectivity.

Some questioned whether design quality was being achieved, and whether the polices in this plan would make a difference. It was stated that policies in the plan needed to be followed, and not overridden by speculative development, including infrastructure projects. Others highlighted the importance of development being accompanied by new infrastructure. A number of representations considered that the policies regarding the historic environment were too prescriptive.

Response to main issues raised in representations:

The general support for policies under this theme is noted.

Cultural infrastructure is an important issue that has informed development of the Local Plan. A number of studies new studies were commissioned, including the Community Infrastructure Study and Cultural Infrastructure Strategy which also inform the Infrastructure Delivery Plan.

The people and place responsive design policy seeks proposals which empower people and communities through community engagement to inform design decisions. Furthe updates have been made to policies to address community safety and reflect up to date guidance on Counter Terrorism security and prevention measures. Policies in the infrastructure addressing transport and

connectivity seek to deliver walkable and connected neighbourhoods, and set appropriate and robust requirements around active travel. Policies seek to successfully integrate public art in development and the public realm.

The plan has appropriately considered heritage, and provides a robust set of policies, supported by evidence to ensure protection and enhancement of heritage assets.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Recommend that new developments incorporate Secured by Design principles – physical protection, well□defined routes, safe lighting, clear separation of public and private spaces, surveillance and management – as an early□stage design requirement, in line with NPPF 12(135)(f).	201335 (Cambridgeshire Constabulary)
Support Cambridge Junction and Create Cambridge in asking that: • Cultural infrastructure is embedded across strategic chapters, not confined to Wellbeing • Culture is treated with parity alongside housing, transport and utilities as core civic infrastructure • Create Cambridge is engaged as advisor/consultee on the further development of the Cultural Infrastructure Strategy and the Local Plan where this relates to cultural infrastructure and embedding Culture across the city's plans. • This reflects how cultural venues function in practice and ensures consistent delivery across the plan	202153, 202320, 202898, 202902, (Cambridge Junction), 202402 (J Webber), 202421 (T Shaw), 202694 (T Altmann), 202724 (W Townsend), 202768 204197, 205433

Summary of issues raised in comments	Comments highlighting this issue
	(Cambridge Junction / create Cambridge), 202950 (R Tarry), 202963 (T Flinders), 203374 (N Ellis), 203455 (S Ashworth), 203497 (L Heap), 203649, 203881, 205083 (University of Cambridge), 203859 (N Yeni), 204422 (New International Encounter), 204872 (L Matthews), 205148 (H Paterson), 205379 (L Howse), 205383 (N Oakley), 205444 (A Seiglow), 202066 (H Chamberlain) 202208 (H Tam), 205223 (J Walsh)

Summary of issues raised in comments	Comments highlighting this issue
We support these policies.	203040 (Cambridge City Liberal Democrat Group)
We support the Great Places policies GP/PP and GP/QD and recommend each include an explicit reference to Active Design.	209231 (Sport England)
Included in great places consideration must be given to buildings such as Schools and Hospitals. They should all be upgraded or replaced if they are no fit for modern use	202181 (M MacGinley)
The emphasis on high quality design and local character is welcome and relevant to rural areas with sensitive landscapes and heritage. However, the policies appear largely framed around urban form, density and taller buildings, with less guidance tailored to village scale development. Rural vernacular, farmsteads and the setting of small settlements are not clearly referenced. Stronger rural proofing would include clearer expectations for design in working landscapes, protection of village edges and support for reuse of rural buildings, ensuring quality design enhances both heritage and everyday rural life.	203176 (Cambridgeshire ACRE)
The 'Great Places' theme should include more concrete references to involving local people and communities in decision-making, as people are central to creating great places. References to building materials should specifically require that the materials be sustainable. Provisions for enhancing and protecting biodiversity must be strengthened, as research shows that to fully benefit from biodiversity, at least 20% of land area (including urban spaces) must be maintained as semi-	203711 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
natural habitat and urban green spaces are crucial for cooling local temperatures. Finally, we recommend adding a new policy on Tree-lined streets.	
It is unclear how the plan will respond to and deliver Public Art. It is currently unclear whether its preservation and implementation fall under the general design quality standards of GP/QP (landscape and public realm) or the protection of Non-Designated Heritage Assets (GP/ND). Without a specific designation, significant public art installations may lack the necessary protections against removal or decay. Irrespective of how the plan will approach public art, it should emphasise the importance of early collaboration on the appropriate siting and integration of public art in the design of greenspace and/or public realm	203917 (Cambridge Past, Present and Future)
The governance of Street Lighting requires further definition within the plan. It is presently uncertain whether lighting standards will be dictated by shopfront guidance or broader design policies like GP/QP. Clear policy language is essential to ensure that lighting schemes are sensitive to the historic character of Cambridge and do not contribute to visual clutter or inappropriate illumination of the heritage environment	203920 (Cambridge Past, Present and Future)
Security and Crime prevention measures should be considered at the earliest opportunity as an integral part of any initial design for a proposed development. Proposals should demonstrate well-designed security features; well-defined routes, spaces and entrances that provide for convenient movement without compromising security; Safe routes: direct, wide, well lit, without hiding places; Places that are structured so that different uses do not cause conflict; appropriate and non-obtrusive	204652 (Cambridgeshire Constabulary)

Summary of issues raised in comments	Comments highlighting this issue
lighting levels; Clear separation between public and private spaces, avoiding public routes next to back gardens; Places that promote a sense of ownership and community; Places where the level of human activity is appropriate to the location reduces the risk of crime; Places that are designed with management and maintenance in mind	
Greater Cambridge also has examples of some truly depressing architecture. Of little boxes of blandness. Is there any way of requesting that some effort is put into the design of new buildings? This does not need to cost a lot. There are examples where modest brick detail is enough to make the building more appealing. There may not be, but I plead anyway.	205201 (B Nicolson),
Most of the are laudable aims but too often developments create high levels of traffic or provides a route that other traffic prefers which cuts off one part of a community from another, thus effectively isolating them. If the walking route to local facilities crosses a high traffic zone this then creates yet another incentive for car use and exacerbates the problem.	205238 (D Stouhgton)
Dense development needs strong walking, cycling and public transport to succeed. Introduce mandatory permeability standards based on site size. Walking and cycling connections should be required, not optional	205242 (J Thomas)
As a Cherry Hinton Resident, it is currently difficult to get an appointment at the local surgery without having to wait at least a couple of weeks and the NHS dentists are full. Even though you have already built houses and flats in Cherry Hinton you have not compensated with additional	208618 (R Smith)

Summary of issues raised in comments	Comments highlighting this issue
facilities. Do you have any plans to amend this and to do the same for further developments that are planned in other locations? If not, this place is a great deal of extra pressure on existing surgeries	
Good to make HIAs a formal requirement and important points about social isolation and poorer health outcomes but add community severance issue where high traffic levels/layout impede neighbourliness. Walkers/wheelers don't always feel safe near cyclists and micromobility vehicles/skateboards (?) - speed, footway abuse, lack of lights -build in remedies. Add building continuous footways at junctions fostering pedestrian priority/wheeling accessibility/slowing vehicle speeds.	201632 (Cambridge Living Streets)
Rural active travel routes and PROWs should be bridleway to include horseriders.	204008 (S Rogers)
Recent houses at Springfield Village and the flats near Cherry Hinton High Street are aesthetically poor and have ruined the character of the village.	208615, 209169 (R Smith)
There should be a clause allowing for increased scale, density, and form in new developments, enabling them to deviate from existing low-density patterns while maintaining good quality. Policies that mandate car-free streets may lead to negative outcomes, such as rear parking; a balance should be struck to create multi-use streets that accommodate parked cars. Encouraging robust and flexible building designs is positive, but the current approach may overlook the adaptability of various building types, particularly those that are less adaptable. There is a lack of emphasis on material quality in the policies regarding skyline and tall buildings, which should be addressed.	202662 (Mole Architects)

Summary of issues raised in comments	Comments highlighting this issue
The plan fails to recognise and protect Cambridge's world-heritage significance. The plan does not recognise or manage the conflicts between the proposed growth and Cambridge's finite physical and environmental constraints. Tall-building proposals are presented without visualisations or impact assessments, breaching the required heritage and skyline controls.	206574 (J Preston)
I would like to see consideration for different types of development, such as garden or forest developments, where cars are pushed to the edge of the development in hidden multistories/screened single stories, and access roads are minimised to create semirural villages that one can walk around. I think there is a lack of ambition in terms of providing at least some space for these more radical housing design schemes. I think wherever possible when parking is present, it should be hidden (Look at Great Kneighton as a good example). Proper use of architects should be encouraged within these developments, rather than revision to quantity surveyor. Full service Supermarkets (Such as the Sainsburys in Eddington) are very useful to provide cheaper, more varied food than smaller metro shops.	208732, 208734, 208736 (Cllr M Morgan)
Redevelopments are too often causing social exclusion of poorer residents. Measures are needed to improve public consultations. Questions should be open and impartial. North Cambridge Framework, and Cambridge Market examples provided. Social inclusion of communities needs to be far better protected.	204928, 207547, 207548, 207549 (A Copping)
We often see developers rely on government-sponsored NSIP legislation to ensure they can bypass local planning frameworks entirely, presenting residents and businesses with proposals that are	209119 (S Hepworth)

Summary of issues raised in comments	Comments highlighting this issue
poorly designed, poorly evidenced, and that embody none of the vital investment in local host-communities that could bring real, lasting benefits and sustainability, helping them to build greener, happier futures. If Cambridge is serious about shaping its future responsibly, it cannot allow its carefully planned growth strategy to be overridden by speculative, profit-driven proposals that treat surrounding rural areas as expendable or as commodities to be consumed and exploited for their private financial or 'greenwashing' potential. The Greater Cambridge Local Plan must Strengthen policy language to prevent NSIP-scale or speculative developments from undermining local landscape, green infrastructure and wellbeing objectives.	
Villages like Weston Colville are not simply buffers to absorb growth pressure from Cambridge or elsewhere and we are not here so that private individuals or corporations can asset strip us for our proximity to a growing city. We are living communities with deep historical roots, active social networks, local family businesses, farms, valuable wildlife habitats and heritage assets. What we seem to lack though, are any meaningful protections. For the Greater Cambridge Local Plan is to be a meaningful and credible policy document, it must explicitly recognise and protect rural communities beyond the Green Belt as an integral part of Cambridge's setting, identity and future resilience.	209120 (S Hepworth)
Secure parking for motorbikes and electric bikes is essential; future developments must improve bike-storage safety in workplaces and residential sites.	208010 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
One of Greater Cambridge's greatest attributes for cycling is its ability to connect people to their destinations via green space and alongside water. Routes such as those across commons and along river corridors are not in conflict with nature but instead provide people with a powerful experience of nature everyday. Development should build on this strength, treating cycling as a means of stitching together landscapes, communities and daily life. Two policies should be added to the Local Plan: Policy 1: Active travel design principles Potential draft policy: All development must be designed to support walking and cycling as the default choice for everyday journeys. Proposals will only be supported if they demonstrate compliance with the five active travel design principles. Policy 2: Mandatory permeability Potential draft policy: To ensure directness and convenience for walking and cycling, development proposals must meet minimum permeability standards based on site size. For example: ● Developments of up to 50 homes or equivalent floorspace must provide at least two direct outward walking and cycling connections to the surrounding area. ● Developments of 51 to 100 homes or equivalent floorspace must provide at least three direct outward connections, aligned to different cardinal compass directions. ● Developments of more than 100 homes or equivalent floorspace must provide direct outward	209081 (Camcycle)

Summary of issues raised in comments	Comments highlighting this issue
connections in all four cardinal compass directions, unless it can be robustly demonstrated that this is physically impossible.	

Policy GP/PP: People and place responsive design

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was general support for a policy addressing place making and design issues.

The Cambridge Green Party consider the policy should be clearer that engagement should help shape developments. They also consider the policy should make responding to climate change a requirement.

The importance of designing for active travel, permeability, and creating walkable communities, and sustainable transport opportunities. Camcycle asked for consideration of safety and the perception of safety, and also to consider the comfort of the end uses of active travel infrastructure. One Comments suggests the policy could be more to make sure places are accessible for all. The British Horse Society consider large scale proposals should include rights of way masterplans.

Anglian Water consider policy should refer to a buildings operation as well as its delivery and maintenance. East England Ambulance Service NHS Trust raised a range of design issues needed to create healthy places.

The plan should recognise that development in villages may not be able to meet all the policy requirements. Girton Parish Council highlighted the importance of design reflecting village context. Stapleford PC and Great Shelford PC highlighted the importance of local design guides, and that they are not sufficiently referenced in the policy.

One comment proposed that Design Codes based on Traditional Vernacular Architecture (TVA) should be utilised in preference to Design Guides. Another comment was concerned about inclusive design appearing optional.

Response to main issues raised in representations:

The people and place responsive design policy seeks proposals which empower people and communities through community engagement to inform design decisions. The Councils also publish a Statement of Community involvement with further guidance on how to carry out a good consultation. The policy has been strengthened to include reference to participation in early stages of plan making such as through masterplanning and public art to inform and shape design decisions.

The policy is ordered by the core themes of Community, Connectivity, Climate and Character, to reflect the Cambridgeshire Charter for Growth but many elements of the policy are reflected in other chapters of the Plan. The policy sets out how development can improve connectivity and includes reference to maximising active travel and sustainable transport through design principles. Connectivity and public rights of way are also addressed in the infrastructure theme, which sets appropriate policy requirements. It is important to minimise repetition of policies. Climate change issues are addressed within the relevant theme, and should not be duplicated here. Wording has been added to include design of development that has low impact on its operation to respond to the climate emergency.

The policy can be applied proportionally to a range of contexts, including in villages and additional references have been added to reflect on the important rural character that extends into the city and the key opportunities to experience the built and natural environment from these locations. The importance of the various types of design guidance and codes, including village design codes, is recognised in the supporting text to the policy and has been added to policy criteria alongside references to neighbourhood planning. Different types of architecture will be appropriate to different locations, including Traditional Vernacular Architecture.

More detailed requests regarding design of high quality streets, public realm and development are noted, and have been addressed in other design policies within the Great Places Chapter.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Design guidance and codes produced by local communities during neighbourhood planning, reflect extensive community engagement, and are important documents. These documents are not adequately referenced in the policy or supporting text, except for a vague mention in paragraph 7.12. Clear references to design guidance and codes should be included in the policy or its supporting text, emphasising their role in influencing development design and ensuring responsiveness to people and place. Whilst clause 4 of Policy GP/QD includes references to design guidance, similar references should be made in Policy GP/PP.	201618 (Stapleford PC)

Summary of issues raised in comments	Comments highlighting this issue
Where neighbourhood plans have been adopted, local communities have invariably undertaken extensive community engagement to produce at the very least a design guide and, in many instances, a detailed design guidance and codes. No mention of this is made in either the policy or supporting text. Design guidance and codes are invaluable documents with long lifespans which should be a major influence on development design and, by their very nature, already demonstrate people and place responsive design. We request that clear reference is made to them at an appropriate place in either the policy or its supporting text.	210944 (Great Shelford PC)
The Local Plan must incorporate the five active travel design principles – coherent, direct, safe, comfortable and attractive – as a requirement for all development. It must also include mandatory permeability standards requiring multiple direct walking and cycling connections into surrounding areas. Also, the planning stage must include tests of design quality, not (as too often at present) left until later stages.	201997 (D Langley)
Anglian Water is supportive of clause 1.c to ensure new development supports the climate emergency response. We consider it would be useful to include the term 'operation' as new buildings using less energy and potable water are a factor of its operation rather than delivery or maintenance.	210211 (Anglian Water Services)
This policy has an excellent basis, and supports the need for citizens to be able to live in healthy and attractive environments. There is one omission worth noting: 1.b.i/ii mentions connectivity, transport infrastructure, and active travel. Sadly the transport isn't required to be sustainable.	202644 (P Tribble)

Summary of issues raised in comments	Comments highlighting this issue
We support the aims in this policy particularly aims around connectivity and active travel links.	203042 (Cambridge City Council Liberal Democrat Group)
Policy is aimed at large-scale developments and there should be a recognition that if development is provided in villages that are also communities, it may not be possible to meet the full checklist of information being sought and a proportionate approach should be used.	203369 (ESCO Prospect)
Large-scale development site opportunities may come forward in a piecemeal manner. However, in such circumstances, planning permission should require a comprehensive rights of way masterplan for the whole site to be prepared and agreed at an early stage. This would ensure that the cumulative impact on the public rights of way network is properly addressed and that opportunities to protect, enhance and improve the network are not lost. Securing a site-wide rights of way masterplan as part of the permission, would enable coherent delivery of safe, inclusive multi-user access meeting national and local policies.	203601 (British Horse Society)
In 1.a.iv, “inform design decisions” should be amended to “inform and shape design decisions,” so that community engagement genuinely empowers local people and has a clear influence on outcomes. Without this, engagement risks being tokenistic. In 1.c, we recommend adding a second subclause 1.c.ii, “being designed to be adapted and resilient to the impacts of climate change, including extreme weather events.” This change is necessary to reflect scientific forecasts and ensure	203712 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
development responds effectively to the climate emergency. An effective response needs to go beyond mitigation and extend to adaptation and resilience.	
We support the strategic vision of Policy GP/PP, particularly its emphasis on development responding positively to context and maximising active travel through new and improved cycle routes. This focus on connectivity aligns well with the locational advantages of settlements such as Horningsea, which have benefited from recent Greenway investment. By prioritising character, climate, connectivity and community, the policy provides a strong framework to ensure that new housing, including deliverable fringe sites, contributes positively to a lasting legacy of high-quality development.	202070 (M Asplin)
Connectivity without coercion; Good permeability matters — but it should apply to all users, not selectively. Creating routes that: work well for cyclists but poorly for pedestrians; or exclude vehicles regardless of context, creates division rather than connection. Design principles should aim for: safety; legibility; and coexistence.	208878 (D Smith)
1. Design Codes based on Traditional Vernacular Architecture (TVA) should be utilised in preference to Design Guides 2. LAs should establish recurring partnerships with key Consultation Bodies, such as Create Streets and The King's Foundation, etc who specialise in getting through to a huge swathe of grassroots members of the public with tried and tested previous experience in Local Plans, such as Lichfield, etc. 3. Option for people to provide feedback even if out of time for additional documents, such as SPDs or at the discretion of Councils where feedback may be particularly assistive or lead to additional academic	210354 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
and architect guidance. Option for public publishing of feedback should be encouraged with the consultee's consent to encourage wider consultation uptake moving forwards.	
EEAST requests: • Permeable surfaces that can be used by wheelchairs, mobility scooters, pushchairs, walking aids) and reduce localised flooding. • Lighting designed to reduce crime and improve perceived safety whilst supporting nocturnal habitats. • The needs of adults, children and older people with disabilities but not wheelchair users should also be considered. This might include provision of seating at regular intervals to allow people to sit and rest before continuing with their journey, provide mental health benches and benches at different height levels for children and those who have difficulty lowering/rising. • EEAST would encourage the development of dementia friendly streets, shared space design to promote inclusive access and safety. Street play areas should integrated facilities for disabled children (physical and/or mental health) and be accessible for adults who may be disabled (physical and/or mental health) who are supervising children. • Consideration that not all disabled people are wheelchair users but may still have difficulty negotiating stairs/accessing outdoor or communal spaces.	210331 (East England Ambulance Service NHS Trust)
I strongly support this policy and encourage its strict implementation. I might suggest going further and adding a point:1.b.iii Whilst encouraging cycling and other forms of active travel, protecting pedestrians from speeding scooters, e-bikes and bikes and ensuring infrastructure that prioritises pedestrians.	204813 (M Cleminson)

Summary of issues raised in comments	Comments highlighting this issue
The Draft Plan lacks sufficient reference to the transport/place-making needs of those using walking aids or wheeled mobility aids. It should be clear that when the Plan is considering the needs of pedestrians, it is also considering the needs of walking aid/wheelchair users. The term 'wheeling' is now commonly used to mean active travel at pedestrian speed using mobility aids such as wheelchairs, mobility scooters, and rollators. I think it would be much better if the plan referred to 'walking and wheeling' throughout, instead of just 'walking'. A definition of wheeling should be added to the glossary.	203994 (S Hughes)
Point 1d is a crucial part of the policy and as it relates to point a., it should be given greater prominence and be renumbered as point b.	203927 (Cambridge Past, present and Future)
Support the policy which keeps the special quality of Cambridge and the surrounding area, ensuring that it continues to be a place where people want to live, learn, work and play.	202489 (University of Cambridge)
Design in Girton must respond to the historic rural village character, protect the Girton Gap, and reinforce the parish’s distinct identity separate from Eddington or urban Cambridge. Place-responsive design must reflect rural scale, green edges, and low building heights.	202232 (Girton PC)
Support the objectives of the policy. In particular, support is given to the emphasis on development responding to local character and distinctiveness. Given the significant variation in character across Greater Cambridge, it is important that the policy is applied in a way that avoids a homogenised approach to design and instead allows proposals to respond appropriately to the specific qualities, scale and identity of their local context. Important that the policy is implemented proportionately through the planning process.	210251 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
The policy seeks to maximise active travel. It should also seek to make best use of opportunities to enhance countryside access through an expanding network of PROW and permissive access routes for leisure journeys.	210614 (Cambridgeshire County Council)
Rural active travel routes and PROWs should be bridleway to include horseriders.	204010 (S Rogers)
Concerns that inclusive design and accessibility are treated as aspirations rather than enforceable requirements.	208982 (J. Williams)
It is recognised that high quality design is a key element of a successful community.	208271 (Martin Grant Land Limited)
Active travel safety must be understood through two lenses. The first is actual safety. Too many developments prioritise vehicle capacity at site access points, resulting in oversized junctions that encourage excessive motor traffic speeds and form hostile barriers to walking and cycling. Junctions are the biggest risk to cyclists and pedestrians. The second is perceived safety. Lighting remains a major weakness across the network. Important everyday routes remain unlit and solar studs (while a useful guidance solution) are presented as a substitute for lighting when they are not. The barrier this presents in particular to young adults and women is well known and researched but environmental concerns are frequently cited as reasons not to act, yet the environmental cost of journeys not made by bike and instead made by car is rarely	209079 (Camcycle)

Summary of issues raised in comments	Comments highlighting this issue
acknowledged. Sadly, in Cambridge many locations that are lit and only lit after a serious incident have occurred. We should not have to wait for a horrible assault or a collision before lighting is installed.	
For active travel infrastructure, comfort continues to be treated as optional rather than essential. Surface quality, width, drainage and maintenance remain points of dispute despite clear national guidance. Poor surfacing and constrained widths disproportionately affect less confident users and those using non-standard cycles, directly undermining inclusive mode shift. Comfort is not about luxury. It is about enabling predictable, smooth and accessible journeys for everyday use, across seasons and user types.	209080 (Camcycle)

Policy GP/QD: Achieving high quality development

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Representors considered the policy should avoid creation of car dominated environments rather than just the perception. A number of comments requested greater clarity to be added around active travel design, which should be assessed at the planning stage and not left to later detail. Active travel routes should meet the five core design principles. Camcycle consider directness and permeability (the ability to move easily through urban environments) as inseparable.

Cambridge City Council Liberal Democrat Group highlight the policy is missing the letterbox guidance from the 2018 local plan. Cambridge Green Party request further emphasis on the importance of community consultation in shaping places, and a number of other changes including adding reference to sustainable materials.

Anglian water request that the policy require access to existing utilities be considered when designing new development. Cambridge Past, Present and Future that it should consider waste collection, not just storage, and that consideration of impacts should include on the environment and heritage. The East England Ambulance Service NHS Trust highlighted a range of matters for designing healthy places. Comments also highlighted the importance of inclusive design, for both older and younger people. Stapleford Parish Council praised reference to the role of neighbourhood plans in setting design principles, but considered this should also be referenced in other policies. Girton Parish Council considered that design should respond to village context.

Some representors were concerned that quality design was not being delivered, and sited examples. One representor supported the policy in principle, but considered that it should be applied proportionately.

Several comments proposed specific measures that should be applied to the area of the Elizabeth Way Bridge and Underpasses in Cambridge.

Response to main issues raised in representations:

Active travel is addressed in a number of parts of the plan, but most directly in the infrastructure theme. Concern about creation of car dominated environments is noted, and further clarification around this issue has been added to the policy. Active travel has also been added to the Glossary and makes reference to walking, wheeling and cycling.

Criteria i) has been amended to include reference to the Biodiversity Supplementary Planning Document and the incorporation of design measures to support priority and threatened species such as swift boxes. Requests to ament policy to emphasise the importance of sustainable materials are noted. Criteria i) and o) have been amended to incorporate the climate, nature and biodiversity within high quality design, and this has been set out further in the supporting text and within other policies in the Great Places Chapter and Climate Change Chapter. The ordering of the policy criteria has been amended to separate waste/recycling from cycle parking to distinguish between the design elements and safety, convenience and accessibility.

Designing appropriately to local context is addressed in this policy, with emphasis on responding to high quality design with materials and architectural detailing that are appropriate to the context and character of the area. Changes have been made to emphasise the importance of successfully incorporating legible and safe design into development. Additional requirements have

been added to ensure building layouts, open spaces and active streets provide natural surveillance with appropriate lighting to avoid the creation of blind spots around buildings. Criteria l) has been amended to include waste storage and collection as well as access to utilities and sets out that this must not negatively impact on the environment, heritage and neighbouring amenity. Guidance set out by Secured by Design guidance, and the National Protective Security Authority has been incorporated into the policy with careful design solutions integrated in development through crime prevention features and counter-terrorism protective security measures.

Health and wellbeing have been emphasised in policy amendments with the successful design of buildings, facades, and open space and public realm surrounding buildings playing a key role in improvement mental health. Emerging research in neuro-architecture has been referenced in new policy criteria and the supporting text – setting out how design can have measurable effects on users and passers-by. References to the positioning and accessibility of letterboxes and names and numbering of buildings to increase legibility have been added and reference to permeability of spaces has been added to criteria h). Other elements of inclusive design are required by the People and Place Responsive Design policy. Request for reference to opportunities for safe open spaces and active streets for children and young people is noted and has been included within the landscape and public realm policy within the Great Places chapter. Suicide prevention through high quality design has been added to the skyline and tall buildings policy and establishing high quality landscape and public realm.

The policy provides criteria on achieving high quality development and should be considered in the planning process alongside other policies in the Plan. The policy is also proportionate and sets out how design measures should be implemented.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
We support this policy in particular active ground floor uses and frontages to support natural surveillance. However, this is missing the letterbox access guidance from the 2018 City local plan. Please can you add this back in (probably in 2, j) so it is clear that letterboxes should be at an accessible height (in the middle of the door) and that these should be accessible from outside the building for flats, without the need to ring for entry. Please can this also be added to para 7.20 so it includes letter boxes as well as the other services listed.	203044 (Cambridge City Council Liberal Democrat Group)
Section 2.d requires avoiding the perception of a car-dominated environment; perhaps this should rather require avoiding the reality of car-dominated environments rather than just the perception?	203186 (P Tribble)
Is this really required when such information could be sought by a design guide and addressed in a detailed Design and Access Statement?	203376 (ESCO Prospect)
Anglian Water requests that clause 2.i also includes utilities, as it is important that existing utilities are factored into the layout and design of new development. Our existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewerage assets should be sited within highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required	210212 (Anglian Water Services)

Summary of issues raised in comments	Comments highlighting this issue
The policy and supporting information should be strengthened by referring to waste collection as well as storage, and to environment and heritage as well as neighbouring amenity. Suggested wording for point 2.i. - new text shown in capitals Ensure the layout and design of development successfully incorporates functional needs such as waste storage AND COLLECTION, recycling and bicycle parking, in a way that does not negatively impact on THE ENVIRONMENT, HERITAGE or neighbouring amenity. The policy must be backed by a clear commitment to refuse applications that do not meet the highest possible standards of architectural integrity.	203946 (Cambridge Past, Present and Future)
The overview should replace “designed with communities in mind” with “designed to reflect the needs and priorities of communities, as determined through robust consultation processes” to ensure meaningful engagement. In 2.c, “highquality building materials” should read “high-quality, sustainable building materials.” Section 2.d should prioritise safe, active streets, minimise car use, and integrate parking. 2.i should separate waste/recycling from parking, ensuring both are safe, convenient, and non-intrusive. 2.k should be moved earlier and read “Prioritise mixed-use proposals.” Supporting text should address climate, nature, and biodiversity, and circulation should avoid cul-de-sacs to improve safety and connectivity.	203713 (Cambridge Green Party)
Vistry support the vision of the proposed policy. However, Vistry wish to reiterate the point made in response to Policy GP/PP that it is important the policy is applied proportionately, with detailed matters assessed at the reserved matters stage and clear design principles established at outline planning application stage where appropriate	204866 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
• The quality of the design of these needs to be tested early on at the planning stage, not later on when 'spades' are in the ground. • Getting this right is key to encouraging people to adopt sustainable methods of transport and meeting any climate targets.	205047 (B Nicolson)
• Developments often feature indirect, unsafe, uncomfortable, or fragmented routes due to the lack of mandatory design quality requirements, making future corrections difficult. • The Local Plan should incorporate the five active travel design principles – coherent, direct, safe, comfortable, and attractive – as mandatory policy tests for all developments. • Mandatory permeability standards should be introduced based on site size, requiring multiple direct walking and cycling connections to surrounding areas to avoid car dependency. • Best practices from proven approaches in places like the Netherlands should be adopted in local policies to enhance active travel. • Design quality should be assessed at the planning stage and considered throughout the entire development process, from initial vision to construction completion.	205285 (R De Beaux)
This policy must ensure that active travel routes meet the five core design principles – coherent, direct, safe, comfortable and attractive – as a clear policy test for all development. It should also introduce mandatory permeability standards based on site size, requiring multiple direct walking and cycling connections into surrounding areas. Design quality should be tested at the planning stage, not left to later detail.	205358 (A Williams)
Design quality should be tested at the planning stage, not left to later detail.	205675 (S Nuttall)

Summary of issues raised in comments	Comments highlighting this issue
Transport considerations are a key component to the design process and if not included (and reviewed) at an outline stage it is often impossible to find suitable solutions later. I would like to support the submission provided by CamCycle (the Cambridge Cycling Campaign), in particular: Policy must ensure active travel routes must meet the five core design principles; Design quality should be tested at the planning stage, not left to later detail	204936 (A Brown)
Clause 4 – we are very pleased to see reference to the role of neighbourhood plans in setting design principles. We request that a similarly explicit reference is also incorporated into Policy GP/PP: People and place responsive design.	201619 (Stapleford PC), 210945 (Great Shelford PC)
The public celebrate good design but there are grey over-tall rectangular blocks proposed currently for prominent sites, Kett House replacement Station Road, and the Histon Road/Castle Street corner. Will these be "appreciated by future generations" ? Poor external design adversely affects people's mental health and wellbeing. If built they could feature in Hideous Cambridge 2nd ed. Main routes and junctions should have statement buildings, not dull ones. And the power and influence of the Colleges and other bodies (Railpen) have over planning decisions is worrying. They are so powerful and influential they seem to ride roughshod over all rules.	201783 (H Jackson)
I would like to see explicit inclusion of children - including teenagers - and their needs within this policy. Landscaping can include opportunities for imaginative place and natural play equipment. Safe open spaces and active streets should include formal play equipment for younger children and social spaces for teenagers. Safe locations where they are not chased off for being a nuisance. I think this is	201830 (T McKeown)

Summary of issues raised in comments	Comments highlighting this issue
extremely important as this demographic are completing consultations or commenting on planning applications.	
Active travel needs designing into developments at an early stage. Too many developments are designed round a single major road junction, with no other accesses for other modes. Developments need to be permeable to walking and cycling, with access to the development in multiple locations. This enables day-to-day trips by these sustainable modes. This would allow the developments design to best meet the Local Plans overall sustainability goals.	201832 (T McKeown)
Do what Cambourne did.	204013 (S Rogers)
The Local Plan must make active travel a real priority: all development should meet the five design principles - coherent, direct, safe, comfortable, attractive - and include mandatory permeability standards. Sites should have multiple direct walking and cycling connections to surrounding areas. Without this, cul-de-sacs and single-access layouts will continue to trap families in adult-dependent or even car-dependent routines for decades, limiting children's freedom and independence and keeping limiting the time parents have to work, cook/clean and invest in community.	204690 (R Humphrey)
The plan must require designing walking and cycling as the main form of transportation for new developments. To achieve that, active travel routes need to meet the five core design principles set out by Active Travel England's national guidance and standards: routes should be (1) coherent, (2) direct, (3) safe (both actual and perceived), (4) comfortable and (5) attractive. Without these the percentage of trips done by people via active travel will be a fraction of what it could be.	203675 (T Preud'homme)

Summary of issues raised in comments	Comments highlighting this issue
Policy must ensure active travel routes must meet the five core design principles Design quality should be tested at the planning stage, not left to later detail	204540 (D Potts), 202859 (J Williams), 204576 (R Hoadley), 202292 (R MacDonald), 205047 (B Nicolson), 205429 (P Colledge), 205355 (S Nuttall), 205144 (J Grantham), 201704 (M Hickford), 203306 (A Hoare), 202875 (J Williams), 203333 (S Hughes)
High quality new development should replicate successful sustainable developments like Eddington. Policy must ensure active travel routes must meet the five core design principles – coherent, direct, safe, comfortable and attractive Design quality should be tested at the planning stage, not left to later detail Following these principles not only makes the development better for those who live there it also enhances the value for the developer in the long term.	202875 (J Williams)

Summary of issues raised in comments	Comments highlighting this issue
The Local Plan should embed the five active travel design principles (for infrastructure for walking/wheeling and cycling) – coherent, direct, safe, comfortable and attractive – from Active Travel England's national guidance and standards as a clear policy test for all development. The ability for a site to support these principles should be a prerequiste to it going ahead, not a later add-on if it is feasible.	203333 (S Hughes)
• More emphasis needed on active transport / design for people not cars • Require active travel routes to be coherent, direct, safe, comfortable, attractive • Mandatory permeability requirement as per LTN 1/20 • Test quality requirements met at design stage, not later	202596 (A Lawrence)
High-quality development means context-sensitive, community-friendly design that protects green space, fits rural morphology, and contributes positively to village life. High quality = appropriate scale, low massing, high environmental standards. Protect the Girton Gap and avoid over-intensification. Community-scale enterprises and buildings preferred over large centres. GPC Requests to the Local Plan: Set quality expectations that prevent over-intensification. Require green-infrastructure integration and rural-fit design. Ensure all development refers to Girton NP design principles.	202233 (Girton PC)
Modern “Carbuncle” extensions should not be permitted at any one area- instead an authentic style addition may be used to retain blending.	210367 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
Extensions- there must be a proactive emphasis on in-keeping structural fabric to prevent future errors, such as the Municipal Building depicted in the SPD being replicated again thereby harming the Conservation value. Building Form shouldn't permit for dated modern structures that delineate and essentially divide communities between the old and new parts of any one location. Façade Design mustn't be compromised for contemporary architecture, especially in view of coveted Heritage Status for any one area being at risk of being lost if said contemporary architecture is pursued.	210370 (Community Campaigner D Barton)
Supports the proposals as quality design which builds in nature conservation helps the physical and health and well-being of residents eg interesting and varied roof lines, mental health benches, places for those with mobility issues to rest and enjoy the views (both blue and green). Include as part of residential and commercial design places for nature to be incorporated into the buildings (eg Swift nesting boxes), fencing (eg hedgehog shelters/gaps, planted living walls instead of fencing). All of these help residents to enjoy nature and provide nature corridors. Scooter/mobility scooter parking also needs to be included (and not just in care homes/specialist housing) with safe charging options to prevent the potential risk for fires. Similar issues should be considered for electric wheelchairs which are used indoors and provision of charging facilities. Ensure sufficient parking spaces/road width and design to enable emergency vehicles to pass safely without delaying attendance on a call. Similar issues exist for refuse lorries.	210326 (East England Ambulance Service NHS Trust)

Summary of issues raised in comments	Comments highlighting this issue
Design of bridges should consider the use of curved walls to increase safety and reduce the ability of death by suicide. Underpasses should be well lit and feel safe for uses at all times of day and night. Use of bright colours and designs can also improve mental and physical health.	210343 (East of England Ambulance Service NHS Trust)
The Local Plan should embed the active travel design principles of coherent, direct, safe, comfortable and attractive, as a policy test for all development. This design quality should be tested at the planning stage. The plan should also introduce mandatory permeability standards based on site size, requiring multiple direct walking and cycling connections into surrounding areas, to shops and amenities.	204088 (K ap Garth)
While the Local Plan places appropriate emphasis on healthy ageing, accessibility, and inclusive design, there is no specific reference to neurodiversity or sensory inclusive design principles. Neurodivergent people, including those with autism, ADHD, learning disabilities, and sensory processing differences, may experience barriers in the built environment such as noise, visual clutter, poor legibility or unpredictability. Therefore, it is recommended to include incorporating sensory-inclusive principles into policies and design principles, such as clear layouts, controlled lighting, reduced overstimulation, and quiet spaces. These measures would create healthier, more inclusive environments for neurodivergent people, older adults, and others with cognitive or sensory impairments.	210636 (Transport 2000 Cambs & W Suffolk)
Supports Policy GP/QD and its overarching objectives, particularly creation of walkable neighbourhoods that align well with the design principles underpinning the approved Bourn Airfield masterplan. The	208985 (Barratt Homes Northampton)

Summary of issues raised in comments	Comments highlighting this issue
principles set out in Policy GP/QD provide a helpful and flexible framework that complements the ongoing Reserved Matters work at Bourn Airfield. In particular, the policy allows for a context-led approach that recognises the site's unique characteristics, masterplan vision, and locally distinctive design aspirations.	
Support the vision of the proposed policy. However, Vistry and The Quy Estate wish to reiterate the point made in response to Policy GP/PP that it is important the policy is applied proportionately, with detailed matters assessed at the reserved matters stage and clear design principles established at outline planning application stage where appropriate	210252 (Vistry Group)
Support the policy which encourages good design as a key aspect of sustainable development and has the potential to maintain and enhance existing environments, alongside bringing benefits in terms of the health and wellbeing of students and staff of the University as well as residents of Cambridge.	202491 (M Parsons)
Early layout decisions fragment new build areas. The Local Plan should embed the five active travel design principles – coherent, direct, safe, comfortable and attractive – as a clear policy test for all development.	201814 (J Baumberg)
point 2d is not enough to safe guard and ensure high quality walking and cycling routes. Plans should be required to show that active travel routes are designed in at the outset, that are:- coherent- direct- safe- comfortable – attractive. Mandatory requirements should be set for permeability of sites, preventing cul de sac developments that do not allow convenient walking and cycling routes.	201736 (B Brierton)

Summary of issues raised in comments	Comments highlighting this issue
Chair and Vice-chair of Environment and Green Economy Committee Designing streets, towns, and cities with properly secure parking facilities is essential if we are serious about supporting alternative modes of transport. For example, motorbike parking in Cambridge city centre does not allow riders to secure their vehicles to a fixed anchor, such as a rail or ground-embedded locking ring. As people are increasingly encouraged to travel longer distances by electric bike, greater attention must be given to improving the safety and security of bike storage—particularly in workplaces and residential developments.	211011 (Cambridgeshire County Council)
Future development should be of quality design and should contribute and respond to the local character of the surrounding settlement.	211239 (Living Housing Space)
Coherence remains one of the most consistent shortcomings in recent development. Routes may exist in theory, but are broken, diluted or overridden by other priorities on the ground. Two case studies have been presented in the accompanying attachments where this shortcoming is clear and apparent. We have to learn that public space and cycling work together, but segregation is required.	209077 (Camcycle)
Directness and permeability (the ability to move easily through urban environments) are inseparable. Direct routes only exist where layouts are permeable, and permeability is the structural condition that allows walking and cycling to be convenient. Across Greater Cambridge, walking and cycling routes are routinely diverted, interrupted or deprioritised, when motor traffic circulation is prioritised or due to unfounded safety concerns. The cumulative effect of these small decisions is profound. Each detour, signal delay or loss of priority reduces the usefulness of the network and discourages everyday trips by	209078 (Camcyle)

Summary of issues raised in comments	Comments highlighting this issue
foot or by cycle. In places where cycling works well internationally, very high levels of convenience are achieved not through speed, but through directness and continuity. Minimal stopping, few barriers and consistent priority allow people to cover distance comfortably and predictably.	
Hayfield agrees that future development should be of quality design and should contribute and respond to the local character of the surrounding settlement.	211464 (Hayfield Homes Construction Ltd)
It is recognised that high quality design is a key element of a successful community.	211548 (Martin Grant Land Limited)

Policy GP/HD: Housing density

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Some comments offered support for the policy approach suggested in the Draft Local Plan. Higher density housing was supported in central and adjoining Cambridge where areas are well connected, and it can create high quality mixed use walkable neighbourhoods. Higher densities should come with open spaces.

A number of comments provide detailed feedback on the relationship between higher density development, lower car ownership and parking and the need for high quality active travel provision. The opportunities provided by sustainable travel and reduced car parking were highlighted. The need for high quality cycle storage was also raised.

Some comments highlighted that appropriate densities would need to be applied for land released from the Green Belt adjacent to existing developments. Girton Parish council said density should be context led. Historic England welcomed the reference to a context led approach and also the reference to heritage assets. Cambridge Green Party highlighted the importance of considering local context and the needs and priorities of existing communities. They also raised that sustainable water supply must be available.

Some representors highlighted the importance of applying the policy flexibly, including that densities should not be unduly constrained. There was concern references to heritage repeated other policies. Some representors proposed that minimum densities should be set in line with national planning policy.

Response to main issues raised in representations:

Comments supporting the approach to the policy, and encouraging higher densities in appropriate locations, are noted. The policy seeks to respond to local circumstances but also achieve higher density in sustainable locations.

Some comments say the policy is overly focused on reflecting local character which is not consistent with the NPPF. The policy has been clarified so that site potential is optimised whilst being responsive to surrounding local character and contexts. This is considered consistent with national policy. Within the policy, there is an in-principle support for higher density development in appropriate locations subject to proposals demonstrating they can address the criteria in the policy. Reference to heritage within the policy has also been maintained, given the significance of heritage issues in the area they will be a key consideration when considering density.

Some comments suggested adding minimum densities for specific locations/areas to provide certainty at the development appraisal and application process. Consideration was given to setting specific minimum densities within Cambridge at transport nodes and other sustainable locations, however, these areas were also in close proximity to heritage assets including the historic core, where bespoke site design is needed to optimise sites which respond to the local context. Setting a minimum density would not be appropriate, or as a precautionary measure in order to respond to all sites it would need to be set so low as to undermine its

effectiveness. In addition, considering NPPF (2024) paragraph 130, the requirements where plans have not identified land to meet identified development needs do not apply in Greater Cambridge.

This policy, along with Policy I/EV Parking and Electric Vehicles, respond to opportunities to reduce parking whether alternative to the car are available. Additional reference to this has been added to the proposed submission policy to emphasise this. Comments also highlighted the need for higher density development to come with high quality cycling facilities. Policy I/EV Parking and Electric Vehicles requires this.

The policy should also be read alongside those in the Biodiversity and Greenspace theme, which set standards for open space and biodiversity which will ensure these issues are effectively addressed.

The policy has been amended to include further details on the approach to density on the edge of settlement.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
General support for the policy	202078 (M Asplin), 203094 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners), 203527

Summary of issues raised in comments	Comments highlighting this issue
	(Cambridge Ahead), 208341 (Thakeham Homes Ltd), 210502 (Barratt Homes Northampton)
Land Release and Green Belt Concern: • Appropriate building densities are required for land released from greenbelt adjacent to existing developments, ensuring they reflect the surrounding area and present a soft edge of the surrounding landscape. • Creating a soft edge to the landscape should involve not only planting but also incorporating gaps and longer sightlines between buildings, which may lead to a necessary reduction in building density	201620 (Stapleford PC)
We welcome the reference to a context led approach and also the reference to heritage assets. Reference should also be made to gentle densification.	210172 (Historic England)
The relationship between higher density development, lower car ownership and parking and the need for high quality active travel provision: • High density housing both enables and requires low car ownership. The Plan should explicitly link these two. It is important to break the "one car per household" assumption made by many developments.	202284 (A Lawrence), 202290 (R MacDonald), 203072 (S Hughes), 203204 (G Orwell), 203669 (T Preud'homme), 204877 (A

Summary of issues raised in comments	Comments highlighting this issue
• Parking uses scarce land area and drives up costs; and often dominates estate layout and amenability. • Higher-density development should include strong alternatives to driving to support sustainable travel. Current dense schemes in Greater Cambridge often include high levels of private parking, which consumes land and undermines walking and cycling. • High private parking levels increase housing costs, forcing non-car-owning households to subsidise parking through higher prices. • Dense housing estates without this are either dominated by car parks and/or result in large numbers of cars parked on pavements/in cycle lanes/in public space. • Higher density development should include high quality walking/cycling/public transport network in order to succeed. • Central Cambridge developments should be car free	Brown), 204924 (K Brightwell), 205281 (S Nuttall), 202507 (H Brown), 202856 (J Williams), 203301 (A Hoare), 203715 (A Hofer), 203728 (D Peters), 203884 (J Prince), 204077 (K ap Garth), 204368 (F Sanchez Garcia), 204512 (D Potts), 204568 (R Hoadley), 204651 (M Fordham), 204666 (R Humphrey), 205126 (J Grantham), 205304 (A Williams), 205350 (P Colledge), 203666 (V Ashton), 201813 (J Baumberg), 201827 (T McKeown), 209071 (Camcycle)

Summary of issues raised in comments	Comments highlighting this issue
High density is a great opportunity to encourage cycling and other forms of wheeling, but must come with really good quality storage/parking that is convenient, secure and feels safe to use day and night.	205281 (S Nuttall), 205350 (P Colledge)
Development density is a key factor in delivering community scale rainwater reuse schemes. The report Water reuse in new housing: Understanding the business case published on the EWSC website identifies the benefits of examining in greater detail the relationship between development density and the respective cost of community versus on-plot installations, due to the significance of external pipework costs as a component of the total cost within community systems. Community scale systems yield cost savings over on-plot reuse above densities of around 60 units/ha - concluding that it is density, not size of development which is the deciding factor.	210213 (Anglia Water Services)
Support for higher housing density: • Support the policy that supports higher density development central and adjoining Cambridge as well as areas that are well connected by high quality infrastructure and active travel options. • Higher density development should be actively encouraged, and encouraged everywhere, as it minimises use of precious land resource while creating more walkable environments, enhances the viability of local businesses by having a larger population within a fixed distance, and frees up land for public amenities • Mixed-use developments are essential to provide necessary facilities, reducing the need for car travel.	202492 (University of Cambridge), 202640 (P Tribble), 204775 (R De Beaux)

Summary of issues raised in comments	Comments highlighting this issue
Development should take into account of the needs and priorities of existing local communities to ensure development responds to local context	203716 (Cambridge Green Party)
Increased density can create a critical mass of people that fosters a sense of place, supports community uses, services and facilities: High density development at Darwin Green would efficiently utilise land in a sustainable location, enabling residents to live near their workplaces.	203094 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
The policy should be applied with sufficient flexibility, recognising that prevailing local densities are not always an appropriate to the location, particularly where sites are well located or benefit from strong accessibility. In such circumstances, higher densities may be both suitable and sustainable and should be assessed on their individual merits rather than constrained by surrounding built form that may no longer reflect the most efficient or appropriate use of land.	204869 (Vistry Group)
Policy proposals for tree canopy and biodiversity should be mandatory, not subject to developer modification. Increased open space requirements should be established for high density developments that lack gardens whilst additional open space requirements should be considered in areas adjacent to existing high density developments.	204877 (A Brown)
Negotiations on land price should occur if economic feasibility cannot be demonstrated, rather than relaxing planning requirements.	204877 (A Brown)

Summary of issues raised in comments	Comments highlighting this issue
Prevailing character and context: • The design-led approach in the policy is overall supported but it is unduly constrained to densities 'that reflect local character and context....' This is not the approach that the NPPF takes, which acknowledges that densities should "take into account… the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change." • Allow greater flexibility in density on small sites where this reflects local character and efficient land use.	208612 (Pigeon Land & LIH), 202078 (M Asplin)
Heritage considerations: • Part (c) of the policy should be removed. It is essentially repeating the heritage tests that are already put in place by draft Policy GP/HE and through the balancing exercises set out in Chapter 16 of the NPPF. Those balancing exercises in turn recognise that there may be some impact to heritage assets arising from new development to heritage assets and their settings, but that nonetheless those harms can be found to be acceptable if sufficiently outweighed by the public benefits the development would deliver. That is a more nuanced exercise that than set out in Policy GP/HD, which does therefore not need to repeat the point in a more constricted way • The policy requires greater flexibility to enable higher density development to come forward without being constrained by existing context and heritage considerations.	208612 (Pigeon Land & LIH), 203527 (Cambridge Ahead)

Summary of issues raised in comments	Comments highlighting this issue
The policy should align with the draft NPPF and provide a minimum density similar to 40-50 dwellings per hectare.	201711 (K Mak), 208341 (Thakeham Homes Ltd)
Density should be context and infrastructure led in rural villages and intensification should be avoided.	202234 (Girton PC)
Higher density development does not necessitate high-rise residential development, as demonstrated through a range of housing typologies	203973 (Cambridge Past, Present and Future)
An additional requirement should be added that proposals must demonstrate that water can be adequately and sustainably sourced given the region's water scarcity and to ensure development is environmentally sustainable	203716 (Cambridge Green Party)
High density housing tends to be Leasehold but should be Share of Freehold	202567 (A Lawrence)
Support the overall principles of the policy. Although, Vistry and The Quy Estate consider that the policy should be applied with sufficient flexibility, recognising that prevailing local densities are not always appropriate to the location, particularly where sites are well located or benefit from strong accessibility. In such circumstances, higher densities may be both suitable and sustainable and should be assessed on their individual merits rather than constrained by surrounding built form that may no longer reflect the most efficient or appropriate use of land.	210253 (Vistry Group)
There is enormous tension between the NPPF's requirement for local plan policies to make efficient use of land versus clauses b and c of this policy. In the absence of further evidence for the policy (as noted in para 7.27), it is difficult to comment on its merits or otherwise. This is unfortunate given how significant this policy will be in determining future planning applications in Greater Cambridge.	210946 (Great Shelford PC)

Summary of issues raised in comments	Comments highlighting this issue
When considering how density should be applied in different locations, it is vital that explicit consideration is given to appropriate building densities for land released from Green Belt which is adjacent to an existing development framework. Such densities should reference density in the immediate surroundings but also present a soft edge to the surrounding landscape. A soft edge is created not just through planting but by gaps and longer sightlines between buildings, which will inevitably – and appropriately – reduce building density.	210947 (Great Shelford PC)
Supports the Council's view that for housing density to be appropriate it should reflect the local character and context. Making the efficient use of land through increasing densities is an existing national planning policy requirement. The emerging Local Plan should align with national policy in order to assist Greater Cambridgeshire in meeting their housing requirement. Terra note that no density figures have been provided within the draft policy. Whilst it is acknowledged that character and local context should inform appropriate density levels, the absence of any minimum figures creates uncertainty at the early planning, feasibility and land valuation stages. The inclusion of broad density guidance as part of the policy's design-led and context-led approach, would improve consistency in decision-making, ensure that sites come forward with proposals which make efficient use of land in line with national planning policy. Therefore, it is recommended that draft Policy GP/HD is amended to include indicative density ranges that provide clarity for developers and decision-makers	211222, 211266 (Terra Strategic), 211240 (Living Space Housing)
MGL welcomes the approach to defining appropriate density, and avoiding undue prescriptive requirements.	208260 (Martin Grant Land Limited)

Summary of issues raised in comments	Comments highlighting this issue
EWR Co welcomes the draft Local Plan's focus on ensuring that land is used effectively when being developed, as set out in draft Policy GP/HD. In line with this draft policy, EWR Co would support maximising densities around stations which will be served by EWR at Cambourne, Cambridge South, Cambridge, and Cambridge East, as development in these areas would benefit from being in highly sustainable locations.	211889 (East West Rail Company)
Hayfield supports the Council's decision for housing density to be appropriate in order to reflect the local character and context. However, Hayfield note that no density figures have been provided. Whilst it is acknowledged and supported that character and local context should inform appropriate density levels, the absence of any benchmark figures creates uncertainty at the early planning, feasibility and land valuation stages. The inclusion of broad density guidance, alongside the policy's design-led and context-led approach, would improve consistency in decision making and provide greater certainty for delivery. Therefore, it is recommended that Policy GP/HD be altered to include indicative density ranges that provide clarity for developers and decision-makers. While a design-led approach is welcomed, clear benchmarks would support early feasibility work, improve consistency across decisions, and reduce uncertainty at pre-application and application stages.	211465 (Hayfield Homes Construction Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Note that no density figures have been provided within the draft policy. Whilst it is acknowledged that character and local context should inform appropriate density levels, the absence of any minimum figures creates uncertainty at the early planning, feasibility and land valuation stages. The inclusion of broad density guidance as part of the policy's design-led and context-led approach, would improve consistency in decision-making, ensure that sites come forward with proposals which make efficient use of land in line with national planning policy. Therefore, it is recommended that draft Policy GP/HD is amended to include indicative density ranges that provide clarity for developers and decision-makers.	211587 (Terra Strategic)

Policy GP/ST: Skyline and tall buildings

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

A number of comments expressed support for the policy. This includes Historic England, who advised they were keen to support growth in appropriate locations whilst protecting and enhancing what is important in relation to the skyline of the City and surrounding area. They welcomed the detailed work that had informed the policy. They consider that policy currently underplays the semi-rural nature of parts of Cambridge and the surrounding area, development should be seen as an opportunity to enhance Conservations Areas and the skyline of the city in general, and it will be important that increases in height do not affect our experience and perception of coalescence between the city and surrounding villages.

There were comments that raised concerns that the policy wording is actively promoting tall buildings in the Cambridge and the surrounding district and that there is a reliance on site-by-site assessment. Further comments raised concern that tall buildings are not appropriate in historic and rural settings.

Elements should be strengthened including in point e that reference to daylight should be more than ‘adequate’, and the reference to microclimate was too weak. It was also suggested that glare should be added as a consideration. FECRA suggested mandatory protection for domestic-scale building heights. Cambridge Past Present and Future were concerned the policy could create monotonous roofscape, and were also concerned about the identification of four areas as being suitable for tall buildings.

Some comments sited concerns over the height of recently constructed buildings and gave examples. Others considered opportunities to restore skylines and replace carbon poor glass towers should be encouraged. Girton Parish Council highlighted the importance of the skyline to their village, and that sensitive skyline should be protected. Visual impact assessment should be required.

Some sought greater flexibility, that tall buildings may be acceptable on a site by suite basis. If the policy is operated to strongly it could hold back density and aspirations for growth. It was questioned where the policy was consistent with national planning policy. There was concern whether the policy was overly focused on developments breaking the skyline, and also how the policy applied to villages. There was concern whether it would constrain uses that need height, such as logistics. Others thought the policy would give developers too much freedom, and development must fit in with the local skyline and landscape character for sites on the edge of and beyond Cambridge.

Response to main issues raised in representations:

The policy, supported by Appendix I which forms part of the Local Plan, and the Skyline and Tall building study, are considered an appropriate framework for considering proposals.

The policy allows consideration of any tall building proposal on any site (including brownfield sites within and on the edge of the City) and provides a comprehensive set of criteria supported by Appendix I to help in the assessment of any tall building proposal. This provides flexibility whilst also ensuring that development proposals are appropriate in terms of their height, massing, scale and any local and/or strategic impacts are carefully considered and mitigated. The wording says ‘no adverse impact’ rather than no

impact. For example, BRE Daylight and Sunlight assessment seeks to ensure that proposals result in adequate daylighting. Schemes that have an adverse impact that overrides all other considerations, would need to be considered in terms of planning balance. The policy maintains the word ‘must’ in point e because the degree of assessment can be tailored to the complexity of the scheme and circumstances but these matters will require assessment as part of scheme design.

The opening wording has been amended to avoid any perception that the policy establishes a general presumption in favour of taller buildings. The revised wording makes clear that the policy is concerned with the assessment and management of development proposals that would materially affect the skyline and that such proposals will only be supported where they satisfy the policy criteria. The amendment retains a positive approach by clearly identifying the circumstances in which proposals will be supported, while better reflecting the policy's primary purpose of managing change to the distinctive skyline and character of Cambridge and the surrounding district. This recognises that the historic skyline of Cambridge is a defining characteristic of the area and that proposals which respond positively to their context and make a positive contribution to the skyline may be acceptable where they satisfy the policy criteria. Whilst it is agreed that Cambridge is emerging into a polycentric city, the design, massing and height of new proposals on these edge of city sites still require careful consideration, both individually and cumulatively and therefore the policy seeks to ensure a balance can be achieved; the delivery of high quality, context led development and the careful consideration on the city’s skyline, heritage and landscape assets. The definition of tall buildings has been retained within the opening of the policy, with the wording refined to improve clarity and readability.

The purpose of a policy is not to justify why there should be harm but rather set out a framework for the consistent assessment of tall building proposals and skyline impact. Part b) of Policy GP/ST specifically identifies the need to assess impact on the historic environment and the need to ‘assess and quantify the potential harm of proposals to the significance of heritage assets’. It specifically identifies Cambridge in part b) and the need to ‘ensure that the character and appearance of a city of spires and towers

emerging above an established treeline remains dominant from relevant viewpoints.' It specifically identifies Cambridge in part b) and the need to 'ensure that the character and appearance of a city of spires and towers emerging above an established treeline remains dominant from relevant viewpoints.'
Appendix I provides an overall approach to the assessment and justification of proposals that include tall buildings and therefore have the potential to impact on the skyline. The use of Appendix I and the criteria in Policy GP/ST and other related policies, is part of the approach of providing the clear justification for development proposals.

The policy provides a comprehensive and clear set of criteria to assess the likely impacts of tall building proposals in relation to the skyline and more locally, to ensure that proposals are appropriate to their context and deliver high quality design. Comments relating to masterplan level considerations and robust landscape and townscape principles would form part of such an approach and particularly when considering cumulative impact and concerns about coalescence.

A masterplan to identify and locate tall buildings would be impractical for an area the size of Greater Cambridge. Furthermore, the policy is not actively promoting tall buildings within the Greater Cambridge area. Instead, it recognises that pressure for growth may result in taller buildings, many of which will be located in Areas of Major Change but also have the potential to be proposed on a more ad-hoc basis. Therefore, the establishment of assessment criteria supported by Appendix I is considered the most appropriate way to assess and ensure that any tall building proposal (defined by the context heights thresholds) responds positively to local and wider contexts and maintains the character and quality of the skyline. Requirement relating to the expected quality of landscape and townscape are captured in other proposed policies.

Matters relating to coalescence are covered through part c) which requires assessment of the cumulative impact at both strategic and local levels.

New development, including that which is at a higher density (Covered in Policy GP/HD Housing Density) and which may have taller buildings, will still need to be appropriate to their context and setting and deliver high quality development overall and as required by the other policies in the plan.

Appendix I provides information on ‘context heights’ and the thresholds at which buildings will be considered ‘tall’ and therefore need to be assessed again the Skyline and Tall Buildings Policy. This is a skyline responsive approach and allows the assessment of impact to be tailored to local circumstances. Parts c and d have had the words ‘high quality’ inserted. It should also be remembered that this policy will be used in conjunction with other polices in the plan that go to more detail on expected qualities of development. Policy GP/QD Achieving high quality development identifies the expected qualities of development proposals including at parts c), i) and g).

The role and importance of Cambridge Commons and the role they have in allowing experience of the historic environment has been added to part b) of the policy and to the Supporting Information, ‘The Cambridge Commons introduces a rural character that extends into the heart of the city and provide key opportunities to experience the historic environment, including scale of buildings, from these locations.’ In addition, the following wording has been added ‘rural and semi-rural character’ to the Supporting Information to cover development proposals outside of Cambridge.

No change is needed to part a) for the protection of domestic scale building heights in Conservation Areas because Appendix I identifies the context height thresholds and also the areas where more detailed assessment will be needed. As such the triggers for assessment of tall building proposals are much more context led. Additionally, the policy already requires careful consideration of heritage assets which includes Conservation Areas. With regards to the application of the policy to the wider district, the Local

Plan covers the Greater Cambridge Area and the policy is written to apply to the City and South Cambridgeshire District. The context heights mapping provides a baseline to identify the contextually tailored thresholds at which the policy would be applied. It is unlikely that rural villages will experience pressure for tall buildings, even those at a modest scale, but if proposed, would be covered by the requirements of this policy.

Regarding the comment requiring development proposals to be to consider all viewpoints, the policy has not been amended as not all the identified viewpoints in Appendix I will need to be assessed as part of every proposal that triggers the application of the skyline policy. Appendix I makes it clear that there will be a process of identifying and agreeing relevant viewpoints, this process not only picking up the strategic views, but also local views to ensure comprehensive assessment of likely impact is made.
Additional wording ‘to ensure a well-articulated skyline’ has been added to address concerns are raised about height limits leading to a monotonous roofscape, suggesting the policy should encourage varied heights to maintain the character of the skyline.
The use of the word ‘adequate’ is consistent with the BRE guidelines ‘Site layout planning for daylight and sunlight: a guide to good practice’, which are the industry standard approach for the assessment of impact relating to daylight and sunlight.
Urban heat island effects are part of the microclimatic assessment have been added to the revised wording for part e).

Introducing the word ‘historic’ before ‘towers’ is not considered necessary. New towers that create positive additions to the skyline and maintain the character and appearance of Cambridge would be supported subject to being able to demonstrate appropriateness against the identified criteria and supporting Appendix I.

Microclimatic impacts, including glare and reflectivity, are identified and addressed as part of the policy wording part e).

Suicide prevention issues are understood but this policy is specifically dealing with tall buildings so it would be unwise to extend it to all building types in this policy. The requirement can be addressed through other relevant policies relating to the design of new buildings and public spaces. Minor text changes to part f) of the policy added to clarify that design measures need to be proportionate and also understand the public accessibility of any tall building.

The context height mapping establishes a prevailing height for an area (based on average heights in particular areas) and then the criteria are used to help assess and manage the impact of proposals, regardless of location, including development proposals along the A14 corridor. The wording to the policy says 'significant change' and the criteria and Appendix I are then there to provide a structure to ensure assessment of potential change and impact is made. The Areas of Search undertaken through the Skyline and Tall Buildings Strategy is a high-level strategic study that does not seek to restrict tall buildings or masterplan the sites considered in the site. Similarly, it does not pre-determine appropriate heights for development. It has been prepared to give a broad understanding of the thresholds in which new development at these sites would start to have adverse impacts on the city's skyline from the strategic viewpoints. Clearly this would require a more detailed assessment through the preparation of a planning application.

The term 'high quality' has been added to part d) of the criteria to set out the requirement for tall buildings to be an acceptable standard in terms of design. Additionally, taller buildings whether existing or new should be part of creating a well curated skyline and therefore it is not reasonable to apply a blanket approach setting out that historic buildings should remain the dominant elements on the city's skyline. Other matters relating to the design expectations are covered in supporting policies such as GP/QD parts c), g) and i) and do not need to be duplicated in GP/ST.

A number of representations identified inaccuracies, omissions and areas where further clarification was required within the Townscape Character Assessment for South Cambridgeshire. The assessment has subsequently been reviewed and refined, with amendments made where appropriate to improve its accuracy and robustness as part of the Local Plan evidence base.

It would not be appropriate to specifically identify Cambridge East in Appendix I of the Local Plan given this is broad guidance that should be applied to tall buildings across the districts. There is also no current proposed masterplan for Cambridge East and therefore the site is not referenced in the paragraph regarding clusters. Whilst clusters of taller buildings may be suitable at Cambridge East, this would need further testing through an evidence led masterplan process.

Through a comprehensive review of the city's strategic viewpoints, the Heritage Impact Assessment and Skyline and Tall Buildings Strategy have updated the initial 2018 viewpoints. As set out in the study, this has been informed by a range of evidence including the Townscape Characterisation Study, site visits and professional judgement.

Regarding 3d model requirements, Appendix I states that contextual elements should be provided within a 3d model, such as conservation areas and natural features where it is relevant to the application site. The extent of the model would need to be scoped with the Councils at the application stage. Given the file size of 3d models, the councils may require low detail versions to be supplied alongside higher detailed 3d models which may contain elements such as building materials.

Whilst it is noted that the Skyline and Tall Buildings Strategy is split into several documents, the councils are required to manage file sizes to ensure they can be easily downloaded.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support of the Policy Points 1 a,b,c,d,e and Point 3, 6 and 7: • Strongly support Points 1b, c, d & Point 3 • Support Point a and E • Strongly Support 6 • Point 7: define ancient and woodland trees explicitly as by the Woodland Trust	201872 (J Hurst), 207649 (Duxford PC), 207664 (K Holland)
Concern over the height of new buildings within Cambridge. The policies in the draft Local Plan sound reassuring, but the reality of the buildings around the main rail station (which make me feel like I'm in London rather than Cambridge) and the five-storey buildings currently being built right next to Coleridge Rec (Fanshawe Road development) leave me feeling concerned.	201934 (I Rudy)
The policy should not exclude tall buildings on other sites where they can be justified on a site by site bases through submitted evidence.	202496 (University of Cambridge)
Concerned about some limits and constraints in the current approach to density within the Local Plan, particularly the emphasis on conformity and heritage considerations. Automatic assessment triggers linked to building heights across different location types risks unduly constraining well-justified higher density development that would deliver benefits in terms of amenity, future transport provision, and long-term viability and sustainability. Greater flexibility needed.	203528 (Cambridge Ahead)

Summary of issues raised in comments	Comments highlighting this issue
Microclimate adverse impacts should include overheating. Good luck with design quality given the boxes planned for the biomedical campus and the Kett site	202636 (C Pointon)
This is essential to prevent the Beehive site overshadowing residential homes, but clarity on acceptable heights between a traditional Cambridge terrace and non-residential could be helpful. Railpen obfuscated the height from the start and failed to provide a model. This must not happen again, it causes huge distress	205449 (B Smith)
Whilst we support the spirit of the draft policy it is considered that it should be revised to ensure that it does not unnecessarily conflict with wider aspirations for the optimisation of brownfield land impacting the ability to deliver on the aspiration for growth.	207448 (Pioneer Group Ltd)
St Matthews Centre, Sturton Street, Cambridge (HELAA Reference 59405) Proposal would be a disaster for this community: • This Site was given an Overall Score of 'Red'. The exclusion of this Site must be permanently enforced. This will protect our vital, extremely limited and increasingly pressurised local amenity space. St Matthew's Piece is the only public park in North Petersfield. Unambiguous evidence of this is the sequence of five Planning Refusals since 2021 (none appealed) all pertaining to this area: 25/0432/TTPO, 24/0413/TTPO, 23/0119/TTPO, 22/0271/TTPO, and (most significantly) 20/04514/FUL.	207663 (K Holland)
Object Policy Point 1, 2, 3:	207665 (K Holland)

Summary of issues raised in comments	Comments highlighting this issue
• Throughout this Policy AND the whole Local Plan: replace “changing climate” with “climate crisis”. • Point 1: Design solutions must "respond proportionately and actively to the emerging climate crisis" (not "positively respond to our changing climate"). • Point 2 must explicitly address the impact of any development not only on future edifices but (more importantly) on surrounding townscape and biosphere. • Point 2: all applications must explicitly address the impact of any development not only on future edifices but (more importantly) on surrounding townscape and biosphere. • Point 3: delete the words “where possible”	
Generally support policy, but concern that it will still give developers too much freedom to extend the heights of buildings beyond the scale of neighbouring infrastructure. Having "hard" figures for heights is a necessary, but not sufficient condition. Any development must fit in with the local skyline, as well as complying with the height limits - this is a stronger requirement than any absolute height limit.	201300 (N Campbell)
Policy GP/ST clause 1(e) – glare (i.e. reflection of light from a glazed surface onto another surface or into a building or other amenity area) needs to be added to the list of adverse impacts on amenity and microclimate.	210948 (Great Shelford PC)
Clause 1(e) – glare (i.e. reflection of light from a glazed surface onto another surface or into a building or other amenity area) needs to be added to the list of adverse impacts on amenity and microclimate.	201621 (Stapleford PC)

Summary of issues raised in comments	Comments highlighting this issue
We welcome the inclusion of a policy for tall buildings and the skyline. We are keen to support growth in appropriate locations whilst protecting and enhancing what is important in relation to the skyline of the City and surrounding area. Cambridge is set within a low-lying landscape. Much of the city is hidden within a well treed skyline, punctuated by a few landmark buildings. Maintaining the settings of highly graded heritage assets and well-known features on the skyline, including how they sit within the skyline, particularly from key views in and out of the City, will be important. In the wider area, we are seeking to ensure that the rural character of the area is maintained and that even within the new settlements, buildings do not over-dominate the wider landscape and have a negative impact on the historic environment. The relatively flat nature of the area means that impacts can be felt over considerable distances; We welcome the detailed work that has been undertaken to prepare an evidence base in the form of the Skyline and Tall Buildings Baseline, Strategy and Guidance (although the detail is, at times, hard to follow – we recommend an executive summary is prepared to draw out the main points). We note that the Local Plan policy wording itself is very similar to the previous Local Plan, albeit with greater emphasis on design quality and the addition of a further criterion relation to suicide prevention. We welcome the reference to the historic environment in criterion b of the Policy and seeking to protect important views; More generally, we consider that the policy currently underplays the semi-rural nature	208926,208927,208928, 208931, 210173 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
of parts of Cambridge and the surrounding area. In addition, development should be seen as an opportunity to enhance Conservations Areas and the skyline of the city in general. Finally, it will be important that increases in height do not affect our experience and perception of coalescence between the city and surrounding villages. The policy should be amended to better reflect these three points; We have some ongoing concerns regarding the densities and heights on some of the edge of Cambridge sites. Development at very high densities/heights has the potential to impact on the overall setting of this historic city. We appreciate that there will inevitably be a trade-off between height versus further urban expansion. We have particular concerns about heights in north-east Cambridge and remain so about impacts on views from Ditton Meadows and the Conservation Areas, as well as wider views approaching the City from the north-east and east; In relation to new settlements, there will still need to be some caution in relation to heights owing to nearby Conservation Areas and other heritage assets such as the Roman Road. In particular, we note that the Strategy does not consider Grange Farm. This needs to be addressed prior to Regulation 19, perhaps through an addendum to the Tall Buildings Strategy.	
Higher-density development in areas with strong transport and public service provision is fundamental to ensuring long-term viability. Significant concerns about some of the limits and constraints specified in the current approach to density, particularly the emphasis on conformity and heritage considerations. The automatic assessment triggers linked to building heights across different location types (as per Appendix H: Skyline and tall buildings guidance) risks unduly constraining well-justified higher density	201678 (British Land)

Summary of issues raised in comments	Comments highlighting this issue
developments which would deliver clear benefits in terms of amenity, future transport provision, and long-term viability and sustainability.	
Financial Incentives for the demolition of Carbon-poor Glass Towers and contemporary construction should be utilised to restore the skylines across any one area whilst providing better mathematical application of the space for residential and commercial use, such as larger tenement buildings or the original streetscape reinstated yet designated specifically for housing where there may be a deficit.	210355 (Community Campaigner D Barton)
Point a (Add): Mandatory protection for domestic-scale building heights, particularly in Conservation Areas. Point b "For Cambridge.... relevant viewpoints" - support. Point d - strongly support. Point e: the use of "adequate" is too weak and undefined, particularly for surrounding properties or spaces. Must be clarified, strengthened and improved. On "microclimate", Point e is far too weak. It must also require that the effect of any development should prove that, at minimum, it will not increase (and, ideally, decrease) the Urban Heat Island Effect.	205467 (C Aman) 204883 (Federation of Cambridge Residents' Associations) 204820 (M Cleminson) 203691 (J Johnson) 202991 (Cambridge Glenys Self) 201512 (B Greig) 201799 (J Neal) 201841 (T Neal) 201873 (J Brightman) 201876 (J Hurst)

Summary of issues raised in comments	Comments highlighting this issue
	205584 (S Buckingham) 205664 (D Storey) 207652 (Duxford PC) 207661 (K Holland)
Policy is an improvement over the 2018 plan, but there are concerns about creating a permanent 'ring' of tall buildings that could alter the Cambridge skyline. Concern about identification of four sites for tall buildings. Clarification is sought on how Policy GP/ST aligns with existing masterplans, especially regarding the necessity of tall buildings for the West Cambridge site's objectives. Support is expressed for tall buildings that demonstrate architectural excellence, with a focus on creating distinct 'Landmark Buildings' rather than just maximizing height. Concerns are raised about height limits leading to a monotonous roofscape, suggesting the policy should encourage varied heights to maintain the character of the skyline. There is a lack of confidence in the Councils' ability to enforce high design standards, emphasising that Policy GP/ST must include a commitment to reject substandard applications. Detailed policy amendments are suggested to strengthen the policy.	204059 (Cambridge Past Present and Future)
Welcome policy's emphasis on design quality and on protecting Cambridge's heritage assets and historic skyline. At 1.b, replace "relevant viewpoints" with "all viewpoints" to strengthen this protection. At the same time, however, we recommend amending 1.a to recognise that building taller buildings in appropriate locations can have significant environmental benefits over lower buildings. In the supporting	203717 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
information, we recommend explicitly broadening suicide prevention guidance to all building types and noting that most suicides occur at or near residential dwellings.	
Brookgate has already destroyed the skyline and views from Lime Kiln Hill. This should be used as a case study/example of what to avoid.	202373 (A Carpen)
At Mission Street (Land south of Coldhams Lane) you are allowing buildings up to 20 metres? That is totally out of keeping with surrounding RESIDENTIAL BUILDINGS of two storeys	201251 (S Williams)
The commitment to domestic-scale building heights is not strong enough especially in view of the current pressure to build tall and densely (to fit many people into a small space and make huge statements for the sake of it rather than with truly uplifting buildings). Domestic scale buildings fit with the existing character of the city, create a sense of peace and calm and neighbourhood, and allow large views of the sky, rather than being overshadowed and hemmed in (especially in a largely flat city) and a sense of being connected to the countryside around.	203838 (U Crook)
Tall buildings are not appropriate within Girton's village landscape, which depends on open views, treed horizons, and the Girton Gap. The skyline is integral to Girton's identity. Tall buildings undermine heritage setting and rural landscape. The Girton Gap must remain visually open. GPC Requests to the Local Plan explicitly rule out tall buildings in Girton. Treat the Girton Gap as a sensitive skyline zone. Require visual impact assessments aligned with NP evidence.	202235 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
It is necessary to define 'tall buildings' within Policy GP/ST to avoid ambiguity. Point (b) should be revised to align with the NPPF and accommodate future clusters regarding impacts on the historic environment. Point (c) needs amendment to ensure the policy does not exceed committed development and remains consistent with guidance. Point (e) should allow for judgement and planning balance, rather than requiring applicants to demonstrate no impact. The term 'must' in the criteria for tall buildings should be replaced with 'should' to provide discretion for decision makers. Changes are needed to reflect Government intentions for effective land use and increased development density.	204192 (RailPen) 204429 (Brookgate land ltd and Network Rail)
Policy GP/ST and its supporting evidence fail to recognise the requirements of freight and logistics development and established employment areas, such as Bar Hill, which have buildings exceeding domestic scale. The policy applies a uniform urban-led approach that does not consider the diverse character of the Greater Cambridge area, particularly in South Cambridgeshire. Appendix H should define higher thresholds for tall or large-scale buildings in established employment areas, acknowledging existing structures that exceed domestic scale. The current policy may constrain appropriate industrial and logistics development by applying urban assessment criteria to rural and employment locations, which is seen as disproportionate.	204463 (Tritax Big Box Developments)
Policy repeats an issue with Policy 60 of the 2018 Cambridge Local Plan policy by continuing to imply that any building which breaks the skyline is unacceptable. Even modest additions at high level can break the skyline – it depends on where you are looking from. The policy would be clearer if it stated	208284 (Imperial War Museum)

Summary of issues raised in comments	Comments highlighting this issue
‘developments that cause significant change to the existing skyline and / or are significantly taller….’. The policy extends into the villages and rural areas of South Cambridgeshire, so this clarity is necessary for new development at IWM Duxford – otherwise any new building or addition to the height, no matter how modest, would break the skyline from somewhere and potentially be unacceptable.	
It is unfortunate that this policy repeats an issue with Policy 60 of the 2018 Cambridge Local Plan policy by continuing to imply that any building which breaks the skyline is unacceptable. Even modest additions at high level can break the skyline – it depends on where you are looking from. The policy would be clearer if it simply stated: ‘developments that cause significant change to the existing skyline and / or are significantly taller….’. As this policy effectively uses the old Cambridge Local Plan Policy and extends it into the villages and rural areas of South Cambridgeshire, the above clarification is even more necessary – otherwise any new building or addition to the height, no matter how modest, would break the skyline from somewhere and potentially be unacceptable.	208244 (Kings College)
The Tall Buildings Policy GP/ST will have a substantial effect on the character of Cambridge and any surrounding areas where they are applied. The skyline and streetscapes of Cambridge are distinctiveness and historic and the policy is weak as it does not assess and justify why there should be harm to that distinctive character.	210993 (C Newell)
The Tall Buildings policy GP/ST1 relies on an assessment of local context heights in Appendix H. This assessment is not one of those documents linked to the web page on Policy GP/ST and is confusing to access, being a large number of separate documents.	210994 (C Newell)

Summary of issues raised in comments	Comments highlighting this issue
Appendix H is not always comprehensive and accurate and does not consistently assess the predominate height and character of the locality. Instead heights are based on the tallest, without considering why there is a single building, a historic landmark or small group of ‘landmark’ buildings of greater height than their surrounding buildings. The Tall Buildings Map in Appendix H includes rural villages in South Cambridgeshire and well outside the designated Cambridge City extent. There is no clarity about their inclusion in the Tall Buildings policy and why their townscape is being assessed in this section. If intended to be within the Tall Buildings Policy, their inclusion should be clear and justified, and if not, they should be excluded from the Tall Buildings Map.	210995 (C Newell)
Unlike the London Tall Buildings Policy, there is no aspiration on of outstanding design and landmarks, but instead the policy wording suggests tall buildings as the default. 1.18 The policy should emphasise high quality design at street level as well as the mentioned skyline and services. 1.19 The historic environment GP/ST1b should make clear that the towers to remain dominant within the last sentence are historic rather than new towers.	210996 (C Newell)
Unlike the London Tall Buildings Policy, there is no aspiration on of outstanding design and landmarks, but instead the policy wording suggests tall buildings as the default. 1.18 The policy should emphasise high quality design at street level as well as the mentioned skyline and services. 1.19 The historic environment GP/ST1b should make clear that the towers to remain dominant within the last sentence are historic rather than new towers.	210997 (C Newell)

Summary of issues raised in comments	Comments highlighting this issue
Subject to the above, the Tall Buildings Map for outlying villages is at too small a scale to provide clarity about character areas. For example, many of the existing green spaces are missing and these maps are inconsistent with the village maps of the same locations.	210998 (C Newell)
The policy would be clearer if it simply stated 'developments that cause significant change to the existing skyline and / or are significantly taller….' As this policy effectively uses the old Cambridge Local Plan Policy and extends it into the villages and rural areas of South Cambridgeshire, the above clarification is even more necessary for Girton College – otherwise any new building or addition to the height, no matter how modest, would break the skyline from somewhere and potentially be unacceptable.	208299 (Girton College)
Support, recognising that Appendix H includes "While new settlements and employment areas such as science and technology parks may accommodate taller buildings due to their evolving context heights, proposals in these areas will still be assessed against these guidelines to ensure appropriate skyline integration and design quality."	211549 (Martin Grant Land Limited)
Skyline and Tall Buildings Strategy The prescribed height thresholds (19 m, 25.5 m, 32 m) and the 13 m limit in the Suburban/Rural Height Zone are overly prescriptive for Cambridge East and should be replaced by a design-led approach.	209040 (Marshall Group Properties)
Cambridge is located in an environment where the land is flat and views are extensive. Such views need to be preserved. In this environment 'big boxes', with eaves hights of 24m, equivalent to a seven story building would be inappropriate. Neither Tritax and Newlands developments meet policy	211114 (Boxworth Parish Meeting on behalf of A14

Summary of issues raised in comments	Comments highlighting this issue
requirements nor the implied restrictions on the size and scale of rural developments. Any developments should be required to clearly demonstrate (including through 3D illustrations), at consultation phase, maximum size, including overall heights, of the buildings on developments and how through comprehensive landscaping their developments will not be visible beyond the site boundaries. Supported logistic/commercial developments on the A14 corridor should consist of small to medium size buildings. Eaves heights should be restricted and clearly set out; In this context 10/12 m would seem appropriate.	Logistics Forum), 211436 (Boxworth Parish Meeting)
The proposed warehouses are excessively large and tall for the flat, open landscape near villages, causing significant environmental and visual impact.	207727 (Swavesey PC)

Policy GP/QP: Establishing high quality landscape and public realm

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Comments offered general support for the aims of the policy in securing sustainable development. Others sited that it must be applied flexibly so it does not undermine development capacity and viability.

A number of comments, particularly from those representing arts venues, highlighted the importance of public art. They said a Percent for Art initiative or Cultural Infrastructure Levy should be applied. Artists should be embedded in the master planning process and Create Cambridge should be engaged. Comments requested that the Public Art Supplementary Planning Document should be updated.

There was also a number of comments focusing on the opportunities for public realm and cultural infrastructure improvements around the Elizabth Way bridge area of Cambridge. The area provided an opportunity for a cultural hub community project, with a redesigned area focused on pedestrians and cyclists over cars. The Eastern Gate Public Realm Improvement Area policy has also addressed these comments.

Cambridge Past, Present and Future considered there should be more guidance on the design of public realm areas. Mothers CAN Cambridge said areas should include engaging elements for children in public realm designs. It should reference the needs of older

people, including way finding and dementia friendly design principles. Health was also highlighted, and how spaces can help address social isolation and poor health outcomes. One comment said further work was needed to consider the impact of urban design and building facades on the levels of mental stress within the brain, and particularly people who are neurodivergent / ADHD / Autistic.

A common thread throughout comments on the policies was that active travel routes must meet the five core design principles. It was requested that mandatory requirements should be set for permeability and that routes must be suitable for children, promoting safe travel to schools. There was also challenge that the plan did not sufficiently reference accessibility and addressing the needs of disabled people. The need for seating in development and the public realm was also mentioned. Comments suggested that policy should require street design to encourage active travel and discourage car use, not merely avoid vehicular dominance.

Cambridgeshire County Council said that the policy needed to recognise the value of public rights of way. The British Horse Society said it should also recognise equestrian users where green corridors, public realm routes and landscape connections were being planned.

Other suggestions included addressing the paving over front gardens, with impact on both place and flood risk sited. The policy should consider the impact of street clutter, and ensure space for pedestrians when parking spaces are occupied. The importance of post development monitoring, which should be funded by developers. And developments should include dog-friendly open spaces.

Natural England welcomed part 1c in particular. One comment said it should remove reference to historic street furniture, while other comments focused on enhancing historic appeal. On 1.c.ii, the Cambridge Green Party considered it should require at least

20% of land area to be allocated to nature. Others highlighted the importance of selecting trees that could deal with the impacts of climate change to avoid high failure rates Trees also needed to be managed.

Anglian Water welcomed reference to the inclusion of green and blue infrastructure as one of the key factors to achieving high quality development.

Some representatives were concerned about the quality of open spaces being eroded. The issue of potholes was also raised.

Response to main issues raised in representations:

Requirements for public art provision as part of development proposals is established in the policy and has been amended in criteria 1.e.iv and within the supporting text to emphasise the importance in fostering a sense of identity and response to culture and nature.

Wording has been added into criteria 1.d.ii and 1.e.ii to prevent negative impacts on climate and character from paving over front gardens. This wording was originally set out in the adopted Cambridge City Council Local Plan (2018) and has been successful applied in planning decision-making. It is appropriate to reflect this policy in the Greater Cambridge Local Plan as it relates to both urban and rural contexts.

References to street lighting, street furniture and elements of well designed public realm has been developed to incorporate the needs of all users and reference is made in the supporting text to the reduction of hostile architecture that prevent inclusivity and undermine the effective use by older and younger people, homeless people and skateboarders who may use the spaces in a

variety of ways. The supporting text also references the research into the benefits of inclusive design to mental health and wellbeing. Additional wording has been added to criteria 1.a.iii) to include imaginative and natural play within high quality public realm.

Further reference has been added to reflect perceived safety and the design of secure, convenient and appropriately designed street furniture such as bins, to prevent street clutter and to set out measures to manage the risk of hazards and harm to people.

A number of comments seek to add issues which are already addressed effectively by other policies, such as active travel or references to biodiversity. The plan as a whole provides an effective set of policies to address these issues. Reference to specific open space standards have been considered in the Biodiversity and Green Spaces Chapter, supported by new evidence on creation of a suitable set of policy metrics and standards responding to Natural England guidance. A wide variety of groups and needs were highlighted. A clear aim of the policy is to ensure that streets and spaces are accessible to all. Policy BG/TC: Tree canopy cover and the tree population provides a clear approach to trees, including the selection of species, and monitoring requirements.

Amendments have bene made to Policy S/PRIA/EG: Eastern Gate to reflect the opportunities around the Elizabeth Way roundabout.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support Create Cambridge in asking that: • public art and cultural activation link to a Percent for Art initiative or Cultural Infrastructure Levy • the Public Art SPD is explicitly referenced • artists are appointed at RIBA Stage 2–3, embedded in masterplanning • Create Cambridge is engaged as advisor/consultee/co-curator (with communities) in developing plans and strategies for public art and cultural activation This ensures cultural value is designed in from the outset.	202056 (H Chamberlain), 202139, 202870, 202871, 202305 (Cambridge Junction), 202198 (H Tam), 202317, 202753 (Cambridge Junction/ Create Cambridge), 202409 (T Shaw), 202411 (Kettle's Yard), 202685 (T Altmann), 202715 (W Townsend), 202782 (S Lee), 202931 (R Terry), 202974 (T Flinders), 203023 (The Arts Theatre Cambridge), 203046 (Cambridge City Council Liberal Democrat Group), 203337 (N Ellis), 203434 (S Ashworth), 203486 (L Heap),

Summary of issues raised in comments	Comments highlighting this issue
	203515 (D Lever), 203629, 203870, 205040 (University of Cambridge), 203850 (N Yeni), 204683 (NEUBAU Architecture), 204836 (L Matthews), 204998 (Wysing Arts Centre), 205062 (H Paterson), 205135 (J Walsh), 205293 (A C de Azevedo Lamha), 205314 (N Oakley), 205323 (L Howse), 205389 (A Seiglow), 205399 (Cambridge Junction), 202386 (J Webber), 202460 (K Jones)
Existing policy on Public Art is based on SPDs originating with SCDC and City respectively over 10 years ago. New thinking on art policy and public art has developed significantly and the Local Plan needs to reflect this new reality. Similar cities to in mainland Europe and North America have well developed and modern policies that consider public art as an element of an arts eco-system that	202148 (R Stobart)

Summary of issues raised in comments	Comments highlighting this issue
includes healthy living and sustainable communities. Co-operation between the arts communities, authorities and residents are the basis for vibrant cultural life.	
The area around the Elizabth Way bridge should be transformed including a cultural infrastructure project. S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project. • Crossing the Elizabeth bridge should be a pleasant experience causing active users to pause and take in the advantageous views. Provide green links between open spaces and facilitate vertical growth and urban greening where possible, including the bridge • Provide streetscapes encouraging active lifestyles, skate friendly seating, sheltered spots, bicycle/scooter parking, sufficient street lighting, access to water, toilets, F+B offerings • With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, the new urban realm surrounding the infrastructure should aim to achieve better quality materials, increase landscaped areas and biodiversity and create green corridors connecting N/S and E/W - promoting desire lines and prioritising active transport modes (pedestrians of all ages, cyclists, scooters a.o.) around the infrastructure and to and across the river • With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, crossing the Elizabeth bridge should be a pleasant experience causing active users and visitors to pause and take in the advantageous views. • Re-design of the car dominated transport roundabout to include cycle lanes and four required pedestrian & cyclist crossings, all of which should prioritise pedestrians and cyclists over cars, and integrate practical and desired lines for better N/S and E/W connectivity.	208508 (Cambridge Green Party), 208513, 208514, 208518, 208519, 208520, 208521, 208522, 208523, 208524, 208525, 208526 (NEUBAU Architecture), 204894 (M Cleminson) 204537 (T Woodcock)

Summary of issues raised in comments	Comments highlighting this issue
• End of Walnut tree avenue access road into a shared surface for recreational use, offering advantageous West facing views of the river with additional integrated seating and planting - a public realm outdoors area.	
All new developments should include dog-friendly open spaces where dogs can be exercised off-lead.	203260 (Cllr C Hofman)
Wording of this policy should be strengthened at multiple points. Criterion 1.a.ii should explicitly include space for biodiversity and nature alongside drinking water, shade and shelter. Criterion 1.b.ii should be amended to require street design to encourage active travel and discourage car use, not merely avoid vehicular dominance. Criterion 1.c.i should remove reference to historic street furniture, while 1.c.ii should require at least 20% of land area to be allocated to nature. The supporting information should emphasise flood risk reduction, biodiversity, and the use of natural, permeable paving materials.	203718 (Cambridge Green Party)
Policies GP/QP and BG/EO are interrelated; consider placing them in the same topic area or cross-referencing them. Definitions of external spaces are inconsistent; a standardised description should be provided across policies. The policy should include more guidance on the design of public realm areas, such as streets and civic squares. The wording of the policy is repetitive and unclear. Retain and update Policy 66 on paving over front gardens, as current guidance lacks clarity and enforcement. Factors increasing front garden conversions include parking competition, avoiding permit fees, and enabling EV charging. Introduce a financial mechanism for monitoring and enforcing landscape quality to address resource gaps in delivery. Developers should contribute to a landscape monitoring fund to ensure compliance with approved conditions and management plans.	204101 (Cambridge Past Present and Future)

Summary of issues raised in comments	Comments highlighting this issue
1. c. ii. In our experience at Northstowe Phase 1, native varieties are often now unsuitable and experience high failure rates in the recent hot, dry summers, wet winters, and clay soil. We would encourage the LPA to emphasise the second clause in this point. Establishment must be improved via careful species selection at the design stage, maintenance during the first years after planting, with a backstop of robust planning enforcement when schemes are not effectively implemented.	208057 (Northstowe TC)
Policy must ensure active travel routes must meet the five core design principles. Design quality should be tested at the planning stage, not left to later detail	202509 (H Brown)
The policy is very positive in that it prioritises pedestrian led movement. There is space for improvement: the policy on street clutter needs to also apply to the infrastructure policy around communications facilities in Policy I/DI 1.a, and the policy as laid out here in section 1.a.iii should require adequate footway for pedestrian movements when parking is occupied, not just when it's not.	202635 (P Tribble)
Extensive natural grazing in Cambridge and keeping it affordable deserves more attention as it is a distinctive and valued feature of the city. Open spaces are being heavily encroached on and the small open areas within developments are often formal and boring. Many of the aims and aspirations listed are laudable but as many are advisory they lack teeth resulting in open spaces which are of low quality and have little consideration for supporting biodiversity. Just as with climate change, measures are	205099 (A Copping)

Summary of issues raised in comments	Comments highlighting this issue
considered, then dismissed because to expensive, or the development would have to be scaled back to afford them	
Recommend adopting policies similar to The London Plan S4, which emphasises accessible routes for children to play areas, schools, and youth centres to promote safe and independent movement. And for large-scale public realm developments to include incidental play spaces to enhance playability.	205597 (Mothers CAN Cambridge)
Advocate for incorporating more engaging elements for children in public realm designs, referencing the success of Dinky Doors as an example of effective engagement.	205598 (Mothers CAN Cambridge)
Good to make HIAs a formal requirement. Important points about social isolation and poorer health outcomes but add community severance issue where high traffic levels/layout impede neighbourliness. Active Travel glib phrase - walkers/wheelers don't always feel safe near cyclists and micromobility vehicles - speed, footway abuse, lack of lights -build in remedies. Add building continuous footways at junctions fostering pedestrian priority/wheeling accessibility/slowing vehicle speeds. Tree management issue - fine to plant but leaf fall/lack of maintenance brings trip hazards/impassable footways. Address exiting as well as new routes.	201633 (Cambridge Living Streets)
There seems to be a disconnect between what people think and what planners propose. The main complaint about delivery of pleasant places to live in is potholes. But planning is (mostly) City and District while roads are (mostly) County so there appears to be a disconnect. Even where the cityscape is the responsibility of the same local authority as the planning, we see a dreadful mess of street	201733 (T Stone)

Summary of issues raised in comments	Comments highlighting this issue
furniture with bad maintenance, poor cleaning and a proliferation of fly-posting. Could we have it recognised in the Local Plan that work is being done on this? Meanwhile forget public art	
We welcome this policy, particularly part 1c, which recognises the many benefits of incorporating natural elements into development to respond to climate change.	207635 (Natural England)
Anglian Water welcomes reference to the inclusion of green and blue infrastructure as one of the key factors to achieving high quality development. Public art requirements should exclude applications for utilities development.	210214 (Anglian Water)
Enhancement of Historic Areas to remove modern street furniture with the integration of classical style timepieces should be encouraged and pursued wherever possible with clear preferred guides set out for each part of the City. Fascia Frontage details should be reinstated whether in a Conservation Area or not, especially where approval has been granted to rebuild an entire house using breeze block to produce a stereotypical black, white and grey dwelling out of place.	210359 (Community Campaigner D Barton)
Highways & Street Furniture should be duly supported across the whole of an area to enhance its historic appeal to the commercial community as much to its indigenous community; as this is supported greatly in equivalent Public Realm Strategy SPDs- where any and all guidance and support must and should be provided, with key at risk projects being an exceptional anecdote that may be cited in future documents or versions of this and other consultations to stimulate economic construction and restoration across other designated Conservation Areas, etc or otherwise.	210363 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
Clearance of vegetation along the Railway Lines alongside other equivalent parts of the Line to eradicate the perceived neglected aesthetic.	210366 (Community Campaigner D Barton)
The Plan throughout barely references transport by wheeled mobility aid, giving the impression it does not address the needs of disabled people.	204124 (S Hughes)
Transport at pedestrian speed by wheeled mobility aid is commonly referred to as 'wheeling'. Every reference to 'walking' in the Plan should either be changed to 'walking and wheeling', or it should be made absolutely clear that when the term walking is used, it is used inclusively, encompassing the use of wheeled mobility aids (the former is preferable).	205496 (S Hughes)
There is confusion in this policy over what 'wheeling' means'. It should not refer to skateboarding, which is entirely separate.	205497 (S Hughes)
More seats in public green spaces, especially for the elderly. Greater efforts to reduce traffic speed and reduce pollution - providing charging points throughout residential areas, not just in public car parks. Better control of e-bikes etc. More encouragement of pedal bikes with obvious priority on all streets without cycle lanes for pedestrians and pedal bikes.	202361 (R Lind)
Please commission a specialist paper on neuroarchitecture and the impact of urban design and building facades on the levels of mental stress within the brain, and particularly people who are neurodivergent / ADHD / Autistic.	202363 (A Carpen)

Summary of issues raised in comments	Comments highlighting this issue
Barratt Northampton supports Policy GP/QP and its strong emphasis on delivering high-quality landscape and public realm. Barratt Northampton also welcomes the clarity that GP/QP provides for the delivery of coherent landscape and public realm across phased developments. The flexibility within the policy allows site-specific interpretation while maintaining high design standards.	210503 Barrat Homes Northampton)
Objection to Policy GP/QP, it should consider individual site circumstances to avoid undermining development capacity and viability.	203103 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
Policy would benefit from reference to cycle parking being located conveniently in order to help reduce nuisance parking of bikes. Policy could explicitly recognise the value of PROW in providing connectivity between rural communities. Development should not hinder this function but should seek to augment it, and where there is limited rural connectivity, expanding the PROW network should be championed.	210583, 210617 (Cambridgeshire County Council)
The Plan acknowledges the significant demographic shift anticipated in Greater Cambridge, projecting a 26% increase in residents aged 65+ by 2031, with the most rise among those aged over 80 years old, raising concerns about dementia prevalence. Whilst policies such as GP/PP, criterion 1.a.ii, and GP/QP, criterion 1.e, address accessibility and inclusivity for older people and those with reduced mobility, they lack dementia friendly design principles. It is suggested that Policy GP/QP could be	210635 (Transport 2000 Cambs & Suffolk)

Summary of issues raised in comments	Comments highlighting this issue
strengthened by including features like clear wayfinding and appropriate street furniture to improve cognitive accessibility.	
Please learn to hyphenate nouns where necessary. Also 'espond' is not a word.	201252 (S Williams)
Support the ambition of the policy to create inclusive, well designed public spaces that promote health, wellbeing and accessibility. However, the BHS is concerned that the policy focuses heavily on pedestrian and cycle movement but does not explicitly recognise equestrian users where green corridors, public realm routes and landscape connections link to the wider countryside or ROW network. Policy should explicitly recognise equestrian users.	208656, 208657 (British Horse Society)
We consider the threshold for the provision of public art should be increased to 100 dwellings. Sites delivering smaller quantities of units are typically within more rural or village areas where the provision of public art may not be appropriate for the area. It also adds further financial and administrative burden on developers of small sites.	208360 (T Elbourn)
Do what Cambourne did	204017 (S Rogers)
We support the inclusion in The Local Plan the requirement to use native species in landscaping. We recommend that should anyone proposing to plant species as part of development submit a planting schedule that specifies species native to the area and sourced locally to maintain genetic integrity and ecological resilience. The schedule should also include details of establishment care, such as watering and maintenance, to ensure successful growth and long-term survival.	211170 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
It is recognised that high quality landscaping and public realm are a key element of a successful community.	211550 (Martin Grant Land Limited)

Policy GP/LC: Protection and enhancement of landscape character

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support, including strong support for the policy from a range of individuals and organisations. There were also some comments that there needs to be a balanced application of the policy to avoid hindering housing development in sustainable locations. While another comment was that the policy was not strong enough, and proposals must do no net harm to existing landscape character.

Some representations proposed amendments to the wording of the policy including Cambridge Past, Present and Future who suggested that there could be a new section to identify opportunities for introducing new landscape features to compensate for any loss or degradation and that landscape assessment should be part of the pre-application process. There were also objections from a small number of developers that the requirements of the policy are unduly onerous and not consistent with National policy as there are no valued landscapes within Greater Cambridge.

There were some locationally specific comments. Girton Parish Council requested specific measures to protect their village identity and the Girton Gap. Haslingfield Parish Council raised concerns about the East West Rail proposals. There was also a comment

that the boundaries of the Landscape Character Assessment are incorrect in Stapleford and Sawston. Another commented on some of the details in the landscape character assessment.

There was some support for the continued protection of Important Countryside Frontages, with calls for the ICF within the Stapleford and Great Shelford Neighbourhood Plan be included on the Policies Map and that there is another potential ICF identified in Stapleford. There were also objections to three of the ICFs saying that they did not meet the definitions and should be deleted.

Response to main issues raised in representations:

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

Support for the policy from a number of representations was noted.

Whilst it is recognised that there are no defined valued landscapes within Greater Cambridge, the intention of the policy to protect, conserve and enhance local landscape character is in line with NPPF section 12 on achieving well-designed places, which says that planning policies and decisions should ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change'. The policy follows a landscape character approach to ensure that new developments respect local landscape character and features as set out in the Greater Cambridge Landscape Character Assessment (LCA). The policy will be considered along with all the other policies in the Local Plan when considering planning applications giving a balanced approach.

A reference to the importance of pre-application discussions, particularly for major development has been include in the supporting text of the policy. A number of other specific policy amendments were proposed, but these were not considered necessary, and the policy is already effective in addressing landscape issues.

The locationally specific comments have been considered. The area referred to as the Girton Gap is also within the Green Belt. Policies within the Local Plan would apply were development proposed, and it does not warrant specific policy reference. The East West Rail project is the subject of a different consenting regime (a Development Consent Order), and impact on landscape character and visual impact will be considered as part of that process.

With regards to the Greater Cambridge LCA, this was undertaken at a strategic level for the whole of Greater Cambridge. There will never be an exact boundary between landscape character types and sometimes there is an area of transition which would need to be considered at the planning application stage when more detailed assessment is carried out. The LCA is considered a robust part of the Loca Plan evidence base and does not warrant a review at this time.

Some comments reference issues outside the remit of this policy, such as enhancing connectivity, or considering urban heat island effects. These issues are addressed by other policies.

The comments on the ICFs were considered in the Protected Open Space Review (2026) in Appendix E and the responses are summarised here. Neighbourhood Plan ICF designations already form part of the development plan and are shown on the policies map and it is not necessary to also include them within the Local Plan. An assessment of the two sites put forward in Stapleford found that neither meet the criteria and so wouldn’t be included. The sites where respondents objected to the ICFs were considered again, but the Councils consider they meet the criteria and there has been no visible change since the Protected Open

Space Evidence Report (2025) and so they should remain as ICFs in the Local Plan. A proportionate approach has been taken to the Protected Open Space Report and many of the ICFs have already been through an examination for the adopted South Cambridgeshire Local Plan. Therefore, it was entirely appropriate for the 2025 Review to focus on whether there had been any change in circumstances to warrant a change of position for these sites.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support Point 1a & e. Strongly support Point 1b, c & d & Point 3.	202164 (J Neal), 203694 (J Johnson), 205469 (C Aman), 205669 (D Storey), 202997 (Cambridge G Self), 204983 (Federation of Cambridge Residents' Associations), 201511 (B Greig), 201844 (T Neal), 201875 (J Brightman)
Fully support this important policy	201018 (M Colville)
Object and request changes to plan: • The policy must explicitly require that development proposals demonstrate no net harm to existing landscape character, including microclimate, biodiversity, and historic townscape. • Replace "should" with "must" throughout • Add requirement for independent landscape character assessments for all major developments	204901 (M Cleminson)

Summary of issues raised in comments	Comments highlighting this issue
• Add explicit reference to the Urban Heat Island Effect and the need to mitigate it through landscape design. • Add requirement for long-term maintenance plans for landscape interventions.	
Support the policy in all respects. Preservation of landscape character is vital if fostering a sense of living in a great place is desired. We agree the setting of villages in South Cambs should be protected and enhanced. We also specifically support the continued protection of identified Important Countryside Frontages.	203550 (Ickleton PC)
Strongly supports but suggests amendments for clarity and effectiveness. Consider whether other documents should be referenced such as the Tall Buildings Baseline, Strategy and Guidance (2025) and the townscape study. The respondent believes evidence of consideration for the GC Landscape Character Assessment should be required during the pre-application stage, rather than just accompanying the planning application. They propose amendments to the text, 1a) addition of 'diversity and natural beauty'. New 1b) is suggested to ensure that changes are appropriate to the landscape character type. New subsection to identify opportunities for introducing new landscape features to compensate for any loss or degradation	204113 (Cambridge Past, Present and Future)
Vistry supports the principles of the policy aimed at protecting and enhancing landscape character but stresses the need for a balanced application to avoid hindering housing delivery in sustainable locations. Vistry advocates for a site-specific assessment of landscape contributions based on existing conditions. Vistry notes that not all land in the wider landscape setting of Cambridge contributes	204874 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
meaningfully to its character, and suggest that development can enhance landscapes by strengthening green infrastructure and reinforcing defensible settlement edges, while positively supporting the wider growth strategy.	
Do what Cambourne did - a lovely rural feel perimeter public bridleway	204018 (S Rogers)
The Girton Gap is the most critical element of landscape character, preventing merger with Cambridge and sustaining rural identity. The 2021 Green Belt Assessment confirms AR1 release would erase the gap. Landscape character includes green corridors, hedgerows, and village edges. Landscape design must protect the parish's separate historical identity. GPC Requests to the Local Plan explicitly name and protect the Girton Gap in GP/LC. Reject AR1 release proposals. Support planting and habitat corridors consistent with Girton NP.	202237 (Girton PC)
Girton's public realm must connect green spaces, Active Travel, and heritage settings, creating calm, inclusive, walkable environments. Residents value rural character + functional community spaces. Public realm must integrate planting, safety, and village-appropriate materials. Active Travel is central to public realm improvements. GPC Requests to the Local Plan: Require all public realm upgrades to reflect rural village character. Integrate green infrastructure (trees, SuDS, habitat corridors). Align landscape design with Active Travel and community wellbeing	202236 (Girton PC)
Object because the development of Cambourne North is contingent upon the EWR project, which must adhere to Policy GP/LC that emphasises respect for landscape character. The proposed EWR alignment is expected to fundamentally change landform, fragment the landscape, intrude into long-	202030 (Haslingfield PC)

Summary of issues raised in comments	Comments highlighting this issue
distance views, and erode rural tranquillity, contradicting Policy GP/LC. The Local Plan inadequately justifies the acceptance of EWR as infrastructure, failing to assess its landscape impacts in accordance with Policy GP/LC and neglecting alternative alignments. Claims of potential mitigation through future planting and earthworks are deemed insufficient, as they cannot restore lost landscape character or historic features within the Plan period.	
Although the Landscape Character descriptions in the CBA 2021 LCA are reasonable, the boundaries shown for them in Stapleford and Sawston are wrong so should be corrected to ensure that the open Chalk Hills are properly segregated from the lower lying settled and wooded valleys that they look over. The current boundary was challenged by the inspector during the appeal that granted a new retirement village on the hill outside Stapleford.	202863 (M Foote)
Support Policy GP/LC, highlighting its recognition of the importance of safeguarding landscape character and green corridors in the Greater Cambridge area. The policy's requirement for development to positively respond to its landscape context aligns with national planning policy objectives for environmental protection and landscape quality.	204472 (Tritax Big Box Developments)
Object to Policy GP/LC since the proposed requirements of the draft Policy are considered to be unduly onerous and are not justified, positively prepared or consistent with National Policy. The proposed wording of the policy should explicitly recognise that both new settlements or extensions of settlements	205063 (Endurance Estates)

Summary of issues raised in comments	Comments highlighting this issue
may not be deemed to “protect, conserve and enhance” the local landscape character, and features in full since development provides an inherent and unavoidable change.	
Part 1.a. of Policy GP/LC, to be consistent with the NPPF (paragraph 187), should be revised to conserve the intrinsic character and beauty of the local landscape as there are no valued landscapes.	205134 (Lolworth Developments Ltd)
Where there are existing public rights of way the character of those should be retained by green corridors or other means.	210615 (Cambridgeshire County Council)
Paragraph identifies the need to consider the cumulative effects of development on local landscape character. The local plan should consider opportunities to improve connectivity between adjoining or adjacent development sites so that provision is made for non-motorised routes that link developments. The existing practice of treating each development as an isolated site, even where there are separate parcels within a larger development, restricts the ability of the highway authority to require each individual development to contribute to the creation of a more connected PROW and no-motorised user network.	210616 (Cambridgeshire County Council)
The assessment of landscape setting and contribution should be undertaken on a site-specific, case by case basis, having regard to the existing condition and character of the land concerned. Not all land within the wider landscape setting of Cambridge currently makes a meaningful contribution to its character or special qualities. Where development proposals can deliver landscape enhancement, strengthening green infrastructure and reinforcing defensible settlement edges, they can positively contribute to the objectives of the policy while also supporting the wider growth strategy	210254 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
• Support the policy but highlights the need to update the draft Policies Map to include the Stapleford & Gt Shelford Neighbourhood Plan and specifically Policy S&GS 13, which designates a new Important Countryside Frontage. • Concerns are raised regarding Policy GP/LC clauses 1 and 3, stating that their application to Stapleford parish is inappropriate due to inaccurate mapping of the Gog Magog Hills. An urgent review of the Gog Magog Hill Landscape Character Area is requested. • Concern that the mapped extent of the Gog Magog Hills is inexplicably shrinking over time, which undermines Policy GP/LC. Specific inaccuracies regarding the landscape character area 7B: Gog Magog Chalk Hills and its boundaries are detailed. • Inaccurate mapping has already impacted local planning decisions, including an appeal decision that approved a retirement care village on Green Belt land in part due to discrepancies in landscape character assessments.	201622 (Stapleford PC)
Include the Stapleford and Great Shelford Neighbourhood Plan (adopted Oct 2025), in particular to include Policy S&GS 13 which introduces a new Important Countryside Frontage between 41 Gog Magog Way and houses at Chalk Hill, Stapleford.	210949 (Great Shelford PC)
Support the policy to protect Important Countryside Frontages where landscape with strong countryside character penetrates or separates villages and retains their sense of connection with their rural surroundings. There are two in Stapleford that meet this objective and the visual and physical tests set out in the GP/LC policy and supporting documents, yet the policy map shows no protection for these frontages even though similar or less important frontages are protected in neighbouring villages. The	202909 (M Foote)

Summary of issues raised in comments	Comments highlighting this issue
policy should be consistently applied across the villages and these two ICFs (on Mingle Lane and Gog Magog way) added on the policy map.	
Object as consider that the land off Home End, Fulbourn does not meet the definition of Important Countryside Frontage and is deleted. It is surrounded by buildings and a car park. There are sport and recreation facilities and associated car parking areas between the site and the countryside beyond.	201959 (KG Moss Will Trust & Moss Family)
Object because it is considered that the land off Ditton Lane in Fen Ditton does not meet the definition of an Important Countryside Frontage, and it is requested that this designation is deleted from this site.	202093 (J Francis)
Remove the ICF allocation on the northern boundary of the Land south of Church Street, east of High Street, Guilden Morden (HELAA Ref. 40300). Site does not have a strong countryside character and it is visually enclosed by significant vegetation screening; there are no views out to the countryside side to protect.	206698 (E W Pepper Ltd)
Land to the South of Station Road, Harston The Station Road frontage of the Site, together with the Station Road frontage of Baggot Hall farm to the east, is proposed to continue to be subject to the 'Important Countryside Frontage' Policy, under Policy GP/LC: Protection and enhancement of landscape character. Object to Policy GP/LC and question the robustness of the Protected Open Spaces Review (2025) as merely a desk-based review. We believe this requires a more detailed assessment including site visits to better understand the specific context and landscape character. This should be undertaken to inform the preparation of the Regulation 19 consultation of the Plan.	203436 (Jesus College)

Summary of issues raised in comments	Comments highlighting this issue
The countryside east of Cambridge is not empty land awaiting “opportunity”. It is an established and strategic green resource, already referenced in the existing Cambridge Plan, and it underpins Cambridge’s success in multiple ways. The existing Greater Cambridge Plan rightly identifies this area as important green infrastructure and recognises its role in safeguarding landscape character and environmental connectivity. However, these policy aspirations are currently being undermined by external NSIP proposals. The Greater Cambridge Local Plan must require that proposals affecting land outside the Green Belt demonstrably align with Greater Cambridge’s vision, evidence base and environmental strategies.	209118 (S Hepworth)
Current policy wording of South Cambs Local Plan (2018), Policy NH/2 would be more appropriate, which states that “Development will only be permitted where it respects and retains, or enhances the local character and distinctiveness of the local landscape and of the individual National Character Area in which it is located.” If the current drafting remains, it needs to be recognised that the LVIA and GI Strategy for the planning application for Cambourne North will state that the scheme takes account of the Specific Landscape Sensitivities, and complies with the Specific Landscape Guidelines, of LCA 4A Croxton to Conington Wooded Claylands (within which the site lies), as defined in the GC LCA (2021).	211551 (Martin Grant Land Limited)
The policy GP/LC is inconsistent with NPPF Paragraph 174 in that it should allow for the designation of Valued Landscapes. The CA assessment does not include development of the last 5 years and assessments do not include the whole Plan area as the Assessment Units Areas do not extend to parish boundaries. Part 1 paragraph 1.2.13 gives the specific planning issues not covered by the study,	211909, 211910 (C Newell)

Summary of issues raised in comments	Comments highlighting this issue
which include ecological factors, cultural heritage/archaeological factors, visual amenity and technical design/feasibility factors. It is clear that these omissions do affect the assessments, such as the merging of Pampisford and Linton landscape areas, the detail of the Assessment Units Areas (such as for LIN01-04) and the conclusion that the Pampisford CA 8A is not of ecological interest.	
The eastern Granta Valley of Hildersham, Linton and Bartlow should have been assessed separately in the CA. Pampisford Lowland Chalklands Landscape Character Area 8A extends further eastwards to Linton and Bartlow. The slightly sloping valley edges photographed as Area 8A on page 164 are of Pampisford and are not characteristic of the landscape of the River Granta Valley further east and the map on the same page shows the fields eastwards are no longer the large fields described in paragraph 2 of the text. In the same paragraph on page 164, it is stated that 'This is not an ecologically rich landscape' which is incorrect, as the relevant ecological records in the mapped area around Linton and Hildersham show. By excluding the eastern Granta from LCT9, the assessment also excludes part of the County Wildlife Site, the chalk river, the Pocket Park. The reference to Linton having 'grown substantially since 1950s' obscures its role in the 1970s Local Plan as a planned village expansion to protect the Cambridge Green Belt.	211911 (C Newell)

Policy GP/HE: Historic Environment

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

A number of comments offered general support for the policy.

Historic England welcomed the inclusion of policies for the historic environment, and the positive strategy for the historic environment as set out here and elsewhere in the Plan They suggested that the heritage policies could be more spatially specific, and make more of opportunities to enhance the historic environment. They recommend adding more about the importance of heritage in place-making, quality of life and well-being as well as being a key economic driver as well as the importance of protecting and enhancing heritage because of this. Also seeking to enhance existing provision and create greater access to other heritage assets to spread the impact on heritage destinations.

The Cambridge Green Party said the policy should clarify the benefits of conserving heritage assets, through the positive contribution of heritage conservation to the cultural identity, wellbeing and sustainability of communities. The policy could also explicitly recognise the importance of integrating heritage into public realm improvements. A range of other suggestions were proposed regarding restoration of heritage.

Cambridge Past, Present and Future considered more was needed in the policy to protect and enhance heritage assets. The plan must include a formal statement recognising the city's global heritage value as a cohesive whole. Broaden the Scope of Protection: Policy must explicitly recognise the world-heritage significance of the city. Another representor considered the policy was weak, and did not provide a Historic Environment Strategy, just a list of existing tools.

Some comments highlighted the need to manage the proposed growth with heritage impacts through a Historic Environment Strategy and that the Plan does not make enough reference to the importance of the special character of Cambridge.

Vistry Group considered the policy was not consistent with the structured approach set out in national planning guidance. Others suggested it was overly prescriptive.

A number of specific locations were highlighted, including at Girton, the area of Cambridge around the Elizabeth Way bridge, and the St Andrew the Less Community Project.

Response to main issues raised in representations:

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The Councils note the broad support expressed for the positive strategy for the historic environment and the role of heritage in placemaking, community identity, wellbeing and the local economy. Representations also highlighted the importance of heritage in supporting sustainable communities and improving access to historic assets, alongside suggestions to strengthen strategic and spatial elements of the policy approach.

In response, the policy has been amended to strengthen and clarify the role of the historic environment within the development strategy. This includes refining wording to explicitly recognise the contribution of heritage to cultural identity, placemaking, wellbeing and sustainability, alongside its economic importance. The policy has also been updated to encourage the enhancement of existing heritage provision and improved access to a wider range of heritage assets.

The Councils note representations regarding the requirement for Heritage Impact Assessments and their relationship to validation requirements. The policy retains the requirement for proportionate Heritage Impact Assessments where development may affect heritage assets or their settings, reflecting their importance in informing decision-making.

Comments seeking greater spatial specificity, a more strategic approach to heritage capacity, and the introduction of additional standalone strategies or policies are noted. The Councils consider that the Local Plan, together with supporting strategies and guidance, provides an appropriate framework for managing the historic environment, and no further policy changes are made in response to these matters.

Representations concerning active travel routes, bridleways, design approaches, simplified consents, contractor directories and other operational matters fall outside the scope of this policy and have not resulted in amendments.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
The policy should be revised to clarify the benefits of conserving heritage assets. In 2.a, wording should be amended to state that proposals consider the positive contribution of heritage conservation to “the cultural identity, wellbeing and sustainability of communities,” not just “sustainability,” ensuring it reflects its broader social and cultural value. In 2.c, a final sentence should be added: “This could include a broad range of uses, both residential and commercial, consistent with historical mixed-use patterns.” This recognises many heritage assets were originally mixed-use, encourages higher density, mixed-use development, and makes better use of existing historic buildings	203720 (Cambridge Green Party)
We welcome the inclusion of policies for the historic environment. We broadly support the draft policies to date although we offer the following suggestions as to further enhancements: i.Policy wording should have a more local flavour whilst being consistent with the NPPF. Heritage policies should be more spatially specific, unique to the area, describing the local characteristics of the area and responding accordingly with policies that address the local situation. ii.The Strategy policy could make more of opportunities to enhance the historic environment, recognising its important role in placemaking and the contribution made by heritage to well-being as well as to the economy. The strategy should also acknowledge the increased pressures being placed on existing heritage destinations and promote and facilitate greater access to other heritage sites in order to reduce the current pressures on honeypots.	208925 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
iii.The part of the policy and supporting text relating to enabling development should be deleted. iv.Additional clarification is needed regarding the identification of non-designated heritage assets	
Historic England welcomes this policy. We welcome the positive strategy for the historic environment as set out here and elsewhere in the Plan. We welcome the requirement for Heritage Impact Assessments. Although these are often known as Heritage Statements at Application stage. We recommend adding more about the importance of heritage in place-making, quality of life and well-being as well as being a key economic driver as well as the importance of protecting and enhancing heritage because of this. We recommend adding text that that recognises the growing pressures on heritage of a rapidly growing population. We recommend including in the strategy something about seeking to enhance existing provision and create greater access to other heritage assets to spread the impact on heritage destinations. This might include specific encouragement of other heritage/nature base areas to open up to visitors.	210174 (Historic Environment)
Figure 134: Non-designated heritage assets (rather than non-designed)	210189 (Historic England)
Vistry support the intent of the policy. However, it is considered that the reference within the policy to proposals being supported by a Heritage Impact Assessment would be more appropriately addressed through the Council's validation requirements, rather than forming part of the policy wording itself. In addition, while the policy states that “The Local Planning Authorities will balance the need for development with the conservation, enhancement and enjoyment of the historic environment”, wording	204875, 210255, 210256 (Vistry Group),

Summary of issues raised in comments	Comments highlighting this issue
does not reflect the structured approach required by the NPPF. It is therefore recommended that the policy is refined to explicitly reflect this test.	
There is a concern that the policy does not address heritage, prompting a recommendation for a Historic Environment Strategy and an additional policy (1g) to protect and enhance heritage assets.	207391 (Cambridge Past, Present and Future)
Believes the policy is weak and not significant: • The draft plan lacks an overall Statement of Significance and fails to acknowledge Cambridge's world heritage significance, particularly along the river corridor. • The Historic Environment Strategy is criticized for being a mere list of existing tools without strategic assessment or evaluation of Cambridge's heritage. • The 2021 Strategic Heritage Impact Assessment did not provide a holistic analysis of Cambridge's significance or threats, ignoring Conservation Area Appraisals. • The Council has not completed the Historic Core Conservation Area Management Strategy or the Making Places for People SPD, which are essential for addressing capacity issues in the historic core. • The proposed Policy and Strategy are deemed premature and ineffective without clear statements of significance and addressing key capacity issues	205451 (J Preston),

Summary of issues raised in comments	Comments highlighting this issue
• There is a concern that the policy does not address heritage, prompting a recommendation for a Historic Environment Strategy and an additional policy (1g) to protect and enhance heritage assets	
Before the 2006 Cambridge Local Plan, planning polices sought to protect the special character of the historic university city. There has been no strategic review of the success or failure of the 2006 Plan in achieving its objectives in relation to the historic environment. This lack of strategic review is compounded by the new Local Plan (and the development strategy). There is little mention of the role of the historic environment in making Cambridge an attractive place in which to live and work. Cambridge meets UNESCO's criteria for World Heritage status.	211448 (J Preston)
Rural Active Travel routes and PROWs should be bridleway to include horseriders so that we can get to/from historic environment.	204022 (S Rogers)
Girton's historic environment includes heritage buildings, village form, and landscape setting, especially the Girton Gap and church environs. Village heritage contributes strongly to identity. Urbanising forms undermine heritage setting. Heritage interacts closely with landscape/green space. GPC Requests to the Local Plan: Require heritage-led design for all development in Girton. Protect settings of key heritage assets, including views. Consult Girton NP heritage evidence.	202238 (Girton PC)
Non-designated heritage asset with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project. The designation of this asset as a noteworthy architectural asset,	204482 (T Ziromskas)

Summary of issues raised in comments	Comments highlighting this issue
albeit where the asset should be championed through regenerative and community-focused practices. The space is currently undervalued and transition experiments such as the 'Out of the dark' urban light show showcased an alternative, community-led and culturally-advancing use for the space. Attention should be paid to how the cultural economy of such an asset can be utilised, with a designation and allocation for cultural use in the Local Plan being the first step.	
All Powers to monitor, collaborate with existing and/ or new property owners to conserve these buildings should become mandatory with appointed Community Champions for Civic Heritage that area direct link between Local Authorities and said wider key stakeholders to prevent demolition of structures that may be at risk of destruction from vandalism, urban exploration and demolition	210360 (Community Campaigner D Barton)
Defining Character Areas- zoning symmetrical parallel construction recommended where distinctive individualised properties remain as checked against authentic archive blueprints. This will ensure high-quality housing for everyone reducing the societal divides between misperceived “good areas” where affluent people reside in historical style properties and less advantaged reside in contemporary ones.	210361 (Community Campaigner D Barton)
Alterations for Listed Building Consent must be simplified with additional streamlined testing methodologies, such as proof of legitimate third party support, such as correspondence chains between applicant and Groups, such as The Victorian Society that can assist LAs complete workload much sooner allowing more attention for challenging cases, such as Non-Designated Heritage Assets at live or upcoming risk of demolition by Housebuilders, etc.	210362 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
Provide incentives for the return of lost adornments and decorative features, such as roof fixtures like Chimney Stacks once again with an approved contractor directory to make Old Builds practical to own, live and work in the 2020s onwards.	210364 (Community Campaigner D Barton)
New Conservation Areas should be established covering areas of surviving built historic environment to positively reverse fascia changes to more modern ones.	210365 (Community Campaigner D Barton)
Non-designated heritage asset with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project, I support retention as a noteworthy 70's Heritage asset. I support regeneration and re-use of the EW Bridge and underpasses as a pedestrian/cycle friendly, cultural hub.	204309 (L Cooke), 204307 (A Giarlis)
Objects to the wording of Policy GP/HE, stating that Part 2(b) is overly prescriptive and inconsistent with national policy regarding the historic environment. The use of the term 'must' is seen as problematic as it may hinder high-quality, sustainable development by suggesting an absolute requirement to conserve or enhance heritage assets.	203947 (Emmanuel College), 206063 (Brookgate land and Network Rail Infrastructure Ltd), 204483 (Tritax Big Box Developments)
The plan must include a formal statement recognising the city's global heritage value as a cohesive whole. Broaden the Scope of Protection: Policy must explicitly recognise the world-heritage significance of the city. Shift from "Narrow" to "Cumulative" Heritage Impact Assessment. Heritage-Driven Green	204163 (Cambridge Past Present and Future)

Summary of issues raised in comments	Comments highlighting this issue
Infrastructure, mitigate Visitor Pressure, and strategic park expansion. Reform the Historic Environment Strategy. Include dynamic strategy diagram which considers whole life of heritage assets. Complete a Making Space for People SPD to manage pressure on limited space in historic core.	
As there are specific policies relating to both designated and non-designated heritage assets, why is this policy needed? The requirement for a Heritage Impact Assessment could (if considered necessary given the Council's application validation requirements) be easily added into the other policies. Notwithstanding this comment, in limb b), the meaning of 'nature' with respect to heritage assets needs to be clarified.	208245 (Kings College), 208300 (Girton College)
Strong support for the policy, especially 2a, where it takes in account "the positive contribution that conserving heritage assets can make to the sustainability of communities".	204926 (M Cleminson), 204561 (The St Andrew the Less Community Project), 204766 (NEUBAU Architecture Ltd)
Pleased to see the Plan recognises Greater Cambridge's historic environment as an important social, cultural, economic, environmental and community resource, which adds to the quality of life of residents and visitors (para 7.56) and Wimpole's contribution to this as an important visitor attraction with historic merit.	208458 (The National Trust)

Summary of issues raised in comments	Comments highlighting this issue
Brookgate Land Ltd and Network Rail Infrastructure Ltd object to policy GP/HE as worded. Part 2(b) is overly prescriptive and not fully consistent with national policy or the statutory framework for decision-making in the historic environment. The use of the word 'must' risks precluding high-quality, sustainable development by implying an absolute requirement to conserve or enhance heritage assets in all circumstances, rather than allowing for a balanced planning judgement. National policy and legislation require decision-makers to have special regard to the desirability of preserving heritage assets, while weighing this against the scale of harm, site context and public benefits. Policy GP/HE should therefore be amended to adopt more proportionate wording that reflects this balanced approach, consistent with the NPPF 2024 and statutory duties.	204063 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
Support. It is recognised that it is important that development proposals that may affect heritage assets, or their settings, are carefully considered.	211552 (Martin Grant Land Limited)
Townscape Character Assessment: - Page 149 shows Area 206 as the historic settlement core. It actually extends further west. - The materials should include the natural slate roofs characteristic of C18 and C19 development, which are contemporary with the gault bricks. - The Map does not have an area called 207. - Area 209 is Linton Village College rather than 'a small secondary school'. - Area 210 contains a listed thatched timber framed cottage and curtilage listed farm buildings.	211908 (C Newell)

Summary of issues raised in comments	Comments highlighting this issue
- Area 211 comprises 21st century infill, an exception site of affordable housing and 2 unplanned sites outside the village, which do not contribute to townscape character. - Page 138 does not show the key open spaces which form the core and separation of the two settlements. - Area 194 is Granta Park centred on the listed C18 Abington Hall and its historic Lodge, Gardeners Cottage, walled garden and parkland. It is separate to the historic villages. Page 140 incorrectly describes this as Up to 4 storeys Industrial/Scientic type and that the Building style is of warehousing and offices in sheet metal and glass. The assessor has clearly not visited the site.	
The policy and supporting information for GP/HE does not appear robust because it appears inconsistent with the NPPF and should refer further to significance and harm. The supporting information should be more robust; for instance to work with communities etc to conserve and enhance the historic environment wherever possible could be inconsistent with the statutory duty. If the Heritage Impact Assessment is not to accompany every application that potentially affects a heritage asset or its setting, the last paragraph of supporting information should make clear that it is the local authority (not the applicant) who will decide whether the proposal will have an impact on heritage assets.	211912 (C Newell)
The CBA maps accompanying the proposed Allocation Sites confusingly show the listed buildings as a small dot of similar pink to red colours whereas the locally listed buildings are shown to the full outline of the buildings. It would be clearer and more proportionate if both groups and the Monuments were	211913 (C Newell)

Summary of issues raised in comments	Comments highlighting this issue
shown to the outlines of the buildings and if there were more variation in the colours of the listed building categories.	
Figure 134 has an error - Non-designated heritage assets (rather than non-designed)	211981 (Historic England)

Policy GP/HA: Designated heritage assets

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Some comments offered general support, including the need to protect designated herniate assets.

Historic England provided detailed comments on the policy criteria, including it should be clearer that harm should be avoided in the first instance, and also a policy on enabling development is not a necessary.

Cambridge Green Party considered the policy should reference the use of sustainable materials, encouraging more environmentally sustainable building practices.

Some representations do not consider the policy aligns with National planning policy guidance, particularly how heritage assets should be considered in the planning balance. Imperial War Museum said the policy needed to be clearer regarding how it would be applied

Anglia Ruskin University consider the boundary of the Mill Road Conservation Area warrants a review. National Trust asked for another example of a Historic park and garden to be added, Wimpole Hall.

Response to main issues raised in representations:

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The Councils note the range of representations received, including support for the policy's overall approach to conserving designated heritage assets and recognising their importance to local character and identity. Comments also highlighted the need for alignment with national policy and legislation, and for the policy to appropriately reflect the balancing exercise required by the National Planning Policy Framework and the Planning (Listed Buildings and Conservation Areas) Act 1990.

In response, the policy has been amended to improve clarity and consistency with national policy, including reinforcing that harm to designated heritage assets will be considered in line with the NPPF's clear and convincing justification and planning balance tests. Amendments also refine wording on demolition of buildings contributing to Conservation Areas, clarifying the circumstances in which loss may be justified, and strengthening references to heritage at risk and opportunities for repair, regeneration and adaptive reuse.

The Councils note representations seeking further flexibility in policy wording, including concerns that elements of the draft policy were overly prescriptive or insufficiently explicit in reflecting the balancing exercise between harm and public benefits. The policy has been reviewed in this regard, with wording amended where necessary to ensure it reflects a proportionate decision-making approach while continuing to secure the conservation and enhancement of heritage significance.

Representations concerning active travel routes, bridleways, contractor directories, design approaches, and unrelated infrastructure matters are noted but fall outside the scope of this policy and have not resulted in amendments.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
It is important that policy is reviewed to ensure that it is in accordance with the advice contained within the draft revised NPPF which is due to be adopted in June/July 2026.	203382 (ESCO project)
The boundary of the Mill Road Conservation Area warrants review. As the Conservation Area Appraisal (2011) notes 'Anglia Ruskin University provides a variety of modern buildings, mostly of no special merit, which butt up to the western boundary of the cemetery'. ARU consider this is a fair assessment and do not consider the inclusion of the southernmost buildings on their original East Road site within the Conservation Area designation are warranted.	203998 (Anglia Ruskin University)
Vistry support the overall vision and objectives of the proposed policy. Although, it is noted that the principles set out within the policy closely mirror those contained within Policy GP/HE. The policy would benefit from being combined with Policy GP/HE.	204876 (Vistry Group)
Criterion 1 sets an inappropriate tone. Amend criterion 1 to make it clear that harm should be avoided in the first instance. Criterion 4 We welcome the reference to heritage at risk. Allocations should reference any relevant HAR status and encourage positive solutions/identify opportunities for their conservation and enhancement. Criterion 5 should be deleted, as a policy on enabling development is not a necessary component of a local plan document. A local plan should adequately set out a positive strategy for the historic environment without the need to include such a policy. Paragraph	210175 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
7.62 could be much clearer in relation to the definition of designated heritage assets. Put simply, designated heritage assets are Listed Buildings, Conservation Areas, Registered Parks and Gardens and Scheduled Monument. Paragraph 7.70 – 7.72 We recommend that these paragraphs should be removed for the reasons set out above.	
Rural Active Travel routes and PROWs should be bridleways so that horseriders are included and can visit heritage assets.	204023 (S Rogers)
Designated heritage assets must be protected within their landscape and village context, not isolated or overshadowed. Assets rely on rural setting for meaning. Over-intensification threatens their character. Views and approaches are significant. GPC Requests to the Local Plan: Protect setting, approaches, and views of designated assets. Reject high-density forms that affect heritage significance. Require heritage-informed site design.	202239 (Girton PC)
Provide a directory of approved and trusted Conservation Specialist Contractors- this will be key for repairs and maintenance reducing costs for all parties, expediting the physical process of regeneration and smoothen planning work schedules so that finer detail may be considered on priority cases or those that may be at risk of consequential repair, such as Places of Worship and detached Buildings with flat roofs, etc at higher risk of damage than customary dwellings. These same people should be readily contactable for new construction.	210368 (Community Campaigner D Barton)
Alterations- must introduce a simplified listed building consent form and application process that is streamlined encouraging better maintenance of Old Builds and reducing the rising propensity of	210369 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
builders to allow buildings to deteriorate, such as the Historic Pub that had to be rebuilt in Kilburn, London post 2015. Area Expansion of housing must revert to traditional timeless designs that confer many practical advantages over modern styles that are harder to maintain are timeless with regard to dating and ensure a more evenly distributed community atmosphere in the long-term future.	
Strongly support. Just as Scheduled Ancient Monuments and Conservation Areas are shown on the Policies Map, It would be useful for listed building to be annotated.	204168 (Cambridge Past Present and Future)
St Andrew the Less is a site of historic interest and I support any efforts made by the community group to restore and bring the church building and grounds back to community use. A viability will decide if the church building currently on the HAR can be restored and upgraded to include modern utilities. Support the retention of historically important features including the Grade I listed organ attached to the church building.	204792 (NEUBAU architecture ltd)
Welcome this policy's emphasis on adaptive use and regeneration of heritage buildings, which can deliver significant carbon savings. However, in 2.c, "Use high-quality materials" should be revised to "Use high-quality, sustainable materials," encouraging more environmentally sustainable building practices.	203721 (Cambridge Green Party)
Objection to the wording of Policy GP/HA, stating it does not allow for any harm to designated heritage assets and neglects the required balancing exercise as per the National Planning Policy	204490 (Tritax Big Box Developments), 203960

Summary of issues raised in comments	Comments highlighting this issue
Framework (2024) and the Planning (Listed Buildings and Conservation Areas) Act 1990. The respondent highlights that Sections 66 and 72 of the 1990 Act require decision-makers to consider the desirability of preserving the setting of listed buildings and the character of conservation areas, indicating that harm should be identified and weighed in the planning balance. The NPPF (2024) allows for harm to designated heritage assets if justified and outweighed by public benefits, which the proposed policy fails to reflect, making it inconsistent with national policy and legislation. The mandatory language in Part 2 of the policy overstates statutory and policy tests, limiting professional judgement and balancing, which the respondent argues should be revised. The respondent recommends amending Policy GP/HA to align with statutory wording and the NPPF approach, suggesting the use of proportionate language that allows for a comprehensive assessment of impacts on heritage significance.	(Emmanuel College), 207449 (Pioneer Group Ltd), 204078 (Brookgate Land Ltd and Network Rail Infrastructure)
Support the overall vision and objectives of the proposed policy. Although, it is noted that the principles set out within the policy closely mirror those contained within Policy GP/HE. In Vistry and The Quy Estate's view, the policy would benefit from being combined with Policy GP/HE.	210257 (Vistry Group)
The requirement in point 2 that development proposals must 'preserve or enhance' and comply with the rest of strands a) to g) of this policy is not in line with statutory duty in Sections 16, 66 or 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (which requires 'special attention' to be paid). It is similarly not in accordance with paragraphs 213 to 215 of the NPPF where, in some	208246 (Kings College), 208285 (Imperial War Museum), 208301 (Girton College)

Summary of issues raised in comments	Comments highlighting this issue
circumstances, public benefits can outweigh harm to heritage significance. As drafted, this is unreasonably prescriptive. In point 3 (a) who 'formally' assesses this (ie whose opinion determines if a building is considered unsound)? Similarly, how could an applicant ever demonstrate that 'all possible measures' have been explored in point b). It is not clear if all of strands a), b) and c) must be met or if these are either / or situations.	
Para. 7.66 notes historic landscapes including historic parks and gardens are particularly important in South Cambridgeshire where they add interest and variety to the countryside. Grade II* Pampisford Hall and Grade II* Croxton Park are specifically highlighted in the South Cambs district but Grade I Wimpole Hall RPG which is by far the largest Registered Park and Gardens, and one of only two Grade I RPG in Greater Cambridge, is not mentioned which fails to recognise its importance and rarity (only around 10% of England's RPG are designated Grade I). The text should be amended to include Wimpole Hall Registered Park and Garden.	208459 (The National Trust)
It is recognised that the requirement to 'preserve and enhance' is rooted in Section 72 of the Planning (Listed Buildings and Conservation Areas) Act, whilst the similar concept of 'sustain and enhance' is found at Paragraph 210 of the current NPPF. 2.a. should be reworded to: "Pay special attention to the desirability of preserving or enhancing the significance of the designated heritage asset(s) and its setting, and the character or appearance of Conservation Areas including views into, within and out of them" as development may not always meet the current wording of "Preserve or enhance the significance of the designated heritage asset(s)	211553 (Martin Grant Land Limited)

Summary of issues raised in comments	Comments highlighting this issue
and its setting". This rephrasing will bring the policy in line with the wording of the Act and NPPF as referenced above, and removes the apparent contradiction created by the current wording. Reordering this section so that the current points 1. and 2. are reversed would also seem logical to help this.	
This policy also appears to be trying to do quite a lot and might benefit from being split into policy relevant to listed buildings and policy relevant to conservation areas (rather than trying to do both under one heading, leading to comments on importance of original fabric and layouts, alongside more generic requirements). This could still be in the same policy, but under separate headings.	211554 (Martin Grant Land Limited)
For consistency with the 1990 Act, GP/HA1 should include setting and curtilage listed structures. For consistency with NPPF, there should be mention of designated landscapes and mitigation of harm. GP/HA2c when referring to character of the area, it should be clear that this is the designated area, not the locality of the asset, especially if the surroundings of an asset are unsympathetic.	211914 (C Newell)

Policy GP/ND: Non-designated heritage assets

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Some comments offered general support for the policy. Historic England welcomed inclusion of the policy, and suggested a series of clarifications be made to the supporting text particularly on how they are identified.

Some comments highlighted specific buildings that they considered warranted stronger protection.

Other comments considered the policy is not consistent with national planning guidance. Care should be taken to ensure that non-designated heritage assets are not by default elevated to the status of Designated Assets. The policy needed greater flexibility.

Response to main issues raised in representations:

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The Councils note the strong support expressed for the protection of non-designated heritage assets and their contribution to local character, identity and sense of place.

The Councils also acknowledge representations which raised concerns that the draft policy could be interpreted as requiring the retention and enhancement of non-designated heritage assets in all circumstances, potentially going beyond the balanced approach set out in national planning policy.

In response, the policy has been amended to align more closely with the National Planning Policy Framework (2024). The previous wording seeking to ensure the retention and enhancement of non-designated heritage assets has been revised to seek their protection and enhancement, while retaining the requirement for a balanced judgement to be made based on the significance of the asset and the scale of any harm or loss.

Comments regarding the identification of non-designated heritage assets, including local lists and the Historic Environment Record, are noted and are addressed through supporting text rather than policy wording.

Overall, the principal amendment arising from consultation has been to refine the policy wording to better reflect the proportionate and balanced approach set out in national planning policy while continuing to support the protection and enhancement of non-designated heritage assets.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Can stronger protections be put in place on buildings like the Romsey Labour Club and the Hobson Street cinema buildings?	203810 (A Carpen)

Summary of issues raised in comments	Comments highlighting this issue
Care should be taken to ensure that non-designated heritage assets are not by default elevated to the status of Designated Assets. The policy implies a similar level of assessment, protection and recording for non-designated assets as would be expected for, for example, listed buildings	203387 (ESCO Prospect)
South Cambridge (but not Trumpington) has very few listed buildings or non-designated heritage groups of buildings south of Hills Rd Bridge. Yet the attractive red brick group buildings of Homerton College align with attractive nineteenth century buildings on Hills Road (St Johns Church). There are many attractive Arts & Craft houses in the area. The Capturing Cambridge website has documented their history. Surprisingly there is no listing for Homerton apart from the College's Arts and Craft Dining hall? No mention either of Homerton avenue of mature trees with its cow parsley or gardens	205416 (Federation of Cambridge Residents' Associations)
The draft policy seeks to "ensure the retention and enhancement" of non-designated heritage assets. National policy does not require retention in all circumstances, but instead requires a balanced judgement, having regard to the significance of the asset and the scale of any harm or loss. The proposed wording removes this necessary flexibility and risks precluding appropriate development regardless of context or public benefits. Draft Policy GP/ND should be amended to reflect the NPPF's proportionate approach and allow impacts to be assessed through balanced decision-making.	207450 (Pioneer Group Ltd)
Girton's non designated heritage includes village pattern structures, open rural edges, and valued community spaces. NDHAs shape village identity even without formal listing. Loss would erode local	202240 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
character. They interact with green spaces and the Girton Gap. GPC Requests to the Local Plan: Require assessment and retention of NDHAs. Integrate NDHAs into development layouts. Avoid erosion of rural character.	
Non-designated heritage asset with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project, I support retention as a noteworthy 70's Heritage asset. Support regeneration and re-use of the EW Bridge and underpasses as a pedestrian/cycle friendly, cultural hub.	204305 (NEUBAU Architecture Ltd)
Strongly support the protection of non-designated heritage assets.	204179 (Cambridge Past, Present, and Future)
LAs should adopt a Local List of Valued Buildings (Non-designated Heritage Assets), which have been a Government requirement since the policy introduction through the NPPF in 2012. Historic England produced a guide to help Councils in May 2012. Bristol produced an exemplar list in 2015, which is well worth reviewing. Existing Action Plan if present for Designated and Non-designated Heritage Assets needs identifying and/ or establishing (I may support this if invited). Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of landmark buildings, especially those with key links to an area's founding or history locally or places of worship	210358 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
Object to the proposed wording of Policy GP/NP. The policy goes beyond national planning policy by seeking to 'ensure the retention and enhancement' of non-designated heritage assets. The NPPF does not require retention in all circumstances, but instead requires a balanced judgement, having regard to the significance of the asset and the scale of any harm or loss. The proposed wording removes this necessary flexibility and risks precluding appropriate development regardless of context or public benefits. Policy GP/ND should be amended to reflect the NPPF's proportionate approach and allow impacts to be assessed through balanced decision-making.	204082 (Brookgate Land Ltd and Network Rail Infrastructure)
We welcome the inclusion of a policy on non-designated heritage assets. Paragraph 7.76 We recommend including a link to the criteria. Paragraph 7.76 The final bullet point – it should be noted that not all entries on the HER are Non-designated heritage assets. A planning judgement (by a 'plan-making body') is needed to determine whether or not something is a non-designated heritage asset. Inclusion on the HER alone is not sufficient. Please refer to this in this paragraph. Paragraph 7.78 We welcome the inclusion of links through to the Cambridgeshire Local Heritage List Portal. Paragraph 7.79 This paragraph should make it clear that other ways that non-designated heritage assets may be identified are through: Local Plans; Neighbourhood Plans; Conservation area appraisals and reviews.	210176 (Historic England)
Rural Active Travel routes and PROWs should be bridleways so that horseriders are included and can visit heritage assets.	204026 (S Rogers)

Summary of issues raised in comments	Comments highlighting this issue
Objects to the wording of Policy GP/NP, stating it exceeds national planning policy by mandating the retention and enhancement of non-designated heritage assets.	204497 (Tritax Big Box Developments)
It is recognised it is helpful that the policy sets out how proposals to alter, extend or demolish non-designated heritage assets will be assessed.	211555 (Martin Grant Land Limited)

Policy GP/CC: Adapting heritage assets to climate change

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There is broad support for this policy. Historic England welcomed the inclusion of this policy. It should highlight the need to take a whole buildings approach. National Trust supported the policy approach.

Girton Parish Council raised a range of issues, including that the plan should support sensitive, heritage compatible climate adaptations, and should not compromise heritage significance. Cambridge Past, Present, Future consider the plan lacks a clear sequential approach to retrofitting historic buildings. Without a requirement to prioritise less harmful measures first, such as improved insulation, there is a risk of unnecessary harm to heritage assets through more intrusive options like solar panel installations.

Response to main issues raised in representations:

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- The Councils note the support for the policy and the desire to balance heritage conservation against energy efficiency measures. It is felt the policy and supporting text strike the right balance between these issues, actively encouraging innovative, sensitive and high-quality interventions.

- The Council notes the support for landscape based carbon measures and CC/DC set out how this can be achieved as well as BG/EO to utilise greening for adaption and cooling.
- The suggestions to promote a sequential Whole Building approach are noted. It is agreed this is widely considered best practice and therefore wording has been added to the policy to recommend this approach is employed where appropriate.
- The Councils note the comment regarding retention of older buildings. Policies CC/CE, GP/HA and GP/ND are felt to strongly cover this point in their policy wording and supporting text.
- In response to Historic England, the suggested guidance has been added into the policy wording.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Climate adaptation must respect heritage fabric while promoting resilience through nature□based measures and sensitive retrofits	202241 (Girton PC)
The policy lacks a clear sequential approach to retrofitting historic buildings. Without a requirement to prioritise less harmful measures first, such as improved insulation, there is a risk of unnecessary harm to heritage assets through more intrusive options like solar panel installations. The plan should explicitly reference standard BS EN 16883, which provides a structured sequential process for energy upgrades in heritage settings. This is seen as a necessary addition because the current reference to PAS 2035 is insufficient for protecting the unique significance of historic fabric.	204186 (Cambridge Past, Present, Future)

Summary of issues raised in comments	Comments highlighting this issue
We strongly support this policy and would like to see a greater reference to applying weight to climate considerations in the valance of affecting heritage, for example the use of PVs on heritage roofs, or adapting windows	204969 (Mothers CAN Cambridge)
Heritage must be adapted without compromising significance. Landscape□based climate measures (shade, planting) work well in Girton. Avoid intrusive urban solutions. Requests to the Local Plan: Support sensitive, heritage□compatible climate adaptations; Use rural□fit landscape interventions to reduce heat/flood risk; Prohibit intrusive, large□scale engineered forms.	205575, 205576 (Girton PC)
Rural Active Travel routes and PROWs should be bridleways so that horseriders are included and can visit heritage assets.	204028 (S Rogers)
We welcome reference to heritage assets in this policy. We recommend that the policy should highlight the need to take a whole building approach. We welcome the various hyperlinks to publications. We also recommend including the following link: Energy Efficiency and Retrofit in Historic Buildings | Historic England	210177 (Historic England)
Non-demolition of historic buildings prior to the 1950s must be made policy or adhered to as part of LCC's commitment to combatting the Climate Crisis through sequestering carbon in its Old Builds. Where demolition is proposed for 1950s style housing onwards- any new construction must be in the historic building style and local materials to ensure high carbon capacity, quality aesthetic and true blending of the interconnected conurbations of any one area, place or location. Era-style Buildings, especially rows of Georgian, Victorian and Edwardian architecture must be faithfully restored, retained	210356 (Community Campaigner D Barton)

Summary of issues raised in comments	Comments highlighting this issue
and recreated to complement surrounding historic streets that may or may not be classed in official Conservation Areas preventing harsh contrast with newer built housing estates from the 1950s onwards.	
Concerted efforts to identify and locate core suppliers for raw materials and specific heritage skills should encourage new uptake of these limited artisan craft skills by new contractors locally based to support the local economy, provide employment, and reduce the cost of product and service in the long-term. Volunteer labouring assemblies should be fully encouraged and supported identifying key individual and group skillsets that can be utilised to protect historic buildings or areas at risk with a view to supporting the construction of new authentic style housing (as and where appropriate) and the reconstruction of demolished prized old buildings beloved by the community, such as community pubs, libraries and community centres.	210357 (Community Campaigner D Barton)
We would like to see more historic buildings retrofitted with sustainability measures. Max Fordham have experience of successfully doing this with case studies such as Trinity College New Court Grade I listed retrofit, The Engine Shed stirling, integration of heat pumps and solar panels onto a number of heritage assets including the Kings College Cambridge Chapel roof. We would like to see great consideration of the importance of climate change mitigation and adaptation be considered weighing up any impacts on heritage assets.	204615 (Max Fordham)
It is important for heritage assets to contribute to addressing climate change. The National Trust is supporting research into delivering retrofit for heritage buildings to identify issues in practical delivery of	211083 (National Trust)

Summary of issues raised in comments	Comments highlighting this issue
historic building retrofit and better understand the challenges. We support Policy GP/CC which establishes how works to enhance the environmental performance of heritage assets will be balanced against the need to protect and enhance the character and significance of that asset.	

Policy GP/AR: Archaeology

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy's objective of protecting archaeological assets as an important part of Greater Cambridge's historic environment and local identity.

Comments were made seeking stronger requirements for archaeological assessment to be undertaken at an early stage and to inform planning proposals, site layouts and masterplans. Respondents also requested clearer guidance on the timing of archaeological investigations.

Concerns were raised about the potential for development to harm buried archaeological remains. Respondents emphasised the importance of protecting archaeological deposits and avoiding unnecessary disturbance through appropriate design and mitigation measures.

Further representations supported the integration of archaeological assets into development where feasible, enabling archaeology to contribute positively to place-making, heritage interpretation and local character. Comments were also made on the wider role of heritage in supporting regeneration and enhancing the attractiveness of local centres.

Overall, respondents supported the policy direction while seeking stronger emphasis on early archaeological assessment, the protection of archaeological remains, and the contribution of archaeology and heritage to local identity and development

Response to main issues raised in representations:

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The Councils note the support expressed for the proposed policy and the importance of archaeology in understanding and conserving the area's historic environment. The Councils also acknowledge representations seeking stronger recognition of the need for archaeological assessment to inform planning proposals at an early stage and to ensure archaeological considerations are integrated into the design and masterplanning process.

In response, the policy has been amended to clarify that Archaeological Assessments should inform planning proposals, including through masterplanning. This change reinforces the importance of considering archaeological constraints and opportunities early in the development process and supports the objective of preserving archaeological remains in situ wherever possible.

The Councils consider that the policy already provides a robust framework for the assessment, investigation and protection of archaeological assets, including requirements for appropriate assessment, investigation and recording, and a presumption in favour of in-situ preservation where development affects scheduled monuments or archaeological sites.

Comments relating to active travel routes and bridleway access to heritage assets are noted. However, these matters fall outside the scope of this policy and have not resulted in amendments.

Overall, the principal amendment arising from consultation has been to strengthen the role of archaeological assessment in informing planning proposals and masterplanning from an early stage in the development process.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Archaeology is important as it links past and present and helps develop a sense of continuity	202183 (M MacGinley)
Archaeological assets must be treated as integral to Girton's long historical continuity. Archaeology should be assessed early in the planning process. Development must avoid harm to buried remains. Archaeology strengthens heritage identity. GPC Requests to the Local Plan: Require early archaeological assessment; Protect archaeological deposits from disturbance; Integrate archaeology into design where feasible.	202242 (Girton PC)
The policy should reference the importance of archaeological assessment informing planning proposals including masterplans. The policy should provide clearer guidance on the appropriate timing of archaeological assessment.	210178 (Historic England)
The respondent supports the proposed wording of Policy GP/AR.	204501 (Tritax Big Box developments)
Rural Active Travel routes and PROWs should be bridleways so that horseriders are included and can visit heritage assets.	204030 (S Rogers)
It is recognised it is helpful that the policy sets out how proposals that may affect sites of known or potential archaeological importance or interest will be assessed.	211556 (Martin Grant Land Limited)

Summary of issues raised in comments	Comments highlighting this issue
This policy appears more robust than that relating to other heritage assets. It includes significance, the NPPF tests, harm and justification and the presumption in favour of preservation.	211915 (C Newell)

Policy GP/SF: Shopfronts

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Comments received expressed broad support for the policy's objective of ensuring that shopfronts contribute positively to local character and distinctiveness. Respondents supported the protection of historic shopfronts and their contribution to the area's heritage and townscape.

Comments were made seeking stronger controls on illuminated displays and shopfront lighting. Concerns were raised regarding the increasing use of bright, flashing and excessive LED lighting, with respondents highlighting potential impacts on visual amenity, energy consumption, street safety and the wellbeing of people with neurological and neurodiverse conditions. It was suggested that the policy should include measures to limit light spill and ensure lighting remains proportionate to its surroundings.

Concerns were raised that a uniform approach to shopfront design may not be appropriate in rural areas. Respondents emphasised the need for village-scale retail development and shopfronts that reflect local character, avoiding urban commercial forms that could detract from rural identity. Historic England considered more could be done to encourage the restoration and reinstatement of historic shopfronts.

Overall, respondents supported the policy direction while seeking stronger controls on lighting and signage, continued protection of historic shopfronts, and a more locally responsive approach to shopfront design in rural communities.

Response to main issues raised in representations:

The Councils note the support expressed for the protection of historic shopfronts and the representations seeking stronger policy protection for traditional and historic shopfronts, including the restoration and reinstatement of historic features and greater recognition of the contribution that heritage can make to the vitality and character of centres.

In response, the policy has been strengthened to provide greater protection for traditional and historic shopfronts. The revised policy introduces a clearer presumption against the removal of traditional shopfronts that are appropriate to the building or are of architectural or historic significance in their own right. Additional wording has also been included to ensure that the replacement of traditional shopfronts within Listed Buildings and Conservation Areas will only be permitted where the existing shopfront is inappropriate and the replacement would improve the character of the building or area.

The Councils note comments relating to illuminated displays, light spill and excessive shopfront lighting. While these concerns are recognised, they are considered to be more appropriately addressed through the shopfront guidance appendix, advertisement consent and other design and amenity policies. As such, no amendments have been made to the policy in this regard. Comments relating to active travel, bridleway access and village-specific retail provision are also noted. However, these matters are either outside the scope of this policy or are considered to be adequately addressed within other local plan policies or through the policy's existing requirements for shopfronts to respond positively to the character, scale and appearance of their local context.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support the protection of historic shopfronts	204194 (Cambridge Past, Present and Future)
Can anything be done in this Local Plan to reduce (or, better still, eliminate) the use of flashing, bright illuminated displays. These are a distraction for those concentrating on street-safety/surveillance (for themselves, or for children or other vulnerable individuals in their care). They can also be distressing (if not actually downright dangerous) for those with some autistic, epileptic and other neurological or neurodiverse characteristics. This request also applies to bus stops, and to stand-alone signage on pavements and in 'pedestrianised' areas	202537 (J Neal)
This policy should include a requirement to limit the light spill from shop fronts which has become an issue in the high street in the last few years with new shops using excessive LED lighting that is disproportionate to the streetscape at night and consumes more energy than is necessary.	204938 (Mothers CAN Cambridge)
Rural Active Travel routes and PROWs should be bridleways so that horseriders are included and can visit shops and cafes	204032 (S Rogers)
Girton does not currently have traditional shopfronts, but it does have strong community interest in local retail, small enterprise, and village-scale business. Shopfront policy must therefore support future village-appropriate retail, not urbanised frontages. Survey data shows strong support for local retail and small businesses. Village identity requires a rural, modest, contextual approach. Any future shopfronts must avoid urban commercial typologies. GPC Requests to the Local Plan: Support village-appropriate	202243 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
retail units with modest rural shopfront design; Avoid imported urban high-street forms; Ensure any shopfront proposals respect village scale and character.	
We welcome the reference to historic shopfronts in this policy. The policy could go further and encourage the restoration and reinstatement of historic shopfronts. This is both in terms of the positive contribution historic shopfronts make to the character of an area, but also the economic benefit of providing traditional and bespoke shopping units to shop owners. Our recent High Street Heritage Action Zones across the country are unlocking the potential of high streets, fuelling economic, social and cultural recovery and breathe new life into it for future generations. The Policy should make more reference the role of heritage in the re-vitalisation of retail areas.	210179 (Historic England)

Consultation Statement

Appendix 12: Response to Representations - Jobs



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

Jobs

Jobs Introduction

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The representations received were wide ranging. They included the need to direct hi-tech industries to the deindustrialised parts of the UK; a request that cultural infrastructure be embedded across plan policies as core civic infrastructure and for Create Cambridge is engaged as an advisor/consultee and the need for greater consideration of walking/wheeling accessibility in new retail and office developments. The relationship between housing and employment was mentioned including planning for mixed-use neighbourhoods with specifics on how to achieve hyperlocal and interconnected employment and community amenities, the need for a clearer link between the timing of jobs coming forward and the homes needed for the growing workforce and for a mix of

homes and jobs on or nearby active travel routes. There was support from the Cambridgeshire Chamber of Commerce for the Cambridge Science Park North development.

Comments from neighbouring authorities included support for excluding large-scale warehousing and distribution centres and a call for joint working on logistics challenges across the Ox-Cam corridor. The plan for the “delivery of a flourishing, dynamic and mixed economy” within Greater Cambridge was welcomed and there was a recognition of the economies of scale that a flourishing Greater Cambridge economy brings to other areas. Requests included the need for the Plan to appreciate the factors that attract existing and future businesses, training facilities and institutions to locate, continue to reside and facilitate the opportunity for future investment in the locality and to clearly articulate the benefits and opportunities of close proximity to London Stansted airport.

Response to main issues raised in representations:

Policies in the Jobs Chapter and Strategy Chapter of the Local Plan, supported by evidence, seek to provide both an environment for a range of uses including cultural uses and to support existing key sectors recognising not only regional importance but also national and international importance. The plan has sought to consider the development strategy as a whole, considering not only economic needs, but also need for homes, infrastructure, and to protect and enhance the environment. We recognise wider links. The role of Greater Cambridge siting at the heart of several economic corridors: the Oxford Cambridge Growth Corridor, the UK Innovation Corridor (London-Stansted-Cambridge-Peterborough) corridor and the Cambridge-Norwich Tech Corridor, has been added as a reference in the economic portrait section at the beginning of the plan. The Councils have also engaged with neighbouring authorities on the warehousing and distribution sector.

Cultural infrastructure needs have been considered to inform the local plan, including preparation of a Cultural Infrastructure Strategy and Community Facilities Studies, which have informed the Infrastructure Delivery Plan as well as policy requirements in other theme chapters.

Transport and accessibility was raised by a number of general comments on this theme. Transport has been a key consideration when identifying site allocations, and the Infrastructure and Great Places theme policies seek to ensure sites deliver well connected places. Policies on retail seek to support a range of centres to ensure facilities are accessible.

Policies Individual developments at Histon and Cambridge Science Park North are addressed in the allocations section. Having reviewed the employment land supply, there are no exceptional circumstances for release of green belt land in these locations.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support selected	203053 (K Porrer, Cambridge City Council Liberal Democrat Group)
Support Cambridge Junction and Create Cambridge in asks that: • Cultural infrastructure is embedded across strategic chapters, not confined to Wellbeing • Culture is treated with parity alongside housing, transport and utilities as core civic infrastructure	202065 (H Chamberlain), 202152 (M Ridler, Cambridge Junction), 202207 (H Tam), 202319 (L Mills, Cambridge Junction), 202401 (J Webber), 202420 (T Shaw), 202470 (K Jones), 202693 (T

Summary of issues raised in comments	Comments highlighting this issue
• Create Cambridge is engaged as advisor/consultee on the further development of the Cultural Infrastructure Strategy and the Local Plan where this relates to cultural infrastructure and embedding Culture across the city's plans. This reflects how cultural venues function in practice and ensures consistent delivery across the plan.	Altmann), 202723 (W Townsend), 202767 (C Woods, Cambridge Junction/Create Cambridge), 202894 (B Groisman, Cambridge Junction), 202899 (R Tinkler, Cambridge Junction), 202951 (R Tarry), 202964 (T Flinders), 203370 (N Ellis), 203452 (S Ashworth), 203498 (L Heap), 203647 (Z Svendsen, University of Cambridge), 203858 (N Yeni), 203879 (J Fritsch, University of Cambridge), 204195 (M Burman, Cambridge Junction/ Create Cambridge), 205076 (L Sheerman, University of Cambridge), 205159 (H Paterson), 205222 (J Walsh), 205375 (L Howse), 205378 (N Oakley), 205431 (E Hine, Cambridge Junction/ Create Cambridge), 205442 (A Seiglow)
Support for the policy but would like to see a clearer link between jobs coming forward and the homes needed for the growing workforce. The targets for both homes and jobs are not connected and for good placemaking, we need to be sure that a mix of homes both rented	203053 (K Porrer, Cambridge City Council Liberal Democrat Group)

Summary of issues raised in comments	Comments highlighting this issue
and to purchase, can come forward in time for those taking the additional jobs, on active travel routes or nearby. If we don't do this, workers will be forced to live outside the area, with long, usually car based commutes, and new communities won't be established successfully.	
Criticise the focus on clustering hi-tech industries in Cambridge, likening it to 19th-century manufacturing and asking why central government does not direct investment to other de-industrialised regions.	203254 (I Ralls, Cambridge Friends of the Earth)
Horseriding and keeping is a vital and large part of the rural economy and job force in Cambridgeshire, even excluding Newmarket.	204036 (S Rogers)
The best business transport policy is the one that most reduces transport needs in the first place. This section needs greater focus on mixed-use zoning with specifics on how to achieve hyperlocal and interconnected employment and community amenities which can be easily reached with tightly integrated active transport. Cambridge already suffers from scattered zones with many residential areas lacking local leisure and shopping areas, now is the time to fix that.	205209 (P Colledge)
Support plans to provide varied and relevant jobs and emphasise the need for residents as well as commuters to benefit. One key is accessibility not just by cycle or public transport but by walking/wheeling. Not enough consideration is being given to this in new retail and office developments e.g. the Beehive and Grafton centre redevelopments, walkers/wheelers will have to travel across busy roads and via a significantly longer	205567 (L Jones, Cambridge Living Streets)

Summary of issues raised in comments	Comments highlighting this issue
journey for to shops that are less likely to be cheap/bargain retail. They will have greatly reduced choice. This is likely to increase home deliveries, increasing the number of vehicles and level of congestion. The 'doughnut effect', the hollowing out of cities to periphery supermarkets and facilities, increases motor traffic and reduces walking/wheeling. It has a disproportionate negative effect on older people who rely on local shops and on walking/wheeling.	
Support for excluding large-scale warehousing and distribution centres and a call for joint working on logistics challenges across the Ox-Cam corridor.	208227 (C Barnes, Bedford Borough Council)
Support for the proposed development at Cambridge Science Park North, promoted for allocation in the Local Plan. • The proposals will provide local people with access to high-value careers, strengthen the city's innovation ecosystem, and ensure that Cambridge remains competitive globally. The focus on mid-tech and advanced manufacturing addresses a critical gap in the region, enabling research and invention to translate from nearby R&D facilities, into production and tangible economic growth. • It will strengthen Cambridge's position within the Oxford–Cambridge growth corridor and the UK's wider science and technology ecosystem. By providing flexible, high-quality workspaces and fostering collaboration across sectors, the site ensures that Cambridge can continue to lead in innovation, attract global investment, and support a diverse economy. • The development will create a well-balanced environment that integrates work, learning, leisure, and wellbeing. By combining economic, social, and environmental	203242 (H Stewart, Cambridgeshire Chambers of Commerce)

Summary of issues raised in comments	Comments highlighting this issue
objectives, it demonstrates a commitment to inclusive growth that benefits residents, employees, and future generations. • It will strengthen education and skills development through meaningful partnerships with local schools and colleges. The inclusion of a dedicated STEM will provide learning and event space to inspire the next generation of innovators, offering practical experience and engagement with emerging technologies. Such opportunities are vital to ensuring that young people across the city and region are equipped for the jobs of the future. • The construction and delivery of the development presents a valuable opportunity to employ local people, support apprenticeships, and strengthen links between education providers, employers, and the local supply chain. • At Cambridge Regional College, has seen significant growth in construction-related courses, and the proposals would provide invaluable work and site experience for these learners. • Beyond construction, the development will create real-world learning environments and apprenticeship opportunities across a diverse range of subjects, supporting the local skills economy and helping businesses access the talent they need.	
Welcomes that jobs and the “delivery of a flourishing, dynamic and mixed economy” is sought to be delivered within Greater Cambridge and recognise the economies of scale that this brings, and the spread of these industries within western Essex (including Harlow and Uttlesford (Chesterford Research Park)). Recognises the fast growing economy, and the importance of Cambridge, as well as its worldwide prestige, supported by successful businesses, industries, training and educational institutions. In developing Local Plans and future planning policy, it is imperative that there is an appreciation of the factors that	210464 (Z Smith, Essex County Council)

Summary of issues raised in comments	Comments highlighting this issue
attract existing and future businesses, training facilities and institutions to locate, continue to reside and facilitate the opportunity for future investment in the locality.	
The Plan must ensure that the benefits if close proximity to London Stansted airport are clearly articulated, and the opportunity this provides for those living, working, residing and investing in Greater Cambridge.	210464 (Z Smith, Essex County Council)

Policy J/NE: New employment development proposals

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

- There were a number of comments related to that element of the policy that restricts the size of warehouses/distribution centres. Responses were received from developers objecting stating that the policy imposes disproportionate constraints on warehousing and distribution uses and limits the Plan's ability to meet identified economic needs and provide a flexible supply of employment land that can respond effectively to changing economic and employment floorspace requirements. It was considered to be inconsistent with the current NPPF, Planning Policy Guidance, the direction of travel in the draft new NPPF, recent appeal decisions and market conditions and therefore it is considered to be unsound. There was an objection and a request from West Suffolk Council to work collaboratively to identify and address wider needs for large scale strategic logistics provision and data centres and a request for sufficient flexibility to respond effectively to changing industrial and commercial needs over time from Cambridge Ahead.

- Swavesey Parish Council and the A14 Logistics Forum supported the size limit on warehouses/distribution centres, stating that it is necessary to preserve Greater Cambridge as a university city in a rural setting and requesting that information on size, height and landscaping be provided at consultation phase. It was also stated that logistics sites should be sited as close as possible to residential centres to encourage walking or cycling and each proposed A14 sites is reviewed using this criteria. The two organisations state that logistic/commercial developments on the A14 corridor should consist of small to

medium size buildings as it would be inappropriate for scarce resources of land and water together with fragile flood management to be used to support logistics hubs where the primary focus is not on supporting the local economy.

- There was support for the Plan's intention focus on jobs growth including the provision of additional headroom and a diversity of space and for its recognition of and supportive approach to clusters but a request for sites and infrastructure to design-in flexibility to enable them to adapt to the changing economic environment and for the Plan to more explicitly recognise the value of existing innovation infrastructure and the benefits of intensifying and expanding the parks and clusters to fully realise agglomeration benefits.

- Other comments included an objection to the use of conditions limiting occupants to first occupants and concern that the policy element relating to the expansion of existing business premises in countryside is overly restrictive and impacts on businesses' ability to respond to a changing economic climate. Specific concerns were raised included the over development of the Cambridge economy and the fact that the Plan does not adequately recognise rural employment uses such as equestrian and equine enterprises.

- There were suggestions for policy changes to ensure public and active travel to sites with consideration given to see if public rights of way can be instated to provide access opportunities, the need to ensure that suitable small-scale workspaces are prioritised in villages and to widen the scope of potential Class E restrictions. The location of TTP's new Campus, Cambridge Research Park and Cambourne Business Park outside the Defined Development Extent (DDE) was queried. With TPP requesting policy alterations were its DDE inclusion not to be considered. There was a request for additional employment areas within the countryside to be identified to enable able to adapt to the evolving economic climate and meet future

business needs including at Evolution Business Park. A number of other specific sites and premises are also mentioned including concerns relating to one or more of the proposed A14 logistics/industrial sites.

- There were suggestions for policy changes to ensure public and active travel to sites with consideration given to see if public rights of way can be instated to provide access opportunities, the need to ensure that suitable small-scale workspaces are prioritised in villages and to widen the scope of potential Class E restrictions

Response to main issues raised in representations:

Comments on the policy are noted. The concern over the restrictions on large-scale of warehousing and distribution is acknowledged. It is considered that warehousing and distribution facilities serving national or regional markets are best addressed at the sub-regional level. The councils have developed a Statement of Common Ground with the Cambridgeshire & Peterborough Combined Authority, neighbouring authorities within and neighbouring the functional economic area in which Greater Cambridge sits which confirms the need to assess the need for strategic warehousing facilities serving national or regional markets across the functional economic market area (FEMA) that includes but goes beyond Greater Cambridge, working in collaboration with authorities within and authorities neighbouring the FEMA. In principle, the Cambridgeshire & Peterborough Combined Authority Spatial Development Strategy (SDS) is considered to be the appropriate planning process by which to determine the need for warehousing and logistics serving national or regional markets. Preparation of the SDS will commence in 2026 and the CPCA intends to progress it at pace. Subject to confirmation of the scope of SDS's by Government, the SDS therefore provides a credible prospect that a long term solution to the need for warehousing and logistics serving national or regional markets will be identified in the foreseeable future.

Recognising the requirements of national planning policy and guidance, Local Plan policy J/NE has been altered so that Proposals for large scale warehousing and distribution facilities providing for national or regional needs will not be permitted unless it can be demonstrated that: there is an unmet need for such facilities that must and can be appropriately provided within Greater Cambridge having regard to other policies and priorities within and arising from the Local plan; a proposal will not impede delivery of warehousing and distribution and industrial space that meets local market needs in market sector priority locations. The supporting text to the policy provides an example of what "appropriately provided" can mean - that the development does not generate traffic movements that impede the delivery of the wider development strategy. It also highlights that market sector priority locations are identified in the Greater Cambridge Warehouse and Industrial Space Needs Study (March 2025).

It is considered that the Jobs policies and allocations within the Plan support the Greater Cambridge economic ecosystem including seeking to maximise the benefits of key clusters and knowledge based sectors. Evidence has been commissioned for this stage of the plan to help improve understanding the needs of our key sectors, policy J/NE supports the development of existing employment floorspace and Policy J/PB seeks to protect it from redevelopment to other uses and policies for Wellcome Genome Campus, Babraham Research Campus, Cambridge Biomedical Campus, Granta Park, West Cambridge and North East Cambridge (including Cambridge Science Park) support development and intensification with additional allocations to provide a range of space for new R&D development. One comment sought additional reference to the planning policy changes that were made in the 2018 Local Plans regarding the selective management approach to the economy. As those changes were made in the previous plan, those references are not necessary.

Planning Policy Guidance on The Use of Conditions states that "A condition limiting the benefit of the permission to a company is inappropriate because its shares can be transferred to other persons without affecting the legal personality of the company." The use of a condition to ensure that there is a named user who will be the first occupant of the development has therefore been

removed from the policy and is replaced with the stipulation that occupation and use of the building by the named user will be secured for at least 1 year through a S106 agreement. To clarify that changes to Use Class E will impact development across Greater Cambridge, in the supporting text to the policy, the following sentence has been removed: “In particular, it has the potential to impact the economic function of Established Employment Areas in the Countryside.”

The requests for individual employment parks to be included in the Defined Development Extent (DDE) of settlements have been reviewed. Cambourne Business Park, the TTP site in Melbourn and Waterbeach Research Park are retained as Established Employment Area in the countryside due to the low density/landscaped nature of the sites and their rural setting. Cambourne Business Park lies outside the proposed DDE for Cambourne, noting that housing development to the south of the Park has yet to be completed. As such, for this Plan, Cambourne Business Park is located within the countryside and so is proposed to continue to be included as an Established Employment Area. It is considered that there is sufficient flexibility in Policy J/NE which allows for development of the edge of towns and villages in Greater Cambridge where proposals are well related to the built form of the settlement, the scale and form of the development would be in keeping with the category and scale of the village. Evolution Business Park is not included as an Established Employment Site in the countryside due to its location within the Green Belt.

It is considered that the policy requires employment development within villages to be appropriately scaled. Public and active travel to sites and public rights of way are addressed in Policy I/ST: Sustainable transport and connectivity.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support selected	201984 (L Miller, Swavesey PC), 203055 (K Porrer, Cambridge City Council Liberal Democrat Group), 204090 (Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204474 (The Royal London Mutual Society Ltd)
Object selected	201712 (K Mak), 203990 (KWA Architects), 204218 (Railpen), 204507 (Tritax Big Box Developments), 205300, 211684 and 211685 (Newlands (Cambridge) Limited)
The Cambridge economy has been over-developed (and thereby ruined) for years. Jobs are needed elsewhere in the UK.	201254 (S Williams)

Summary of issues raised in comments	Comments highlighting this issue
Personal permission to the first occupant violates national PPG 21a-015-20140306: A condition limiting the benefit of the permission to a company is inappropriate because its shares can be transferred to other persons without affecting the legal personality of the company.	201712 (K Mak)
The Newlands development 220 acre ‘big box’ distribution centres to the west of Boxworth Road will dominate the landscape and blight Boxworth. It will add significant vehicle journey to the already overloaded Swavesey Roundabout. This development is not intended to meet the local needs of Greater Cambridge - but is a large-scale national hub.	201282 (E Grant)
Part (g) should be amended to read “The site can be easily accessed by public transport and by foot and cycle” to link the development to public transport networks to benefit decarbonisation of the transport network.	203724 (R Comins, Cambridge Green Party)
Under “Established employment areas in the countryside” a point should be added which states “Any further development must contribute positively to employees being able to access the site using low carbon methods of transport via planning conditions, for example to subsidise greenways or the development of improved public transport infrastructure along with the increase in employee numbers using the site.”	203724 (R Comins, Cambridge Green Party)
Where consideration is given regarding access to employment sites by foot or cycle, consideration should be given to see if public rights of way can be instated to provide access opportunities. Where PROW are unachievable, permissive footpaths and bridleways should be considered.	210621 and 210622 (Mr C Fitzsimons, Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
The policy should prioritise small business units, flexible workspaces, co-working, and shared-use hubs. Small-scale workspace strengthens local economy and reduces car travel; ensure new employment fits the village character. High density research parks overshadow village needs; support landowner diversification compatible with rural identity.	202244 (Y Murray, Girton PC)
Support that element of the policy that does not support proposals for large scale warehousing or distribution centres generally exceeding 9,300 square metres (100,000 square feet) and which serve a wider regional or national function.	201984 (L Miller, Swavesey PC)
Objections to the wording of Policy J/NE. It should be modified to adopt a more proportionate and flexible approach, explicitly recognising the distinct characteristics of industrial and logistics development. This should allow proposals in rural and edge-of settlement locations to be assessed on their individual merits where they can demonstrate sustainability, suitable access and appropriately managed impacts. Currently the policy is overly prescriptive, misinterprets the function and dynamics of the logistics industry and risks unduly restricting the delivery of large-scale industrial and logistics development serving national and regional needs. It is considered to be inconsistent with current and emerging national policy, guidance, economic strategy and market conditions, not effective in the absence of any joint working on cross-boundary strategic matters, not positively prepared and unsound. It risks	204218 (Railpen), 204507 (Tritax Big Box Developments), 205061 (Lolworth Developments Limited), 205300, 211684 and 211685 (Newlands (Cambridge) Limited)

Summary of issues raised in comments	Comments highlighting this issue
excluding sustainable employment proposals that would meet identified economic needs and contribute to a diverse and resilient supply of employment land. • Part 7 imposes disproportionate constraints on warehousing and distribution uses, limiting the Plan's ability to respond effectively to changing economic and employment requirements. • Paragraph 8(a) of the NPPF 2024 states that the planning system must help to build a strong, responsive and competitive economy, to make sure that sufficient land is available in the right places at the right time to support growth. • Paragraph 23 of the NPPF is clear that Local Plans should include strategic policies that provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period. There is no differentiation between Local and Strategic need. Indeed Paragraph 24 of the NPPF actively looks to enforce "effective strategic planning across local planning authority boundaries" to build economic resilience, through the duty to cooperate. • Paragraph 26 stresses that effective and on-going joint working between strategic policymaking authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere. This approach has not been adopted by Greater Cambridge. There is no such evidence within either the Duty to Cooperate' Statement of Common Ground '(October 2025) or 'Duty to Cooperate' Statement of Compliance (October 2025) as to how wider economic growth, or specifically strategic industrial/warehousing need, is to be met across the wider region. This is in direct conflict with Paragraph 36 of the NPPF, which requires Plans to be positively prepared. None of the adjoining authorities, currently in the	

Summary of issues raised in comments	Comments highlighting this issue
process of preparing their Local Plans refer anywhere to meeting the employment needs of Cambridge and South Cambridgeshire. This is despite the Greater Cambridge Employment and Housing Evidence Update 2025 (para. 2.88) stating that 'big box' demand is met in the wider sub-region. • Paragraphs 85, 86 and 87 NPPF 2024 set out planning policies and decisions should: o "...help create conditions in which businesses can invest, expand and adapt. Significant weight should be places on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development." o Be "...flexible enough to accommodate needs not anticipated in the plan.... to enable rapid responses to changes in economic circumstances." o Recognise and address the specific locational requirements of different sectors. o Make provision for "storage and distribution uses at a variety of scales in suitably accessible locations that allow for the efficient and reliable handling of goods." o "Pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics..." • The approach is inconsistent with the direction of travel in the draft new NPPF. o E1 emphasises that plans supporting long-term economic growth should avoid overly prescriptive requirements on acceptable uses and instead enable flexibility to respond to evolving commercial property demands. o E1.1.a also sets out a clear alignment between the economic strategic priorities and the Industrial Strategy with the plan-making. The Industrial Strategy emphasises the role of the freight and logistics sector and its part in growing the economy nationally and has stated that a new plan for the sector will be published in due course. It on this basis that anticipated regional and national priorities for the sector will be further weighted in the	

Summary of issues raised in comments	Comments highlighting this issue
near future, making it even more important to consider those needs now as part of emerging plans. ○ E1.1.c. echoes Paragraph 85 of the NPPF by requiring plan makers to allocate sites to meet anticipated needs, and facilitating development to meet the needs of a modern economy, including storage and distribution operations at a variety of scales and in suitably accessible locations. ○ E1.2 states that development plans should not be overly prescriptive about the types of uses that would be acceptable on particular sites (other than where there is a clear and justified rationale for being specific about acceptable uses at the plan-making stage) ○ Paragraph E3 further recognises the particular physical and locational characteristics of freight and logistics development, including the need for access to strategic transport infrastructure and, in some cases, larger buildings. • The only apparent justification for not planning for anything other than local logistics/warehousing need is predicated on the 'high land take' and undefined 'local pressures' on land supply of specialist sectors, yet the Council's own evidence base already provides allocations for R&D/Life Science Space, well beyond the need that has been assumed by Iceni. To argue there is insufficient land to accommodate specialist sectors is wholly untrue. To the contrary, a very large amount of land has been proposed for release in other locations, closer to central Cambridge for a large quantum of R&D/Life Science floorspace, which has not been supported for release by the Authorities. • NPPG clearly acknowledges that storage and distribution uses have a set of inherent locational requirements, in that developments must be located close to a strategic road network on large sites, with sufficient access to power and labour (NPPG 031 ref: 2a-031-20190722). These characteristics clearly demonstrate that the locations typically occupied by Life Sciences and R&D uses are not suited for storage and distribution uses, so there is no competition for land	

Summary of issues raised in comments	Comments highlighting this issue
between these operators. • Guidance in the Housing and Economic Needs Assessment section of the NPPG Paragraph 031 (Reference ID: 2a-031-20190722) advises plan makers on how local authorities should assess need and allocate space for logistics uses. By only accommodating for local industrial/warehousing needs, the Draft Local Plan departs from this NPPG. Engagement with other local authorities and logistics developers/occupiers is lacking from the evidence base, while demand for large-scale logistics uses, serving regional and national operations, has not been assessed. • A similar West Suffolk policy as reworded by the Inspector and the restriction on large scale strategic logistics was removed. The new wording reflected Policy SP22(d) which enables large-scale logistics uses so long as it can be demonstrated that such proposals would not be detrimental to more localised needs. This is not relevant to Greater Cambridge as there is evidence of need. • There is evidence of latent demand for larger scale units in the area from market signals, reflecting enquiries and activity and stakeholder engagement. Evidence shows that warehouses are becoming larger in scale to suit occupier demands. • Evidence also suggests that average clear heights for buildings have also increased and demand for taller buildings has significantly increased. Therefore the size and height of buildings is essential to ensure properties are successfully let and do not become obsolete in a short period of time. • There is no evidence that large-scale warehousing units above 9,300 sq.m (100,000 sqft) are solely accommodating national or regional needs. A fixed threshold does not determine the type of occupier or the market being serve. • There are already a number of both local and national/international companies operating in Greater Cambridge that occupy industrial units above 100,000 sqft e.g. Hain Daniels, Hexcel etc.	

Summary of issues raised in comments	Comments highlighting this issue
• Compared to other locations with similar economic dynamics, such as Oxford, Sheffield, Bedford, Bristol, and Norwich, the presence of larger-scale of industrial units is significantly higher. This highlights that markets need this segment to function appropriately, and emphasises Greater Cambridge market's gap in the stock offer. • As a result of the policy restriction for the last eight years - there have already been two businesses - namely Marshalls and DHL - that have had to relocate from Greater Cambridge due to a lack of availability of premises of sufficient scale. • Given the Planning Practice Guidance ('PPG') paragraph 031 advises that, where needs for strategic facilities exist, policy-making authorities should collaborate with infrastructure providers and other parties to identify the scale of need across the relevant market, and the authorities will then need to consider the most appropriate locations for meeting these identified needs and E2.2 of the draft reformed NPPF states that, if market signals demonstrate undersupply of specific types of land or premises, considering the relevant catchment area (which could expand beyond Greater Cambridge's boundaries), or specific locational requirements exist, then, in compliance with the proposed NPPF S5, the development could be permitted, there is the risk that such units would be promoted outside the provisions of the GCLP. • Bidwells note 'Need for B2/B8 in Greater Cambridge' (January 2026); "By 2024, Oxford Economics local forecasts (April 2025) showed that only 9.7% to of the total GVA generated by Greater Cambridge was from the Manufacturing and Transport and Storage sectors1 ("the B2/B8 sectors"), compared to 14.7% for the entire Cambridge to Oxford Arc. Clearly there has been an intentional suppression of these industrial sectors in Greater Cambridge through planning policy since at least the 1990s and is now manifesting itself through a notable difference in economic output." • Recent appeal decisions reinforce the importance of flexibility and choice within employment land markets. For example, the Beehive appeal decision (APP/Q0505/V/25/3360616), the Inspector	

Summary of issues raised in comments	Comments highlighting this issue
emphasised that maintaining an adequate and diverse supply of employment land is critical to keeping the market fluid, accelerating delivery, and reducing the risk of investment being lost overseas. The decision makes clear that quantitative targets, including those in the Iceni analysis The Greater Cambridge Growth Sectors Study September 2024, should be treated as reference points rather than caps, and that a diversity of site types, locations and offers is essential to meeting demand and maximising job creation. • There is clear evidence that industrial, storage and distribution uses are essential parts of the supply chain that support those sectors that are perceived to be of higher value by Greater Cambridge. Therefore, a failure to plan sufficiently for local and strategic industrial and logistics space will serve to undermine the wider economic ecosystem. • The policy creates a disproportionate bar for industrial and logistics development, which typically requires larger plots, specific access arrangements and locations beyond tightly constrained settlement boundaries. • It risks excluding sustainable employment proposals that would meet identified economic needs and contribute to a diverse and resilient supply of employment land, contrary to national policy and recent appeal findings. It is not effective, as it may prevent appropriate industrial and logistics schemes from coming forward simply because they cannot satisfy the policy requirements, despite being sustainable in principle. • The policy provides limitations in terms of any future proposal's viability, as it constrains market flexibility and future occupiers' choice by limiting options for larger units which, based on market evidence, are subject to high levels of demand.	
Recommend that the policy read "Large scale warehousing and distribution centres providing for national or regional needs will not be permitted prioritised in Greater Cambridge. The focus is on	205061 (Lolworth Developments Limited)

Summary of issues raised in comments	Comments highlighting this issue
meeting the identified Greater Cambridge needs for an appropriate range of warehousing and industrial uses and unit sizes." With supporting text “However, proposals for large scale warehousing or distribution centres will not be prioritised as the aim of the policy is to provide for a wide range of uses, types and sizes to meet demand across the local area”.	
TTP continues to grow, in particular its core consulting activities are expanding rapidly. To support this growth and deliver for its expanding client base, there is a continuing need to create additional office and research space on the TTP Campus. It is critical that the new Local Plan policies support this. The Campus opened in Spring 2023 following planning approval in 2018 and a Section 73 permission granted in 2020 (S/4535/19/VC). The Campus has been the recipient of a number of major design awards including the Greater Cambridge Design and Construction Award 2024 and more recently in October 2024, winning the national Corporate Workplace Award from British Council of Offices which is one of the most prestigious awards in the country. Welcome the designation of the TTP Campus at Melbourn as an Established Employment Area in the countryside. Consider the TTP Campus to be clearly part of the extent of the built-up area and not isolated in open countryside or detached from the main concentration of buildings within Melbourn. A Local Plan that is positively prepared, justified, effective and consistent with national policy should	204851, 210719, 210720 (TTP)

Summary of issues raised in comments	Comments highlighting this issue
identify the TTP Campus as a site on which new employment development should be supported, and (having regard to the Councils' own Supporting Information to 'Policy S/DE) it should be designated as being part of the Melbourn Defined Development Extent. In the alternative situation that the Site remains designated as an 'Established Employment Area in the countryside', it is important that the proposed requirement for developments to 'reflect their location' is considered having regard to the aims of the policy as set out in the Supporting Information, namely to support businesses to locate, grow and evolve, and that the provisions of the Local Plan are clarified to make clear that applications within Established Employment Areas on the edges of villages will be assessed having regard to their village location.	
Support the policy approach in principle but question the basis on which the Established Employment Areas have been identified. J/NE should go further by identifying additional employment areas within the countryside that already make a strong contribution to the rural economy and support a number of jobs. This is vital in ensuring such areas are able to adapt to the evolving economic climate and meet future business needs to maintain vitality of the rural economy and negates the need to plan for access requirements and connectivity to sustainable modes of transport, as these are already established. To ensure that the Council not only meets this minimum need, but is also able to respond to evolving need, additional land should be identified to accommodate growth including additional sites as	206950 (Cambridge Realty Limited)

Summary of issues raised in comments	Comments highlighting this issue
Established Employment Areas, and especially those that relate well the settlement hierarchy for directing growth and that already make a strong contribution to employment within the area. Therefore it is requested the Evolution Business Park, including the adjacent parcel of land that is suitable to accommodate expansion, is included within the list of Established Employment Areas.	
Support the policy element relating to the expansion of existing business premises in countryside in principle but it is overly restrictive. Specifically, the requirement to demonstrate 2 years of operation and identify a named user for the development inhibits the ability of businesses within the countryside to respond robustly and dynamically to material shifts in business needs. It should be reconsidered to ensure that rural business is truly afforded the conditions by which to grow and evolve in response to an ever-changing economic climate.	206950 (Cambridge Realty Limited)
Question whether a. Cambourne Business Park is located within the countryside under Part 5.	204997 (A Brand, Abbey Properties Cambridgeshire Limited)
Support for Cambridge Research Park's (CRP) designation as an Established Employment Area in the countryside under Section 5b, although highlight that CRP should be viewed as being within an urban location given it's adjacent to the new town of Waterbeach.	204474 (The Royal London Mutual Insurance Society)
Endorse the policy approach of Section 4, which allows employment development in Established Employment Areas in the countryside, where they are of a scale and character that reflects their	204474 (The Royal London Mutual Insurance Society)

Summary of issues raised in comments	Comments highlighting this issue
location to promote job creation, and their exclusion from 'Expansion of existing businesses in the countryside' section 6.	
Flexibility regarding the removal of restrictive planning conditions in the Draft Greater Cambridge Local Plan into policy J/NE, as outlined in the current South Cambridgeshire Local Plan 2018, and in line with paragraph 85 of the NPPF 2024 is requested to support economic growth and facilitate business investment and expansion, particularly for established high-tech and R&D sites.	204474 (The Royal London Mutual Insurance Society)
In light of the West Suffolk local plan approach, NPPF and PPG, the council asks Greater Cambridge to work collaboratively with its neighbouring authorities, including West Suffolk to seek to identify and address wider needs for large scale strategic logistics provision and data centres arising from national and regional demand and taking a strategic cross border approach. In particular as no provision for large scale B8 units or those meeting regional or national demand is made in allocations S/RRA/SCS and S/SHF and neither does policy J/NE support such proposals.	204769 (J Baird, West Suffolk Council)
Para 8.18 of the supporting information - the Class E restrictions seem to only apply to Employment Areas in the Countryside - should this not also be available across Greater Cambridge as the issues with change of use may impact on other developments when permission is granted.	203055 (K Porrer, Cambridge City Council Liberal Democrat Group)
Welcome: • The Local Plan's intention to take projected jobs growth as far as is defensible and supports the use of robust local evidence that Cambridge Ahead commissions.	203530 (E Pritchard, Cambridge Ahead)

Summary of issues raised in comments	Comments highlighting this issue
• The inclusion of additional headroom in both jobs and housing projections which appropriately reflects Cambridge's growth potential and aligns with wider ambitions across the place. This approach is vital for long-term viability and enhances the overall robustness of the draft Plan. • The draft Local Plan's supportive approach to clusters, which appropriately reflects the increasingly clustered nature of the Cambridge knowledge economy over the past decade, is welcomed. • Recognition of infrastructure supporting the innovation economy, including densification at Whittle Laboratory, proposed growth at Babraham, and the proposed innovation hub. • The Plan's recognition of the global importance and growing breadth of scientific activity within major clusters • The Plan's support for developments that strengthen clusters, including its recognition that the Cambridge ecosystem requires a diverse range of commercial space to accommodate different stages of business growth. • The approach the Local Plan has taken to setting out how land should be used to support the wider economy is welcome, particularly the allocation of space for industrial, logistics and mid-tech uses, which helps promote a more balanced economy and address existing shortfalls. Would like to see: • The Local Plan, future spatial and housing strategies and supporting infrastructure need to design-in flexibility so that they can adapt to changing patterns of economic activity, new economic sectors and the future needs of a growing and more diverse population. • The Plan more explicitly recognise the value of existing innovation infrastructure and the benefits of intensifying and expanding the parks and clusters to fully realise agglomeration benefits.	

Summary of issues raised in comments	Comments highlighting this issue
• The approach to industrial and warehousing provision retains sufficient flexibility to respond effectively to changing industrial and commercial needs over time.	
The policy does not adequately recognise rural employment uses such as equestrian and equine enterprises. These are typically sui generis businesses that require large areas of land, modest built form and countryside locations, and cannot be accommodated within defined employment areas. The policy should: • be amended to explicitly recognise specialist rural and land based businesses, including equine and equestrian enterprises falling within sui generis use, as a distinct and important component of the rural economy. • Support the development, expansion and modernisation of such businesses in countryside locations where a functional need for extensive land holdings can be demonstrated, acknowledging that the built footprint may be limited relative to the site area. • Make clear that proposals which are necessary to secure the viability of established rural businesses, including stud farms, training yards and associated facilities, will be supported where landscape, environmental and amenity impacts can be satisfactorily mitigated. • Give greater weight to economic benefits, including employment generation and contribution to the rural economy, particularly in areas with functional links to the wider equestrian and racing industry. This would ensure the policy is consistent with national guidance on supporting a prosperous rural economy.	203990 (K Warth, KWA Architects)
Horseriding and keeping is a vital and large part of the rural economy and job force in Cambridgeshire, even excluding Newmarket.	204037 (S Rogers)

Summary of issues raised in comments	Comments highlighting this issue
Since the policy makes specific reference to site allocations, it is requested that the allocations be updated as per the submissions requested on the NEC and Station Road West sites, to ensure that new employment development can be delivered in accordance with Policy J/NE.	204090 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
There should be a site specific exception from the Green Belt for site 115407 for commercial and recreational use. 71% of residents in a recent consultation support the proposal and the high-quality recreational space it would provide. It would provide a net benefit to the community. It is uniquely positioned for sustainable development, benefiting from exceptional connectivity. To meet regional economic demands, consolidated, high-impact employment hubs are advocated rather than fragmented, smaller developments. By integrating a dedicated Country Park and diverse employment opportunities (including apprenticeships), this proposal offers greater long-term community value than its current Green Belt designation.	201727 (S Jocelyn, Histon & Impington PC)
The Council should be considering the higher job figure as it realistically responds to the Government's ambitions for the region. It is considered that the proposals for Land to the North of A505, Duxford meet the criteria set out in part 3 of the draft Policy J/NE. Therefore, the Site should be allocated to help meet this increased demand	209702 (B Homent, J Tee and R Smith)
There is clearly significant pent-up demand for warehouse space across the plan period, including across a range of different unit sizes. Whilst the large allocation on the A14 will deliver a large amount of this residual demand, this will likely be larger floor plates, and as identified above there is also demand for smaller scale units which can be accommodated on sites 115388 and 115413. Given the	210434 (G Pritchard, Bidwells),

Summary of issues raised in comments	Comments highlighting this issue
Site's sustainable location on the Cambridge urban fringe and its strong access to the strategic road network; it could function across many of the identified warehouse uses identified in the evidence base and, in the case of site 115413, accommodate occupiers that may look to take up warehouse space across Greater Cambridge.	
There is clearly significant pent-up demand for warehouse space across the plan period, including across a range of different unit sizes. Whilst the large allocation on the A14 will deliver a large amount of this residual demand, this will likely be larger floor plates, and as identified above there is also demand for smaller scale units which can be accommodated on this Site 115388. Given the Site's sustainable location on the Cambridge urban fringe and its strong access to the strategic road network; it could function across many of the identified warehouse uses identified in the evidence base and accommodate occupiers that may look to take up warehouse space across Greater Cambridge.	206050 (Hardwick Farming Company Limited)
Meldreth is also specifically mentioned in respect of the 'Eternit Site' as per policy J/NE - we agree. Local employment of all types is important for sustainable village life and we are happy with the continued use, and possible expansion of business activities on this existing brownfield site.	209135 (J Damant, Meldreth PC)
The Centre for Computing History (CCH) plays a crucial role in documenting Cambridge's technological contributions and houses significant collections that preserve both technological milestones and human stories. It attracts 22,000 visitors annually, including 7,500 young people, providing hands-on learning experiences that foster digital confidence and support the development of the future tech workforce.	202343 (L Salter, The Centre for Computing History)

Summary of issues raised in comments	Comments highlighting this issue
The centre offers volunteering opportunities, accessible programming for neurodivergent visitors, and serves as an informal and welcoming space for all ages to engage with technology. CCH contributes £410,019 to the local economy each year, highlighting its cultural and economic significance as a community museum. The current location on Coldhams Road limits CCH's offerings and is at risk due to potential EWR development, lacking necessary environmental controls and accessibility. CCH requires a new building in a more accessible location to expand educational programmes, enhance community engagement, and safeguard its collections for future generations.	
Logistics sites should be sited as close as possible to residential centres to encourage walking or cycling. It seems that Slate Hall Farm/C25 can meet this requirement, although there are significant issues with other forms of traffic generated by this site. It is less clear that Jaynic's site is within reasonable active travel distance for existing or proposed housing sufficient for its needs. The Newlands site would seem to be too remote from centres of housing to result in a significant number of employees choosing active travel as a regular means of commuting. Noon Folly, or Tritax may provide more scope for active travel although this proposal suffers from other deficiencies referred to in the sections of this note covering traffic and size and scale of the development.	202743, 206377 (Boxworth Parish Meeting on behalf of A14 Logistics Forum), 211429 and 202478 (Boxworth Parish Meeting)
Future developments should support future industries whilst maintaining the essential nature of a university city in a still, largely, rural setting. It would be inappropriate for scarce resources of land and	202743, 206382 (Boxworth Parish Meeting on behalf of

Summary of issues raised in comments	Comments highlighting this issue
water together with fragile flood management to be used to support logistics hubs where the primary focus is not on supporting the local economy.	A14 Logistics Forum), 211435 and 202478 (Boxworth Parish Meeting)
Cambridge is located in an environment where the land is flat and views are extensive. Such views need to be preserved. In this environment 'big boxes', with eaves hights of 24m, equivalent to a seven story building would be inappropriate. Neither Tritax and Newlands developments meet policy requirements nor the implied restrictions on the size and scale of rural developments. Any developments should be required to clearly demonstrate (including through 3D illustrations), at consultation phase, maximum size, including overall heights, of the buildings on developments and how through comprehensive landscaping their developments will not be visible beyond the site boundaries. Supported logistic/commercial developments on the A14 corridor should consist of small to medium size buildings. Eaves heights should be restricted and clearly set out; In this context 10/12 m would seem appropriate.	211114, 202743 and 202478 (Boxworth Parish Meeting on behalf of A14 Logistics Forum), 211436 and 202478 (Boxworth Parish Meeting)
The Newlands development does not meet the policy requirements relating to providing support for Greater Cambridge nor the implied restrictions on the size and scale of rural developments.	202743 (N Turton, Boxworth Parish Meeting on behalf of the A14 Logistics Forum) and 202748 (N Turton, Boxworth Parish Meeting)

Summary of issues raised in comments	Comments highlighting this issue
The Tritax development does not meet the policy requirements relating to providing support for Greater Cambridge nor the implied restrictions on the size and scale of rural developments.	202743 (N Turton, Boxworth Parish Meeting on behalf of the A14 Logistics Forum)
It is noted that this policy does not include new employment developments as part of new / expanded settlements.	211557 (Martin Grand Land Limited)
Clearly, land, which is not within the Green Belt, is available, and being actively promoted by our client to deliver development that would go some way to meeting that strategic industrial /warehousing and logistics need, in a location, for which there is no demand for any other more prioritized or specialist sectors (by which we assume is referring to Life Sciences; R&D). To argue there is insufficient land to accommodate specialist sectors is wholly untrue.	211684 (Newlands Cambridge Limited)

Policy J/RE: Supporting the rural economy

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was concern from one respondant that there was insufficient focus on rural economies, their unique needs and the needs of rural businesses in the Job theme with the focus of opportunity on urban Cambridge potentially increasing commuting and weakening rural resilience. Another respondant was concerned that the policy should protect agricultural land, rural businesses, and water-dependent enterprises and that development should not undermine food production, water availability, or land management. A number of changes to the policy were requested to incorporate environmental criteria into the policy including carbon reductions, environmental improvements assessed over the life span of the project and accessible locations. There was objection to the policy due to concern that there was insufficient recognition of other land based rural businesses, with requests for a number of revisions to address the needs of equestrian and other specialist rural enterprises in the countryside. There were also specific requests to protect equestrian access by, for example, connecting up public bridleways and to support small holdings. Girton Parish Council recognised the importance of the rural economy, viewing sympathetic employment development within the village boundary positively but wishing to maintain a separation with urban employment typologies. Shelford Parish Council strongly agree with the policy but expressed concern that a proposed development within the parish is inconsistent with its rural setting.

Response to main issues raised in representations:

Comments on the policy are noted. The policy seeks to appropriately support the rural economy, reflecting the National Planning Policy Framework. A number of the comments raise issues already addressed by other policies, such as requirements regarding digital connectivity, sustainable transport opportunities, and building standards. The focus on clustering development around existing buildings is an appropriate policy requirement, protecting the character of the countryside. Some comments specifically reference equestrian businesses, but the proposed policy provides an appropriate framework consider proposals for these land bases businesses in combination with H/DC: Dwellings in the countryside.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Object selected	204005 (K Warth, KWA Architects), 208661 (L Warth, British Horse Society)
Girton's rural economy depends on landowner diversification, small-scale businesses, local services, and environmental stewardship. Rural development is essential for community resilience. Rural diversification consistent with village identity and landscape character should be supported. Local retail and small enterprises should meet real surveyed demand and the Plan should enable small-scale enterprises integrated with the Development Framework.	202245 (Y Girton PC)
The Plan should protect the Girton Gap and rural edges from urbanised employment types.	202245 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
The Jobs theme is too heavily weighted to Cambridge based clusters and major employment centres. Limited reference to the specific needs of rural businesses such as farm diversification, small rural enterprises, home based businesses and workspace in villages risks concentrating opportunity in urban areas, longer commute with reduced jobs and weaker resilience in rural areas.	203128 (H Neal, Cambridgeshire ACRE)
Policies should more clearly address rural employment land, digital connectivity, transport access for workers and support for rural high streets and services.	203128 (H Neal, Cambridgeshire ACRE)
Replacement buildings should be permitted only where they deliver an overall carbon saving, including embodied emissions.	203725 (R Comins, Cambridge Green Party)
The policy should require environmental improvement to be assessed over the full lifespan of existing and proposed buildings, covering construction and operational emissions.	203725 (R Comins, Cambridge Green Party)
Wording should be strengthened so that developments generating significant employee or visitor numbers are located near larger settlements or are accessible by public transport, cycling and walking, rather than any single mode.	203725 (R Comins, Cambridge Green Party)
The Local Plan is overly restrictive and risks discouraging new rural enterprises from establishing in Cambridgeshire. Rural policy support is largely framed around agricultural operations, with insufficient recognition of other land based rural businesses. The Policy should be revised to explicitly recognise and support the development of equestrian and other specialist rural enterprises in the countryside.	204005 (K Warth, KWA Architects)

Summary of issues raised in comments	Comments highlighting this issue
The policy should recognise that equestrian businesses require access to large areas of land, while the built footprint is often limited, and that development may need to be separated for health and safety or operational reasons.	204005 (K Warth, KWA Architects)
The policy should make clear that proposals necessary to establish or maintain the viability of rural businesses will be supported where landscape, environmental, and amenity impacts can be mitigated.	204005 (K Warth, KWA Architects)
The policy should clarify that development can occur in countryside and Green Belt locations where justified by operational need, in line with NPPF guidance.	204005 (K Warth, KWA Architects)
The policy should reflect the significant contribution of rural businesses, including equestrian enterprises, to employment, tourism, and the wider rural economy.	204005 (K Warth, KWA Architects)
The policy should avoid overly prescriptive requirements that are impractical for specialist rural uses, such as restricting car parking to within clusters of buildings.	204005 (K Warth, KWA Architects)
Existing structures are often unsuitable for modern equine operations. Limiting development to existing buildings risks undermining business viability and the wider rural economy. The policy should recognise that some businesses may require new buildings in the countryside and that the rural economy has the right to thrive with access to necessary facilities and amenities (even if new build) in the same way as urban economies.	204005 (K Warth, KWA Architects)
Providing better infrastructure to tempt and persuade people out of cars is a good idea. Equestrian provision should always be included in rural Active Travel schemes and not just "where appropriate". The current network is extremely disjointed and a minimal part of the Public Rights of Way network.	204038 (S Rogers)

Summary of issues raised in comments	Comments highlighting this issue
This impacts on the safety of equestrians most of whom are women. Providing such give safe access to the countryside allows them to safely enjoy health and fitness. Cyclepaths and footpaths are joined up; Bridleways should be too.	
Equestrian activity is a vital and large part of the rural economy nationally and locally. Access to a safe and connected Rights of Way network is fundamental to the viability of businesses in this sector. BHS suggests that the plan should recognise the economic importance of the equestrian sector, the role of Rights of Way and multi-user routes in supporting rural livelihoods and the need to protect and enhance equestrian access as part of sustainable rural development.	204038 (S Rogers), 208661 (L Warth, British Horse Society - BHS)
The Plan should reference supporting small scale local agriculture, in particular smallholdings. These support sustainability and resilience in the food chain compared to large farms. It should actively encourage the creation of smallholdings with attached dwellings with an agricultural occupancy condition (which should not be allowed to end). The production of local food distributed via local farmers markets and Cambridge Market should be given a priority.	204673 (F Gawthrop)
We strongly agree with the policy including: not changing the character and impact; where there are no environmental improvements; not well-designed in form and bulk; not consistent in scale with its rural location; not located near to a settlement.	210950 (N Webster, Great Shelford PC)
In respect of change of use of the large barn at Shelford Bottom to be used as a Phlebotomy Centre, this proposed development is entirely inconsistent with its rural setting.	210950 (N Webster, Great Shelford PC)

Summary of issues raised in comments	Comments highlighting this issue
Policy E/1 (Rural Economy) should protect agricultural land, rural businesses, and water-dependent enterprises. Development should not undermine food production, water availability, or land management.	208956 (CPRE Cambridgeshire and Peterborough)

Policy J/AL: Protecting the best agricultural land

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was a mix of support for and objections to the policy. A number of objections from developers did not consider that the policy was consistent with the NPPF which, since 2024, has a greater emphasis on balancing the economic benefits of development with the loss of agricultural land, with agricultural land no longer explicitly protected. Given development pressures in Greater Cambridge this risks preventing sustainable, plan-led development regardless of wider benefits. There was also a respondent that considered that the approach taken was sufficiently balanced. Concern was also expressed over part b of the policy which was considered to require a sequential approach to development on agricultural land. This was considered to be too onerous and not supported by the NPPF. Suggested changes to the policy sought to ensure that it reflects the scale of any proposed loss, for example the use of the Natural England 20 ha threshold for consultation, and allows greater flexibility where alternative development delivers economic and other benefits. It was also requested that the policy acknowledge that land within agricultural designations may not be actively or viably farmed.

Support of the policy acknowledged the need to avoid the loss of agricultural land, its impacts on Priority Species and Habitats and its importance in food production, food security and equestrian activity. One responder stated that policy needed to be more stringent with a more precise mechanism to quantify benefits against the loss of agricultural land. There was concern from the CPCA and Stapleford and Great Shelford parish councils over the use of prime farmland for solar farms with suggestions that the

policy should seek to restrict them on the best and most versatile agricultural land. There were specific requests to specify whether both or just one of the criteria in part 1 needs to be met, to make links to other policies in the plan, such as Greenbelt Policy, to help safeguard land, to protect agricultural land around Girton and prioritise rural uses that prioritise landscape character. Positive support in the policy for urban/peri-urban food production was requested and local supply chains was requested. The RSPB requested reference to the Local Nature Recovery Strategy and local habitat map. Requests were made by Natural England around detailed land surveys and soil management.

Response to main issues raised in representations:

Representations received are noted. A number of comments seek greater protection, for example for food security reasons. Agricultural land is a valuable asset which should be appropriately weighted in planning decisions, but it must also be balanced against the need for other uses. Other representations seek to make the policy more flexible. National Planning Policy has consistently required local planning authorities to take into account the economic and other benefits of the best and most versatile agricultural land, and that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. Part 1b of the policy reasonably requires evidence that the loss is justified and issues that should be considered. Weakening the policy, to exclude land not actively farmed for example, would not fully reflect the potential permanent loss of land that could go back into agricultural use. In identifying allocations in the local plan consideration has been given to opportunities to reuse brownfield land, and to the impact on agricultural land. Soil management issues have been addressed in Policy I/CM: Construction management.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support selected	211558 (Martin Grant Land Limited)
Object selected	205448 (A Cannard, CPCA), 204597 (Redrow South Midlands), 204033 (K Warth, KWA Architects), 202561 (P Tribble), 204515 (Tritax Big Box Developments), 204288 and 204513 (Bellway Strategic Land)
Strongly/fully support the policy	201623 (J Flynn, Stapleford PC), 203555 (Ickleton PC)
There was a reiteration of the need for the plan to avoid the loss of high-quality farmland.	202246 (Y Murray, Girton PC)
It is unclear whether development needs to satisfy 1.a AND 1.b or 1.a OR 1.b.	202561 (P Tribble)
Food security is a major problem that is only going to get worse as a result of climate change, water scarcity, and geopolitics. The bar for development on the best agricultural land needs to be set higher, and needs a more precise mechanism to quantify benefits against the loss of agricultural land, otherwise it's ripe for abuse.	202561 (P Tribble)

Summary of issues raised in comments	Comments highlighting this issue
The NPPF recognises the importance of high quality agricultural land but no longer provides explicit protection.	204597 (Redrow South Midlands), 204033 (KWA Architects)
The policy is not consistent with the 2024 NPPF which now requires recognition of the economic value of best and most versatile agricultural land. It also fails to acknowledge that land within agricultural designations may not be actively or viably farmed. The policy should be revised to allow greater flexibility where alternative development delivers clear economic and rural benefits. Suggested wording: "Development proposals on land designated as the best and most versatile agricultural land will be supported where they demonstrate that: (a) the land is not actively or viably farmed; and/or (b) the proposed development delivers clear economic, employment, or wider rural benefits; and (c) any impacts on soil quality, landscape character, and the wider rural environment can be appropriately mitigated."	204033 (K Warth, KWA Architects)
Land in the Greater Cambridge area is subject to significant development pressure, and lower-grade agricultural land may not be available, deliverable or sustainable due to ownership constraints, infrastructure capacity, access limitations, environmental designations or competing development needs. In this context, the policy risks preventing sustainable, plan-led development	204515 (Tritax Big Box Developments)

Summary of issues raised in comments	Comments highlighting this issue
regardless of wider benefits. This is inconsistent with national policy, which requires impacts on agricultural land to be balanced.	
Part (b) of the policy implies a sequential approach to development where it should be demonstrated that lower quality land has been considered first. This approach is: • Not supported by national guidance which states that where significant development of agricultural land is necessary, areas of poorer quality land should be preferred, rather than requiring proof that no alternative location exists. • Unnecessarily onerous and places a potentially unrealistic evidential burden on applicants. A justification for the loss of agricultural land will have already been considered through the first part of the policy.The policy should be amended to align with national policy.	204597 (Redrow South Midlands), 204515 (Tritax Big Box Developments), 204288 and 204513 (Bellway Strategic Land)
Where the loss of BMV agricultural land is limited in extent and outweighed by the benefits of development the policy should allow for a balanced and proportionate assessment rather than operating as an absolute constraint. The Natural England Guide 20 ha threshold for consultation with Natural England provides a clear indication of the scale at which the loss of high quality agricultural land is considered significant in planning terms. Accordingly, the application of the policy should reflect both the scale of any proposed loss and the wider planning balance, including housing need, sustainability, deliverability and the availability of alternative sites.	204881 (S Boyd, Vistry Group), 210258, 210259 and 210260 (Vistry Group)
Support consideration of impacts on Priority Species and Habitats. Reference should be made to the Local Nature Recovery Strategy and local habitat map.	201468 (D Pullan, RSPB)

Summary of issues raised in comments	Comments highlighting this issue
Agricultural land is vital with set aside schemes providing much needed permissive horseriding routes linking villages and places. Farms provide livery yards to keep horses at.	204036 (S Rogers)
Great Shelford Parish Council's development framework is surrounded by high quality farmland (Grade 2). As such, the strongly support this policy.	210951 (N Webster, Greater Shelford PC)
Concern over the use of prime farmland for solar farms. Potential solutions: • Policy should state that the best agricultural land should not be used for solar farms and/or an explicit link to CC/RE: Renewable energy projects and Infrastructure. • Alter policy to apply the 'permanent loss' test to significant-scale solar farms on the highest grades of agricultural land.	201623 (J Flynn, Stapleford PC), 205448 (A Cannard, CPCA), 210951 (N Webster, Greater Shelford PC)
Much of the higher quality farmland in S Cambs is also Green Belt land. It would be helpful to link Policy J/AL to Green Belt policy, either explicitly in policy wording or in the supporting text, as a double safeguard of the best agricultural land.	201623 (J Flynn, Stapleford PC), 210951 (N Webster, Greater Shelford PC)
Advise adding to this Policy the requirement for detailed Agricultural Land Classification (ALC) surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would also be welcomed.	207636 (C Duerden, Natural England)
The authority should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable or sufficiently detailed information is available, it	207637 (C Duerden, Natural England)

Summary of issues raised in comments	Comments highlighting this issue
would be reasonable to expect developers to commission a new ALC survey, for any sites they wish to put forward for development.	
To assist in understanding agricultural land quality within the plan area and to safeguard Best and Most Versatile agricultural land in line with the NPPF, strategic scale ALC Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally by contacting Natural England. Some of this data is also available on the magic website.	207637 (C Duerden, Natural England)
A requirement for soil handling and sustainable soil management strategies is advised. This should be based on a detailed assessment of the soil resource following best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning. This would help to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would also be welcomed. Sustainable soil management should aim to minimise risks to the ecosystem services which soils provide, through provision of suitable soil handling and management advice. The planning authority should ensure that sufficient site-specific soil survey data is available to inform decision making. To include, for example, assessment of suitability of soil properties for type of landscaping and planting proposed to inform beneficial re-use, appropriate soil management, and drainage, where required.	207638 (C Duerden, Natural England)

Summary of issues raised in comments	Comments highlighting this issue
Further guidance for protecting soils (irrespective of their ALC grading) both during and following development is available in Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, to assist the construction sector in the better protection of the soil resources with which they work, and in doing so minimise the risk of environmental harm such as excessive run-off and flooding. The Code should be referred to where relevant in the development plan.	207639 (C Duerden, Natural England)
Rural uses that prioritise landscape character should be prioritised and agricultural land around the Girton Gap should be protected.	202246 (Y Murray, Girton PC)
Agricultural land of top quality should be used for food production (regeneratively) not housing, + solar farms should be on warehouse roofs and car parks, not on this land.	209677 (H Hale)
Support the protection of the best and most versatile agricultural land (Grades 1-3a).	208189 (Cambridge Sustainable Food), 206959 (Y Dignon)
Recommend adding positive support for urban/ peri-urban food production and local supply chains, including: supporting appropriate farm diversification that strengthens local food supply (e.g., small-scale processing, storage, distribution, farm shops and community-supported agriculture models), where impacts are well managed; identifying opportunities for community food growing at scale (where suitable) as part of resilience planning; and ensuring employment and rural diversification approaches recognise food as a strategic sector, not just "countryside uses."	208194 (Cambridge Sustainable Food), 206964 (Y Dignon)

Summary of issues raised in comments	Comments highlighting this issue
Supports the principle of protecting the best and most versatile agricultural land and recognises the importance of safeguarding Grades 1, 2 and 3a land where reasonable alternatives exist. Policy sets out in criterion (b) that the protection of agricultural land must be balanced against wider sustainability considerations and demonstrable development needs. This planning balance strand is supported and consistent with national policy, which requires decision-makers to take a proportionate and pragmatic approach where the benefits of development clearly outweigh the loss of agricultural land and where there are no suitable or available lower-grade development.	207035 (Mac Mic Land)
Agricultural land is vital with set aside schemes providing much needed permissive horseriding routes linking villages and places. Farms provide livery yards to keep horses at.	204041 (S Rogers)
Support reference to policy wording accepting loss of Grades 1, 2 or 3a agricultural land where the land is allocated for development in the Local Plan.	211558 (Martin Grant Land Limited)

Policy J/PB: Protecting existing business space

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The objection to this policy considered that it did not recognise current office market trends and would prevent the effective reuse of underutilised brownfield sites. It was also considered to be overly restrictive and inconsistent with Government policy around permitted development rights. It was requested that the policy adopt a more flexible approach by removing the 12-month marketing or vacancy requirement where office-to-residential conversion is proposed and support office to residential conversions. Parish councils focused on the need to protect and promote small business space in villages and the risk to jobs in schools, shops or pubs without further opportunities for new housing in villages. Histon Parish Council asked that Neighbourhood Plan policy on the Hain Daniels site be respected. The omission of Linton Industrial Estate was questioned. Suggestions for changes included expanding the range of meanwhile uses supported by the policy and adding a biodiversity net gain element. The opportunity for active travel that rural business units provide was recognised. Anglian Water Services highlighted the impact the increase in capacity at Cambridge Waste Water Recycling Centre may have on the identification of Strategic Industrial Estates, or other employment opportunities in North East Cambridge.

Response to main issues raised in representations:

Representations received are noted. As set out in the Jobs Topic Paper, employment sites and business premises in Greater Cambridge are under pressure for redevelopment from residential and other uses. The uncontrolled loss of employment land

reduces the sustainability of local communities. Less local employment opportunities can reduce the vibrancy of communities, and mean people have to travel further for work, or to access local services. The protection requirements, including the length of the marketing period, strike the right balance of protecting sites whilst not unreasonably applying longer term restrictions. It is acknowledged that changes to class E mean that some changes of use can take place without planning permission, and the policy can only apply where permission is required. Similar policies have been found sound in the adopted 2018 local plans. Minor changes have been proposed to the policy to expand the potential range of meanwhile uses. Policy S/PA/LN: South of A1307, Linton seeks to prevent windfall residential development in a defined area south of the A1307 other than improvements to existing properties. This is carried forward from the 2018 South Cambridgeshire Local Plan. Some representations seek to address issues which are already addressed in other policies, but the plan should be read as a whole.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Object selected	204024 (K Warth, KWA Architects)
Site 5g. Hain Daniels Site is covered by priority HIM08 in the Histon and Impington Neighbourhood Plan 2020 – 2031. A reference to all the points made in the Neighbourhood plan are to be respected.	201439 (S Jocelyn, Histon & Impington PC)
Girton needs to retain its limited local business space, as these support essential local services and small-scale employment. The Local Plan should protect existing village-scale employment sites and resist change-of-use to housing unless community benefit is proven.	202247 (Y Murray, Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
The Local Plan should support small enterprises as core to the Development Framework. New business space should favour small, flexible formats.	202247 (Y Murray, Girton PC)
Anglian Water notes Policy J/PB seeks to retain existing employment sites and premises, and any loss would only be permitted where the site is allocated for an alternative use in the Local Plan (or a Neighbourhood Plan). As previously referenced, one of the current key priorities for Anglian Water to facilitate sustainable growth is to bring forward a phased scheme to increase the capacity to treat wastewater at our existing Cambridge WRC site, following the withdrawal of government funding to relocate the works to the north of the A14 under the CWWTPR DCO. We recognise that this will have implications for the current North East Cambridge site allocation, and this will have a bearing on future policy direction in the emerging Local Plan, potentially including the identification of Strategic Industrial Estates, or other employment opportunities within the North East Cambridge area defined by Policy J/NE.	210215 (T Saunders, Anglian Water Services)
Without meaningful opportunities for further housing, rural jobs are at risk. Declining and/or aging populations do not provide sufficient inhabitants to keep schools, shops or pubs running without patronage from outside. To hold on to a successful school and pub without encouraging too much car traffic there is a need to ensure the local population does not decrease.	203052 (H Livermore, Little Wilbraham and Six Mile Bottom PC)
The following should be added to the end of part 1c of the policy: “(in this scenario biodiversity net gain should be evidenced in any application),” to ensure environmental improvements accompany redevelopment.	203727 (R Comins, Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
Part 6 of the policy should be altered to read ""6. Meanwhile uses that generate employment opportunities, community benefit, increased biodiversity or food sustainability will be encouraged while the marketing of a vacant site takes place."	203727 (R Comins, Cambridge Green Party)
Rural business units provide opportunity for Active Travel routes including horseriders to and from local villages.	204042 (S Rogers)
The policy should adopt a more flexible approach by removing the 12-month marketing or vacancy requirement where office-to-residential conversion is proposed as: • The Policy does not reflect post-Covid changes in office use. Demand for traditional office space has reduced. Requiring the demonstration of 12 months' vacancy risks preventing the effective reuse of underutilised brownfield sites for much-needed housing. • The Policy is overly restrictive and inconsistent with national policy. Permitted development rights under Class MA allow office-to-residential conversion without the need to demonstrate 12 months' vacancy. The policy should supporting the conversion of office buildings to residential use where they comply with relevant design, amenity, and environmental requirements. It should also explicitly recognise the contribution of such conversions to housing delivery and the efficient use of land.	204024 (K Warth, KWA Architects)
The policy J/PB appropriately supports the vibrancy of local communities provided by employment sites. The list does not appear to include the Linton Industrial Estate south of Cambridge Road allocated on the village map and in previous Local Plans but it is unclear whether that is because it is an error or	211917 (C Newell)

Summary of issues raised in comments	Comments highlighting this issue
whether the list refers only to sites where a change to Mid-tech would be appropriate. It should be clarified.	

Policy J/AW: Affordable workspaces and creative industries

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Concerns were expressed that there was insufficient information on the policy parameters e.g. thresholds levels, to be able to comment on the policy. If left undefined, this would cause uncertainty for applicants and investors contrary to the NPPF. It was suggested that the lack of definition of affordable workspace could lead to inconsistencies in the implementation of the policy however it was also suggested that inflexibility caused by requirements would not enable it to meet local needs and would challenge deliverability and viability, deterring investment. A suggested alternative would be for the policy to explicitly confirm that affordable workspace provision will be assessed on a case-by-case basis. There was concern that there was insufficient (non-London) up-to-date evidence to support the policy and that policy requirements had not been viability tested, risking embedding requirements not yet demonstrated to be viable or deliverable. The impact of the policy (including alongside other plan requirements) on viability, was a key concern for respondents particularly for those schemes already facing viability constraints; it would stimy growth generally. It was requested that a viability clause be added and clarity provided on how competing objectives are prioritised which viability is threatened. General objections to the policy from developers concerned the fact that it was not justified by or consistent with national planning policy.

There were objections from developers over how the timescale requirement for the implementation would impact on scheme delivery and viability. There was a request for flexibility for developers and/or occupiers to be given an appropriate degree of control

over the delivery of affordable workspace on-site so that it is contextual and reasonable. Clarity was requested on how an owner would demonstrate competence to deliver affordable workspace. Specific concerns were raised that it would not be appropriate for small scale affordable workspace to be required on sites with large scale logistics sheds.

There was support for allowing affordable workspace to be provided off-site. Cambridge Science Park was cited as an example were provision on alternative parcels within the Park might be a better option. It was highlighted that affordable workspace can come in many forms. A large number of respondents supported Create Cambridge's asks to clearly distinguish cultural production space, ensure that is affordable, prioritised over generic co-working space with a minimum requirement. The was a request for affordable workspace to be located in villages. Respondents who supported Elizabeth Way bridge and Underpass(es) cultural hub / Community project:

It was requested that the affordable workspace should be of an equivalent quality to the other space and that science and technology developments should make provision for general employment, arts and creative spaces to increase the economic resilience of the economy.

Response to main issues raised in representations:

Representations questioning whether the parameters of the policy were clear enough received are noted. Ahead of Proposed Submission the Councils commissioned a study to further explore the case for requiring affordable employment space, the appropriate way it should be applied, and to test viability. The evidence demonstrates that a policy for Greater Cambridge is justified by local circumstances, and recommends specific parameters and implementation approaches. Informed by the study, the policy in the Proposed Submission Plan sets clear parameters to enable it to be effectively implemented.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support selected	201862 and 204676 B Lenz, NEUBAU Architecture), 203061 K Porrer, Cambridge City Council Liberal Democrat Group), 204247 and 204695 (A Giarlis), 204610, 204624, 204633 (T Woodcock), 204940 (M Cleminson), 205087 (C Sharman), 205206 (M Burman, Cambridge Junction/Create Cambridge), 205266 (R Good), 205453 (B Smith), 211491 (Trinity College, Cambridge)
Object selected	204528 (Tritax Big Box Developments) 204466 (The

Summary of issues raised in comments	Comments highlighting this issue
	Royal London Mutual Insurance Society Ltd), 204230 (Railpen), 205043 (Abbey Properties Cambridgeshire Limited), 203449 (Babraham Research Campus), 207451 (Pioneer Group Ltd)
The policy is not considered to be justified or consistent with national planning policy as there is no requirement in the NPPF to deliver affordable workspace. The policy is not justified and does not propose any threshold for where affordable workspace would be required to be delivered. Any threshold would require consideration in terms of practical considerations and viability.	205043 (A Brand, Abbey Properties Cambridgeshire Limited)
Fully support affordable spaces to work.	205453 (B Smith)
The inflexibility of the policy contradicts part 1 of the policy that affordable workspace should meet an identified needs therefore the policy is unsound.	204466 (The Royal London Mutual Insurance Society Ltd)
On sites with large/strategic logistic sheds, providing an affordable provision on the Site is not considered to be appropriate (for start-ups) or feasible. It will conflict with national priorities for making an effective use of land.	204528 (Tritax Big Box Developments)

Summary of issues raised in comments	Comments highlighting this issue
Large-format employment and logistics developments are typically designed for single occupiers and are not compatible with subdivided, small-scale units. Requiring on-site affordable workspace risks constraining efficient site layout and undermining economic viability.	
The requirement for affordable workspace to be made available for occupation at, or prior to, the first occupation of 50 per cent of the non-affordable economic floorspace: • Introduces a delivery risk. This would be ahead of the point at which sufficient market floorspace has been occupied to support scheme cashflow. • For large and complex commercial developments, the front-loading of non-market floorspace has the potential to undermine development viability and delay delivery, contrary to the National Planning Policy Framework (December 2024), which requires plan policies to be supportive of economic growth. • Start-up business in the science and technology market prefer to co-locate close to established, more mature, businesses so that they can fully take advantage of the clustering benefits which can in turn drive innovation. Part 4, as drafted, therefore may not properly reflect market signals and again may hinder quick delivery of floorspace within the early parts of the plan period.	204466 (The Royal London Mutual Insurance Society Ltd), 204230 (Railpen), 204047 (Mission Street & BGO Propco Newton Ltd)
A requirement for a prescriptive percentage provision of affordable workspace over a fixed period, or in perpetuity is inflexible and will challenge the deliverability and viability of some commercial development. Development won't be able to respond to market signals in an effective way. It creates uncertainty, deterring investment.	204466 (The Royal London Mutual Insurance Society Ltd), 204230 (Railpen)

Summary of issues raised in comments	Comments highlighting this issue
The policy does not define the floorspace thresholds, the percentage of affordable workspace to be delivered, the level or duration of rental discounts and does not have a proper definition of 'affordable' workspace. In its current form it is not possible to provide comprehensive comments on the policy wording. Further clarity is needed on the types of development which will trigger Policy J/AW. Comments included: • These matters are fundamental to assessing development feasibility. • The absence of this information creates significant uncertainty for applicants and investors, which is inconsistent with the NPPF requirement for planning policies to be clear, unambiguous and supportive of growth (para 16d). • Support the overarching objective but it currently lack clarity. • It is acknowledged that a number of affordable workspace policies exist in London where land values and construction costs are high making the delivery more feasible. However, even in these circumstances, scheme viability is greatly compromised.	204528 (Tritax Big Box Developments), 204094 (Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204230 (Railpen), 203090 (Trinity College, Cambridge), 203449 (Babraham Research Campus)
Should the Council intend for affordable workspace to be delivered as part of larger commercial developments, it is considered necessary for the policy to clearly define both the minimum size of development to which the requirement applies and the percentage of floorspace to be allocated. Alternatively, if the Council does not wish to prescribe specific thresholds or figures, the policy should explicitly confirm that affordable workspace provision will be assessed on a case-by-case basis. This approach should be set out within the policy wording itself, rather than relying on supporting text or supplementary information.	203090 (Trinity College, Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
Support the inclusion of flexibility to allow affordable workspace requirements to be met off-site in exceptional circumstances. These circumstances may include, but are not limited to, developments where an occupier requires exclusive use of a single office building, or where mixed-use sites comprise multiple landownerships that make on-site provision impractical.	203090, 211491 (Trinity College, Cambridge)
The term ‘affordable’ lacks proper definition, affordability might mean different things in different contexts, leading to inconsistencies in how the policy is applied.	204230 (Railpen)
Policy J/AW should retain flexibility for bespoke solutions such as incubator hubs.	209039 (Marshall Group Properties)
The NPPF is explicit that policies should be underpinned by proportionate, up-to-date evidence (para 32) and that policy requirements should be tested through plan-wide viability assessment. Introducing a policy of this nature before the completion of the required work risks embedding requirements that have not been demonstrated to be viable or deliverable. Policy is not considered to be justified or consistent with national planning policy as there is no requirement in the NPPF to deliver affordable workspace. The policy is not justified and does not propose any threshold for where affordable workspace would be required to be delivered. Any threshold would require consideration in terms of practical considerations and viability.	204230 (Railpen), 205043 (Abbey Properties Cambridgeshire Limited)
The cumulative effect of uncertainty around thresholds, rental levels, delivery timing and management requirements risks placing a disproportionate burden on development at a time when viability is already a limiting factor for schemes due to interest rates, inflation and material costs. This may result in	204230 (Railpen)

Summary of issues raised in comments	Comments highlighting this issue
reductions to contributions elsewhere. Paragraph 35 of the NPPF makes clear that the cumulative impact of policy requirements should not undermine the deliverability of the Plan. In its current form, Policy J/AW coupled with other obligations fails to meet this test and risks discouraging investment, delaying delivery and reducing the overall quantum of employment floorspace that can be brought forward. This is particularly worrying as Cambridge is reliant on a small number of large sites, which if not brought forward will mean that development will need to be sought from elsewhere.	
London should not be used as a benchmark for provision. It is a very different market in terms of economic conditions/market values and the scale of units that may be delivered.	204528 (Tritax Big Box Developments)
While the principle is to be supported the policy is still subject to full justification. However, in London, affordable workspace policies don't work and usually the evidence base doesn't justify them on viability grounds. If this policy is to evolve it must set out clear and realistic targets based on Cambridge evidence and include 'subject to viability' within any policy to allow for market variations throughout the plan period.	202499 (M Parsons, University of Cambridge)
The need for, and form of, affordable workspace provision should be considered on a case-by-case basis, informed by site characteristics, intended occupiers, operational requirements and local evidence of demand, with flexibility to allow alternative approaches where on-site provision would be impractical or ineffective.	204528 (Tritax Big Box Developments)
Strongly support proposals that prioritise the provision of affordable workspaces for the creative industries in Cambridge. Cambridge's success as a centre for innovation depends not only on science	205087 (C Sharman)

Summary of issues raised in comments	Comments highlighting this issue
and technology, but also on its creative sector: artists, designers, makers, illustrators, musicians and cultural producers who contribute to the city's identity, economy and quality of life. However, rising property costs have made it increasingly difficult for creatives to find and retain suitable, affordable places to work.	
An affordable workspace policy is not considered to be necessary or appropriate in the industrial and warehouse sectors, having regard to the economic needs, market demand and signals in these sectors, or indeed for any other reason.	205145 (Lolworth Developments Limited)
The requirement for affordable workspace may significantly affect development viability for schemes that are already facing significant pressures. In the absence of detailed viability testing, and appropriate flexibility within the policy to account for unknown viability pressures, it is considered that the policy conflicts with requirements of the NPPF. If the policy is carried forward, a viability clause should be added in. This could allow for negotiated contributions and provide justification for alternative delivery mechanisms as outlined in the draft policy.	207451 (Pioneer Group Ltd)
We support this policy which will support smaller businesses and community organisations to succeed in Cambridge, where rents can be expensive.	203061 K Porrer, Cambridge City Council Liberal Democrat Group)
Support clause 1a - level of affordable workspaces provided: with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub / Community project. Support the Community Group running this project in place of a commercial developer, with council rents affordable enough to	201862, 204341 B Lenz, NEUBAU Architecture), 204610, 204624, 204633 (T

Summary of issues raised in comments	Comments highlighting this issue
offset the initial investment. A viability and operational business plan will help understand the level of affordable workspaces supplied, % will depend on market demand for affordable creative / commercial programmes. Support market discounts applied to a Community-led development located within the Eastern Gate improvement area, surrounded by high cost areas.	Woodcock), 204940 (M Cleminson), 205206 (M Burman, Cambridge Junction/Create Cambridge), 205325 (Z Svendsen, University of Cambridge)
With reference to with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub / Community project: • Support clause 1a - level of affordable workspaces provided: support affordable workspaces and facilities management using a third-party organisation, if so required. Promote continued involvement of a Community Group with charitable interest, rather than a commercial developer, to ensure maximum impact on sustainable, affordable and social goals through planning stages, build and operations. • SUPPORT Community Access to public funding and S106: a community led project with charitable interest and %affordable provisions for local SMEs should be made eligible for funding or match funding via S106 or similar, enabling planning and construction phases and with pragmatic, sustainable goals and management to ensure financial profitability and returns in the operational phase.	204247 (A Giarlis), 201862 B Lenz, NEUBAU Architecture), 204610, 204624, 204633 (T Woodcock), 204940 (M Cleminson)

Summary of issues raised in comments	Comments highlighting this issue
• SUPPORT Affordability of workspaces for the creative industry: Affordability and access to low-cost high social impact shared spaces are key concerns for smaller creative businesses and start ups who require networking and interaction to promote their business. A Community-run group with charitable interest has the advantage of not being subject to financial fluctuations and market demands as would be the case under commercial ownership, inevitably causing the project to 'gentrify' and draw creatives away from city centre location. An affordable cultural hub could potentially offset rents with other community and commercial leaseholders integrated, to ensure community agenda but maintain financial profitability to ensure continued operations. Other affordable measures might include hot desking, shared workspaces and/or membership schemes to facilitate low entry thresholds for local creatives, artists and craftspeople, individuals and businesses.	
• SUPPORT Community Access to public funding and S106: a community led project with charitable interest and %affordable provisions for local SMEs should be made eligible for funding or match funding via S106 or similar, enabling planning and construction phases and with pragmatic, sustainable goals and management to ensure financial profitability and returns in the operational phase.	205335 (Z Svendsen, University of Cambridge)
Support the proposal to transform Elizabeth Way bridge area into a cultural hub.	205266 (R Good)
Rural business units provide opportunity for Active Travel routes including horseriders to and from local villages	204044 (S Rogers)

Summary of issues raised in comments	Comments highlighting this issue
Affordable workspace and community-scale creative enterprise align with Girton's economy and support residents who seek local, flexible work. • The plan should provide affordable, flexible workspaces suitable for small businesses and creatives. Residents support small enterprise and flexible workspace. • The plan should locate affordable workspace within the village, not in remote employment areas, and design workspace that respects rural scale and character. Community-scale creative industries fit village character. • Affordable units reduce commuting and strengthen local resilience.	202248 (Y Murray, Girton PC)
Would like to see explicit inclusion of artist studios and art spaces.	202809 (H Cook)
Support Cambridge Junction and Create Cambridge in ask that: • "Affordable Office Space" is clearly distinguished from "Cultural Production Space" • genuinely affordable cultural production space is required (e.g. peppercorn, with rental charges well-below market rates and established based on evidence, ie Wysing Arts Centre's research on affordable artist studios) • rehearsal, making and sole-use studios are prioritised over generic co-working • a minimum requirement (e.g., 10% in schemes over 1,000 sqm) is introduced. This safeguards usable creative space from being diluted.	203625 (Z Svendsen, University of Cambridge), 203848 (N Yeni), 203866 (J Fritsch, University of Cambridge), 204159 and 204162 (M Burman, Cambridge Junction/Create Cambridge), 204394 (L Elmer, New International Encounter), 204676

Summary of issues raised in comments	Comments highlighting this issue
	NEUBAU Architecture Ltd, 204695 (A Giarlis), 204984 (R Cooper, Wysing Arts Centre), 205030 (L Sheerman, University of Cambridge), 205049 (H Paterson), 205123 (J Walsh), 205282 (AC de Azevedo Lamha), 205298 (N Oakley), 205316 (L Howse), 205364 (A Seiglow), 205390 (E Hine, Cambridge Junction/Create Cambridge), 202053, 202054 (H Chamberlain), 202138 (M Ridler, Cambridge Junction), 202196 (H Tam), 202302 (L Mills, Cambridge Junction), 202310 (S Yusuf, Cambridge

Summary of issues raised in comments	Comments highlighting this issue
	Junction/Create Cambridge), 202383 (J Webber), 202404 (S Biller, Kettle's Yard), 202407 (T Shaw), 202458 (K Jones), 202683 (T Altmann), 202713 (W Townsend), 202751 (C Woods, Cambridge Junction/Create Cambridge), 202779 (S Lee), 202865 (R Tinkler, Cambridge Junction), 202868 (B Groisman, Cambridge Junction), 202925 (R Tarry), 202977 (T Flinders), V Beechey, 203017 (The Arts Theatre Cambridge), 203330 (N Ellis), 203430 (S Ashworth),

Summary of issues raised in comments	Comments highlighting this issue
	203489 (L Heap), 203508 (D Lever)
It is crucial that sustainability is embedded into all aspects of the local plan in the light of ongoing climate breakdown. Therefore, the key strategic priority should be amended to read “Encourage a sustainable and successful mixed economy in Greater Cambridge within ecological limits which includes a wide range of jobs, while maintaining our area's global reputation for education, research and innovation.”	203723 (R Comins, Cambridge Green Party)
“7. Affordable workspace within a development should not be inferior in terms of location, exposure to noise or other pollution, facilities, light availability, bicycle and vehicular parking, as compared to the non-affordable workspace.” should be added.	203729 (R Comins, Cambridge Green Party)
The cumulative impact of Local Plan requirements on viability and delivery is a concern. There is a need to recognise the cumulative effect of multiple policy requirements which can place significant pressure on scheme viability. The Plan would benefit from a clearer, aggregated assessment of viability outcomes, informed by both permissions granted and historic delivery, to better understand where negotiated reductions have occurred and how trade-offs are being made. Greater clarity on how competing objectives are prioritised when viability becomes constrained would provide increased certainty and help ensure that high-quality growth can be delivered at pace.	203531 (E Pritchard, Cambridge Ahead)
All sci-tech developments should make provision for general employment spaces and also for arts and creative spaces given the lack of provision and the significant economic and social risks of building an	203811 (A Carpen)

Summary of issues raised in comments	Comments highlighting this issue
economy based on a narrow economic base. This will increase the economic resilience of the Cambridge economy.	
Several science and technology schemes in the local area appear to have stalled and simply are not being delivered at the required rate. Many of these projects will cite development viability as the core reason for this. As such, a mandatory policy requirement to deliver affordable workspace is likely to put added strain on viability and ultimately stimy delivery.	204047 (Mission Street & BGO Propco Newton Ltd)
The application of a flat rate proportion of 10-20% of permitted floorspace is inflexible and would contradict with part 1 of the policy which requires affordable workspace to meet a local identified need. In that sense, there is a risk the policy will be found to be unsound.	204047 (Mission Street & BGO Propco Newton Ltd)
Object to the proposed wording of Policy J/AW. The requirement for affordable workspace would significantly affect scheme viability for schemes that are already facing viability constraints. In light of the requirement for thousands of new jobs in Greater Cambridge, this would severely impact the number of schemes coming forward to deliver this level of growth.	203449 (Babraham Research Campus)
The policy allows affordable workspace to be managed and operated by the owner where they can demonstrate the necessary skills and experience. Given the absence of existing guidance, it should be clarified how an owner would demonstrate competence to deliver affordable workspace effectively.	203449 (Babraham Research Campus)
Affordability also comes in many forms. For example, at Babraham Research Campus they have a 'Live Labs' scheme whereby new start-ups rent bench space and desk space underpinned by the	203449 (Babraham Research Campus)

Summary of issues raised in comments	Comments highlighting this issue
support services running that facility. The company/individual enters into a facility agreement to use the space. For start-ups in other buildings, they benefit from more flexible lease terms (shorter leases and break terms).	
There is an imperative that a viability clause is added in to the policy wording. This could allow for negotiated contributions and provide justification for the alternative delivery mechanisms outlined in the policy such as off-site provision, or financial payments where on-site affordable workspace is not feasible.	204094 (Brookgate Land Ltd and Network Rail Infrastructure Ltd), 203449 (Babraham Research Campus)
The policy should be drafted to allow developers and/or occupiers an appropriate degree of control over the delivery of affordable workspace on-site. This should allow for flexibility on the location of affordable workspace within the development, duration of occupation and form of affordable workspace. A prescriptive approach where the Council are gifted control of affordable workspace would likely lead to incompatible development. A more flexible approach however, would allow for affordable workspace to be contextual and reasonable, so as to not undermine the developers' wider ambition.	204094 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
Clarity is requested on how an owner would demonstrate competence to deliver affordable workspace effectively	204094 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
Cambridge Science Park already provides a broad and established range of workspace typologies, supporting businesses at all stages of growth, from early-stage start-ups and incubator space, through	203090 (Trinity College, Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
grow-on and scale-up accommodation, to bespoke headquarters buildings for established companies. In this context, the ability to meet affordable workspace requirements flexibly across the wider Cambridge Science Park estate, rather than within each individual development parcel, is supported. This would allow affordable workspace provision to be aligned more effectively with the operational needs of occupiers and the evolving lifecycle of businesses, while still contributing to the overall supply of affordable workspace across the site.	
Support in principle. It is noted that the Local Plan states that “The Councils are still refining the nature and scale of the employment floorspace the policy will apply to, the affordable workspace percentage to be applied to total floorspace, the level of discounts applied to different areas of Greater Cambridge and payments in-lieu calculations. We would welcome feedback on the approach though this consultation.” It is important that this detail is carefully considered and viability tested, and that stakeholders have further opportunity to consider these details before these matters are concluded.	211559 (Martin Grant Land Limited)

Policy J/EP: Supporting a range of facilities in employment parks

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy suggesting the balance between ancillary/complementary uses and employment uses was appropriate and citing the alignment of the policy with national policy and good use of these facilities on Cambridge Science Park. Caveats included that facilities need to be appropriate, viable and assessed on a site-by-site basis. The potential benefits highlighted included: creating a stronger sense of place; enhancing employee wellbeing; and reducing off-site travel. One respondent suggested that the policy could help develop the local bridleway network. Concerns included the impacts of employment parks on village-scale employment and a request to support small village facilities. Two developments were highlighted as delivering the types of facilities highlighted in the policy.

Response to main issues raised in representations:

Representations are noted. The need for appropriate supporting facilities to support employment park has been a theme in our employment space, and a number of comments support that principle. The policy acknowledges the need to also consider the impact on nearby centres, which was also raised as a concern.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support selected, including where appropriate and viable and where the type and amount of space is assessed on site-by-site basis. Reasons for support: • Strikes an appropriate balance by ensuring such uses remain ancillary or complementary to existing or proposed employment uses. • Aligns with national policy, particularly paragraph 85 of the NPPF (2024), promoting conditions for business investment and expansion. The policy is deemed positively prepared, justified, and effective as per paragraph 36 of the NPPF 2024. • These facilities at Cambridge Science Park are widely used and contribute positively to the day-to-functioning and attractiveness of the Park for both occupiers and visitors.	204533 (Tritax Big Box Developments), 204471 (The Royal London Mutual Insurance Society Ltd), 203093 (Trinity College, Cambridge), 202501 (M Parsons, University of Cambridge), 211560 (Martin Grant Land Limited)
Employment parks nearby can overshadow local needs. The policy should ensure that employment-park policies do not divert investment away from village-scale employment. Local enterprise requires modest, accessible facilities.	202249 (Y Murray, Girton PC)
The policy should provide support for small business facilities within Girton itself to reduce commuting pressure and recognise the village's rural context in any employment-park policy application.	202249 (Y Murray, Girton PC)
A new recommended policy point: "3. Facilities will be particularly supported when they contribute to sustainability, for example through reuse schemes, recycling facilities, encourage active transport and reducing food waste."	203731 (R Comins, Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
Rural business units provide opportunity for Active Travel routes including horseriders to and from local villages. Providing better infrastructure to tempt and persuade people out of cars is a good idea. Equestrian provision should always be included in rural Active Travel schemes and not just "where appropriate". The current network is extremely disjointed and a minimal part of the Public Rights of Way network. This impacts on the safety of equestrians most of whom are women. Providing such give safe access to the countryside allows them to safely enjoy health and fitness. Cyclepaths and footpaths are joined up; Bridleways should be too.	204045 (S Rogers)
Meaningful and facilities on employment facilities deliver benefits. These include: • Creating a stronger sense of place • Enhancing employee wellbeing • Reducing off-site travel	204533 (Tritax Big Box Developments), 204471 (The Royal London Mutual Insurance Society Ltd)
I have been told you have no cafe facilities at Cambridge Science Park? If so, why not? When I worked there, my employer provided free chocolate, and we all ate that at lunchtime, obviously a very bad idea.	201255 (S Williams)
The emerging masterplan for Cambridge Science Park seeks to build upon this strong existing provision through the introduction of additional services and facilities designed to further support the employment function of the site. These include enhanced indoor and outdoor social and collaboration spaces, leisure and wellbeing facilities, and improved green and public realm spaces. Collectively, these measures will	203093 (Trinity College, Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
help reinforce Cambridge Science Park as a high-quality, sustainable employment location capable of supporting future growth and development.	
As part of the public consultation, feedback was gathered on the types of facilities the community would like to see. Tritax Park, Cambridge will provide facilities for employees, visitors and local residents, provisionally including sports facilities and circular walking routes to promote recreation and wellbeing.	204533 (Tritax Big Box Developments)
Facilities in centrally located employment hubs like the Cambridge Retail Park and the Beehive Centre should meet the needs of the wider community through offering a diverse mix of community, sports, leisure, culture or creative hubs facilities.	210564 (J Lewis, Cam Skate)
It is recognised that it is important that there is support for proposals for shared facilities in employment parks and campuses.	211560 (Martin Grant Land Limited)

Policy J/MS: Market and street trading

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The policy was supported by several individuals and organisations, including the Cambridge Liberal Democrats. The Riverside Area Residents' Association and other public and private organisations along with individual members of the public stated their support for the establishment of a designated centre for street trading operations, particularly regular outdoors markets on Walnut Tree Avenue to host various types of markets for residents and visitors, and by Stourbridge Common entrance.

Comments were made by the Cambridge Green Party requesting amendments to paragraphs 2(c) & (d) to ensure appropriate public realm, utilities improvements and flexible spaces are designed to not adversely affect the vitality of the market. Girton PC requested the policy support periodic markets and micro-trading options in Girton, ensure siting prioritises Active Travel access and encourages community-led models that fit village identity. Cambridge Past, Present & Future, while supportive of the policy requested the supporting information refers to the unique historic legacy of Cambridge's traditional market. One member of the public objected to the draft's omission of the special historic significance of Cambridge Market.

An objection was also made to the reference in the supporting text regarding the need to ensure only complementary uses are retained within market stalls, based on similarity of physical products or services. Other objections to the policy were made regarding the lack of provision to retain traditional traders and the services they provide, nor to encourage local food producers and resulting low food-miles produce, including the graziers whose cattle are a greatly valued feature of Cambridge's

commons. On this matter, one member of the public commented on the recent planning application for the Market Square 25/04382/FUL not have regard to traditional traders and the services they provide and local food producers.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The first paragraph of the supporting information has been amended to acknowledge the historic legacy of Cambridge's traditional market.

The policy is applicable to markets and street trading located with the existing and emerging Designated Centres listed in Policy J/RC: Retail and other complementary town centre uses. Suggested locations for markets submitted during the public consultation would therefore fall outside the remit of the policy.

Public spaces suitable for market and, or street trading are also compatible with other public uses. This means a balance needs to be reached where these multi-functional spaces are designed to be safe, accessible and practical for a variety of market/street trading, cultural pursuits and community activities. While markets can help support the vitality and vibrancy of local centres, other temporary uses such as community and cultural activities can have both economic and social benefits. The policy's current wording is considered to reach that balance without prejudicing anyone of these uses, especially if public spaces can host a variety of these different yet complementary activities at the same time.

If the current criteria are met, development proposals should positively enhance the experience for both shoppers and traders while ensuring the markets themselves remain viable, vibrant and safe. Criterion (c) is focussed on ensuring a safe and accessible environment for all market users (both shoppers and traders). Criterion (d) is aimed at ensuring theses spaces are also usable for both community and cultural activities. These uses would normally be temporary activities when market activity

is not present, this is particularly important in new centres where market frequency will normally be quite limited and community spaces may not have been fully developed. No policy change is therefore proposed.

An objection was also made to the reference in the supporting text regarding the need to ensure only complementary uses are retained within market stalls, based on similarity of physical products or services. It is important that local markets and street traders complement the local retail and service offer within the Designated Centre to maintain the viability and vitality of permanent retail and service facilities. Permanent retail units will have additional costs compared to temporary market stalls and street traders. Small retailers and food store operators are unlikely to commit to operating permanent retail units if local markets and street traders are allowed to dominate the local retail scene. The provision of cafés is one example whereby a mobile café provider, often small enough to fit on or adjacent to a market stall will, in an emerging new Designated Centre discourage a café opening up in a fixed retail unit. Unless there is sufficient demand for both providers, it is inevitable that the mobile provider will have less risk and low costs compared to the fixed café provider. It is therefore important that local markets are of a size, frequency and type that allows the permanent retail units/operators to trader profitably without significant trade diversion. This is particularly important in new settlements where their designated centres are still emerging; in these circumstances, the market or street trader offer should be subject to additional testing when proposed, to ensure they support these new centres with complementary good and services.

Regarding the objection lodged about the retention of traditional traders, the services they provide and the encouragement of local food producers, the policy relates to the provision of public markets and street trading, it is beyond the scope of planning to determine the nature of the public market and the provenance of their produce. Rather, the policy supports the development of new spaces that can facilitate markets and street trading that might otherwise not be a consideration for new centres and the design of their public realm. These spaces offer the opportunity for established traders to be retained in new locations that might otherwise not come about, especially in the area’s new settlements and urban extensions.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support this policy: • Strongly support protecting the daily market in market square, especially local veg traders and other local sellers. • We support this Policy	202812 (H Cook), 203062 (Cambridge City Council Liberal Democrat Group)
Point 2.c should be amended to read “c. secure appropriate public realm and utilities improvements, where necessary, to ensure the safe operation of street trader activities and maintain public access; and to positively enhance shoppers and traders experience and promote the vitality of the market.” Point 2.d should be amended to read “d. are designed to enable flexible usage for a range of other community and cultural activities only if it can be demonstrated this will not adversely affect the vitality of the market.”	203733 (Cambridge Green Party)
RARA supports establishing a designated centre for street trading operations, particularly regular outdoors markets on Walnut Tree Avenue, an under-used access road, and the space before the entrance of Stourbridge Common, hosting various types of markets for residents and visitors. The areas are not currently designated but have strong potential for smaller markets to emerge and grow over time, given pedestrian footfall and cycle flow data E/W along the river promenade and also N/S between the wards with better connectivity	204456 (Riverside Area Residents Association)
support: designated temporary, flexible outdoors markets/street trading: with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, • I support establishing a designated centre for street trading operations.	204950 (M Cleminson), 205224 (Cambridge

Summary of issues raised in comments	Comments highlighting this issue
• I support regular outdoors markets on the Walnut Tree Avenue under-used access road, hosting various types of markets for residents and visitors, and by Stourbridge Common entrance. • The area is not currently designated but has strong potential for smaller markets to emerge and grow over time, given pedestrian footfall and cycle flow data E/W along the river promenade and also N/S between the wards with better connectivity	Junction), 204650 (T Woodcock), 204386 (NEUBAU Architects), 204266 (A Giarlis), 204267 (L Cooke)
I strongly believe that the recent planning application for the Market Square 25/04382/FUL doesn't recognise and safeguard the significance and value of our traditional traders, the services they provide, the importance of local, low food miles produce, nor balances the need of both traditional traders and hot food providers. I strongly encourage the drawing of a Local Plan that would protect local food producers, including the graziers whose cattle are a greatly-valued feature of Cambridge's commons, and traditional traders that make up the core of Cambridge appeal to the world. Finally, the high number of traders shouldn't be lowered	205297 (D Fornari)
The draft doesn't even mention the special historic significance of Cambridge Market (which predates the University). Its importance in bringing sustainable, fresh, low food miles produce to the people of Cambridge, and the historic links it provides between the city and its hinterland. The policy needs to promote and protect Cambridge's traditional market and its traders, and enshrine its traditional role in the face of pressures to turn into an outdoor food court	205470 (J Preston)
Against the plans aims, the proposals for Cambridge central market, will reduce the number of stalls and stall holders (who number more than the stalls - different businesses, different days), and their	205483 (A Copping)

Summary of issues raised in comments	Comments highlighting this issue
variety. it will destroy some of the greenest businesses in Cambridge increasing greenhouse gas emissions, which the council claim they want to reduce, and cause social exclusion. The market traders have been operating successfully for many years without undue noise, smell, litter or traffic problems, and without presenting a danger to the public. If you want to avoid undue noise, don't replace the market with an events space!!	
J/MS 1 daily market in Market Square The selling of affordable, fresh, local seasonal fruit and vegetables will probably disappear from the market in the near future if local producers are not helped by subsidised stall rates and a free parking to allow selling healthy food to the Community. Please have a proportion of the market stalls must be for fresh, local, healthy food.	207536 (Y Dignon)
Cambridge Market isn't broke, so you are going to fix it! Obviously your opinions about it are much more expert than those of the market traders themselves. I think maybe you have an idea of listening to string quartets there in the evening or something??!! Some of the money you are going to spend there should be saved for RUNNING THE LOCAL ELECTIONS IN MAY!	201256 (S Williams)
Markets and street trading could support local enterprise and community activity, fitting well within Girton’s identity. (Your document references interest in community-scale business and small local retail.)	202250 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
Key Points: Strong interest in small/local retail → markets are a natural extension. Markets reinforce local economy and community cohesion. They require careful siting to avoid parking and traffic impacts. GPC Requests to the Local Plan: Support periodic markets and micro-trading options in Girton. Ensure siting prioritises Active Travel access. Encourage community-led models that fit village identity.	
Visiting the market provides a social experience for locals and tourists alike. For locals, like myself, this forms a vital sense of community. Permanent retail units cannot and will not offer this social experience. Thus, a market stall offering the same physical goods or service as a permanent retail unit offers a different overall experience. Because of this I think it would be unjustified to remove market stalls based on similarity of physical products or services. This will be a great loss of community in Cambridge.	203415 (C Long)
The plan makes no provision to retain our traditional traders and the services they provide, nor to encourage local food producers and resulting low food-miles produce, including the graziers whose cattle are a greatly-valued feature of Cambridge's commons. Market Square has been the heart of Cambridge since the Middle Ages and is still an essential asset for Cambridge residents, the same ones who pay rates, contribute to local economy, live their lives here, and have the right to reject a plan which favours turning this site into yet another tourist trap - Cambridge already has enough of these.	202954 (J Addison)
You need to consider all the market square traders, and not just the shops around them. The small businesses need council help & support to continue to provide the goods & services that locals want	203203 (C Diston)

Summary of issues raised in comments	Comments highlighting this issue
and require. The market square DOES NOT & SHOULD NOT operate for tourists. The craft market provides for both locals & visitors.	
The supporting information should state that Cambridge's traditional market possesses a unique historical legacy, having served as a vital community hub since before the founding of the University. The daily and Sunday stalls providing fresh food and produce represent a living connection to the city's medieval heritage and its enduring relationship with the surrounding agricultural landscape, as well as a sustainable low carbon economy.	204198 (Cambridge Past, Present and Future)
It is recognised that it is important that policy explains the circumstances in which local markets and street traders will be supported in Designated Centres.	211561 (Martin Grant Land Limited)

Policy J/RC: Retail and other complementary town centres uses

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The policy was broadly supported by Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners including the flexibility, in particular Parts 4 and 5. These respond to changing trading patterns and retail needs and given continued fluctuations in economic trends. This is especially the case for large strategic sites that are subject to a phased delivery over a significant period of time.

Stapleford PC commented on the supporting data for planning policy paragraph 2 being flawed because they incorrectly combine Great Shelford and Stapleford as a single ‘local centre’. Stapleford PC consider them to be two distinct villages with separate histories, identities, and markedly different levels of services. Great Shelford contains most of the shops and amenities and could reasonably qualify as a local centre on its own, while Stapleford, considered independently does not meet the criteria.

Comments made by Girton PC highlighted the value of local retail, not large town-centre-scale uses. Retail should be modest, flexible, and village-appropriate. There is high interest in local retail which must respect rural character and avoid urban commercial forms. Small shops and services can reduce reliance on car trips. Girton PC requested the Local Plan support modest, village-scale retail units and not large retail formats inappropriate to Minor Rural Centres. It is also important to integrate local retail within the Development Framework.

Comments were made by Abbey Properties Cambridgeshire Limited seeking clarification about paragraph 2 of the policy which refers to a hierarchy of centres with three tiers being suggested. They noted that the National Framework (NPPF) paragraph 91 requires a sequential test where development it outside of an existing centre. The current policy wording could be construed as requiring a proposal for a small shop in a Local Centre needing to assess whether that same shop could be located within Cambridge City Centre.

A member of the public commented on the policy requirement (paragraph 8a) requires proposals for uses outside designated centres to be "well served by sustainable modes of transport, as appropriate", it places no such requirement on uses in designated centres. The requirement should be applied to all proposals.

Comments made by Cambridge Investment Partnership supported the sequential approach to the location of retail and main town centre uses in Greater Cambridge. They also acknowledged paragraph 4 of the policy regarding acceptable residential development in designated town centre locations. The respondent notes that paragraph 5, specifically criteria 5a and 5b, outlines conditions under which the loss of retail uses, or merging/subdivision of units is supported. The respondent requested that the justification criteria for Parts 4 and 5 include wording that allows for commercial viability considerations regarding the loss of retail uses or merging/subdivision of units with residential uses.

A member of the public commented on the potential of the Riverside area for small-scale retail and complementary uses. The policy should recognise the importance of neighbourhood-serving retail in areas undergoing regeneration, such as Riverside / Eastern Gate.

The Pioneer Group objected to the proposed policy approach incorporates a restriction on use which results in fundamental conflicts with the NPPF and Town and Country Planning (Use Classes) Order which render the proposed policy to be unsound. It is well established that clear intention of Class E is to allow flexibility for businesses to adapt and diversify to meet

changing demands. The current policy wording is inconsistent with this approach and without sufficient evidence to support. To achieve our understanding of the Councils' aims in respect of Policy J/RC, it could choose to adopt a requirement for active frontage and a requirement to consider the well-established principle of 'Agent of Change'.

Comments submitted by Railpen included a request for the former Beehive Centre site to be excluded from the list of designated Retail Centres in the Local Plan. Its current designation would conflict with the comprehensive, major redevelopment of the site which includes a commercial R&D led scheme, a new local centre, enhanced public realm, and improved connectivity.

Comments submitted by McDonald's Restaurants Ltd questioned the current omission of Bar Hill within the proposed hierarchy of centres which could instead be a Local or District Centre given the current location of a large supermarket with a parade of supporting shops.

Response to the main issues raised in representations:

In response to Stapleford PC's comments about the supporting data for planning policy paragraph 2 being flawed, it should be noted that the corresponding defined local centre for 'Great Shelford and Stapleford' on the draft Policies Map is covers the high street uses in Great Shelford and not Stapleford. This means new retail and other town centres uses, commensurate in size to the centre's role within the hierarchy, will be directed to designated centres in areas they are intended to serve. Such developments in Stapleford (outside the high street boundary designation) would need to satisfy the requirements listed in paragraph 8 to be permitted.

Comments made by Girton PC highlighted the value of local retail, not large town□centre□scale uses. Retail should be

modest, flexible, and village-appropriate. There is high interest in local retail which must respect rural character and avoid urban commercial forms. Small shops and services can reduce reliance on car trips. Girton PC requested the Local Plan support modest, village-scale retail units and not large retail formats inappropriate to Minor Rural Centres. It is also important to integrate local retail within the Development Framework. The draft policy supports this approach, ensuring retail and other town centres uses are directed to designated centres in areas they are intended to serve. Village-based retail uses would need to be appropriate to their village location.

Comments were made by Abbey Properties Cambridgeshire Limited seeking clarification as the current policy wording could be construed as requiring a proposal for a small shop in a Local Centre needing to assess whether that same shop could be located within Cambridge City Centre. Paragraph 8 of the policy explains the conditions that need to be satisfied for retail and other main town centre uses outside designated centres. For a local shop intended to serve a particular local catchment area, it should be located in accordance with the sequential test. In this instance it should consider all appropriate centres, commensurate to the shop’s size and intended catchment area. It is also worth noting that rural shop premises falling within Use Class F2(a) (Local community) category are treated as community facilities. As such a proposal for an F2(a) shop would be considered under Policy WS/CF: Community, Sports, and Leisure facilities. F2(a) are defined as shops (mostly) selling essential goods, including food, where the shop’s premises do not exceed 280 square metres and there is no other such facility within 1000 metres. The supporting text has been amended to clarify the application of the sequential test.

A member of the public commented on the policy requirement (paragraph 8a) requires proposals for uses outside designated centres to be "well served by sustainable modes of transport, as appropriate", it places no such requirement on uses in designated centres. The requirement should be applied to all proposals. The location of designated centres and their constituent town centres uses are very much determined by their accessibility, as such their location is inherently central to the area they serve and highly accessible by a variety of sustainable forms of transport.

Comments made by Cambridge Investment Partnership requested that the justification criteria for Parts 4 and 5 include wording that allows for commercial viability considerations regarding the loss of retail uses or merging/subdivision of units with residential uses. The marketing requirements, listed in paragraphs 4(a) and 5(a) are intended to test the commercial viability of the existing units and their current configuration. The output from these requirements should inform the commercial viability of these uses/spaces. The policy breadth of permissible uses (office, retail, leisure or cultural development) also provides a flexible approach to their continued use as a commercially viable use.

A member of the public commented on the potential of the Riverside area for small-scale retail and complementary uses. The policy should recognise the importance of neighbourhood-serving retail in areas undergoing regeneration, such as Riverside / Eastern Gate. The policy has already proposed to designate a part of Newmarket Road as a Local Centre. The supporting text also recognises Neighbourhood Centres as valuable means of providing for the everyday needs of smaller communities.

Both Railpen and Pioneer Group objected to the proposed policy approach which incorporates a restriction on use which results in fundamental conflicts with the NPPF and Town and Country Planning (Use Classes) Order which render the proposed policy to be unsound. The draft policy has been written with full regard to the NPPF and makes no mention of applying restrictions that result in fundamental conflicts with the NPPF or Town and Country Planning (Use Classes) Order. The supporting text explains how Changes to the Town and Country Planning (General Permitted Development) Order have resulted in various planning uses that were previously distinct being categorised under Use Class E (commercial, business and service). Change of use between the different types of planning uses listed under Class E does not constitute development and subsequently does not normally require planning permission. Whilst recognising the benefits and flexibility that Class E can bring, it also increases the risk of main town centre uses emerging in inappropriate edge-of-centre and out-of-centre locations, which could harm the vibrancy and vitality of Greater Cambridge’s network of centres and eventually lead to the loss of retail and other town centre uses.

Similarly, valuable retail, leisure and other main town centres uses could in some cases be changed to other uses within Class Use E. The policy seeks to minimise this by establishing clear criteria for most development involving main town centre uses outside of Greater Cambridge's existing and emerging designated centres. However, the councils may apply other planning controls to safeguard main town centre uses in the most appropriate locations in the hierarchy of centres and reduce the proliferation of such uses elsewhere, including applying conditions on new development limiting the ability to change key retail or leisure floorspace to other uses within Use Class E without the need for planning permission. Other Permitted Rights may also be subject to restrictions dependent on local circumstances.

Comments submitted by Railpen included a request for the former Beehive Centre site to be excluded from the list of designated Retail Centres in the Local Plan. Its current designation would conflict with the comprehensive, major redevelopment of the site which includes a commercial R&D led scheme, a new local centre, enhanced public realm, and improved connectivity. The proposed outline includes a replacement Local Centre and therefore it is considered necessary to designate the site accordingly. This does not preclude other uses coming forward on site.

Comments submitted by McDonald's Restaurants Ltd questioned the current omission of Bar Hill within the proposed hierarchy of centres. Bar Hill is currently designated as an existing Minor Rural Centre; this designation was reviewed as part of the review of the area's existing Settlement Hierarchy which concluded it should remain as a Minor Rural Centre.

Greater Cambridge Retail & Leisure Study – Interim Findings Report (2026) indicates the Tesco Extra Superstore, referred to in the comments has a sales floorspace of approximately 10,566 square metres net and a benchmark turnover of approximately £75 million. The report establishes that it is currently the largest supermarket in Greater Cambridge. The Tesco Extra Superstore is of a size that clearly serves a much wider catchment area than that of Bar Hill. The adjacent parade of shops also provide other town centre uses (at the time of writing this report) two opticians, one audiologist, a locksmith offering

other services including engraving & shoe repairs, a pet food supermarket, a restaurant and a café. Given Bar Hill's resident population of approximately 4,000 people, it is again reasonable to assume these shops and services serve a much wider catchment than just Bar Hill It is therefore reasonable to describe both the supermarket and other shops as an out-of-centre development. The NPPF's description of a 'Town centre' clearly excludes "existing out-of-centre developments, comprising or including main town centre uses" as such and in accordance with the NPPF, the town centre facilities at Bar Hill do not constitute a town centre and therefore these have been omitted from the proposed hierarchy of centres.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The supporting data for Clause 2 are flawed because they incorrectly combine Great Shelford and Stapleford as a single "local centre." They are distinct villages with separate histories, identities, and markedly different levels of services. Although their development boundaries touch in one area, they are otherwise divided by Green Belt. Great Shelford, which contains most of the shops and amenities, could reasonably qualify as a local centre on its own. Stapleford, considered independently, does not meet the criteria. Treating them as one would misapply planning policy in Stapleford, creating inappropriate retail pressures and unacceptable development impacts on both communities.	201639 (Stapleford PC), 210952 (Great Shelford PC)
While section 8.a of the policy requires proposals for uses outside designated centres to be "well served by sustainable modes of transport, as appropriate", it places no such requirement on uses in designated centres. The requirement should be applied to all proposals.	202566 (P Tribble)

Summary of issues raised in comments	Comments highlighting this issue
The respondent supports the sequential approach to the location of retail and main town centre uses in Greater Cambridge. The respondent acknowledges Part 4 of the policy regarding acceptable residential development in designated town centre locations. The respondent notes that Part 5, specifically criteria 5a and 5b, outlines conditions under which the loss of retail uses or merging/subdivision of units is supported. The respondent requests that the justification criteria for Parts 4 and 5 include wording that allows for commercial viability considerations regarding the loss of retail uses or merging/subdivision of units with residential uses.	204406 (Cambridge Investment Partnership)
The Riverside area has potential for small-scale retail and complementary uses, especially if Newmarket Road is re-established as a local centre and high street. The policy should recognise the importance of neighbourhood-serving retail in areas undergoing regeneration, such as Riverside / Eastern Gate.	204982 (M Cleminson)
Part 2 of the policy refers to a hierarchy of centres with three tiers being suggested. It must be noted that NPPF paragraph 91 does not require an assessment of each centre in order - it requires a sequential test where development it outside of a existing centre. As worded the policy could be construed as requiring a proposal for a small shop in a Local Centre needing to assess whether that same shop could be located within Cambridge City Centre. Clarification should be provided.	205075 (Abbey Properties Cambridgeshire Limited)

Summary of issues raised in comments	Comments highlighting this issue
The proposed policy approach incorporates a restriction on use which results in fundamental conflicts with the NPPF and Town and Country Planning (Use Classes) Order which render the proposed policy to be unsound. It is well established that clear intention of Class E is to allow flexibility for businesses to adapt and diversify to meet changing demands. The current policy wording is inconsistent with this approach and without sufficient evidence to support. To achieve our understanding of the Councils' aims in respect of Policy J/RC, it could choose to adopt a requirement for active frontage and a requirement to consider the well-established principle of 'Agent of Change'.	207452 (Pioneer Group)
Girton values local retail, not large town-centre-scale uses. Retail should be modest, flexible, and village-appropriate. Key Points: Survey shows high interest in local retail. Retail must respect rural character and avoid urban commercial forms. Small shops and services can reduce reliance on car trips. GPC Requests to the Local Plan: Support modest, village-scale retail units. Avoid large retail formats inappropriate to Minor Rural Centres. Integrate local retail into the Development Framework.	202251 (Girton PC)
We request that the former Beehive Centre site is excluded from the list of designated Retail Centres in the Local Plan. Designating the site as a Retail Centre creates a direct policy conflict with the Council's ambition to achieve a comprehensive, major redevelopment of the site, which includes a commercial R&D led scheme, a new local centre, enhanced public realm, and improved connectivity.	203451 (Railpen)
Railpen objects to the inclusion of the Beehive Centre in Policy J/RC part 5, stating that the current wording imposes unnecessary and disproportionate requirements that could undermine development effectiveness. Railpen requests the exclusion of the former Beehive Centre site from the designated	203988 (Railpen)

Summary of issues raised in comments	Comments highlighting this issue
Retail Centres in the Local Plan, citing a conflict with the Council's plans for comprehensive redevelopment, including a commercial R&D-led scheme. Railpen objects to the wording of paragraph 8.92 related to Policy J/RC, advocating for greater flexibility to prevent empty shop locations and enhance deliverability, aligning with the goals of the NPPF.	
Broadly support Policy J/RC. The local centre at Darwin Green has been implemented in part and will establish further as occupations increase. The flexibility within the Policy, in particular Parts 4 and 5, are welcomed in order to adapt to changing trading patterns and retail needs and given continued fluctuations in economic trends. This is especially the case for large strategic sites that are subject to a phased delivery over a significant period of time.	203104 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
Policy J/RC supporting text 8.80, It is unclear how Bar Hill meets this definition, Bar Hill is not a small rural hinterland and contains a large population, Tesco Superstore, along with a parade of supporting retail shops, large car parking area and petrol filling station. The retail area of Bar Hill is not dispersed across the settlement and could easily be identified on the Policy Map. It is therefore questioned whether Bar Hill is appropriately categorised within the hierarchy of centres and could instead be a Local or District Centre.	207892 (McDonald’s Restaurants Ltd)
Support. It is recognised that it is important that the policy includes support for a new town centre at Cambourne North.	211562 (Martin Grant Land Limited)

Policy J/SA: Cambridge City's Primary Shopping Area

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The Pioneer Group objected to the proposed policy approach incorporates a restriction on use which results in fundamental conflicts with the NPPF and Town and Country Planning (Use Classes) Order which render the proposed policy to be unsound. It is well established that clear intention of Class E is to allow flexibility for businesses to adapt and diversify to meet changing demands. The current policy wording is inconsistent with this approach and without sufficient evidence to support. To achieve our understanding of the Councils' aims in respect of Policy J/SA, it could choose to adopt a requirement for active frontage and a requirement to consider the well-established principle of 'Agent of Change'.

Comments from the Cambridge City Council Liberal Democrat Group cited concerns about the harm caused by gambling and betting outlets. They requested restrictions on such outlets to avoid large concentrations in one area.

Comments made by Girton Parish Council raised concerns about the application of the policy and requested clarification on the matter. Girton PC also stated their support for dispersed local retail rather than centralised city-focused provision.

Comments were received about the function and role of Cambridge East as a secondary shopping area / urban centre for the specific purposes of residential needs both within the city and the surrounding new towns and villages, along with other support functions.

Response to the main issues raised in representations:

The Pioneer Group objected to the proposed policy approach incorporates a restriction on use which results in fundamental conflicts with the NPPF and Town and Country Planning (Use Classes) Order which render the proposed policy to be unsound. The draft policy has been written with full regard to the NPPF and makes no mention of applying restrictions that result in fundamental conflicts with the NPPF or Town and Country Planning (Use Classes) Order. The supporting text explains how, in order to support the Primary Shopping Area's (PSA) retail, leisure and town centres services, all new retail, leisure and mixed-use town centre development within the designated PSA will be controlled using appropriate planning measures, including conditions, to ensure ground-floor occupancy is restricted to specific land uses identified as generally acceptable in the PSA, as set out in the policy. Planning controls may also be used to restrict the use of permitted development rights to change the use of existing units or control movement between different uses that fall within the same planning use class.

Changes to the Town and Country Planning (General Permitted Development) Order have resulted in various planning uses that were previously distinct being categorised under Use Class E (commercial, business and service). Change of use between the different types of planning uses listed under Class E does not constitute development and subsequently does not normally require planning permission. Whilst recognising the benefits and flexibility that Class E can bring, it also increases the risk of main town centre uses in the PSA changing without consideration for the role and function of the PSA which it is intended to provide. The NPPF defines PSAs as an area where retail development is concentrated. Paragraph 90(b) also states planning policies should make clear the range of uses permitted in such Primary Shopping Areas.

In Cambridge City Centre, in recent years several useful retail shops and services have converted to fast-food outlets. Opticians and other types of retail shops have been replaced by fast food 'restaurants'; they include minimal seating to distinguish themselves from fast food/takeaway. It is therefore important that the PSA is allowed to perform its role and

function by ensuring units within its boundary are retained to meet consumers' retail needs. As such, the Councils are keen to protect and, where possible, enhance the Primary Shopping Area's important retail functions and frontages. To achieve this, retail along with other leisure and town centre services will be promoted on ground floor level spaces with retail use taking precedence, whilst other leisure (arts, culture and entertainment) uses will be supported on basement levels or upper floors provided they do not undermine the PSA's retail functions.

In response to the concerns raised by the Cambridge City Council Liberal Democrat Group about gambling and betting uses on the high street, policy WS/HD: Creating healthy new developments has been amended. This policy now includes measures to direct these uses to designated centres where their number will be restricted.

For clarification, Girton is not part of Cambridge's Primary Shopping Area and therefore not applicable to any part of Girton. The policy is only applicable to Cambridge's Primary Shopping Area, as designated on the draft Policies Map.

In response to the comments received regarding Cambridge East, the urban extension is intended to form part of a large urban extension. It is expected to have a district centre with a few smaller local centres. It is important that people can easily access shops and services using sustainable forms of development, to meet their day-to-day needs. This will reduce the need for travel extensively for their daily needs and support viable and vibrancy district and local centres. It is important that these centres complement other centres including the city centre and nearby town centres (both planned and emerging) including those beyond Greater Cambridge. If Cambridge East were to provide services for people beyond its catchment area, this would encourage people to travel further from their own centres and cause 'trade-diversion' undermining other city/town centres. Town centre uses in Cambridge East will need to be carefully planned to ensure they complement rather than undermines other centres.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
As we commented earlier for the policy Creating Healthy New Developments we would like to add on something around gambling and betting harm and restrictions on such outlets to avoid large concentrations in one area. We would support further evidence being gathered on this now so it could be included at Regulation 19.	203067 (Cambridge City Council Liberal Democrat Group)
Given that the Council now proposes to split policy in respect of the Primary Shopping Area from draft Policy J/RC, the objections in relation to J/RC follow into the wording proposed for J/SA	207453 (Pioneer Group)
Girton is not part of Cambridge's Primary Shopping Area; retail needs are local and community-scaled. Key Points: PCA policies must not be applied to Girton. Girton requires small, rural-appropriate retail. Avoid policies that centralise retail activity away from villages. GPC Requests to the Local Plan: Clarify that PCA policies do not apply to Girton. Support dispersed local retail rather than centralised city-focused provision.	202252 (Girton PC)
Consider designating Cambridge East as a secondary shopping area / urban centre for the specific purposes of residential needs both within the city and the surrounding new towns and villages. These could be as support functions for the anchor institutions I've suggested in other submissions. (City hall for unitary council, large concert hall, lifelong learning college, railway station/transport interchange). Provision could also be made for a nighttime economy neighbourhood where venues can stay open late without disturbing residential neighbourhoods or colleges.	203812 (A Carpen)

Policy J/VA: Visitor accommodation, attractions and facilities

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Members of the Cambridge Hoteliers Association (CHA) highlighted the importance of visitor accommodation to the Greater Cambridge economy but also the rising costs, lower occupancy levels and a shift towards operating models with lower costs being faced by the sector. As a result, they state they are facing serious viability challenges. The requests for the plan are that given the current oversupply in the market, including from short term lets, it should not support additional hotel provision until a significant clear, evidence-led increase in underlying overnight demand can be demonstrated and the existing oversupply is cleared; to avoid exacerbating the overall supply, it should not support further hotel provision unless it can be clearly demonstrated that underlying demand, rather than accommodation supply, is increasing; that short-term lets are fully integrated into its evidence base and policy framework, rather than treated as a peripheral or secondary issue; for compulsory registration linked to clear planning control to be explicitly embedded within policy; it acknowledges the commercial realities for hotels wishing to complete a change to more economically viable use classes and greater consistency in the application of affordable housing policy across accommodation types is introduced to support housing delivery and reduce unintended incentives.

Elsewhere, whilst some aspects of the plan were welcomed, there were objections to the policy from some other respondents. Concerns included the stringency of the proposed test for assessing the loss of visitor accommodation given the housing pressures in Greater Cambridge and the capacity of key Cambridge city centre areas to accommodate visitors safely and pleasantly. A more

proportionate and economically grounded approach to the conversion of visitor accommodation to housing was requested, as was an assessment of the capacity of city centre areas to accommodate predicted visitors to feed into the Plan's assessment of the quantum of tourism to plan for and the hard and soft infrastructure to provide. A strategy to direct visitors to suitable (less conflictual) parts of the centre would help manage impacts. The potential of tourist tax(es) funding was highlighted.

Further concerns were expressed around the conversion of smaller dwellings to visitor accommodation and, in particular short-term lets. The impacts cited included cumulative impacts of these conversions on disruption from increased visitor traffic and negative effects on local workers seeking rental properties. Additional work was requested to establish an evidence base on these impacts and to ensure the policy remains robust against potential national policy changes. There was a request for the policy to acknowledge IWM Duxford's designation as an Area of Major Change and one for the policy to express support for visitor accommodation within new / expanded settlements. A parish council request was to resist large-scale visitor accommodation, support only low impact village-appropriate accommodation and protect the rural edges of villages and countryside that provides a barrier between village and urban development. Hotels, potentially with large conferencing facilities, were supported on science/technology parks and close to a train station, although not to the point where it compromised the space available for science-based development. It was requested that an additional criteria be added to proposals for new or extended tourist facilities and visitor attractions in the countryside – that the site should be accessible by public or active transport. The value of the equestrian sector to the visitor economy was also highlighted.

Response to the main issues raised in representations:

Representations are noted. The visitor economy continues to be an important economic sector for Greater Cambridge, helping to generate a range of jobs for local residents and to support a large number of local businesses. It's importance locally has been

balanced with the need for affordable new homes and with the ability of owners to respond to market signals and it is considered that the continuation and extension of the protections for existing visitor accommodation from the 2018 Cambridge Local Plan is reasonable. It is the role of the plan to ensure that there is sufficient visitor accommodation for the demand for bedspaces generated by visitors to Greater Cambridge. As a land use plan, it is not appropriate for the plan to seek to control the numbers or destinations of visitors to different parts of the area. Agencies such as Visit Cambridge and Visit South Cambs, including as part of the newly announced Cambridgeshire and Peterborough Local Visitor Economy Partnership (LVIP), have a key role in ensuring that there is the knowledge, infrastructure and funding to ensure that the impacts of Greater Cambridge as a visitor destination are positive for residents, businesses and visitors. By supporting new visitor attractions that complement the existing cultural heritage of the city, are limited in scale and assist the diversification of the attractions on offer, especially to better support the needs of families, the Local Plan recognises the need to diversity and enhance the visitor experience in Cambridge whilst recognising the potential negative impacts that large scale developments could bring.

The prevalence and impacts of short term lettings are considered in our Greater Cambridge Future Hotel Need Study (2025) which has provided the evidence base for the policy and in the First Proposals topic paper which considered the impacts of concentrations of short term letting in areas. The Government have indicated that they are introducing a mandatory national registration scheme for short-term lettings in England which is expected to begin in 2026. The introduction of a licensing scheme will provide an accurate picture of the number and location of premises within Greater Cambridge which can then be used to support the implementation of future Government policy. Were Government to introduce a new use class for short term lettings in line with a previous Government consultation, any new lettings would require planning permission. The proposed Local Plan policy states that where planning permission is required, it allows the conversion of residential properties to visitor accommodation use only in exceptional circumstances. The policy would therefore be complementary to such a national policy change.

The supporting information for J/VA sets out that where proposals for apart-hotels or serviced apartments are considered to fall within Use Class C3 or comprise sui generis uses which have the characteristics of a C3 use, such proposals will be assessed via relevant housing policies in the Local Plan including requirements for affordable housing. It also sets out that where apart-hotels and serviced apartment units fall under C1 or Sui Generis uses, the councils will take steps to ensure they will not be used for any other purpose.

It is considered that the importance of Imperial War Museum Duxford is reflected in policy S/AMC/IWM: Imperial War Museum, Duxford. The Local Plan should be read as a whole and it is not therefore considered appropriate to cross reference to policy S/AMC/IWM within policy J/VA. The policy recognises that science and business parks are suitable locations for new visitor accommodation and whilst other policies in the plan seek to ensure that non-employment uses are ancillary or complementary to the primary employment uses. It is considered that the policy will ensure that any new visitor accommodation or attractions will be appropriately scaled to their location, including any new towns or settlements. Other policies in the plan address the need for opportunities for active travel to/from new developments.

The Draft Policy was informed by our Greater Cambridge Future Hotel Need Study (2025). We therefore asked the consultants who carried out the study to review the representations which we received where there was reference the findings of the Study. The response can be found below.

A focus on hotels

The study does present both hotel and short let supply and performance information. The balance of information presented is significantly determined by the data available but both sectors are presented. The focus on hotel projections is fundamentally driven by the scope of work. It is also appropriate since hotel and hotel-style serviced apartment accommodation is the dominant form of

accommodation, includes providers of accommodation at scale per site (10 to 230+ rooms); and as regulated and planned providers of accommodation, it is this sector that should be the driving component of planning future overnight accommodation.

Short let accommodation has grown significantly nationally and in the Cambridge area. In parallel, hotel room night supply and demand has grown enormously in Cambridge city in the last 10 years. This growth has been despite the growth in short lets, and strong occupancies are still maintained. This shows that there is a growth market to address in hotel provision that is not being absorbed by short let supply increases. There is a need to focus on future hotel supply because hotels have a significant role in city brand, international recognition, and business tourism significantly, as well as leisure. Hotel room provision is not interchangeable with short lets provision; it is a larger and significantly growing market in itself and one that is appropriate to forecast for.

The extent of short let accommodation is noted in the study. This market segment runs alongside hotels. As explained, demand for future hotel rooms should not be considered to be met by short let supply as a direct and equal equivalent to being met by hotel room supply. There is some interplay in the guest markets using hotels and short let accommodation, but it is not appropriate for future hotel provision and planning to be determined by the relatively uncontrolled sector of short lets. Rather, it is important to plan for potential future hotel need (and its evolution in types as determined by market desire) in order to create a destination with accommodation supply that is planned, controlled and fitting to the brand positioning of Greater Cambridge now and in the future as an international business and tourism hub, as well as growing residential area.

A prioritising of hotels enables suitable provision in locations that fit wider planning objectives. It is important to not limit future hotel provision as the response to growth in short lets. Rather, the market determines whether planned-for hotel permissions are pursued and the matter to be addressed is the control of provision and regulation of short let accommodation such that it becomes a type of planned provision that is operating and taxed on a level playing field with hotels.

Extent of hotel supply

For clarification, the study supports the principle that overnight accommodation need is a response to demand drivers. As such, expected growth in these drivers is the determinant of expected future hotel need, and growth in tourism support and generators of tourism demand are key in the future success of hotels.

A net increase of new supply is not expected within a context of no additional demand. Indeed the study did not forecast a need for additional supply in the immediate term. The forecast was presented for additional supply need from 2027 based on assumed market growth and supply openings.

Additional supply need was determined due to projected growth in demand, which in turn is a function of other projections such as business growth and leisure demand. If such growth does not occur then this will have an onward impact on hotel demand. It is the market that will determine the viability of future hotels. Supply projections are made in order to plan for potential future need rather than to limit the behaviour of the market.

An annual occupancy of 78% has been used to determine future supply. This is a level that we consider appropriate for this area as a stabilised market based on its weekly and monthly seasonality. It is important to note though that this does not mean that all hotels will be currently at this level, some will be above and some below, and different subsectors of the supply will perform in different ways. It is a suitable average for modelling this market however and is above the national average. In 2024, the national average for regional UK was 76.3% occupancy and £93 ADR [STR]. In relation to Cambridge performance at 77.2% occupancy and £110 ADR [STR] at that time it is not unreasonable to consider 78% occupancy as a position for when additional supply could be absorbed.

It is additionally of note that Cambridge enjoys a level of occupancy and ADR superior to many other locations where the hotel market remains competitive and healthy. A future scenario of hotel provision may alter the current premium occupancy and ADR achieved but this does not warrant limitation of hotel permissions by the council. It is a markets matter. The overall objective of a council is assumed to be to have a healthy hotel market and the wider benefits and facilitations thereof, and does not include a remit to protect individual hotels.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Object selected	202503 (M Parsons, University of Cambridge), 204225 (S Nicholas, Cambridge Past, Present and Future), 203532 (Cambridge Ahead), 205117 (W Davies)
Support selected	203073 (K Porrer, Cambridge City Council Liberal Democrat Group)

Summary of issues raised in comments	Comments highlighting this issue
Visitor accommodation is not a primary need. If proposed, it must respect rural character, avoid traffic impacts, and support the local economy and avoid undermining landscape or community facilities. Small-scale, low-impact models are acceptable if locally beneficial. The policy should resist large-scale visitor accommodation; only support small, low-impact, village-appropriate proposals and protect the Girton Gap and rural edges from tourism-driven development.	202253 (Y Murray, Girton PC)
Welcome that the Plan supports the conversion of non-residential premises to residential use and seeks to restrict the loss of housing to visitor accommodation in order to safeguard housing supply.	203532 (E Pritchard, Cambridge Ahead)
Concern regarding the proposed test for assessing the loss of visitor accommodation, which may benefit from reconsideration in light of current housing pressures. Given Greater Cambridge's sustained and exceptional growth trajectory, there is a strong case for facilitating the conversion of visitor accommodation to residential use or student accommodation through planning policy where appropriate. A more proportionate and economically grounded approach, rather than the stringent economic test currently proposed, would better reflect present conditions and support the delivery of much-needed homes and/or student accommodation.	202503 (M Parsons, University of Cambridge), 203532 (E Pritchard, Cambridge Ahead)
Permitted Development regulations limit the Local Planning Authority's ability to regulate conversions of smaller dwellings to visitor accommodation, affecting housing availability. The cumulative impacts of these conversions in Cambridge cause disruption from increased visitor traffic and the negative effects on local workers seeking rental properties. There should be further work on the policy before Regulation	203073 (K Porrer, Cambridge City Council Liberal Democrat Group)

Summary of issues raised in comments	Comments highlighting this issue
19 to establish an evidence base on the impact of converting smaller dwellings and to ensure the policy remains robust against potential national policy changes.	
As an additional point under “11. Proposals for new or extended tourist facilities and visitor attractions (excluding accommodation) in the countryside will be supported where it can be demonstrated that:”, we recommend adding “f. The site should be accessible by public or active transport.”	203736 (R Comins, Cambridge Green Party)
The importance of hotels to the local economy and social infrastructure is highlighted including through their spending in local businesses, the year round employment opportunities they offer, their role in the Cambridge Cluster eco-system supporting inward investment, international collaboration and major employment hubs by providing accommodation, and meeting and networking space as well as their role in place-making including reinforcing city centre vitality, providing consistent day and evening footfall and supporting Cambridge’s global brand as a centre of excellence. Constraining or destabilising the hotel sector risks not only the loss of discretionary visitor spend but also weakening the wider ecosystem that supports employment, business growth, innovation and long-term economic resilience. The CHA considers that protecting the viability of the hotel sector is integral to delivering the Local Plan’s wider economic, employment and placemaking objectives. Cambridge’s hotel sector is operating in an increasingly high-cost environment alongside weakened demand, lower occupancy levels and an accelerating shift in visitor accommodation towards aparthotels, serviced apartments, B&Bs and home-stay style models, which can operate with materially	204169, 207773, 211860, 211861, 211862, 211863, 211864, 211866, 211867, 207772 and 211876 (R Finn, Hilton Cambridge City Centre), 204256 (S Andreou, Centennial Hotel), 204322 (K Bentley), 204606 (S Papon, The Lensfield Hotel), 204966 and 204987 (R Norfolk), 205034 (S Garwood, Holiday Inn Express Cambridge West Cambourne), 205117 (W Davies), 205130 (R

Summary of issues raised in comments	Comments highlighting this issue
lower operating costs and fewer staffing requirements. The market is also becoming increasingly saturated, with new bedspaces coming forward in a relatively small geographic area and continued pipeline supply expected. Hotels are therefore responding to serious viability challenges by diversify their offers to protect occupancy and footfall, for example by expanding bar and food-led propositions. In addition, the cost base for hotels is expected to rise sharply through business rates changes: UK Hospitality estimates the average hotel will face an overall increase of 115% over the next three years While plan-led provision is essential, there is concern that the scale of additional bedspaces envisaged risks materially overshooting realistic demand when set against current trading conditions and recent delivery including the growth in short term lets leading to provision of double the upper growth projection set out in the 2012 Hotel study. Evidence of the effect this oversupply is having on the market can be found in occupancy rates. The 2025 hotels study states that a hotel occupancy rate of 78% is needed to achieve a stabilised hotel market across Greater Cambridge. CHA members consider that the market is therefore not stabilised with such occupancy levels seldom achieved under current market conditions. Encouraging further hotel growth risks embedding structural oversupply, undermining viability, investment confidence and employment across an established sector. Given existing and consented supply and the scale of short-term lets already operating, the Local Plan should not support additional hotel provision until a	Hutton, Holiday Inn), 205207, 206931,206932, 206933, 206934, 206935 and 206936 (D Rowson, Concilio Communication), 205305 (D Chaplin, Gonville Hotels Limited), 205479 (P Greer, CUA Hotel Limited)

Summary of issues raised in comments	Comments highlighting this issue
significant clear, evidence-led increase in underlying overnight demand can be demonstrated; and the existing oversupply is cleared. The draft Local Plan places significant emphasis on the provision of additional visitor accommodation as a means of increasing overnight visitors. This approach is overly supply-led and insufficiently focused on the underlying drivers of demand. These drivers are the presence of attractions, employment uses, events, conferences, cultural institutions and visitor experiences that require people to stay overnight. The CHA's position is that the Local Plan should prioritise demand-driving uses that increase overnight stays and economic activity and should not support further hotel provision unless it can be clearly demonstrated that underlying demand, rather than accommodation supply, is increasing. In Cambridge there remains significant scope to strengthen and diversify demand-driving uses that increase dwell time, extend stays and convert day visits into overnight visits e.g. strategy for improved transport infrastructure, conference and exhibition facilities, academic and research-related events, cultural and performance venues, festivals, major sporting and recreational events, and publicly accessible attractions that operate year-round. The Local Plan should place greater emphasis on supporting such demand-driving uses, particularly where they help to reduce seasonality, smooth weekly and annual occupancy patterns and reinforce Cambridge's position as an international destination. It should not support further hotel provision unless it can be clearly demonstrated that	

Summary of issues raised in comments	Comments highlighting this issue
underlying demand, rather than accommodation supply, is increasing to avoid exacerbating the structural oversupply highlighted above. A fundamental concern with the draft Local Plan is that its approach to visitor accommodation need does not adequately reflect the scale and impact of short-term lets. While these uses now form a substantial part of Cambridge's accommodation offer, they are not fully integrated into the Plan's evidence base or policy framework. While the 2025 Hotels Study recognises the importance of maintaining an adequate supply of accommodation to support economic growth, this evidence demonstrates that the baseline position already reflects a material level of provision once all accommodation types are considered. It is essential that short-term lets are fully integrated into the Local Plan's evidence base and policy framework, with a more cautious, fully integrated assessment of hotel need that explicitly accounts for the scale and impact of short-term lets, rather than treated as a peripheral or secondary issue before encouraging additional hotel bedroom growth. The level of bedroom growth predicted in the 2012 Hotels Study has been substantially exceeded. When short-term lets are incorporated into the analysis, this indicates a combined supply of almost 3,600 visitor accommodation bedrooms, more than double the number of bedrooms in the upper growth scenario envisaged in the 2012 study. The Local Plan risks planning for further growth against an already oversupplied market, reinforcing the need for a more cautious, fully integrated assessment of	

Summary of issues raised in comments	Comments highlighting this issue
hotel need that explicitly accounts for the scale and impact of short-term lets before encouraging additional hotel bedroom growth. Hotels operate within a comprehensive and highly regulated and high-cost environment whilst short-term lets operate at scale under a materially lighter-touch regime, frequently without equivalent planning scrutiny or effective enforcement. This creates an uneven playing field and distorts market behaviour. Failure to deal with unauthorised short-term letting has contributed to nuisance impacts in residential areas and undermined amenity and community cohesion. It also places pressure on the housing market, particularly affordability including for key workers, by reducing the supply of homes. The CHA considers that, without compulsory registration linked to clear planning control, the Local Plan will fail to address regulatory imbalance, housing loss and market distortion caused by short-term letting, and therefore calls for these measures to be explicitly embedded within policy. Without registration, the Council cannot easily identify which properties are operating as short-term rentals, distinguish genuine home-sharing from commercial activity, or ensure compliance with basic requirements. Registration should be linked to an explicit policy framework confirming when short-term letting amounts to a material change of use and requiring planning permission. The Plan should also enable the designation of controlled zones (such as the city centre and other high-pressure areas) where planning permission for short-term letting is compulsory. Where hosts operate multiple short-term	

Summary of issues raised in comments	Comments highlighting this issue
lets, these should be treated as aggregated commercial activity for VAT and business rates compliance purposes to ensure parity with regulated visitor accommodation. The draft Local Plan adopts a restrictive approach to changes of use involving visitor accommodation, particularly where this would result in the loss of existing hotels. At the same time, the Plan states that the conversion of existing residential properties to hotels will only be supported in exceptional circumstances, in order to maintain housing supply and protect residential amenity. While this objective is understood, the policy position is internally inconsistent and undermined in practice by the widespread growth of short-term lets. Introducing a registration requirement, supported by the designation of controlled zones in areas of highest housing pressure, would allow the Local Plan to draw a clear and enforceable distinction between genuine residential use, incidental home-sharing, and commercial short-term accommodation. This would significantly strengthen the Plan's ability to protect housing stock, while restoring parity between informal accommodation and professionally managed hotels. Residential properties are already being converted into commercial visitor accommodation through short-term letting, generally without planning consent. Effective enforcement is not economically practical and therefore despite widespread acknowledgement of the issues, the Council is hard pressed to get on top of this. The result is a situation where informal, lightly regulated accommodation can	

Summary of issues raised in comments	Comments highlighting this issue
displace housing with relative ease, while formal hotel operation is correctly constrained and tightly controlled. This inconsistency weakens the credibility of the policy framework and highlights the need for a more coherent and enforceable approach to use change. The Plan's approach to changing existing hotel use to alternative uses is slow, resource-intensive and poorly aligned with real-world market conditions. It prevents buildings from responding efficiently to economic signals, locks in underperforming uses, and delays the delivery of potentially more beneficial outcomes, including housing. The CHA therefore calls for the Local Plan to acknowledge commercial realities for hotels wishing to complete a change to more economically viable use classes. The draft Local Plan's approach to affordable housing has the potential to influence development outcomes through the application of different requirements to residential development and certain forms of visitor accommodation. Evidence suggests that variations in affordable housing thresholds can play a role in shaping development proposals and land-use choices. A revised affordable housing requirement of 25% could help to support housing delivery and scheme viability across a broader range of sites. Plus, greater consistency in the application of affordable housing requirements across residential and other uses would help to reduce unintended incentives and ensure that development decisions are guided by the most appropriate and policy-aligned use of land.	

Summary of issues raised in comments	Comments highlighting this issue
These issues point to the need for a more integrated, proportionate and enforceable approach to visitor accommodation within the Local Plan – one that recognises the full spectrum of accommodation provision, aligns regulatory requirements more closely across uses, and allows market forces to operate within a clear and consistent planning framework. The Local Plan offers a timely opportunity to begin addressing the impacts of short-term lets through the planning system, including through compulsory registration, clearer change-of-use triggers and the removal of exemptions that undermine housing protection. While planning policy alone cannot resolve all aspects of short-term let regulation, these measures would represent an important first step in establishing greater oversight, fairness and consistency.	
Given the quantum of visitors, particularly day visitors, and their impact on central areas of the City (impacted by both visitors and their vehicles and already unpleasantly congested), especially with projected population growth which will increase current pressures, the Plan should assess the capacity of key city centre areas to accommodate visitors safely and pleasantly, considering costs and benefits to determine the quantum of tourism for which the Plan should plan and make provision for. Unrestrained numbers of tourist visitors (we did not find a forecast of day visitor numbers in the documentation) will further exacerbate the problem.	204225 (S Nicholas. Cambridge Past, Present and Future)

Summary of issues raised in comments	Comments highlighting this issue
Tourism should be viewed through lens of the area's global reputation for education, research and innovation, maintaining this reputation requires the city to be an attractive place for residents, including internationally mobile workers.	
The Plan should provide hard and soft infrastructure for the estimated desired numbers of both day visitors and longer-staying tourists, along with a strategy to direct them to suitable (less conflictual) parts of the centre. The funding for this and for curating the city centre (information, signage, street cleaning, pavement maintenance etc.) might be sought from a form of tourist tax(es), which should include a modest charge on group tours if possible.	204225 (S Nicholas, Cambridge Past, Present and Future)
Support policies that encourage visitor accommodation in mixed-use developments, such as science parks, as it helps prevent the conversion of houses into short-term lets in surrounding neighbourhoods ((some of which are negatively affecting the appearance and character of those neighbourhoods).	204225 (S Nicholas, Cambridge Past, Present and Future)
Visitor accommodation on science parks should minimise land use for this purpose to ensure sufficient space for science-based development. This should be reflected in the policy or supporting text.	204225 (S Nicholas, Cambridge Past, Present and Future)
The policy refers to visitor attractions outside the defined development of Cambridge will be permitted only where they utilise and enhance existing assets, are appropriate for their location and acceptable in terms of need, environmental and traffic impacts. To acknowledge and establish support in principle for appropriate development at IWM Duxford, the text should be changed to recognise that IWM Duxford has a specific designation as an Area of Major Change under policy S/AMC/IWM as follows:	208282 (Imperial War Museum)

Summary of issues raised in comments	Comments highlighting this issue
“In South Cambridgeshire there are a number of assets which have become major tourist visitor attractions, such as the World War II airfield at Duxford which is now home to the Imperial War Museum, and Wimpole Hall which is owned by the National Trust. Facilities such as these can only be developed where the assets exist. Imperial War Museum Duxford is treated as a special case as a museum which is a major tourist / visitor attraction, educational, commercial and aviation facility and is designated as an Area of Major Change under policy S/AMC/IWM which provides scope for further development focused on aviation and other uses which are complementary and support the future of the museum site. The policy is intended to support the districts existing attractions and assets. It is not the intention of the policy to encourage new major tourist attractions.”	
Pleased to see references to Wimpole Hall as a major tourist visitor attraction, and support policy J/VA which seeks to support existing attractions and new associated infrastructure where appropriate.	211084 (MEE Planning Team, The National Trust)
One or two of the sci-tech park developments should be encouraged to build a large 4-star hotel with very large conferencing facilities. (A main conferencing hall with capacity for at least 1,000 seated). It should also be located close to an existing or proposed railway station.	203813 (A Carpen)
Rural Active Travel and PROW network should be bridleway to include horseriders. Horseriding is good economic activity - horseriding holidays, contributing to local jobs, pubs, etc.	204051 (S Rogers)

Summary of issues raised in comments	Comments highlighting this issue
MGL consider that the proposed policy wording does not provide express support for visitor accommodation within new / expanded settlements, and it is important that it does provide support for this as part of a demand-led, mixed and balanced economy.	211563 (Martin Grant Land Limited)

Policy J/FD: Faculty development and specialist/language school

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was support for the policy approach from the University of Cambridge, highlighting its alignment with their Strategic Estate Framework, which aims for effective land use, mixed uses on larger sites, improved public realm, active frontages, and reduced car parking. The University of Cambridge suggested further clarity regarding the inclusion of sites outside the City Centre that are not listed as strategic University Sites.

Comments were made by ARU indicated the benefits of their university campus to Greater Cambridge should be explored further in the supporting text. ARU commented on their strong support for university development within the Eastern Gate and Grafton Area of Major Change. However, parts of the East Road campus may well deliver student accommodation, as well as faculty teaching/administrative facilities. On this basis, ARU requested that the extent of the ARU ‘campus’ be defined within this policy and associated proposals map so that it can suitably inter-relate with the reading of other policies such as draft Affordable Housing (H/AH) policy. Such an approach would provide greater clarity when interpreting the Development Plan as a whole.

Cambridge Past Present & Future expresses concern over the differing terminology used in the policy, noting that Faculty Development and language schools are 'supported' while University developments are merely 'permitted', questioning the rationale behind this distinction. The respondent also requested clarification on point (b) regarding language schools, specifically whether the policy applies only to non-local students, as the current wording lacks clarity on this aspect. The

respondent highlights the absence of location considerations for language schools, suggesting that large language schools near residential areas could lead to conflicts due to noise from hostels accommodating students, recommending that the policy should address this potential issue.

Concerns from Girton PC were raised about the impact existing education facilities have on local infrastructure. New faculty proposals must be evaluated against impacts on Active Travel, safety, and rural character. The PC requested the new Local Plan require safe Active Travel routes for any new faculty or education-related proposal, impact assessments on landscape and character; and avoid institutional expansion that urbanises Girton.

Further responses received included comments about the approach taken towards campus expansion, supporting new campuses such as Eddington and not the intensification of existing campus locations. Other comments related to the utility of specialist/language schools providing new students with some practical wayfaring guidance or even bespoke transport on their initial arrival, often with luggage to facilitate their welcome and avoid inconvenience to local residents also trying to use the same local public transport.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

Paragraph 6 of the policy has been amended to clarify the approach taken for other university sites beyond the city centre that are not specifically listed elsewhere in the policy. The policy wording is intended to allow sufficient flexibility for applicable sites from either university.

To address specific concerns raised by Cambridge Past Present & Future, paragraph 7(a) has been amended with an additional requirement that addresses concerns over local residents' amenity, and paragraph 7(b) clarifying that paragraph

7(b) applies to non-local students.

Following proposed changes to the Affordable Housing (H/AH) policy, there is no longer a requirement to define the extent of the ARU ‘campus’ within this policy or associated proposals map.

Other transport related matters would normally been treated by Policy I/ST: Sustainable Transport and Connectivity. The reference to the continued support for development of Eddington (Site C/NWC) has not changed in Policy J/FD: Faculty development and specialist/language school.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
It would be helpful if specialist language schools could provide their students with a guide to the local area before arrival. Large numbers of students with no change for bus fare when they arrive at the station, all with luggage and excitedly shouting in their own language, can be off putting to residents and can seem intimidating. Maybe language schools could be required to provide their own transport for the students to avoid embarrassment and delays when trying to board the bus?	201042 (P Spowart)
Girton already experiences infrastructure pressure from proximity to education facilities (e.g., Eddington). New faculty proposals must be evaluated against impacts on Active Travel, safety, and rural character. Key Points: Significant traffic and severance concerns near Eddington. Additional education-related development must ensure safe routes. Village identity must not be overshadowed by adjacent	202254 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
institutional uses. GPC Requests to the Local Plan: Require safe Active Travel routes for any new faculty or education-related proposal. Assess impacts on landscape and character. Avoid institutional expansion that urbanises Girton.	
The respondent supports the proposed policy, highlighting its alignment with their Strategic Estate Framework, which aims for effective land use, mixed uses on larger sites, improved public realm, active frontages, and reduced car parking. The respondent suggests that clarity is needed regarding the inclusion of sites outside the City Centre that are not listed as strategic University Sites, such as the Centre for Mathematical Sciences and Homerton, for the uses mentioned in paragraph 1. It is recommended that if paragraph 6 is intended to address these additional sites, this should be explicitly stated in the policy	202505 (University of Cambridge)
The respondent expresses concern over the differing terminology used in the policy, noting that Faculty Development and language schools are 'supported' while University developments are merely 'permitted', questioning the rationale behind this distinction. The respondent requests clarification on point (b) regarding language schools, specifically whether the policy applies only to non-local students, as the current wording lacks clarity on this aspect. The respondent highlights the absence of location considerations for language schools, suggesting that large language schools near residential areas could lead to conflicts due to noise from hostels accommodating students, recommending that the policy should address this potential issue.	204237 (Cambridge Past, Present and Future)

Summary of issues raised in comments	Comments highlighting this issue
It is vital that university departments and colleges continue to engage with the expanded geography of Greater Cambridge. I welcome the two new college campuses at Eddington, testimony such forward thinking. Elsewhere this is some inertia, and a sustained wish to cram expansion into familiar spaces, for example creating new college facilities close to existing dining facilities. This has nothing to do with 'demonstrable educational need' and rather more to do with a lack of imagination.	205255 (M Jones)
The value of ARU to Greater Cambridge should be explored further in the supporting text. ARU strongly supports University development within the Eastern Gate and Grafton Area of Major Change. However, parts of the East Road campus may well deliver student accommodation, as well as faculty teaching/administrative facilities. On this basis, ARU considers that the extent of the ARU 'campus' should be defined within this policy and associated proposals map so that it can suitably inter-relate with the reading of other policies such as draft H/AH. Such an approach provides greater clarity when interpreting the Development Plan as a whole.	203952 (Anglian Ruskin University)

Consultation Statement

Appendix 13: Response to Representations - Homes



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: Homes

Homes Introduction

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is support for the homes policies, particularly the commitment to delivering an appropriate mix of housing types and tenures. However, there are concerns that homes should not be used as short-term rentals or purchased by international investors, when they are needed to provide affordable housing.

Specific comments have been made relating to:

- securing genuinely affordable housing, including for young families, older people and for NHS staff and healthcare providers,
- delivering smaller homes (rather than family homes) and accessible homes for older people such as bungalows,
- designing homes to ensure health and wellbeing for residents, whilst ensuring they remain affordable and viable,
- understanding the market for self and custom build homes,
- balancing the different types of accommodation, for example there is a request for student accommodation to be capped and a suggestion that co-living developments will be provided at the expense of other forms of housing,

- the relationship between policies and the draft NPPF,
- need for a co-housing policy and greater support for community-led housing, and
- ensuring proportion requirements for information and evidence to be provided with planning applications.

Other comments have been made relating to housing density, car parking requirements, sustainable design and construction, housing requirements for neighbourhood areas, defined development extents, the development strategy, site allocations, additional sites and cultural infrastructure.

Response to main issues raised in representations:

The support for the homes policies is noted, and the polices set out within this chapter aim to secure the delivery of a mix of sizes, types and tenures of homes across Greater Cambridge, including affordable housing, homes to rent and buy, homes for a range of groups in the community from students to older people to travellers, and homes that are designed with internal and external spaces that are functional, comfortable and accessible.

In earlier stages of the plan-making process the Councils did suggest that a policy relating to community-led housing, including co-housing, would be included in the Local Plan. However, as set out in the Homes Topic Paper (2025), community led housing can best be seen as a way of delivering housing rather than a specific type of housing, and therefore it was not considered necessary to include a specific policy when the considerations for community-led housing developments (including co-housing) are no different to any other residential developments. The Councils continue to support community led housing as a means to provide homes for local people through public support and community ownership, and the housing policies in the Local Plan do not prevent community-led housing from being brought forward.

The requirements set out within the homes policies relating to the submission of information and evidence as part of the planning application process are proportionate and reasonable, and have been included to ensure that decisions can be made.

Responses to comments relating to specific homes policies are included within the responses to the individual policies, and our responses to comments relating to policies within other chapters of the Local Plan are included within the responses to those policies or chapters, including comments on proposed allocations.

Comments on the development strategy and approach to defined development extents villages are addressed under those policies. The development strategy was developed following consideration of a range of options, and evidence regarding their relative sustainability. This included alternatives such as release of land from the green belt, further village development, or development near to existing railway stations.

Housing density has been considered in the Great Places theme. Polices support higher densities in accessible areas, where parking can be reduced. The approach to car parking in the Infrastructure theme acknowledges that in less accessible areas there will still be a need for appropriate provision.

Comments advocating the importance of cultural provision have been made under a number of the plans themes. The plan addresses these issues through the Wellbeing and Great Places themes, in addition to supporting the plan with further evidence on this issue.

Table of representations:

Topic	Summary of issues raised in comments	Comments highlighting this issue
Homes	Support for the homes policies.	203410 (Cambridge City Council Liberal Democrat Group)
Homes	Welcome commitment to delivering an appropriate mix of housing types and tenures, and the acknowledgement of important role of employer led housing.	204918 (Innovate Cambridge)
Homes	Regulate short-term rentals (e.g. Airbnb) to enable local people to find affordable homes. Ensure that homes are not used for tourists, and are retained for residents.	202669 (R Page), 203280 (J Palmer)
Homes	More emphasis on ensuring that homes are not purchased by international investors.	203280 (J Palmer)
Affordable housing	Support requirement for 40% affordable housing.	205568 (Cambridge Living Streets)
Affordable housing	Support Cambridge City Councils commitment to council house building.	205568 (Cambridge Living Streets)
Affordable housing	Developers must be held to affordable housing targets.	201043 (P Spowart)
Affordable housing	How many of the thousands of new homes will be genuine social rent? The number of houses planned far exceeds the social housing waiting list, but how likely is it that this list will be reduced to zero?	203255 (Cambridge Friends of the Earth)
Affordable housing	Affordability of house prices and rents is a problem.	201043 (P Spowart), 203276 (J Palmer)

Topic	Summary of issues raised in comments	Comments highlighting this issue
Affordable housing	Need to consider provision of affordable housing specifically for NHS staff and health care providers to support recruitment and retention. Affordable housing needs for NHS staff should be included in housing needs assessments.	205169 (NHS Cambridgeshire and Peterborough Integrated Care Board)
Affordable housing	Need to prioritise increasing the supply of social housing, and should require 25% affordable housing and 25% social housing on all development schemes.	203738 (Cambridge Green Party)
Affordable housing	Specific split of affordable housing tenures does not allow flexibility to respond to changing circumstances over the lifetime of a development, and no wording that allows for exceptions that have been secured on other strategic sites.	209035 (Marshall Group Properties)
Rural exception sites	Support for Rural Exception Sites and First Homes sites to provide housing for young families and specialist homes for an ageing population.	203064 (Little Wilbraham and Six Mile Bottom PC)
Housing mix	Do not need more family houses, instead need affordable homes of 1-3 beds for singles, couples, downsizers, and those looking for first home to rent or buy.	201043 (P Spowart)
Housing design	If houses are designed to last 25 years, who will buy with a mortgage if the house is worthless at the end.	205504 (D Brown)

Topic	Summary of issues raised in comments	Comments highlighting this issue
Internal space standards	Need to consider residents mental health, provide additional space for working at home, and communal workspaces to mitigate loneliness.	208873 (R Lambert)
External space standards	Concern that requirement for balconies as integral element of building design may impact on the viability of affordable housing.	202665 (Mole Architects)
Accessible and adaptable homes	Question feasibility of M4(3) lift requirements for small apartment buildings – suggest exceptions should be allowed based on site specific circumstances where justified by viability and / or practicality.	202665 (Mole Architects)
Specialist housing for older people	Need for bungalows/housing that is accessible for older people other those with disabilities and in turn these developments need to be the most accessible - close to hospitals, regular public transport, communal social spaces, and access to physical activities.	210598 (Cambridgeshire County Council)
Self and custom build homes	Need better enforcement of self and custom build homes. Is there a genuine market for them?	202665 (Mole Architects)
Co-living	Co-living policy may lead to sub-standard accommodation. Concern that support for co-living will increase the cost of	202665 (Mole Architects)

Topic	Summary of issues raised in comments	Comments highlighting this issue
	land, and that will be provided at expense of other forms of housing.	
Student accommodation	Ensure that homes are not purchased for use by students, which is distorting the property market against the interests of residents. Student numbers are capped in Oxford because of concerns the University is becoming too dominant.	203280 (J Palmer)
Dwellings in the countryside	Concern that Policy H/DC includes requirements that are not consistent with draft NPPF.	202665 (Mole Architects)
Co-housing	Need a specific policy encouraging co-housing (not co-living) as there are environmental and community benefits to this approach, but it remains a rare form of housing.	202679 (C Pointon)
Community-led housing	Justification for providing greater support to community-led housing, and substantial weight should be given to exception sites which are led by legitimate local community groups provided that: they have general community support, will be well managed and viable over the long term, and any benefits from the scheme are retained by the local community in perpetuity.	202803 (Histon and Impington Community Land Trust)

Topic	Summary of issues raised in comments	Comments highlighting this issue
Planning application requirements	Should emphasise that reports and initial information requirements must be proportionate to the scale of development. Requiring excessive technical reports at an early stage can be costly and high risk for SME developers, potentially discouraging the delivery of small sites. Where detailed information is necessary, it should be limited to what is reasonable and, where possible, secured through planning conditions rather than required at the point of submission.	209705 (NP Architects)
Housing density	Housing developments need to be denser – achieved by reducing car parking. Many people in Cambridge have no need for a car. Separate out housing and parking, and apply a fair cost to parking spaces for those that want one.	201739 (T Burford)
Housing density	Design homes using the Pinehurst Model, not Eddington accommodation blocks. "Pinehurst" refers to the 3-4 storey blocks of apartments off Grange Road. Built in the 1930s they are surrounded by lawns and mature trees.	210673 (Newnham Labour)
Car parking	Concerned about potential reductions in parking provision, and need to ensure net zero objectives do not unfairly impact on parking provision in rural communities. Policies	203064 (Little Wilbraham and Six Mile Bottom PC)

Topic	Summary of issues raised in comments	Comments highlighting this issue
	aimed at reducing car usage should include reassessment of transport options in underserved villages.	
Sustainable design and construction	There is no mention of sustainability – what about high level insulation, solar panels, community heating, air source heat pumps, sustainable building methods and materials?	202436 (A Fisher)
Housing requirement for Neighbourhood Areas	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.	206161 (Girton Neighbourhood Plan Team)
Defined development extents	Development extents limit meaningful expansion opportunities for villages.	203064 (Little Wilbraham and Six Mile Bottom PC)
Development strategy	Historical core, conservation areas and open spaces within Cambridge should not be further built on.	202669 (R Page)
Development strategy	Without an increase in housing, Six Mile Bottom risks further decline as it currently lacks amenities to sustain its population.	203064 (Little Wilbraham and Six Mile Bottom PC)
Development strategy	Support for housing proposals in Great Wilbraham that would allow for local residents to remain within the parish.	203064 (Little Wilbraham and Six Mile Bottom PC), 206562 (Great Wilbraham PC)

Topic	Summary of issues raised in comments	Comments highlighting this issue
Development strategy	Need to: restrict development where water or sewage capacity is insufficient, prioritise the reuse of empty buildings, support mixed use developments, improve and maintain the evidence base on housing needs, and strengthen compliance with policies on major developments.	203738 (Cambridge Green Party)
Development strategy	Need to ensure that active travel is considered from the start, so that connections can be made to employment and leisure uses. Homes and jobs should be located in close proximity to encourage the shift to active travel.	205168 (B Nicolson)
Development strategy	Homes and jobs being located close to each other is especially important for those working unsocial hours – need adequate street lighting, good pavement quality, and pedestrian focussed crossings at desire lines.	205568 (Cambridge Living Streets)
Development strategy	Do not need more new settlements, that are very different places to villages. Need to ensure separation between new settlements and existing villages.	201175 (K Smith)
Development strategy	Planning for significant numbers of new homes and a new settlement adjacent to key employment sites and ambition to optimise East West Rail is supported.	204918 (Innovate Cambridge)

Topic	Summary of issues raised in comments	Comments highlighting this issue
Development strategy	No housing has been allocated near the seven rural stations despite their ability to accommodate higher footfall – the GCLP should support higher density housing around these stations and work with the railway to improve services.	208033 (Railfuture East Anglia)
Development strategy	The conclusions of the updated Green Belt study, including grey belt land, will need to be considered. Green Belt boundaries should be re-examined in response to clear need for development.	208214 (Pigeon Land & LIH)
Development strategy	Object to non-residential development that is in excess of annual house building, as this would make existing environmental and transport problems worse.	208487 (C Johnson)
Site allocations	GCLP should ensure that smaller communities benefit from new developments, rather than being disadvantaged. Concerned will miss out on improvements to public transport and infrastructure due to being outside the new development, and about increased traffic from new developments.	203064 (Little Wilbraham and Six Mile Bottom PC)

Topic	Summary of issues raised in comments	Comments highlighting this issue
Site allocations	Allocation policies should consider the need for affordable housing for NHS staff, especially near large healthcare employers.	205169 (NHS Cambridgeshire and Peterborough Integrated Care Board)
Site allocations	Cambridge East – the requirements for 10% specialist accommodation, and two travellers sites should be removed. For specialist accommodation, need flexibility in requirements to allow for changes over time in demographic change, market demand, and placemaking. For traveller sites, there is no evidence provided as to why strategic sites should deliver traveller sites (last in list of options from Arc4), and inappropriate use of land (would result in loss of 80-200 dwellings).	209035 (Marshall Group Properties)
Site allocations	Concerned about inadequate public transport connections from surrounding villages to proposed new railway station at Cambridge East.	203064 (Little Wilbraham and Six Mile Bottom PC)
Site allocations	Cambourne North – clear delivery targets should be established, with ambition to deliver individual parcels within 6 months (rather than 18 months as at West Cambourne). Alternative construction methods such as modular or	207073 (Cambourne TC)

Topic	Summary of issues raised in comments	Comments highlighting this issue
	modern methods of construction should be actively encouraged to accelerate delivery.	
Site allocations	Cambourne North – opportunity should be taken to provide bungalows and smaller homes for older people. Shortfall of bungalows in Cambourne, and there is a lack of options for older residents who are capable of living independently but require smaller more manageable homes.	207076 (Cambourne TC)
Site allocations	Cambourne North – need to incorporate design features in homes that allow for future adaptations as residents needs change over time e.g. roofs ready for loft conversions, and double skinned garages for conversion to living accommodation.	207078 (Cambourne TC)
Site allocations	Cambourne North – would welcome further engagement on impacts of Cambourne expansion.	208226 (Bedford BC)
Site allocations	Grange Farm – object due to: • size • location • negative impact on surrounding villages • inadequate infrastructure e.g. capacity of medical services, capacity of education services, significant	202076 (S Tiplady), 204729 (G Huskisson), 202080 (M Barry)

Topic	Summary of issues raised in comments	Comments highlighting this issue
	water shortage, and capacity of transport infrastructure, • building on prime agricultural land, and • proximity to M11 and rail services will attract commuters – will become a dormitory town.	
Site allocations	Cambourne's perimeter bridleway provides an excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably.	204053 (S Rogers)
Additional sites	Cambridge Science Park North – support the inclusion of this site as an allocation in the GCLP, but acknowledge that the development may increase local property prices so urge high affordable housing provision.	205965 (Histon and Impington Community Land Trust)
Additional sites	Land to the east of Fulbourn Road, Teversham – a Housing Needs Survey Report for Teversham has been undertaken.	211480 (G Robinson and Partners)
Cultural infrastructure	Support Cambridge Junction and Create Cambridge in ensuring that: cultural infrastructure is embedded throughout the GCLP, culture is treated with parity alongside other infrastructure, and Create Cambridge is engaged as an advisor / consultee on the Local Plan.	205230 (J Walsh)

Policy H/AH: Affordable Housing

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is support for requiring 40% affordable housing (and 50% affordable housing on land within the Green Belt) and that this requirement relates to both C2 and C3 housing. However, there are also requests for a higher or lower proportion of affordable housing to be secured overall and/or on greenfield vs brownfield sites, and calls for developers to be required to meet these targets. There is also an objection to the requirement for 40% affordable housing on Build to Rent and Co-living developments on the basis that it does not conform to national planning legislation and guidance. Histon & Impington PC request that the re-sale of affordable homes should be restricted, so that affordable homes cannot be re-sold at market value.

Cambridge Green Party calls for the policy to be renamed “affordable and social housing”, as the reference to only affordable housing obscures the need for social housing. There are also comments that the policy should refer to a broader range of affordable tenures, including discounted market homes and key worker housing. Cambridge Green Party also request that that exceptions are allowed when empty buildings are being re-used.

There are concerns that new affordable homes are not genuinely affordable, and comments highlight that affordability of house prices and rents is a problem in Greater Cambridge. Cambridge Green Party requests that the proportion of social rented homes is increased, however there are comments from developers and landowners that the specific split of tenures does not allow for: flexibility to respond to changing circumstances over the lifetime of a development, strategic sites to secure

exceptions to this tenure mix, or older persons housing to take a more flexible approach where mixed tenure buildings can create challenges. There are comments that the policy should explain why the affordable housing tenures change between developments of 10-14 dwellings and 15+ dwellings, and for the policy to remove or amend the tenure requirement for shared ownership properties as some providers do not have the ability to deliver this form of tenure.

The NHS Cambridgeshire and Peterborough Integrated Care Board request that the provision of affordable housing is specifically considered, and that their affordable housing needs are included in housing needs assessments. There are also calls for non-residential developments (including visitor accommodation) to make a financial contribution towards the provision of affordable housing. An almshouse charity has suggested that they should be exempt from the obligations in the policy.

Great Shelford and Stapleford PCs request that First Homes are not precluded from coming forwards, and that the relationship between Neighbourhood Plans and this policy is clarified.

The University of Cambridge and some Colleges have requested that the affordable housing requirement within student accommodation developments is made more flexible, and that exceptions should also be made for sites beyond their campuses. It has also been suggested that it is unclear how the 40% affordable housing contribution on student accommodation aligns with Policy H/SA, which proactively supports the provision of student accommodation and requires a formal legal agreement be entered into with at least one educational institution and to ensure the accommodation is retained for student occupation. Anglia Ruskin University contests the 40% affordable housing contribution on student accommodation developments on the basis of viability and requests that university-led student accommodation developments should be exempt.

Churchill Retirement Living with McCarthy and Stone have highlighted that the viability assessment is unclear as to what specialist housing models have been tested.

There are comments from housebuilders and Northstowe TC relating to the grouping or clustering of affordable homes, and the need to consider their management and location within the development (including adjoining parcels), as well as requests for greater clarity on what constitutes “small groups or clusters”. There are also calls for the references to the nationally described space standards to be removed as they fail to recognise what is allowed and does not allow for meeting the most up to date needs.

Response to main issues raised in representations:

National planning policy requires local authorities to assess the size, type and tenure of housing needed for different groups in the community, including those who require affordable housing, and reflect the results of this assessment in their planning policies. The Councils have evidence that there is high level of need for affordable housing in Greater Cambridge, and it is important we seek a significant contribution from developments to respond to this need. Seeking high levels of affordable housing by securing at least 40% affordable homes on major development sites and at least 50% affordable homes on land within the Green Belt, and by enabling the provision of affordable housing on rural exception sites (see Policy H/ES), will make a significant contribution towards responding to our identified affordable housing needs. Our viability assessment demonstrates it is viable to seek 40% affordable homes on major development sites and 50% affordable homes on land within the Green Belt, but that a higher percentage will impact on the viability and delivery of sites.

All major developments for housing must provide on-site affordable housing or in specific circumstances either a financial contribution to enable delivery of affordable housing elsewhere or linked off-site provision. National planning guidance states that 20% is generally a suitable benchmark for the level of Affordable Private Rent homes to be provided in any Build to Rent scheme, but that local authorities can set a different requirement if justified by evidence. Our viability assessment shows that

the strong Greater Cambridge housing market will support 40% Affordable Private Rent in Build to Rent schemes, and therefore this is the requirement set out in Policy H/AH for affordable housing on Build to Rent schemes. Our viability assessment also demonstrates that it is viable for any major developments for housing (irrespective of their use class of C2, C3, C4 or sui generis) to provide affordable housing or a financial contribution.

Section 5b of the policy requires new affordable homes to be available in perpetuity (wherever possible), and therefore through the planning process provisions will be secured to ensure that affordable homes are retained in perpetuity where it is possible to do this.

Affordable housing is defined in the glossary of the National Planning Policy Framework (2024), and this same definition is included in the Local Plan glossary. Affordable housing covers everything from social rented housing to discounted market sales housing, and therefore the policy already covers a wide range of affordable housing tenures and does not need to be renamed. National planning policy and guidance also already sets out requirements in relation to the reuse or redevelopment of vacant buildings, and how the affordable housing contribution should be calculated on these types of development. It is therefore not necessary to include exceptions within the policy for the re-use of empty buildings as this is already covered by national planning policy.

The Councils are aware that there is a high level of need for affordable housing in Greater Cambridge, and that a variety of tenures of affordable housing are needed to meet this need. The Councils are also aware that homes need to be genuinely affordable for residents, and therefore alongside securing the delivery of a wide variety of affordable homes to meet different types of households and household incomes, the Local Plan also contributes towards other factors that that have an impact on affordability of housing such as energy efficient homes and reducing costs associated with commuting by locating homes close to places of work with opportunities for active travel or access to public transport.

The policy seeks to provide an affordable housing tenure mix that will meet a wide range of housing needs and create mixed and balanced communities. The proportions of different tenures of affordable homes also recognises that affordable homes that provide a route to home ownership (such as shared ownership homes) may be required to support the delivery of affordable housing for rent through cross subsidy, and therefore enable developments to be viable and deliverable. Taking account of comments received and the need to prioritise social and affordable rented homes, amendments have been made to the policy to allow exceptions where developments provide a higher overall proportion of social and affordable rented homes, with no or a smaller proportion of shared ownership homes. Amendments have also been made to the supporting text to explain why there are different tenure mixes for developments of 10-14 dwellings and 15 or more dwellings. Deviations from the tenure mix set out in the policy will be considered, however evidence will need to be provided to justify the deviation proposed, and this is now set out in the supporting information.

The Housing Needs of Specific Groups study (2025) calculates the need for affordable housing from households unable to buy or rent privately, and also, from households able to rent privately but not buy, by considering local house prices and rents, income levels and affordability, need from homeless, overcrowded, concealed or new households, and existing supply and relets. Our assessment will therefore already include the consideration of NHS workers where they fall within the income levels and sources of need. Affordable homes delivered will also be available to NHS workers where they meet the relevant eligibility criteria for the specific affordable housing tenure being provided.

The supporting information for J/VA sets out that where proposals for apart-hotels or serviced apartments are considered to fall within Use Class C3 or comprise sui generis uses which have the characteristics of a C3 use, such proposals will be assessed via relevant housing policies in the Local Plan. It also sets out that where apart-hotels and serviced apartment units fall under C1 or Sui Generis uses, the councils will take steps to ensure they will not be used for any other purpose. With regard to other non-residential developments, they are required to make planning contributions on a range of issues, including

transport (via the proposed CIL), affordable employment space and skills.

Exemptions from the policy for specific providers, such as charities or particular developers, are not appropriate and are also not necessary due to the ability for proposals to provide evidence as part of the planning application process to demonstrate that a material consideration(s) exists to deviate from the policy.

Made Neighbourhood Plans and adopted Local Plans have the same weight in decision making, however, if there is any conflict between the policies in the two plans, the most recently adopted/made plan takes precedence in decision making.

Taking account of comments received relating to affordable housing on student accommodation developments, the policy requirement and supporting information have been amended to clarify that where student accommodation is delivered on buildings or land owned by the University of Cambridge, Anglia Ruskin University or a University of Cambridge College, the policy exempts such development from contributing towards affordable housing, as other types of housing would not normally be delivered in these locations. However, where student accommodation is brought forward on other sites, these could equally be suitable for other types of housing, and therefore it is important that such developments are required to contribute towards meeting our affordable housing need.

Within developments, the new affordable homes must be dispersed in small groups or clusters that: create an even distribution of affordable housing throughout the development as a whole, and when considered in combination with neighbouring developments; contain a mix of affordable housing tenures and a mix in the number of bedrooms; and are proportionate in size to the overall size of the development, having regard to the type and location of the housing being provided. An amendment to the supporting information has been made to set out that the Greater Cambridge Housing Strategy 2024-2029 includes specific requirements relating to the clustering and distribution of affordable housing.

In response to the comment from Churchill Retirement Living with McCarthy and Stone, the Viability Assessment (2026) has

considered the viability of seeking affordable housing within schemes for two types of older peoples accommodation – extra care and sheltered housing. The Viability Assessment (2026) concludes that it is viable to seek affordable housing within both these types of older peoples accommodation. The Viability Assessment (2026) provides details on the assumptions made for each of these two types of accommodation.

Section 5e of the policy sets out that social and affordable rent homes should be designed to accommodate different family compositions by requiring a minimum number of bedspaces for the number of bedrooms provided. This does not conflict with the nationally described space standards (see Policy H/SS) or prevent developments from meeting the most up-to-date needs, but instead is seeking to ensure that occupancy of social and affordable rented homes can be maximised by ensuring that new affordable and social rented homes align with the Councils' Lettings Policies and Local Housing Allowance criteria.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support requirement for 40% affordable housing, and increased requirement on land within the Green Belt.	207749 (Whittlesford PC), 209036 (Marshall Group Properties), 209211 (Urban & Civic), 211223 (Terra Strategic), 211241 (Living Space Housing), 211466 (Hayfield Homes Construction Ltd)
Support for affordable homes policy - it is very important that these come forward as part of every relevant development. Developers should be expected to assess viability as part of the purchase of the site and at least 40% affordable is a key part of this.	203418 (Cambridge City Council Liberal Democrat Group)

Summary of issues raised in comments	Comments highlighting this issue
Generally supportive of Policy H/AH. Council's assessment of affordable housing need points to a need to increase the housing requirement figure and identify further housing land to help reduce the level of acute need in Greater Cambridge.	208910 (Nightingale Land and Hill Residential Ltd)
More affordable housing should be provided.	205700 (Newnham Labour)
Developers must be held to these affordable housing targets: • enforcement is vital and not always achieved in the past, • viability and other arguments shouldn't be used to reduce affordable levels after permission granted.	201044 (P Spowart), 201465 (S Smalley), 201019 (M Colville)
Affordable housing is not very affordable.	201351 (D Wood), 202867 (H Cook)
Fully applaud the strategic priority of including significant quantities of housing that is affordable to rent and to buy.	201779 (H Jackson)
The GCLP does not clearly explain: how affordability will be secured over time, what proportion will be social or genuinely affordable rent, or how local need will be prioritised. Undermines confidence that developments will support a balanced community.	208980 (J Williams)
First Homes are not precluded from coming forwards, and therefore the affordable housing policy should allow for them.	208103 (Great Shelford PC)
Although First Homes may not be suitable for most new developments in Greater Cambridge, the policy should not discourage their inclusion where appropriate.	201640 (Stapleford PC)
Support requirement for both C2 and C3 developments to contribute towards the delivery of affordable housing.	208103 (Great Shelford PC)

Summary of issues raised in comments	Comments highlighting this issue
Commitment to delivering a balanced mix of housing types and tenures is welcome, particularly its focus on affordable housing to address Cambridge's long-standing challenges.	203533 (Cambridge Ahead)
Affordable housing supported but only within villages, respecting Green Belt and settlement character. Affordable housing must reflect rural context and realistic delivery.	202255, 207163, 207164 (Girton PC)
Support the policy and request additional requirements: • Clause 5a should also require the re-sale of affordable homes be restricted such that it cannot be resold at market value, • When an application is received which does not meet the requirements, these must go to a public planning committee meeting and any justification for a site not meeting the requirement is to be made public where permission is granted, • Where an application does not provide affordable homes due to viability, a reassessment should be made if the build time exceeds 5 years from permission granted.	201436 (Histon & Impington PC)
This policy should be renamed "Affordable and Social Housing" and every mention of "affordable housing" in the policy's introduction should be amended to "affordable and social housing." A blanket focus on "affordable housing" obscures the acute needs of those who can only afford social rent, including low-income households and families facing homelessness.	203739 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
Housing should be a requirement on non-residential or employment sites to encourage mixed use developments, and where not appropriate, a commuted sum should be sought.	201506 (B Greig), 201869 (J Hurst), 205666 (D Storey), 207647 (Duxford PC), 207660 (K Holland), 201461 (J Neal), 205332 (T Neal)
Affordable housing requirements can influence development outcomes – consider applying affordable housing requirements to non-residential uses such as visitor accommodation to ensure most appropriate use of land.	207775 (Hilton Cambridge City Centre), 206937 (Concilio Communication)
Affordable housing should not be allowed in the Green Belt whether 40% or 50% applied	201019 (M Colville)
Policy should be flexed to require more affordable housing on greenfield sites than brownfield sites	201463 (K Mak)
Unclear whether this policy applies to charitable almshouse associations providing exclusively affordable housing. It could act as a strong deterrent to developing more homes and, therefore, charitable almshouse associations should be exempt from obligations set out in this policy.	202096 (Great Shelford Village Charity)
Supportive of the policy but concerned about how to manage affordable housing requirements from adopted neighbourhood plans when they differ from the policy.	201640 (Stapleford PC)
Unclear how affordable housing requirements set out in adopted neighbourhood plans will be considered when they differ from this policy. Clarity should be added.	208103 (Great Shelford PC)
The requirement for affordable housing within student accommodation developments should be more flexible. The exception for developments within an existing university or	202508 (University of Cambridge), 202048 (Trinity Hall), 204006 (Jesus College),

Summary of issues raised in comments	Comments highlighting this issue
college campus site should be extended to cover developments nearby to campus sites. It can be difficult to define the boundary of some University of Cambridge college sites.	204751, 210715, 210716 (St John's College Cambridge)
ARU contests that the 40% affordable housing contribution will be viable for student accommodation. The policy approach appears to directly inhibit good equality, inclusion and diversity principles, specific to the student demographic. The policy implications will be starkly different between ARU and the University of Cambridge. Should consider either removing the 40% requirement for student accommodation altogether or consider an alternative approach that would have direct benefits to student affordability. No affordable housing requirement should apply for University-led PBSA.	203976 (Anglia Ruskin University)
Object to 40% affordable housing provision being sought on purpose built student accommodation (PBSA). This will stop demand being met for this type of accommodation. There should be no requirement for affordable housing on PBSA.	208484 (Carter Jonas)
Unclear what 'within an existing university or college campus site' means, when a college has dispersed sites. Unreasonable to seek an affordable housing contribution from student accommodation developments on a site currently within college ownership. Amend policy to not seek affordable housing contribution where the proposed development is within an existing university or college campus site, for the redevelopment of sites within the ownership of university or college at date of adoption of the GCLP, or which will continue to be owned by a university or college after the redevelopment to provide student accommodation to meet its needs.	210978 (Kings College), 211074 (Girton College), 211528,211529 (Trinity College)

Summary of issues raised in comments	Comments highlighting this issue
Object to developments of student bedrooms being required to make an off-site contribution for affordable housing. Unclear how this aligns with policy on student accommodation, which proactively supports delivery of student accommodation to meet needs. Financial burden will discourage the provision of purpose built student accommodation.	208248 (Kings College), 208292 (Trinity College), 208297 (Girton College)
A more flexible approach to affordable housing mix is taken for older persons' housing. Mixed tenure buildings (e.g. combining social rent with affordable rent or sale) can create market challenges and affect viability. Flexibility in tenure is therefore essential to ensure the viability and successful delivery of older persons' housing developments to meet needs.	201942 (A Hanover)
Confusion in the Viability Assessment as to what specialist housing models have been tested – extra care, sheltered housing and / or retirement villages? Viability testing needs to be re-considered for different specialist housing types.	208318 (Churchill Retirement Living with McCarthy and Stone)
Object to the requirement for affordable housing at 40% to be delivered on Build to Rent and Co-living developments. This will stop demand being met for this type of accommodation and does not conform with the requirements of National legislation. In line with National Guidance, any affordable housing on BtR or Co-living should be capped at 20%.	208484 (Carter Jonas)
General support for policy but requested that the requirement to provide 25% of all affordable homes as shared ownership is removed or amended. Cambridge City Council	204418 (Cambridge Investment Partnership (CIP))

Summary of issues raised in comments	Comments highlighting this issue
only retains legacy shared ownership stock and does not have the capacity to administer a new shared ownership programme. Policy approach does acknowledge the importance of a mix of affordable housing.	
The policy needs to ensure it is sufficiently flexible in order to respond to changing needs and opportunities. On-site provision should also be subject to site-specific viability constraints. Furthermore, the ability to include cascade mechanisms is requested to be included in the policy.	203106 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
The policy does not include any wording on how the delivery of affordable housing can be altered should there be material viability considerations. This should be addressed through an amendment or standalone policy.	208684 (Guilden Morden Developments Ltd)
The policy should explain why the affordable housing tenures change depending on whether the quanta are 10-14 or 15+ units.	208684 (Guilden Morden Developments Ltd)
Consider applying lower affordable housing requirement of 25% to support housing delivery and scheme viability	207775 (Hilton Cambridge City Centre)
The proposed affordable housing policy has evolved to introduce more prescriptive requirements, particularly in relation to tenure mix on developments of more than 15 dwellings. The policy provides no flexibility to depart from the specified tenure split where an alternative mix could be robustly evidenced and justified. In practice, it is common for tenure mixes on larger, more complex/strategic sites to evolve as proposals are refined, often through the preparation of a bespoke, site-wide housing strategy submitted	204880 (Hill)

Summary of issues raised in comments	Comments highlighting this issue
alongside a planning application. Such an approach provides a more effective and responsive mechanism for determining an appropriate affordable housing mix, reflecting site-specific circumstances and identified needs.	
The criteria raised in relation to clustering should acknowledge the need to consider the efficient management of affordable homes in clusters, cost effective maintenance and reduced service charge burden.	204880 (Hill)
Object to grouping or clustering of affordable homes – given that new affordable homes should be tenure blind and indistinguishable from other housing. Equivalent proportion of affordable homes (to market homes) should be in prime locations within the development.	208055 (Northstowe TC)
Clustering requirements should be considered for the whole site, and not just individual parcels.	208056 (Northstowe TC)
The policy requires greater flexibility to reflect site specific constraints and the changing viability landscape. The policy needs to incorporate explicit flexibility to allow for cascade mechanisms within S106 agreements.	204601 (Redrow South Midlands)
Criterion 5(e) sets out the precise number of bedspaces to be provided in affordable homes, this would not allow for the meeting of the most up-to-date evidenced local needs.	204601 (Redrow South Midlands)
Greater flexibility is needed within the policy to allow for more bespoke proposals to be favourably considered.	208610 (Pigeon Land & LIH)

Summary of issues raised in comments	Comments highlighting this issue
The policy is supported in principle but it is important the Councils continue to review viability as the plan progresses and allocate a sufficient number of sites of varying sizes, types and locations.	210262 (Vistry Group), 204884 (Vistry Group)
Paragraph 6 of the policy should further clarify as to what constitutes “small groups or clusters” in practice.	210263 (Vistry Group), 204884 (Vistry Group)
The appropriateness of the viability tested route should be explicitly mentioned within the policy wording, rather than the supporting text (point 9.15). This will carry greater weight in decision making rather than being perceived as guidance or an aspiration, and will provide greater clarity for developers, especially in light of the increased requirements for medium scale sites.	204098 (Brookgate Land and Network Rail Infrastructure Ltd), 204291 (Bellway Strategic Land), 204519 (Bellway Strategic Land)
A fixed 40% requirement is often unviable for small and medium-sized schemes delivered by SME developers. While suitable for large strategic sites, it creates a delivery gap for schemes of 10 to 30 dwellings, leading to stalled sites or protracted viability negotiations. A scaled approach is recommended as this would improve viability, certainty and housing delivery while still securing affordable homes.	204569 (NP Architects)
Policy should be amended to introduce greater flexibility in prescribed affordable housing tenure mix, with clearer recognition of viability considerations.	205460 (Mac Mic Land), 211564 (Martin Grant Land Limited)
Specific split of affordable housing tenures does not allow flexibility to respond to changing circumstances over the lifetime of a development, and no wording that allows for exceptions that have been secured on other strategic sites.	209037 (Marshall Group Properties)

Summary of issues raised in comments	Comments highlighting this issue
The Policy should include a broader range of affordable tenures, as it currently lacks reference to other intermediate housing options, such as discount to market provision.	209706 (Endurance Estates), 209707 (Endurance Estates), 211564 (Martin Grant Land Limited)
There is ambiguity regarding the application of the policy to keyworker provision, as there is no reference to keyworker housing within the policy and therefore whether keyworker accommodation qualifies as affordable housing.	211564 (Martin Grant Land Limited), 205069 (Endurance Estates)
Whilst the EEAST understands affordable rented housing should be prioritised, we think identifying NHS and emergency services staff (both clinical and administrative) as key workers is a very important part of staff retention in and around NHS properties.	210336 (East of England Ambulance Service NHS Trust)
Policy should be amended to seek 50% affordable housing, with a greater proportion of social rent homes required. For land within the Green Belt, the policy should seek 55% affordable housing.	203739 (Cambridge Green Party)
After point 1, a new sentence should state “This requirement applies only to new builds. Where a development includes the re-use of long-term empty buildings (for example through conversion, refurbishment or subdivision of existing buildings), any units brought back into use in this way will be disregarded for the purpose of calculating the development’s affordable and social housing requirement. However, if re-used units within a development are provided as affordable or social homes, they can still count towards meeting the requirement.” This incentivises the creative re-use of empty buildings, which is more efficient and sustainable than building new homes.	203739 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
At the end of the first paragraph in the supporting information, the following sentence should be added: “The combination of apartment housing and denser forms of development with self-contained dwellings is also an important strategy for increasing affordable and social housing production.” This reflects the fact that denser, apartment-led development makes the delivery of affordable housing more viable, efficient and sustainable, directly supporting the policy’s stated aim of maximising supply.	203739 (Cambridge Green Party)
Specific provision should be for council housing and key-worker housing close to places of employment, especially hospitals.	203815 (A Carpen)
The Policy should seek to retain flexibility on the tenure to allow developments to reflect localised need for affordable housing.	208342 (Thakeham Homes Ltd)
The table in 5e duplicates the Nationally Described Space Standards (NDSS) requirements. The table also fails to recognise some of the minimum number of bedrooms allowed under NDSS. To avoid duplication and confusion, it is recommended that paragraph 5e is removed.	208342 (Thakeham Homes Ltd)
The policy identifies that all schemes are required to deliver affordable housing onsite, which fails to recognise that there may be circumstances in which provision of affordable housing off-site may be preferable. Recommended that the policy is revised to identify a preference for onsite affordable housing delivery, however that off-site affordable housing provision will be accepted where robust justification for this approach is provided.	211288 (Woolsington One Ltd)

Summary of issues raised in comments	Comments highlighting this issue
The option for off-site provision or a financial contribution as an alternative to on-site affordable housing provision if it is not suitable or viable is supported.	211466 (Hayfield Homes Construction Ltd)
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.	204055 (S Rogers)

Policy H/ES: Exception sites for affordable housing

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was recognition that rural exception sites could support specific types of households such as young families and older people in need of specialist or more affordable housing options. However, there were calls for strong controls to be applied to exception sites to avoid negative impacts on village character and the green belt. It was suggested that market housing on exception sites should be capped at 20% and that rural exception schemes should originate and be directed by the local community rather than a developer.

It was suggested that the policy should be amended to specifically cater for, and prioritise, community led housing on exception sites. Some of the costs associated with progressing an exception scheme were considered unreasonable for a charity and exemptions should apply. Some clauses in the draft policy were considered not to address the specific circumstances of charitable almshouse associations.

It was proposed that viability of rural exception schemes could be supported by allowing additional affordable homes to be built in excess of the need identified for the village concerned. This would be as an alternative to delivering market housing in recognition that not all Registered Providers deliver market housing.

A developer argued that rural and First Homes exception sites should be addressed through two separate policies. They also

proposed loosening the requirements around undertaking a housing needs assessment by deleting reference to ‘independent’ and ‘long term needs’ and that there should be no requirement to name a Registered Provider in the s106 agreement as they wanted the option to engage with Registered Providers throughout the planning application process or the sale of the site post planning.

Response to main issues raised in representations:

Previously, the draft policy, in line with the NPPF, allowed schemes to include some market housing to support viability. However, not all Registered Providers deliver market housing so allowing them to include additional affordable housing in excess of the identified needs of the village provides an alternative option to improve viability. Therefore, an additional section has been added to the policy which enables rural exception schemes to include additional affordable housing in excess of the identified need of the village in order to support viability.

It is considered that the controls proposed are adequate to ensure rural exception schemes are developed and located appropriately. The NPPF already requires that rural exception sites in the Green Belt must include a sequential test to demonstrate there are no alternative non-Green Belt sites. Whilst it is not practical to require that all rural exception sites are led by the local community, good practice dictates that such schemes should be brought forward through a partnership approach including strong engagement with the local community.

Whilst the policy makes no special allowances for community led housing approaches it does explicitly state that rural exception sites must be delivered by, or in partnership with, Registered Providers or community-led housing groups and these must be named in the relevant s106 agreement. The impact of the housing scheme on the adjoining village will be no different regardless of

whether led by a Registered Provider or community led housing group and therefore there is no logic in applying different criteria. Similarly, a key criterion for granting planning permission for a rural exception scheme outside of a Defined Development Extent is that there is an identified local housing need and there is no rationale for waiving the requirement for a housing needs assessment for a specific provider. However, it is recognised that community led housing groups could have alternative sources of information that could add to the evidence base. It is not accepted that clauses in the policy are inconsistent with a community led housing approach to rural exception sites. For example, where a local almshouse charity has a catchment which spans beyond a single parish there is no reason why this wider geography could not be applied to the cascade mechanism in the s106 agreement.

Rural exception sites and First Homes exceptions sites have been kept under the same policy. It is important that these alternative approaches to delivering affordable housing are complementary and that First Homes exceptions sites do not crowd out rural exception sites. An integrated policy approach is considered the best way to achieve this. The requirement for an independent housing needs assessment has been retained as this is an important part of the process of delivering a rural exception scheme and provides reassurance to partners, including the local community, that the scheme is addressing a demonstrable local need. The requirement that the need ‘can reasonably be expected to persist in the long term’ simply ensures that a scheme is not developed to address a need caused by a one-off event or seasonal activity where the need is likely to dissipate in a reasonably short period of time. Requiring a Registered Provider or community led housing group to be named in the s106 agreement ensures that the scheme is workable and does not include conditions that would make it difficult for the organisation that will ultimately manage the homes to operate the scheme. Exception sites achieve viability through low plot values and it is not appropriate to inflate these through bidding processes.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Exception sites must not undermine Green Belt, village identity, or the Girton Gap.	202256 (Girton PC)
The threshold for allowing exception sites for affordable housing on Green Belt land should be significantly raised to prioritise protection of the Green Belt. Alternative sites in other locations (villages, urban centres and new settlements) should be considered instead of encroaching on Green Belt land.	201020 (M Colville)
Proposals must be truly exceptional and locally justified. Require strong tests of local need and landscape fit.	202256 (Girton PC)
Rural exception schemes should originate and be directed by the local community, not a developer.	201897 (R Pargeter)
Clauses in Policy H/ES do not take into account the specific circumstances of charitable almshouse associations in providing affordable housing.	201641 (Stapleford PC), 210953 (Great Shelford Parish Council)
Some clauses do not consider the specific circumstances of charitable almshouse associations in providing affordable housing. For example: • clause 1b – almshouse residents are not tenants but occupants who pay a monthly maintenance charge which, is not specifically related to affordable housing rents, • clause 4a – an almshouse charity constitution determines the ‘local area’ for the charity which can extend beyond a parish (the usual definition of ‘local’ for an exception scheme), • clause 4b – an almshouse charity constitution can require that local connection criteria are retained throughout the lifetime of a property.	202101 (Great Shelford Village Charity)

Summary of issues raised in comments	Comments highlighting this issue
GCLP makes no express provision for housing provided by charities, and in particular almshouse charities. Requirement to provide professional reports of 'need' demands the use of charity funds to demonstrate something already known, as this will decrease the amount of charity funds remaining available for the provision of affordable housing in the long term.	202101 (Great Shelford Village Charity)
Recommend strengthening the policy's wording to prioritise community-led housing initiatives for exception sites where feasible.	203740 (Cambridge Green Party)
A new clause should limit market housing to a maximum of 20% of total dwellings on exception sites to ensure they remain primarily for affordable and social housing.	203740 (Cambridge Green Party)
Support for rural exception sites is positive, but rural delivery challenges are not fully addressed: • Small village schemes often face viability constraints, infrastructure limits and fewer Registered Provider partners, • There is little reference to retaining younger households in villages or providing homes linked to local employment, • Stronger rural proofing would include more flexibility for small rural sites, clearer support for community led housing and better alignment between housing growth, rural transport and access to services.	203179 (Cambridgeshire ACRE)
Rural and First Homes exception sites should be addressed through two separate policies to allow for more convenient interpretation by applicants in order to meet the overall needs for housing and other development types.	208686 (Guilden Morden Developments Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Clause 1a should be altered to ‘demonstrable need for affordable housing for those with a connection to the settlement and which is evidenced by a local housing needs assessment’ as current wording requiring ‘independent’ needs assessment and ‘long term’ needs is overly stringent.	208687 (Guilden Morden Developments Ltd)
Whilst it is appreciated that evidence of the social or economic need for affordable housing is required, that the need identified should be expected to persist in the long term is objected to. The NPPF simply requires that such schemes demonstrate that they will contribute towards meeting identified local needs. The Councils should be seeking to support rural exception schemes which address identified local needs for affordable housing at the time of submission, regardless of whether such needs are envisaged to persist in the longer term.	211289 (Woolsington One Ltd)
Requiring Registered Providers to be named in S106 agreements hampers the delivery of the site and prevents the applicant from engaging with multiple RPs throughout a planning application process or the sale of the site post planning in order to meet both parties' needs for adaptation to circumstances at the time of land disposal.	208688 (Guilden Morden Developments Ltd)

Policy H/HM: Housing Mix

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was a call for a higher proportion of smaller and/or affordable dwellings. They also suggested that deviations from the proposed policy mix should be justified at the local level and, where available, supported by evidence from Neighbourhood Plans, local housing needs surveys and the housing register.

Developers considered the policy overly prescriptive and sought a more flexible approach allowing schemes to take account of settlement type, tenure, housing market areas, urban/rural differences, site constraints and context and changing market demand. It was suggested that the policy would work better if percentages were expressed as a range rather than fixed figures. One respondent made a similar point specifically about older peoples' housing developments. Another sought clarity as to whether charitable almshouse associations would have flexibility to deviate from the policy requirements in order to address their specific target market.

There was a proposal that the policy should incentivise the delivery of social rent affordable homes and mixed use developments by allowing higher densities in these cases. It was argued that this will encourage a more efficient use of land and reduce car dependence.

A comment has been made relating to introducing controls on short-term lets.

Response to main issues raised in representations:

There is a concern that many housing schemes deliver smaller market dwellings as houses while delivering the equivalent smaller affordable dwellings as flats. This causes problems in South Cambridgeshire where flats can be more challenging to let and typically have higher turnover rates. The policy has been amended to ensure affordable dwellings are delivered in similar proportions, in terms of housing types (houses, flats and bungalows), to market dwellings.

The policy already requires that over half of new affordable housing on schemes of 10 or more dwellings are built as 1 or 2 bedroom dwellings. A significant proportion of market housing will also be required to be built as 1 or 2 bedroom dwellings in both Cambridge and South Cambridgeshire. Where variations from the proposed housing mix are put forward these will need to be justified by evidence that relates to the specific site and local housing market. Evidence from Neighbourhood Plans, local housing needs surveys and the housing register are all likely to be very relevant. Made Neighbourhood Plans and adopted Local Plans have the same weight in decision making, however, if there is any conflict between the policies in the two plans, the most recently adopted/made plan takes precedence in decision making.

The proposed housing mix is based on robust evidence of housing need including projections of population and household types and aims to satisfy a diverse range of housing needs and create sustainable, inclusive and mixed communities. However, it is recognised that demand can change over time and that every site has its own unique set of characteristics. The policy strikes a balance by setting out an ideal mix and recognising that there is scope for deviation where developers can provide robust evidence for an alternative housing mix. The policy also recognises that alternative housing mixes will often be appropriate for specific housing proposals such as student accommodation, housing for older people and community led housing developments targeting particular groups within the community. Given the scope for justified deviations from the proposed housing mix it is not considered necessary to present the housing mix in the format of ranges.

The appropriateness of developing at higher density or with a higher proportion of affordable housing is a matter for other policies. Comments on short-term lets have been addressed under the visitor accommodation policy (Policy J/VA). The matter suggested in the comment sits outside the remit of the Local Plan.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for approach to securing a varied housing mix within new residential developments and welcome the flexibility within the policy to allow for alternative mixes where this can be robustly justified. Important that the inclusion of “Unless an alternative mix has been justified as part of a planning application…” is retained in the policy.	211224 (Terra Strategic), 211242 (Living Housing Space), 211467 (Hayfield Homes Construction Ltd), 211565 (Martin Grant Land Limited)
Need more one bed properties including co-housing to address needs of 20-30 year olds.	204021 (Histon & Impington PC)
Girton needs a housing mix more focused on smaller properties, not large family homes or high density flats.	202257 (Girton PC), 205577 (Girton PC), 205578 (Girton PC)
Need increased provision of ‘affordable’ one and two bed market homes to tackle housing unaffordability due to high price of market housing.	207750 (Whittlesford PC)

Summary of issues raised in comments	Comments highlighting this issue
Social and affordable housing should be prioritised over market housing.	205572 (G Briscoe)
Flexibility in tenure and housing mix is essential to ensure the viability and successful delivery of older persons' housing developments to meet needs.	201939 (Anchor Hanover)
Seek clarification that charitable almshouse associations and similar organisations would be encompassed by exceptions set out in clause 2 and permitted to deviate from the type and mix of housing set out in clauses 1, 3 and 4. Requiring evidence to justify deviations would erode charity funds and reduce funds available for provision of affordable housing.	202106 (Great Shelford Village Charity)
Justification for changes to the prescribed housing mix should be made at the local level.	201437 (Histon & Impington PC)
It is unclear how affordable housing mixes as set out in adopted neighbourhood plans would be dealt with under the policy, particularly where they differ from requirements set out in the policy	201642 (Stapleford PC), 210954 (Great Shelford PC)
The percentage of one-bedroom units being required in South Cambridgeshire is too high. The GCLP should recognise that providing larger units (i.e. two bedrooms - still relatively small homes), will allow families to grow without the need to move.	203395 (ESCO Prospect)
A generalised housing mix to be provided across the plan area regardless of settlement type, tenure, or different housing market areas, is overly prescriptive.	204603 (Redrow South Midlands)
Policy should be refined to ensure appropriate mixes are provided across urban and rural areas and across different forms of home tenure.	203395 (ESCO Prospect), 204603 (Redrow South Midlands)

Summary of issues raised in comments	Comments highlighting this issue
Housing needs assessments not always a robust way of assessing need as they may not reflect demand for extra bedrooms to serve other purposes such as a home office.	204603 (Redrow South Midlands)
Support for this policy, which sets out housing mix as a series of recommendations expressed as a range, rather than as fixed requirements. This provides an appropriate level of flexibility, allowing development proposals to respond to changing market conditions and housing needs over the plan period, while still supporting the delivery of a balanced mix of homes.	204887, 210264(Vistry Group)
Clarification sought on how applicants should have regards to 'location and character of the area, the built form of the new development, the nature or type of development being proposed, the viability of delivery given site-specific constraints or requirements, changes in affordable and market housing demand in the local area, and the existing housing mix in the surrounding area', when justifying deviations.	208689 (Guilden Morden Developments Ltd)
The policy does not enable the ability to respond to market demands. In particular, there is insufficient evidence demonstrating that the specific percentages set out are justified across: • different market areas, • settlement types (urban, edge-of-Cambridge, new settlements, villages), • tenure types, or • varying site constraints.	203108 (Barratt David Wilson Homes & NW Cambridge Consortium of Landowners)
It is important that the policy allows for sufficient flexibility so that it can respond to housing mix over the lifetime of the plan period and that the proposed housing mix is not strictly adhered to as an overall	208911 (Nightingale Land and Residential)

Summary of issues raised in comments	Comments highlighting this issue
approach and is instead treated on a case by case basis through the development management process.	
The Policy should include more flexibility in relation to the required housing mix to reflect the circumstances of each site and its context as well as market demand and evidence of local needs in accordance with Government policy.	205071 (Endurance Estates)
Use of fixed percentages could undermine scheme design and undermine deliverability. Welcome supporting text which confirms that deviations will be permitted where justified. This should be within the policy wording to ensure consistent and pragmatic decision making.	207026 (Mac Mic Land)
Support overarching objective of the policy to secure a balanced housing mix that responds to identified needs.	207026 (Mac Mic Land)
Policy is overly prescriptive, lacks flexibility and does not reflect the practicalities of delivery on large sites. Rigid requirements risk constraining delivery and undermines ability to respond to market conditions.	208992 (Barratt Homes Northampton)
Evidence base does not sufficiently justify the detailed mixes proposed – SHMA provides useful strategic guidance, but does not support precise percentages being applies across all sites.	208992 (Barratt Homes Northampton)
Policy fails to explain how its requirements will interact with other policy burdens which influence housing typologies and layouts.	208992 (Barratt Homes Northampton)
Policy would be more workable if percentages were expressed as ranges rather than fixed figures.	208334 (Gladman Developments)

Summary of issues raised in comments	Comments highlighting this issue
Recommend adding a clause requiring special justification for predominantly low-density, market-rate housing proposals, while supporting higher-density schemes that deliver social rent above minimum requirements. This will incentivise the development of new social rent housing and more efficient land use.	203746 (Cambridge Green Party)
Recommend amending point 4 to read “Development proposals will be supported where (a) a mix of housing types (e.g. houses, flats and bungalows) are provided proportionally across all market and affordable tenures, taking account of local character, built form and up-to-date evidence of housing need; and (b) where feasible, the proposals have prioritised higher-density and mixed-use forms that integrate housing with employment, services and facilities.” This will help to encourage more efficient use of land in high-demand areas and reduce car dependence.	203746 (Cambridge Green Party)
Add reference to any relevant adopted Neighbourhood Plans, recent local Housing Needs Surveys, and Housing Register as evidence for the housing needs of the local area.	201387 (Gamlingay PC)
Commitment to delivering a balanced mix of housing types and tenures is welcome, particularly its focus on affordable housing to address Cambridge’s long-standing challenges.	203534 (Cambridge Ahead)
It is important that the implementation of the housing mix policy is supported by the allocation of a sufficient number of sites across a range of sizes, locations and settlement types.	210265 (Vistry Group)
A key barrier to effective regulation is the absence of a compulsory registration system for short-term lets. Without registration, the Council cannot easily identify which properties are operating as short-term rentals, distinguish genuine home-sharing from commercial activity, or ensure compliance with basic	211865 (Hilton Cambridge City Centre)

Summary of issues raised in comments	Comments highlighting this issue
requirements. Crucially, registration must be linked to clear planning control. The Local Plan should provide an explicit policy framework confirming when short-term letting amounts to a material change of use and requiring planning permission. Without compulsory registration linked to clear planning control, the Local Plan will fail to address regulatory imbalance, housing loss and market distortion caused by short-term letting, and therefore calls for these measures to be explicitly embedded within policy	

Policy H/GL: Garden land and subdivision of existing plots

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was general support for the policy, although there were calls for stronger controls to prevent detrimental impact on village character, green spaces and settlement patterns, and due to the importance of gardens and green spaces in reducing localised flooding, for community well-being, and for urban wildlife. The importance of residential annexes in supporting multi-generational living was recognised and there was concern that these should not be allowed to be converted to short term lets or new dwellings.

Those calling for a more flexible approach argued that garden land provided an important source of housing supply from small sites, particularly in rural areas. Local architectural practices argued that the proposed approach would risk constraining sustainable, well-designed housing opportunities and was in conflict with national planning policy which promotes efficient use of land, optimisation of site capacity and the role of small sites. It was also suggested a more flexible approach should be adopted for edge of settlement sites which could provide more opportunities for small residential schemes and self build housing.

Response to main issues raised in representations:

There were comments in favour of protecting gardens with some urging an even more robust approach. This policy responds

to these concerns by setting criteria to guide development on garden land to ensure that new development is appropriate and, alongside consideration of other policies in the Local Plan, mitigates negative impacts on ecology, biodiversity, heritage, surface water flooding and other local considerations. The detailed requirements set out in the policy enable proposals to be considered on a case by case basis. The case for a more flexible approach is not supported. The policy, as proposed, does support the development of garden land sites where appropriate but needs to work with Policy S/DE: Defined development extents to avoid encroachment into the countryside.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Strong controls needed to ensure sub-division does not erode village character, green space, or settlement pattern.	202258 (Girton PC)
Given the importance of gardens and green spaces to deal with rainwater, stronger controls are needed to reduce the chances of localised flooding.	205186 (B Nicolson)
Support the Councils' recognition that well-designed development on residential gardens and infill plots can be a "valuable additional source of housing supply", particularly in rural communities where other development opportunities are limited. There can be a conflict with Defined Development Extent policy where boundaries are drawn too tightly. Boundaries should be reviewed to allow more small sites to come forward making effective use of land.	202050 (M Asplin), 202069 (M Asplin)

Summary of issues raised in comments	Comments highlighting this issue
We are supportive of this policy.	201643 (Stapleford PC), 210955 (Great Shelford PC)
Support a policy of no sub-division of existing gardens in Cambridge. These spaces are vital for community well-being and the wildlife ecosystem, and they define the character of our neighbourhoods.	201988 (M Page)
Strengthen the section about residential annexes to ensure these remain as ancillary uses and are not subsequently converted to short term lets or new dwellings	203422 (Cambridge City Council Liberal Democrat Group)
Policy is overly restrictive and not aligned with national planning policy which promotes efficient use of land. The policy places undue weight on historic patterns rather than planning merits and should instead support garden land development where proposals are well designed and acceptable in terms of character, amenity and access.	204014 (KWA Architects)
A more flexible approach is urged, allowing subdivision where land has been in garden use for at least ten years, enabling sustainable edge-of-framework development while still complying with the wider policy.	204594 (NP Architects)

Policy H/SS: Residential space standards and accessible homes

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was broad support for the policy in principle, in particular its aim to secure high standards of amenity and accessibility in new homes. Respondents recognised the importance accessible and adaptable housing plays in supporting enabling independent living and ageing in place, and including space within new homes for working from home.

Regarding the internal residential space standards section of the policy several respondents raised an issue with the duplication of the Nationally Described Space Standards (NDSS) in full and that instead a cross-reference to the standards would enhance clarity. Developers also raised concern around the application of the NDSS as a blanket standard for all new homes and suggested that it was overly prescriptive, lacks flexibility and is not supported by evidence. Developers set out the importance of the policy being responsive to site-specific circumstances and market needs where the delivery of smaller homes could be justified and deemed viable, and highlighted that the requirement would place additional financial burdens on developments. One housebuilder was particularly concerned with the fixed NDSS not allowing for things such as Flats Over Garages.

Concern was raised by respondents to the lack of evidence to justify applying a fixed minimum private external amenity space standard of 30sqm, as this would be impractical when delivering housing in higher density locations and risks undermining design quality, local character and optimising housing delivery. Several respondents called for the Councils to consider a more design-led approach that would be responsive to various contexts. Concern was also raised around the requirement for

apartments having set balcony standards and therefore forcing identikit development. The requirement for all dwellings to have direct private amenity space was questioned and that where flatted developments are being delivered communal outdoor space should be able to be provided.

Several respondents support all new homes being required to meet building regulations M4(2) and in principle the introduction of set standards for the delivery of building regulations M4(3) compliant homes. However, comments around the M4(3) standard were varied, with some developers challenging the proposed requirements based on the Housing Needs of Specific Groups study and others suggesting that the requirements when applied to all new allocations would result in an oversupply of these homes which would be difficult to for developers to sell, and questioning the feasibility of M4(3) standards in smaller developments and seeking exceptions. The Councils have therefore been asked to reconsider their set M4(3) standards to ensure that they are robustly justified and viability tested. In contrast, some respondents called for greater ambitions for the delivery of M4(3) homes, as is set out in the Greater Cambridge Housing Strategy. The savings made by delivering a greater number of new homes as M4(3) compliant significantly outweighs the additional construction costs over time.

Comments also identified the concerns around the focus on the policy only building to M4(3)(a) (wheelchair adaptable) due to the challenges and costs in converting these to M4(3)(b) (wheelchair accessible). It was highlighted that the requirements for M4(3) homes are inconsistent with national policy as wheelchair accessible homes can only be required where the local authority is responsible for allocating / nominating the occupant. Developers also called for a maximum cap to be applied to the total number of affordable M4(3) units to be delivered on certain schemes.

Some respondents questioned whether the cumulative impact of various policy requirements, including nationally described space standards and accessibility standards, had been tested for viability, and called for the Councils to ensure that the requirements of this policy are fully reflected in viability and site capacity assessments that underpin site allocations.

Response to main issues raised in representations:

Whilst there is concern that the NDSS are replicated within this policy, the Councils have continued to include this as it provides developers/housebuilders and development management officers with a clear reference to the standards when considering planning applications.

The Councils evidence, as set out in the Housing Needs of Specific Groups study (2025), highlights that the Councils should require all new homes to meet the M4(2) standards on the basis of its increasing ageing population and the projected increase in the number of people with disabilities. It is important that new homes across Greater Cambridge provide high-quality internal and external spaces so they are inclusive, accessible, adaptable and flexible to meet the needs of existing and future users, and therefore enable and support healthy lives. There may be specific developments where meeting the required internal space standards, amenity space requirements, and / or accessible and adaptable homes standards, would not be appropriate for the identified occupants, however, any exceptions would need to be clearly justified with evidence provided to demonstrate that the proposed development still delivers suitable and appropriate homes for the anticipated occupants. The evidence set out in Appendix 1 of the Homes Topic Paper (2025) supports requiring all homes to meet the M4(2) standard by showing that the majority of developments for new residential dwellings in recent years are meeting the requirements, and any exceptions are generally developments for specialist accommodation meeting a specific need.

Having considered the representations received regarding the fixed minimum private external amenity space of 30sqm and concern around its application in certain development contexts, the Councils have decided to remove the set external amenity space standard and implement a more design-led, qualitative approach to securing appropriate external amenity space. The implementation of this approach will ensure that schemes provide sufficient amenity space that is appropriate to the typology

and size of the units provided. Applicants will be required to evidence in their Design and Access Statement how the size of the amenity space provided is sufficient for the intended occupants. The Councils have continued to include a specific requirement for apartments to provide direct private amenity space as well as set width and depth requirements as these have been more standardly applied across all contexts in Greater Cambridge and align with national guidance. As set out in the supporting information, where these set balcony standards are not appropriate for the identified occupants and justification can be provided that alternative standards are more appropriate, then exceptions can apply. The policy has been amended to provide clarification that in exceptional circumstances the provision of shared external amenity space will be allowed on schemes delivering aspects of communal living such as specialist housing, purpose-built student accommodation, co-living or co-housing. The amount of external amenity space required will be determined on a design and context led basis and this does not mean that private amenity space will also not be required as part of the scheme.

The policy continues to set the same requirements in relation to M4(2) and M4(3) standards as set out in the Draft Greater Cambridge Local Plan. The Councils have considered the comments received and consider that the current requirements are justified. The Housing Needs of Specific Groups study (2025) sets out that there is an estimated need for an additional 968 wheelchair user homes by 2045. The study highlights that there is likely to be a need for a greater proportion of affordable housing to rent for wheelchair users. The study recommends that up to 5% of all new market homes and up to 10% of all new affordable homes should be wheelchair user dwellings (Building Regulations M4(3) standard). The Housing Strategy sets out a direction of travel for accessible and adaptable homes, based on an earlier version of the Housing Needs of Specific Groups Study. National planning guidance sets out that Local Plan policies for wheelchair accessible homes (M4(3b) standard) should only be applied to those dwellings where the local authority is responsible for allocating or nominating the occupant. This does not prevent Local Plan policies from requiring market homes to be wheelchair adaptable homes (M4(3a) standard).

Although over 52,000 homes are anticipated to be delivered within the plan period (2024-2045), of these 74% are part of the

existing supply, and therefore most of these new homes already have planning permission and therefore will not be subject to the new requirements for M4(2) and M4(3) as set out in this policy. It is therefore important that new developments of 20 dwellings or more are required to deliver wheelchair user dwellings to contribute towards meeting the identified need. The policy already allows for exceptions to meeting the M4(2) and M4(3) requirements, if robust justification is provided. It is therefore not considered necessary to apply a maximum cap on the number of wheelchair user dwellings that can be provided in any one development.

The Local Plan has been subject to a whole plan viability assessment, which includes taking account of the requirements of this policy alongside other policy requirements. It has concluded that it is viable to seek all the requirements set out in this policy for residential space standards and accessible and adaptable homes.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
The mention of boilers in new build homes is out of date. After 2025, boilers are banned so that space standards must allow for a hot water tank/heat store.	201003 (N Upstone)
It is important that residential space standards and accessible homes requirements are clearly set out in the policy.	211566 (Martin Grant Limited Ltd)
Support for the policy and its principle of high standards for amenity and accessibility in new homes.	201644 (Stapleford PC), 202259 (Girton PC), 203431 (Cambridge City Liberal

Summary of issues raised in comments	Comments highlighting this issue
	Democrat Group), 204437 (Cambridge Investment Partnership (CIP)), 204886 (Hill), 210956 (Great Shelford PC), 210957 (Great Shelford PC)
To enable people to live in their own homes for longer, consideration should be given to those who maybe already be disabled or have difficulty climbing stairs. Ensuring new builds have some ground floor bedrooms as standard or have sufficient space to retro fit an internal lift (rather than a stair lift) so upper floors can be accessed would support residents remaining in their home for longer.	210334 (East of England Ambulance Service NHS Trust)
Concerns that this allows for one person one bedroom homes, when in fact these inevitably have a double bedroom and once built cannot enforce a single person/single bed arrangement on which it was constructed at the smaller 37sqm size. Can the one person/one bed option be reviewed?	203431 (Cambridge City Liberal Democrat Group)
Support the principle of the policy, however the policy must be applied with sufficient flexibility to respond to site-specific circumstances, particularly as the rigid application of minimum internal and external space standards may not be achievable without undermining deliverability or viability in certain locations.	204888, 210266 (Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
Object to blanket application of nationally described space standards across Greater Cambridge – need to be justified by need. Flexibility needed to enable homes to reflect market needs, and there may be market demand for homes that are smaller than nationally described space standards.	208343 (Thakenham Homes Ltd)
The policy unnecessarily duplicates the Nationally Described Space Standards (NDSS). A cross-reference would suffice and enhance clarity.	204616 (Redrow South Midlands), 204886 (Hill), 205345 (Home Builders Federation), 208690 (Guilden Morden Developments Ltd), 211290 (Woolsington One Ltd)
The requirement for all new residential developments to meet and wherever possible exceed the residential standards set out in Nationally Described Space Standards is not supported, as it is overly prescriptive, lacks flexibility, is not supported by local evidence, and would place additional financial burdens on developments which could affect viability of developments.	211225 (Terra Strategic), 211243 (Living Space Housing), 211468 (Hayfield Homes Construction Ltd), 211268 (Terra Strategic)
Policy is unduly rigid and imposes fixed minimum private amenity space requirements for all dwellings, including a blanket 30sqm provision for every house and prescribed balcony dimensions for apartments.	203116 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)

Summary of issues raised in comments	Comments highlighting this issue
A blanket requirement for all homes to meet the nationally described space standards and M4(2) standard does not allow for things such as Flats Over Garages (FOGs) due to accessibility requirements. This can impact place making and will increase the size of units which can price first time buyers out the market.	203116 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
The minimum requirement for external amenity space seems arbitrary. For some cases, it wastes space that could be better allocated to other purposes, while not being large enough to be any use. The provision of communal space should be applied to all properties.	203177 (P Tribble)
Requiring all apartments to have a balcony creates identikit developments and forces space to be wasted where it may not be wanted.	203177 (P Tribble)
For apartments, need large balconies or terraces to be provided, with pleasant views.	208733 (Cllr M Morgan)
Older people's housing schemes should be exempt from minimum external amenity space standards, and instead should consider the quality and function of the amenity space instead. With respect to flats and maisonettes it should be noted that there are often other planning issues that restrict the incorporation of a balcony such as overlooking and this should also be noted with the policy.	208319 (Churchill Retirement Living with McCarthy and Stone)
Concerns about the set external amenity space standards, when balanced with requirements from other policies as this may constrain site opportunities. Particularly relevant for allocations with specific housing numbers and densities.	204437 (Cambridge Investment Partnership (CIP)), 204886 (Hill)

Summary of issues raised in comments	Comments highlighting this issue
Concerns around the rigid external amenity space standards, particularly the fixed 30sqm private amenity space requirement. Evidence is lacking to justify this standard and applying it uniformly across all houses could hinder density and conflict with site allocation and character policies.	204616 (Redrow South Midlands)
The narrow exception that only allows for communal amenity space to be provided for co-housing and community-led schemes is insufficient. The policy should allow for flexibility in design.	204616 (Redrow South Midlands)
Uniform minimum private amenity space standards do not reflect the diversity of development contexts across Greater Cambridge. Likely to be impractical to deliver in higher density locations and risk undermining design quality, compromising local character, and optimising housing delivery. No justification for requirement of 30 sqm. Need a more design led and context sensitive approach.	208993 (Barratt Homes Northampton)
Question the requirement for all dwellings to have private outdoor space, as not always practically possible. Where flatted development is provided communal outdoor space should be able to be provided.	208344 (Thakenham Homes Ltd)
Current external space standards lack sufficient flexibility and need to take account of broader considerations such as viability and site-specific circumstances.	205345 (Home Builders Federation)
Supports all homes meeting M4(2) standard, and suggests that requirement for M4(3) standard should be increased from 5% to 10%. Planning for only M4(3a) (wheelchair adaptable) and not M4(3b) (wheelchair accessible) creates problems. Better to make housing fully accessible from the outset, rather than relying on adaptation.	201152 (K Gaunt)

Summary of issues raised in comments	Comments highlighting this issue
Local Plan should follow the advice set out in the Housing Strategy of 10% of new market homes and up to 25% of affordable homes meeting the M4(3) standard.	207575, 207578, 202851 (R Pargeter)
Provision of 10% M4(3) is supported.	203116 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
The requirement for all homes to meet M4(2) standard should be based on evidenced need and where Building Regulations are to change, this will supersede planning policy.	208346 (Thakeham Homes Ltd)
The requirements for M4(3) homes will have implications for the cost of development and as such could be a challenge for SME's delivering small to medium size developments. This should be an optional requirement, if viability allows. The policy should be drafted to include reference specifically to considerations of viability.	211588 (Terra Strategic)
The requirements for M4(3) homes will have implications for the cost of development and should be reflected within viability assessments. Further flexibility should be included to respond to viability and deliverability concerns.	211468 (Hayfield Homes Construction Ltd), 211581 (Living Space Housing Ltd)
The Local Plan presents a major opportunity to reduce long-term costs. Homes should accommodate visitors, including elderly or disabled relatives who need ground-floor facilities, and ideally wheelchair users, reducing isolation and enabling short stays. Accessible housing can also help families support	207576, 207577 (R Pargeter)

Summary of issues raised in comments	Comments highlighting this issue
temporarily incapacitated members, and families with pushchairs. Though slightly more expensive to build, costs are modest, recoverable, and likely offset by long-term savings.	
A wide range of accessible and adaptable M4(3) dwellings is essential, with proportions and sizes based on present and future local need ensuring effective long-term provision. Buyers should be able to arrange bespoke adaptations, sometimes negotiating savings.	207577 (R Pargeter)
Wheelchair users should be actively informed about suitable new M4(3) homes, but provided there is a large supply of M4(3) properties, developers should not be restricted to sell to only households in immediate need.	207578 (R Pargeter)
Requirements for M4(3) are inconsistent with national policy as: wheelchair accessible homes can only be required where the local authority is responsible for allocating / nominating the occupant, and no viability evidence has been provided to demonstrate these units can be viably delivered (especially when considered alongside other requirements).	208993 (Barratt Homes Northampton)
More dwellings should be allocated for wheelchair users as the changes required by M4(3) are minimal and provide benefits to all not just people in wheelchairs.	202885 (H Cook)
Requirements for the delivery of M4(3) units may risk site viability in order to accommodate these units. There should be a maximum cap on the number of M4(3) units to be delivered within a development, particularly developments providing 100% affordable housing.	204437 (Cambridge Investment Partnership (CIP)), 204886 (Hill)

Summary of issues raised in comments	Comments highlighting this issue
The requirement for 10% of affordable and 5% of market dwellings to meet M4(3) wheelchair user standards conflicts with national guidance, lacks evidence and exceeds demonstrated needs.	204616 (Redrow South Midlands), 205345 (Home Builders Federation), 208319 (Churchill Retirement Living with McCarthy and Stone)
Requirements for M4(3) are not supported by the Councils own evidence, which only requires around 970 dwellings and there would be a surplus against this if applied to all proposed new allocations. Will impact on density of developments as these homes are more land hungry – especially flatted developments requiring lifts. Added costs of providing these homes.	208345, 208347 (Thakenham Homes Ltd)
The approach set out in the policy is strongly supported, as accessible and adaptable housing plays a key role in supporting healthy ageing, enabling independent living, and reducing the risk of falls, injury, and avoidable hospital admissions. However, have concerns with the fact that the policy allows exceptions to the M4(2) and M4(3) standards where viability or site-specific constraints are demonstrated. Recommended that the policy be strengthened to clarify that exceptions are expected to be robustly justified, and subject to transparent scrutiny. Consideration could also be given to requiring partial compliance where full compliance is evidenced to be unviable.	210632 (Transport 2000 Cambs & W Suffolk)
The cumulative impact of various policy requirements, including nationally described space standards and accessibility standards, has not been tested for viability, risking housing deliverability.	204616 (Redrow South Midlands)

Summary of issues raised in comments	Comments highlighting this issue
Essential that the requirements of this policy are fully reflected in viability and site capacity assessments that underpin site allocations.	210266, 210267 (Vistry Group)
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.	204058 (S Rogers)

Policy H/SH: Specialist housing

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was support for the overarching objective of addressing specialist housing needs, particularly related to older people. However, there were differing opinions on how this should be achieved. There was support from individuals and community groups for specialist housing to be well integrated with local communities and be within walking distance of facilities. The Cambridge Green Party and Cambridgeshire County Council wanted the threshold at which specialist housing was required reduced from 1,000 dwellings, and Great Shelford PC have asked that planning decisions for older peoples accommodation takes into consideration the number of units already provided via such facilities/institutions within an area to ensure that healthcare infrastructure is not overwhelmed.

Developers were concerned that the specific criteria such as the requirement to be near local facilities combined with the requirements to provide 10% of dwellings as specialist housing on schemes of 1,000 or more dwellings were unreasonable and could affect viability. It was argued that some planning application related requirements were not necessary: the shortage of specialist housing for older people is well documented and further evidence is not needed, whilst the requirement to assess impact on healthcare services and/or make contributions should be removed given that specialist housing reduces the costs to social care and health systems. It was argued that the plan should include specific allocations in sustainable locations to meet the needs of older people and where need was not being met the policy should require that a presumption in favour of development be applied.

There were calls for the Councils to set out an indicative figure, or a range, for the number of units of specialist housing for older people needed and to commit to publishing a regularly updated assessment of specialist housing needs, including analysis of current and projected need by type of specialist housing to avoid the evidence base underlying the Local Plan becoming outdated over time. Cambridgeshire County Council asked for an additional paragraph to be included within the supporting information to describe specialist housing.

Response to main issues raised in representations:

Policy H/SH must be seen as an integral part of a suite of policies that collectively will deliver a range of housing options for specific needs across a range of scales in a range of locations. Creating more independent living opportunities for older people and people with disabilities will be achieved by delivering more dwellings to meet their needs through both specialist housing schemes and more appropriate mainstream housing. Hence Policy H/SH will be complemented by policies to adapt mainstream housing (facilitated through accessibility standards) and ensure market housing is generally more spacious (through residential space standards).

The Local Plan includes specific requirements within Policy S/JH relating to the identified accommodation needs of travellers, older and disabled people, and students. Estimating the precise level of the full range of specialist housing required is dependent on many variables. Considering our latest evidence of the accommodation needs of older and disabled people as set out in Housing Needs of Specific Groups Update for Greater Cambridge (HNSG, 2025), strategic sites play an essential role in the strategy for meeting such needs. The Local Plan therefore includes a series of options for meeting the identified accommodation needs of older and disabled people, as it requires the provision of specialist housing within the strategic site allocations (as set out in the individual site allocation policies), includes a requirement for 10% of dwellings on unallocated strategic sites of 1,000 dwellings or more to be

delivered as specialist housing (as set out within Policy H/SH), and supports the delivery of specific proposals for specialist housing that are brought forward as windfall sites (and not part of larger schemes) provided they meet the criteria within Policy H/SH. Specialist housing needs will be kept under review with partners.

Our Housing Needs of Specific Groups Update for Greater Cambridge (HNSG, 2025) calculates the accommodation needs for older people and disabled people in the form of housing with support, housing with care, and nursing and residential care bedspaces. However, it is also important that a mix of specialist accommodation is provided for older people and people with disabilities from housing with support through to care homes, and that there is not an over-provision of one type of housing within an area, therefore any proposals for new specialist accommodation for older people or disabled people must be supported by evidence of a need in Greater Cambridge, and within the particular location of the proposed development, for the specific proposed specialist accommodation and its tenure. This evidence can take account of any evidence already published by the Councils. The view that health impacts and contributions should not be considered due to their overall net positive contribution to the costs of social care and health systems is not accepted. The local impacts could be very significant.

The supporting information has been amended to include a paragraph outlining the variety of groups that the specialist housing accommodation in this policy relates to, and makes use of the suggested wording from Cambridgeshire County Council.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for policy as: • appropriate housing can enable older people to stay in the local community longer, • need creative and innovative approaches to housing mix for different generations, so that older people have suitable housing and meeting places at the heart of communities, • these developments should contribute towards the delivery of affordable housing, • developers should be incentivised to provide this type of housing, • important that specialist housing requirements are clearly set out in policy.	201045 (P Spowart), 201645 (Stapleford PC), 202185 (M MacGinley), 201822 (St Andrews Church), 203747 (Cambridge Green Party), 211269 (Terra Strategic), 211567 (Martin Grant Land Ltd)
Specialist housing should be in sustainable sites with access to services and facilities. Request that planning decisions relating to large retirement living facilities or institutions take into consideration the number of units already provided via such facilities/institutions within an area to ensure that healthcare facilities are not overwhelmed and that neighbourhoods do not become dormitory communities with a top-heavy population pyramid.	210893 (Great Shelford PC)
Concerned the policy applies stricter criteria to older persons' housing than to general needs housing, which risks limiting delivery despite evidence of need. The requirement that specialist housing should be in walking distance of local centres or facilities is unreasonable and access to public transport should be sufficient.	201937 (Anchor Hanover)

Summary of issues raised in comments	Comments highlighting this issue
Becoming more common for family homes to be occupied by elderly residents, who face practical impediments to down-sizing or re-locating, as well as very limited supply of high-quality and desirable seniors accommodation. Need more high quality, compact homes including sheltered housing for older people.	203281 (J Palmer)
Support for policy objective but concern that requirement for provision on strategic sites alongside the additional criteria set out within the policy could impact on viability and deliverability.	204889, 210268 (Vistry Group)
Need clarity on the application of the policy to minor development.	208691 (Guilden Morden Developments Ltd)
Clarification is sought on the meaning of “unallocated strategic sites” as given the well documented and growing demand for all forms of specialist housing, it is considered that this policy requirement should apply to all strategic sites, rather than being limited solely to unallocated sites.	210540 (Cambridgeshire County Council)
This policy should be deleted as will be superseded by new NPPF requirements.	208320 (Churchill Retirement Living with McCarthy and Stone)
Policy requires applications to provide evidence of need, however it is well evidenced that the UK has an ageing population, and the Housing Needs of Specific Groups study identifies a large need in Greater Cambridge. Should not be required to demonstrate need.	208320 (Churchill Retirement Living with McCarthy and Stone)

Summary of issues raised in comments	Comments highlighting this issue
Specialist housing developments help reduce costs to social care and health systems, therefore requirements to assess impact on healthcare services and/or make contributions should be removed.	208320 (Churchill Retirement Living with McCarthy and Stone)
Must be walkable to facilities and have no adverse impact on character of surrounding area.	202260 (Girton PC)
The threshold requiring specialist housing provision should be reduced from 1,000 dwellings.	203747 (Cambridge Green Party), 210540 (Cambridgeshire County Council)
Policy should be amended to stop developers avoiding specialist housing requirements by building out schemes in smaller packages	203747 (Cambridge Green Party)
Councils should commit to publishing a regularly updated assessment of specialist housing needs, including analysis of current and projected need by type of specialist housing and the overlap between specialist housing need and social housing need to avoid the evidence base underlying the Local Plan becoming outdated over time.	203747 (Cambridge Green Party)
The plan should include specific allocations in sustainable locations to meet the needs of older people.	205363 (Home Builders Federation)
The policy could go further and allocate suitable sites for specialist housing.	211269 (Terra Strategic)
The plan should set out an indicative figure, or a range, for the number of units of specialist housing for older people needed across the plan area throughout the plan period.	205363 (Home Builders Federation)

Summary of issues raised in comments	Comments highlighting this issue
Where needs are not being met the policy should also state that the Council will apply a presumption in favour of development.	205363 (Home Builders Federation)
The text should include a summary paragraph describing specialist housing.	210540 (Cambridgeshire County Council)
Fully support policy and would seek further strengthening of the policy to ensure accommodation is designed with ergonomics in mind and garages/storage facilities meets principles for that can support a wide variety of wheelchairs and mobility scooters. Lifts should be fire insulated to enable effective entry and egress.	210332 (East of England Ambulance Service NHS Trust)
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.	204060 (S Rogers)

Policy H/CB: Self and custom build homes

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Most comments on this policy were from developers and focused on the 5% requirement for self and custom build homes on schemes of 20 or more dwellings, with a general theme that the policy approach needed to be more flexible to respond to demand as measured by the Greater Cambridge Self and Custom Build Homes Register. More specific comments included:

- Need a flexible, case-by-case approach to self-build and custom-build provision, working with developers, the self-build register and local groups to meet identified need.
- There is limited demand for self and custom build on large sites.
- The threshold for requiring self and custom build should be raised, or a sliding scale introduced, as the requirement is more burdensome on smaller schemes.
- Delivering self and custom build on larger sites can reduce the ability to design optimised layouts with standardised unit widths, depths and typologies resulting in lower densities, and reduced overall yield and increased costs.
- Self and custom build plots typically deliver more slowly than developer built units, causing delays in build out rates, sales receipts and s106/CIL trigger points.
- Self and custom build plots create difficulties around logistics, with self-builders developing alongside main contractors.

- Custom finish type approaches are already incorporated by developers into their standard delivery models so the policy requirement is placing an unnecessary and disproportionate burden on developers for no meaningful benefit.

There were also several comments that the policy should focus on addressing demand as expressed by the register and not on quotas. It was argued that the number of new applicants to the register has fallen in recent years and, therefore, the need for further permissions would fall over time. It was also argued that the demand on the register was focused on self build rather than custom build with a preference for smaller sites, which implies that the focus should be on smaller self and custom build specific sites rather than large, multi-tenure sites that are more likely to deliver through custom build or custom finish approaches. There was a suggestion that the policy should be expanded to capture the ability for sole self and custom-build proposals to be brought forward within or on the edge of settlements.

There was disagreement that self and custom build plots should be transferred to a Register Provider if they could not be sold for self and custom build development. It was argued this would affect viability, delay deliverability and result in an over-supply of affordable housing on the site. However, there was a contrary opinion that developers may discourage the take up of self and custom build plots or their transfer to Register Providers through artificially high prices.

It was suggested that the policy should integrate a condition and monitoring process to ensure that the initial occupants who were involved in the design do live there for a minimum period. If there was a breach any exempted biodiversity net gain requirements should be re-imposed.

There was a request that the exemption for affordable housing schemes be reduced to schemes of 50% affordable housing from 80% affordable housing due to the particular viability challenges and funding regimes facing these schemes.

Response to main issues raised in representations:

The recent fall in the number of applicants joining the Greater Cambridge Self and Custom Build Register is recognised. However, there remains a significant deficit in the number of permissions: 440 plots at the end of base period 7 allowing for permissions up to 30 October 2025. The supporting text to the policy states that “the 5% requirement may be reduced where at least a 1 year oversupply of custom and self-build housing permissions exists and subject to agreement with the local planning authority”. The scale of the deficit could reduce quite quickly if the number of new applicants to the register remains low. However, proposals for self and custom build developments continue to be allowed on appeal outside of defined development extents because South Cambridgeshire District Council cannot demonstrate that it is meeting its statutory requirement to match demand (as measured by the register) with permissions. The proposed policy approach of requiring 5% custom or self build plots on developments of 20 dwellings or more offers the best chance of reducing the deficit as quickly as possible, whilst taking a more flexible approach to the 5% requirement later in the plan period once there is no longer a deficit. The requirement that custom or self build plots which do not sell to continue to be marketed as such for a further period or transferred to a Registered Provider is considered to be an important control to ensure potential custom and self build dwellings are not lost to mainstream market housing.

Demand as measured by the Greater Cambridge Self and Custom Build Register does favour larger plots for detached houses with 4 or more bedrooms either as single plot sites or as part of a small development with a limited number of plots, where there is an opportunity to build closer to the traditional self build model rather than a customised approach. However, although the register does not apply a viability test, a review of data provided by applicants suggests that many would be unable to afford their aspirations given current plot values. It is also considered that meeting most of the current demand through small sites in the countryside would: have significant landscape impacts, undermine the sustainable development strategy for new homes proposed by the Local Plan, and have consequences for delivering rural exception sites. The

proposed approach offers a realistic compromise. Windfall sites will continue to come forward for those that can afford the plot values that small rural sites will command. However, these will be balanced with other sites, as part of larger developments, which can offer a mix of self and custom build opportunities at a range of price points. There were no suitable sites proposed specifically for custom and self build through the call for sites process.

It is important that biodiversity net gain requirements are applied where appropriate but there are practical limits to the extent of conditions and monitoring that can be applied. Section 106 agreements and/or planning conditions are already used to ensure custom and self build developments meet the legal definition of custom and self build. It is noteworthy that 49% of households on the Greater Cambridge Self and Custom Build Register suggested that higher environmental performance was a motivator for them wanting to build their own home.

The proposed policy sets out a range of housing schemes that will be excluded from the requirement to include custom and self build homes. Criteria 1aii specifically excludes schemes where at least 80% of homes are affordable. This is designed to exclude rural exception schemes. However, it is recognised that there may be other schemes that are delivering higher than policy compliant levels of affordable housing which may create viability challenges when combined with custom and self build requirements. Supporting information has been added to highlight that custom and self build requirements may be lowered or waived, subject to viability evidence, where schemes are delivering affordable housing numbers that are at least 10% above policy requirements. Viability is likely to be affected by the types of affordable housing proposed with higher levels of the most affordable options, such as Social Rent, strengthening the case for a relaxation of custom and self build requirements.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
The policy is too restrictive and conflicts with PPG by focusing too much on delivery options with lower levels of input from the occupant on large sites whereas the custom and self build register shows demand is stronger for smaller sites offering more design input from the occupant.	202100 (M Asplin)
Policy criteria H/CB(3) is unsound because it unreasonably applies to all custom and self build developments placing unreasonable procedural and financial requirements on single plot developments.	202097, 202102 (M Asplin)
Custom and self build requirements should be increased to 10% on all master planned developments.	201001 (N Upstone)
Self-Build Plots should remain self-build plot designations and not be a means to provide market housing where it would otherwise be inappropriate.	211916 (C. Newell)
Marmalade Lane on Orchard Park demonstrates what is possible by allowing groups to go further than developers.	201001 (N Upstone)
Policy focuses too much on sites of 20+ dwellings: • policy discriminates against individuals seeking to build small individual or collective plots, • Clauses 3a and 3b may reduce availability of self build plots if Councils valuation expertise insufficient,	201516 (D Brock)

Summary of issues raised in comments	Comments highlighting this issue
• Plots may not be taken up due to pricing issues rather than a lack of demand.	
Greater provision should be made on large sites. Large plots should be broken into smaller plots for small building firms and small architectural firms to build on.	203816 (A Carpen)
Self-build in villages should be small scale, fit with the character of the area and not breach the Green Belt.	202261 (Girton PC)
Support for policy but concern that plots could be converted to market housing after 12 months through inflated plot values stopping purchase by self-builders or transfer to Registered Providers.	201388 (Gamlingay PC)
Support for policy but seek a condition and a monitoring process to ensure that the initial occupants who were involved in the design do live there for a minimum period. BNG requirement should be re-imposed if condition breached.	203441 (Cambridge City Council Liberal Democrat Group)
Support for policy but clarification required on how policy applies to minor development.	208692 (Guilden Morden Developments Ltd)
Policy should have more flexibility than blanket 5% approach where it can be demonstrated that there is limited demand and/or it would not support good placemaking. The threshold of 20 dwellings should be increased as:	204897 (Hill)

Summary of issues raised in comments	Comments highlighting this issue
• Self/custom buildings reduce the ability to design optimised layouts with standardised unit widths, depths and typologies resulting in lower densities and reduced overall yield and increased costs, • There is no evidence of large demand for custom and self build on large housebuilder led schemes, • self/custom build plots typically deliver more slowly than developer built units, causing delays in build out rates, sales receipts and s106/CIL trigger points, • create difficulties around logistics, with self-builders developing alongside main contractors.	
Object to the mandatory requirement for 5% self-build homes as part of any development – this is inconsistent with the Act which focuses on demand registers not quotas. Self-build provision should only be sought on sites where there is a demonstrable need. A flexible approach should be taken to respond to the demand on the register.	204771 (Vistry), 204295 (Bellway Strategic Land), 204534 (Bellway Strategic Land), 203120 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners), 204116 (Brookgate Land Ltd and Network Rail Infrastructure), 204127 (E W Pepper Ltd)
It is considered that the requirement for at least 5% of homes on schemes of 20 or more dwellings to be provided for self or custom build housing is excessive, and the delivery of these plots is likely to be onerous for small	211291 (Woolsington One Ltd)

Summary of issues raised in comments	Comments highlighting this issue
and medium sized sites and influence the viability of such schemes. This could have a knock-on effect on the delivery of windfall dwelling delivery, to the detriment of overall housing provision.	
Requirement for 5% on sites of 20 or more dwellings is unduly prescriptive and does not reflect practicalities of delivery (sequencing, logistics, health and safety). The Councils have a shortfall that the adopted policy has been unable to address, therefore need an alternative solution. Suggest dedicated self and custom build sites, as this would also reflect market preferences.	208994 (Barratt Homes Northampton)
Impractical to deliver 5% on strategic sites, and there is not evidence of this level of demand. Developers need opportunity to provide lower proportion if there is not sufficient demand, not practical for placemaking or not viable.	209038 (Marshall Group Properties), 211568 (Martin Grant Land Limited)
Custom finish type approaches are already incorporated by developers into their standard delivery models so the policy requirement is placing an unnecessary and disproportionate burden on developers for no meaningful benefit.	204771 (Vistry), 204295 (Bellway Strategic Land), 204534 (Bellway Strategic Land), 203120 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners), 204116 (Brookgate Land Ltd and Network Rail Infrastructure), 204127 (EW Pepper Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Policy seems to prohibit custom finish or custom build in houses, which is contrary to national policy. Amendments sought to provide clarity that custom finish proposals can apply to both houses and flats where external design is fixed, whereas external customisation is generally not appropriate for flatted schemes.	208972 (Persimmon Homes East Midlands)
Need a flexible, case-by-case approach to self-build and custom-build provision, working with developers, the self-build register and local groups to meet identified need.	203120 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
A fall in new entries to the custom and self build register following the introduction of an administrative charge suggests the register over states demand and should be reviewed.	205376 (Home Builders Federation)
Requirements in the policy do not reflect the Councils evidence base. Significant decrease in entries being added to the register. Requirement for 5% on developments of 20 or more dwellings would significantly over supply against current evidenced demand.	208348 (Thakenham Homes Ltd)
Need to consider desires of those on the register – likely to be seeking plots on small scale developments rather than as part of larger schemes. Mismatch between supply and demand.	208349 (Thakenham Homes Ltd)
The 20 dwelling threshold is too low. The impact of difficulties and delays in deliverable self build is far greater on smaller than larger schemes where	205376 (Home Builders Federation), 204295 (Bellway Strategic Land)

Summary of issues raised in comments	Comments highlighting this issue
there is more scope for separation. The complexity and logistics of developing such sites alongside self-builders could also create significant difficulties: • The development of single plots by individuals operating alongside multiple contractors and large machinery operating on-site raises both practical and health & safety concerns, • Unsold plots should not be left empty to the detriment of neighbouring dwellings or the whole development, • Any differential between the lead-in times/build out rates of self & custom build plots and the wider site may lead to construction work outside of specified working hours, building materials stored outside of designated compound areas and unfinished plots next to completed/occupied dwellings resulting in customer dissatisfaction.	
Suggested that this policy is amended to have a 'sliding scale' for the percentage of self/custom build dwellings needed per site (i.e. a lower percentage on much larger scheme, as this will still provide a larger number of self/custom build dwellings). Alternatively raise the threshold from 20 dwellings to 70 dwellings.	208335 (Gladman Developments)
Threshold is too low, as requirement for 1 self/custom build plot on a development of 20 dwellings is an unnecessary burden for SME builders.	208361 (T Elbourn)

Summary of issues raised in comments	Comments highlighting this issue
Threshold should be raised to 100 dwellings or more, or if needed to meet demand specific allocations should be included.	
Policy should be expanded to capture the ability for sole self/custom-build proposals to be brought forward within or on the edge of settlements within the Settlement Hierarchy. Given the demand for self/custom-build homes in Cambridgeshire, it is considered a more flexible policy that encourages the delivery of such schemes would make an important contribution to housing land supply.	204387 (LVA)
Support in principle but exemption for affordable housing schemes should be reduced to schemes of 50% affordable housing from 80% affordable housing. These schemes can be particularly affected by viability and funding regimes.	204443 (Cambridge Investment Partnership (CIP))
The requirement that unsold plots should either be marketed for a further period or sold to a Registered Provider could make schemes unviable. It should be replaced with the option of the developer building these plots out after the initial marketing period if unsold.	208912 (Nightingale Land and Hil Residential)
The minimum 12 month marketing period before unused plots can revert to developer delivery is a significant delay on build programmes for sites needing timely delivery. This includes the need for bespoke legal agreements, plot passports, boundary definitions and management	204897 (Hill)

Summary of issues raised in comments	Comments highlighting this issue
arrangements for self/custom build plots, causing higher legal and administrative overheads.	
Agree with 12 months marketing requirement, but if not sold should be able to be sold as open market plots. Already significant number of affordable homes being provided on major developments, and a change in tenure of a plot will require revised legal agreements that could cause unnecessary delays.	208335, 210712 (Gladman Developments)
Policy needs to include flexibility for developer to build out any plots not taken up after 12 months marketing.	208994 (Barratt Homes Northampton)
Policy artificially inflates affordable housing on schemes above policy compliant levels and potentially conflicts with Regulation 122(2) of the Community Infrastructure Levy Regulations (2010). Developer should be able to build out as market housing after initial marketing period.	208913 (Nightingale Land and Hil Residential)
The proposed requirement for further, undefined marketing beyond an initial 12 month marketing period before plots can revert to market housing also requires clarity and justification from the Councils.	211568 (Martin Grant Land Limited)
Support the use of design codes and plot passports, but mandating both for outline planning permissions is inflexible, and an either/or approach should be adopted.	208972 (Persimmon Homes East Midlands)

Summary of issues raised in comments	Comments highlighting this issue
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.	204062 (S Rogers)

Policy H/BR: Build to rent homes

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was recognition from some individuals and community groups that Build To Rent could play a role in some circumstances, particularly in contributing to a more varied housing mix. However, there were calls for management fees to be constrained to ensure it remained an affordable option and for sites to be focused on urban areas where the higher densities associated with Build to Rent were considered more appropriate. Two agencies concerned with promoting local growth, Cambridge Ahead and Cambridge Growth Company, were also supportive due to the potential for Build to Rent to contribute to the local housing stock. The latter called for a strengthening of the policy in relation to strategic sites, accessible locations and sites close to employment centres such as the Cambridge Biomedical Campus.

Developers were generally more wary of the policy. They wanted clarification of how Build to Rent related to mixed and balanced communities, what is meant by ‘dominate’ and whether the need to reflect the scale and location of surrounding uses rules out using Build to Rent to introduce an intentionally differentiated product to the market. Some called for the policy to be deleted as they were concerned the term ‘dominate’ could be used to restrict the quantum of development within schemes and unnecessarily restrict well designed development.

The view that the Cambridge housing market can potentially support 40% affordable units within Build to Rent schemes was challenged with the respondent arguing schemes should seek to deliver 20% affordable in line with national planning guidance.

There were also comments about the operation of Build to Rent schemes with suggestions that 3 year rental agreements were often inappropriate, 15 year covenants should be capable of being reviewed where viability was an issue, and that there should be no requirement for a single management operator, particularly on larger schemes.

Response to main issues raised in representations:

Build to Rent homes can respond to a need, by providing quality homes for those who wish to rent, which adds to the flexibility of the local housing market to respond to demand. Build to Rent homes can be provided within any residential developments (allocations or windfalls) provided that the proposed homes meet the requirements for residential developments as set out within various policies within the Local Plan, and the specific criteria within this policy.

The requirements within this policy seek to ensure that developments of Build to Rent homes support the development of mixed and balanced communities, whilst also responding to local demand.

Amendments have been made to the policy and supporting information to clarify that the assessment of the design quality and effect on local character of any proposed Build to Rent development will be considered against other policies in the Local Plan, but that the policy seeks to prevent harmful concentrations of Build to Rent and privately rented homes within an area or new development. Large concentrations of privately rented homes can result in the homes within an area being focussed on specific groups within the community, rather than a mix of groups, therefore limiting the ability to create mixed and inclusive neighbourhoods that meet a range of needs. Additionally concentrations of privately rented homes may limit residents' long term commitment to or integration within the wider community. However, it is recognised that Build to Rent developments need to be able to be of a size that enables them to be delivered and managed viably.

National planning guidance states that 20% is generally a suitable benchmark for the level of Affordable Private Rent homes to

be provided in any Build to Rent scheme, but that local authorities can set a different requirement if justified by evidence. Our viability evidence shows that the strong Greater Cambridge housing market will support 40% Affordable Private Rent in Build to Rent schemes.

The definition of Build to Rent within the NPPF 2024 states that “Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control”. However, in light of changes introduced in May 2026 through phase 1 of the Renters Right Act 2025, the reference to the length of a tenancy agreement has been removed from the policy as it is no longer possible to specify the length of a tenancy. A single management operator is preferred, and is consistent with the definition of Build to Rent in the NPPF 2024, however, the policy wording has been amended to allow some flexibility.

The Councils recognise that Build to Rent investors will most likely want to retain schemes for the long term in order to get a good long-term return on their investment. Our research has identified that covenant periods may be as short as 7 years, but are typically 10-15 years. Including a requirement for a covenant period of at least 15 years reflects the high priority that both Councils give to the issue of community sustainability and place-shaping.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Build to Rent schemes should deliver 40% affordable rather than 20% wherever possible. Concern that policy will allow developer to avoid providing 40% affordable on new sites.	205456 (R Robertson), 201389 (Gamlingay PC)

Summary of issues raised in comments	Comments highlighting this issue
Support for policy: • as helps delivery of rental properties, • but management fees should remain reasonable, • particular support for commitment to deliver balanced mix of housing types and tenures.	202186 (M MacGinley), 203445 (Cambridge City Council Liberal Democrat Group), 203535 (Cambridge Ahead)
Affordable Private Rent is an oxymoron.	201046 (P Spowart)
Build to Rent often implies higher density and urban form and is not suitable for Minor Rural Centres such as Girton.	202262 (Girton PC)
Support for policy but the overall approach to Build to Rent should be strengthened in relation to allocations for strategic sites and in relation to promoting Build to Rent in accessible locations and close to key employment centres such as CBC.	203915 (Cambridge Growth Company), 208941 (Cambridge Growth Company)
Part (a) does not provide sufficient clarity and appears to be general design advice. If the intention is to monitor the mix of tenures in a wider area (rather than large new developments) then this should be made clearer, justified and clarity provided on how this will be assessed and implemented in practice. Need to explain how mixed and balanced communities applies to the Cambridge context.	203011 (Watkin Jones Group PLC)
Part 1a wording is vague. The term ‘dominate’ should be specifically identified so as to ensure consistent application of the policy to development proposals. Similarly, wording to encourage flexibility if there is a demand for the development type (i.e. C3) exists.	208693 (Guilden Morden Developments Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Support policy for Build to Rent, but needs clarification: assumed that 'scale and location' in part a relates to the spatial/physical characteristic, but some build to rent developments offer scope to introduce a differentiated product, and therefore potential for missed opportunities if build to rent developments need to reflect scale and location of surrounding uses. Need to allow for build to rent developments that are deliberately differentiated from the surrounding context.	209203 (Urban & Civic)
Object to the conclusion that the Greater Cambridge Housing Market can support 40% private rent homes. The maximum requirement should be 20% in line with National Guidance.	208485 (Carter Jonas)
The imposition of rigid restrictions on development quantum as outlined in point (a) of the policy is not supported as risks unnecessarily constraining appropriate and well-designed development and fails to reflect the varied context and characteristics of individual sites. Reference to 'dominate' within the policy is not deemed appropriate as this inherently subjective and open to inconsistent interpretation.	203117 (Barrett David Wilson Homes & NW Cambridge Consortium of Landowners), 204133 (Brookgate Land & Network Rail Infrastructure)
The proposed approach of not prescribing a proportion of Build to Rent, but instead setting a criteria against which an application will be assessed is supported.	211569 (Martin Grant Land Limited)
Minimum 3 year rental agreements inappropriate. Target groups such as students and young professionals want shorter agreements.	208611 (Land Investment Holdings & Pigeon Land)
The policy requirements for a 15-year covenant and the availability of tenancies of up to 3 years are consistent with national guidance and industry practice. However, to ensure the policy is effective and	208973 (Persimmon Homes East Midlands)

Summary of issues raised in comments	Comments highlighting this issue
does not inadvertently constrain delivery, suggest clarify that the 3 year tenancy is an option available to residents rather than a minimum term that must be taken, and that the covenant period can be reviewed where the scheme is demonstrated to be unviable or no longer capable of delivering Build to Rent use.	
Remove requirement for single management operator as impractical and/or undesirable for all build to rent units on large schemes.	208611 (Land Investment Holdings & Pigeon Land)
Support policy for Build to Rent, but needs clarification: part d requires developments to be managed by one operator, however, may be different operators for housing component and supporting uses, outdoor spaces or associated public realm. Non-housing component might beneficially be managed by a site wide estate management company.	209204 (Urban & Civic)
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.	204064 (S Rogers)

Policy H/CO: Co-living

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

The Cambridge City Council Liberal Democrat Group were supportive of the policy but wanted to see the role of space standards strengthened to improve the quality of developments. The Cambridge Green Party wanted to see a broader housing mix with less focus on single person studios and a clearer steer that community-led housing models would be supported for this type of housing to promote greater community control. Cambridge Ahead were supportive of co-living as part of a wider mix of tenures. An architects practice were concerned that the co-living policy may lead to sub-standard accommodation, and that co-living developments will be provided at the expense of other forms of housing.

A parish council argued that this type of development was not suitable for rural communities due to its urban high density typology. However, a developer counter-argued that co-living was a suitable housing type for many parts of rural Greater Cambridge provided adequate car parking was provided.

Developers and landowners wanted to see some of the policy criteria removed. It was argued that the upper limit of 200 units was too restrictive and that investors and operators often sought 250+ units. They asked for evidence to justify the proposed range of 50-200 units. There was a request for the minimum 3 month tenancy agreement to be eased and for the requirement to provide evidence of need to be deleted on the grounds that the Local Plan evidence base has already identified a need for single person units. It was suggested that the policy should be explicit that affordable housing requirements could also be provided through a commuted sum as well as a discounted rent option on some of the units.

Response to main issues raised in representations:

Co-living developments are purpose built and managed residential accommodation for rent that include a mixture of individual spaces and shared facilities. The likely residents of Co-living developments are single professionals or key workers aged 20-40, and / or are single person households that are new to an area. Co-living developments provide an alternative to Houses in Multiple Occupation or self-contained private rented accommodation, with the benefits of a wide range of services and facilities and all-inclusive bills. Co-living developments are therefore different to Co-housing developments, which are community-led developments where each household has a self-contained dwelling as well as access to shared community spaces. Co-living developments are not considered to be child or family suitable accommodation due to the units not being self-contained, and to prevent units being used as a sub-standard self-contained dwellings tenancies will be limited to single person occupancy.

The policy sets out that that developments of Co-living units will be directed to the most sustainable areas of Greater Cambridge, well connected to active travel routes, public transport links and services. This reflects the likely residents of Co-living developments. The policy allows for Co-living developments to be brought forward outside of Cambridge, if the proposed Co-living development meets the requirement set out in the policy as well as the requirements of other policies in the Local Plan relating to residential developments.

Given there is a substantial overall housing need in Greater Cambridge, Co-living developments should not compromise the delivery of self-contained homes, and therefore the number of units within a Co-living development must be evidenced by need for this form of development in Greater Cambridge. Amendments to the policy have been made in relation to comments on scale, over concentration, dominate, and mixed and inclusive neighbourhoods to provide clarity.

Developments must be of good quality, well designed and contribute towards mixed and inclusive neighbourhoods. Proposals for Co-living developments should not result in a harmful concentration of Co-living units within an area or place undue pressure on local infrastructure. Where there are larger concentrations of Co-living developments or similar accommodation (such as purpose built student accommodation and / or Houses in Multiple Occupation) relative to conventional housing, these types of accommodation may be considered to be 'crowding out' conventional housing schemes, and it can also result in the homes within an area being focussed on specific groups within the community, rather than a mix of groups, therefore limiting the ability to create mixed and inclusive neighbourhoods that meet a range of needs.

There are no set space standards for Co-living developments, however, changes have been made to the policy and supporting information following further research and consideration by officers of the design of Co-living developments, and how comfortable, functional and accessible units can be provided whilst also ensuring that units are not capable of being used as self-contained homes. Additional detail has been added to the supporting text to refer to the existing standards for residential accommodation that should be considered in the design of Co-living units.

The affordable housing policy requires Co-living developments to contribute towards the delivery of affordable housing, as although these developments are not providing self-contained dwellings, they are contributing towards meeting our overall housing requirement and it is therefore important that they also contribute towards meeting Greater Cambridge's affordable housing need. Recognising that the provision of affordable housing on-site within a Co-living development is unlikely to be practical and off-site provision will deliver affordable housing that will meet a wider variety of local needs, the affordable housing policy (Policy H/AH) has been amended to set out that a financial contribution will be sought from Co-living developments that is comparable to the on-site delivery of affordable housing within other residential schemes.

In light of changes introduced in May 2026 through phase 1 of the Renters Right Act 2025, the reference to the length of a tenancy agreement has been removed from the policy as it is no longer possible to specify the length of a tenancy.

However, it is still important that safeguards are put in place through management arrangements so that Co-living developments do not effectively operate as a hotel or a hostel.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for policy, however, needs minimum space standards to avoid poor quality developments coming forward. Paragraph 9.85 should be amended to require co-living developments to meet the HMO bedroom standards rather than just to consider them.	203448 (Cambridge City Council Liberal Democrat Group)
The Local Plan's commitment to delivering a balanced mix of housing types and tenures is welcome.	203537 (Cambridge Ahead)
Co□living is not suitable for Girton's rural environment as it is an urban high density typology.	202263 (Girton PC)
Amend the first sentence of clause 1d to require a mix of private living space layouts, broadening the policy beyond single-person studios.	203748 (Cambridge Green Party)
Amend clause 1h to explicitly allow co-living developments to be managed by resident-led bodies, Community Land Trusts, co-operatives or other non-profit models, not just commercial operators. This will make the policy more explicitly supportive of resident-owned and democratically governed co-living models, promoting greater community control.	203748 (Cambridge Green Party)
Clause 1c is too restrictive as it focuses on 50-200 units whereas investors/operators usually seek 250+ units. Justification required for scale of 50 to 200 units.	203591 (The Crown Estate), 208694 (Guilden Morden Developments Ltd)

Summary of issues raised in comments	Comments highlighting this issue
The proposed approach of not prescribing a proportion of co-living units, but instead setting a criteria against which an application will be assessed is supported.	211570 (Martin Grant Land Limited)
Clause 1i is too restrictive as many operators offer monthly tenancies. The policy should instead include a clause requiring the developer to provide evidence of the need for the intended minimum tenancy period.	203591 (The Crown Estate)
Part b should be deleted. The housing needs assessment accepts a need for single person households. There is no clear planning-based need to manage housing unit sizes across an urban area.	203035 (Watkins Jones Group)
Part c should remove the upper cap. The housing needs assessment accepts a need for significant single person households. These developments meet that need and should not have caps.	203035 (Watkins Jones Group)
The policy should state that either financial contribution in lieu of affordable housing, or onsite discounted market rent co-living units, would also be acceptable. The application of 20% affordable housing should be promoted in the Local Plan for this specialist housing tenure.	203035 (Watkins Jones Group)
There is a contradiction in part 1a between ‘where the development does not contribute to car dependency’ and ‘parking can be minimised reflecting the high level of accessibility’.	208694 (Guilden Morden Developments Ltd)
Co-living is suitable for many parts of rural Greater Cambridge but sufficient car parking will be required.	208694 (Guilden Morden Developments Ltd)
Opportunities for Co-Living developments like Marmalade Lane in Orchard Park should be included in master plans of greater than 250 dwellings.	201002 (N Upstone)

Summary of issues raised in comments	Comments highlighting this issue
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.	204066 (S Rogers)

Policy H/MO: Houses in multiple occupation (HMOs)

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Many comments focused on how ‘over concentration’ should be defined. Some comments argue specific limits or thresholds should be placed on an area. Other comments, including by some of the University Colleges, raised concerns about impacts and whether the proposed policy approaches were justified. Concerns raised included parking, noise and antisocial behaviour. One comment highlighted these matters should be addressed through licencing. The need for diverse housing products was highlighted. Some comments requested that Article 4 Directions be issued so that planning permission would be required for small HMOs as well as large.

Response to main issues raised in representations:

Representations received are noted, including the diversity of views.

According to the Housing Act a House in Multiple Occupation (HMO) is a property that is rented by at least 3 unrelated people forming 2 or more households and sharing amenities including kitchens and bathrooms. HMOs for 5 or more people must be licensed, and the Councils publish a register of these HMOs. Cambridge City Council also hold details of known non-licensable HMOs. Licensed HMOs are required to meet specific standards – relating to the size of bedrooms and other rooms, and number of kitchens and bathrooms – depending on the number of occupants.

For planning, a small HMO (use class C4) is for 3 to 6 unrelated people, and a large HMO (use class sui generis) is for more than 6 unrelated people. A large HMO always requires planning permission. The change of use from a dwelling (use class C3) to a small HMO is 'permitted development' and therefore does not require planning permission.

To support the new Local Plan we commissioned a study to explore the number and distribution of HMOs within Greater Cambridge, the role of HMOs in meeting the housing needs of Greater Cambridge, the impacts of HMOs, and the potential solutions. This study shows that:

- HMOs form a key part of the housing supply in Cambridge, providing accommodation at a comparatively affordable rent for professionals, students and healthcare workers, especially in central Cambridge locations.
- HMOs also represent the most viable market-based housing option for those unable to access social housing.
- Evidence of concentrations in some areas, particularly around Mill Road and Anglia Ruskin University, strongly linked to the prevalence of older terraced housing and proximity to employment centres and universities.
- Areas with more HMOs are also locations likely to have wider amenity issues due to inner City and main road locations, and housing types (e.g. terraced homes). However, there appears to be no correlation between HMOs and crime or antisocial behaviour, and some correlation between HMOs and residential amenity (e.g. noise, rubbish). Correlation is not causation.
- Limited evidence of loss of family dwellings.
- Evidence base recommends policy approach that avoids sandwiching, minimises cumulative impacts and seeks appropriate design to ensure good quality HMOs are approved.

The adopted Cambridge Local Plan 2018 includes a policy for HMOs, that is used when any planning applications are submitted for HMOs. The new Greater Cambridge Local Plan carries forward this policy, with amendments, and applies it to the whole of Greater Cambridge.

The policy in the new Local Plan reflects the findings of the study and focuses on:

- avoiding ‘sandwiching’ i.e. there being a HMO either side of a non-HMO dwelling,
- ensuring HMOs are of a suitable quality,
- ensuring amenity impacts from HMOs are reduced,
- requiring appropriate management arrangements to be demonstrated.

Whilst some local planning authorities have planning policies restricting HMOs where the concentration goes above a certain threshold, this would restrict HMOs from areas where they may be suitable, and could have unintended consequences regarding knock on impacts for other areas, and on the affordability of accommodation.

The new Local Plan policy seeks to control any potential negative impacts, by setting out criteria to be considered on a case-by-case basis.

Whilst outside the plan making process, there is a strong case for developing an Article 4 Direction, so that small HMOs would also require planning permission. The policy is therefore drafted to enable it to be applied to all HMOs that require a planning application i.e. large HMOs, but also small HMOs if an Article 4 Direction issued.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Request that the policy includes a clear 10% concentration threshold within a defined radius.	206584 (Guest Road Residents Association), 203787 (The Guest Road Area Residents Association)
Definition of 'over-concentration' is not provided, and unclear why additional requirements regarding sandwiching and adjacent properties have been added. Further consideration needed in relation to finding the right approach to address the matter of potential harm to residential amenity. Need to allow for site specific circumstances.	208249 (Kings College), 208298 (Girton College)
Request an Article 4 Direction for Petersfield and central Cambridge to remove permitted development rights for small HMOs and short-term lets. In Petersfield about a third of dwellings are HMOs, causing noise, anti□social behaviour, parking pressure, litter and waste□collection strain. The position that there is insufficient evidence is no longer valid given high HMO concentrations.	206587 (Guest Road Residents Association), 203787 (The Guest Road Area Residents Association)
HMOs are providing an affordable accommodation option, but are often a sub-optimal form of housing. HMOs are not a long term solution for young professionals and there needs to be greater consideration of this group – alternative models should be considered such as co-housing.	208009, 211009 (Cambridgeshire County Council)
Strict limits on the density of HMOs within an area should be imposed. Concentrations already too high in places, such as Orchard Park. High concentrations of HMOs can have a	208009, 211010 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
negative impact on neighbourhood quality - undermine placemaking, contribute to a transient population, and are associated with poor property maintenance.	
HMOs increase parking stress, undermine character, and create intensification. Strong limits on HMOs are needed, and require management plans and parking controls.	202264 (Girton PC)
Proposed policy H/MO 1(b) includes a prohibition on “three or more adjacent properties as HMOs”. This is unduly restrictive in the context of College accommodation in Cambridge City Centre, where there are many examples of high-quality rows of College owned HMOs. In certain roads in the City, this may be a better solution than “pepper potting” College HMOs across the City: better for residents as college can have better management and for students in term of community. Recommended that the restriction in 1(b) be removed from the policy and that a more nuanced approach to defining over-concentration be included in the Supplementary Planning Document referenced in paragraph 9.97. Part 1a. is considered to be sufficient to avoid over concentration.	201746 (Christ’s College, Cambridge), 202051 (Trinity Hall), 204781 (St John’s College), 204020 (Jesus College)
Support for policy but request for policy qualification to be strengthened as HMOs are detrimental to community cohesion and quickly erode any sense of neighbourhood or neighbourliness because of their transitory nature. There should be a presumption against the conversion of c3 housing into HMO and new HMOs should not be part of the Local Plan. Instead build to rent apartment complexes with affordable offerings (and communal spaces) should be prioritised.	201824 (St Andrew’s Church)

Summary of issues raised in comments	Comments highlighting this issue
Comment made to specific planning application (25/03323/FUL) for proposed development of 23 double bedrooms. Comment notes that application does not mention demographic of residents or what management arrangement will be in place. The requirement to license HMOs that house 5 or more people, which is outside the planning system, is noted as seemingly unhelpful.	201888 (T Jewell)
Support policy but request made for the removal of references to C4 and Sui Generis to allow for automatic inclusion of smaller HMOs if Permitted Development regulations change or an Article 4 directive is implemented. Advocate for further work on this policy to establish an evidence base regarding the impact of converting smaller dwellings, ensuring the policy remains robust against potential national policy changes.	203454 (Cambridge City Liberal Democrat Group)
The Local Plan's commitment to delivering a balanced mix of housing types and tenures is welcome, particularly its focus on affordable housing to address Cambridge's long-standing challenges. The recognition of diverse housing options to meet differing needs, as highlighted by Cambridge Ahead's Young Advisory Committee, is positive.	203539 (Cambridge Ahead)
Support for policy covering Greater Cambridge and not just Cambridge City. Orchard Park specifically given as example which is over dense with HMOs and creating community tension. Do not want issues in Orchard Park replicated in Darwin Green or potentially Histon & Impington. Need to make sure the people who live in HMOs have access to good quality housing alternatives. Too high density of HMOs makes community universally less attractive.	204035 (Histon and Impington PC)

Summary of issues raised in comments	Comments highlighting this issue
Policy needs specific detail about what 'over concentration' of HMOs means. Undefined ‘over-concentration’ is insufficient and makes refusals subjective.	204035 (Histon and Impington PC), 208695 (Guilden Morden Developments), 206586 (Guest Road Residents Association)
Suggestion that the ‘over concentration’ definition is applied to tiers within the Settlement Hierarchy in order for a proportionate approach to be taken. Similarly, 1.b. should be justified: the policy places an inherent negative stance on the ‘sandwiching’ of a C3 property by C4/Sui Generis HMO; however, compliance amenity matters in 1.a. would negate the need for 1.b. Part 2 of the policy is also presumptive, with the prevention of antisocial behaviour a requirement for retention of an HMO license; this is not a planning policy.	208695 (Guilden Morden Developments)

Policy H/SA: Student accommodation

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

A number of colleges expressed concern about the impact of the policy on providing accommodation for part-time students. Girton PC considered there should not be further student accommodation in Girton and an individual highlighted that student accommodation is distorting the property market against the interests of residents. The Cambridge Green Party highlighted the need to clarify the position regarding need, and a potential inconsistency in how this is explained in the supporting information. There was one objection to restricting student accommodation on sites allocated for housing, including related to development viability. A query was also raised regarding how the loss of dwellings would be considered in light of the in lieu affordable housing contribution requirement. The Cambridge City Council Liberal Democrat Group sought a distinction between student and staff accommodation, and that any staff accommodation should adhere to residential space standards. One comment sought greater opportunities for local young people to benefit from institutional development.

Response to main issues raised in representations:

The Councils are aware that the University of Cambridge Colleges are increasing the availability and range of their part-time and flexible degree courses – these changes are being made in the context of Government policy proposals and also due to market dynamics. This means there is likely to be an increasing expectation on the Colleges to house more part-time students, as the Colleges are the principal providers of accommodation and related services for their student members on

degree level courses, including part-time degree courses with residential requirements. Amendments have been made to the policy and supporting information to exceptionally consider the provision of accommodation for part-time students on a case-by-case basis, where this meets the identified needs of an existing higher educational institution within Greater Cambridge. The policy continues to restrict occupancy to students attending full-time courses of at least one academic year, but this has been broadened to include “or part-time courses where permitted’’ as an exception in line with the associated changes made to other parts of the policy. Without the ability for the local planning authority to flexibly consider applications for accommodation for part-time undergraduate and / or postgraduate students (which is evidenced to meet the identified needs of an existing higher educational institution within Greater Cambridge) an inadequate amount and level of student accommodation may be able to be offered by the University of Cambridge Colleges for this student group. Without this flexibility in the policy, this need may have to be met by other housing sectors (principally the private rented housing sector), and this would likely increase demand for such housing, which will risk taking up accommodation potentially more suited to the general housing market needs in Greater Cambridge.

The provision of student accommodation to meet the identified needs of an existing higher educational institution within Greater Cambridge is supported, subject to the requirements within the policy being met, including that proposals have considered the scale and impact of the development on local residential amenity and on the character of residential areas. This ensures that where accommodation is to be provided, that any potential for conflict or negative impacts of the proposal on the surrounding areas is considered when making the decision on the planning application being considered.

The Councils have identified the accommodation needs of students and academic staff, and this is set out in Policy S/JH. The Councils have also considered the existing supply for accommodation for students and academic staff, and existing permissions and allocations (including strategic sites) are anticipated to deliver an over provision against the identified need. However, new proposals for accommodation for students and academic staff will continue to come forwards during the plan

period, and these proposals will be considered against this policy.

Given that there is an overall substantial need for housing in Greater Cambridge, the provision of student accommodation should not compromise the delivery of homes on sites allocated for housing or result in the net loss of market and affordable housing. An exception on a case-by-case basis for this restriction is not considered necessary due to the ability for proposals to provide evidence as part of the planning application process to demonstrate that a material consideration(s) exists to deviate from the policy.

Any self-contained dwellings, irrespective of their use class, are required to meet the residential space standards set out in Policy H/SS. However, there may be specific developments where meeting the required internal and external amenity space standards, and / or accessible and adaptable homes standards, would not be appropriate for the identified occupants. Any exceptions would need to be clearly justified with evidence provided to demonstrate that the proposed development still delivers suitable and appropriate homes for the anticipated occupants.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Additional student accommodation is not appropriate within Girton village. Eddington already contributes significant student/education pressure that increases traffic and conflicts with rural character. Avoid student accommodation allocations in Girton. Focus student housing on university-adjacent locations outside Green Belt.	207165, 207166, 202265 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
The policy constrains expansion of part-time student provision. Cambridge University is expanding part-time courses and accommodating part-time students in line with Government policy. Students on part-time degree courses are members of Colleges, and because Colleges are the principal providers of accommodation and related services, there is an expectation on Colleges to house more part-time students. Some part-time courses require intensive teaching blocks and mandatory residence in Cambridge, particularly for students from overseas. Clauses 1a and 8 should permit part-time student accommodation for those with a residential requirement exceeding two days per week.	202049 (Trinity Hall), 202512 (University of Cambridge), 204016 (Jesus College Cambridge), 204787 (St John's College, Cambridge)
Objection to policy. Policy elements 1a-c are replicated by 4a-b and are therefore unnecessary. If 4a is satisfied, but then 4b is not possible for the educational establishment, and it would not be justified nor lawful to restrict occupation of the property. Suggestion to delete 1a-c and 4b.	203114 (Watkin Jones Group PLC)
The limitation of PBSA on sites allocated for housing, or with an extant planning permission for residential is not justified. There will be cases where traditional residential accommodation is not viable. Exceptional circumstances should also include an applicant being able to demonstrate that traditional forms of residential development is unviable in that instance.	203114 (Watkin Jones Group PLC)
Support for policy but request for distinction between student and staff accommodation. Staff accommodation should adhere to housing standards, including meeting space standards and access to private amenity space. Allowing 25% of the development for staff housing with smaller room sizes and limited amenities may lead to poor living conditions.	203457 (Cambridge City Council Liberal Democrat Group)

Summary of issues raised in comments	Comments highlighting this issue
We welcome the commitment to affordable housing.	203457 (Cambridge City Council Liberal Democrat Group)
A definition of acceptable use for staff accommodation during term breaks is needed, as some universities have extended breaks. If staff accommodation is rented out as short-term visitor accommodation unrelated to the university, it should comply with policy J/VA.	203457 (Cambridge City Council Liberal Democrat Group)
Need to clarify the timing, type and location of the identified need for student housing. The statement "Our evidence demonstrates that there is a continued identified need for the development of new student accommodation and staff accommodation" implies that more student and staff housing is needed. On the other hand, the statement "For student accommodation, existing permissions and allocations (including strategic sites) are anticipated to deliver an over provision against the identified need" implies that the need is already being met or even exceeded. Editing and rewording is needed to resolve this apparent contradiction.	203749 (Cambridge Green Party)
Provision should be made for new facilities in larger developments that not only benefit the students but also residents. Provision should be made for developers and institutions to contribute towards a fund that pays for joint activities that bring visiting students together with local schools so that local young people benefit from the opportunities that might otherwise be restricted to visiting groups.	203818 (A Carpen)

Summary of issues raised in comments	Comments highlighting this issue
Welcomes policy but seeks further information on 1d. The Council is invited to accommodate the role of contributions to affordable housing in lieu of, and how this is taken into account in determining whether development would lead to permanent net loss of C3.	208696 (JMS Planning and Development ltd)

Policy H/DC: Dwellings in the countryside

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was some support for the policy from Parish Councils with requests for various aspects of the policy to be strengthened. There were calls for a formal standard of what defines the required marketing to ensure adequate marketing is made and concern that the policy could be weakened by conversion of mobile home temporary permissions to permanent dwellings in the open countryside. There was also concern that the policy could erode the rural edges of villages.

There was a specific comment about the shortage of livery yards in South Cambridgeshire which was associated with a request that where stables are being converted to other uses, alternative provision must be made to rehouse the horses. Another specific point concerned windmills. It was argued that tall structures near to a working windmill are likely to have a detrimental effect and therefore consideration should be made where a site is within 400m of a working windmill. Reference is made to a relevant policy in the Histon and Impington Neighbourhood Plan as an example of good practice.

A couple of architects practices were concerned that the policy was in conflict with national policy although one of these referred to the latest draft NPPF. The other considered that both the current South Cambridgeshire Local Plan policy and the proposed draft were in conflict with the provisions of Class Q of the General Permitted Development Order (2015). They cited the example of large portal-frame barns that are poorly suited to residential use but still fall within Class Q. They argue that better schemes, including redevelopment rather than reuse, have been negotiated by securing a Class Q permission as a fallback position with the resulting permission being treated as a departure from policy.

A developer argued that the marketing requirements necessary for a change of use of redundant buildings to uses other than employment were unreasonable.

The Environment Agency recommend that the ‘Reuse of buildings in the countryside for residential use’ refers to the need to place restrictions on changes of use within flood risk areas.

Response to main issues raised in representations:

The criteria set out in the policy are considered to be sufficiently robust to stop unsustainable or inappropriate development. This includes any changes of use from a livery yard, where planning permission is required, as evidence would be required to demonstrate the benefits of this change.

The reference to a windmill is a very specific issue. It is unlikely to be affected by this policy as most dwellings and other buildings considered against the policy are unlikely to be particularly tall. The issue would also be considered against other policies including Policy GP/ST: Skyline and tall buildings. There is also scope for a Neighbourhood Plan to introduce a bespoke policy if it is considered to be an important local issue such as in Histon and Impington.

A final version of the NPPF has not yet been published therefore the policies in the Local Plan will not, at this stage, reflect the proposed NPPF 2025 changes. The proposed draft policy is not considered to be in conflict with the current NPPF or Class Q provisions. However, it is recognised that there could be situations where a building could secure permitted development under the Class Q provisions and that this will act as a fallback position. The supporting information has been amended to highlight the relationship between this policy and permitted development under the Class Q provisions.

The marketing requirements for a change of use of building in the countryside to residential use are considered to be reasonable and proportionate, and Appendix G of the Local Plan sets out expectations on what is required. The policy has an overarching aim to reduce unsustainable living patterns and minimise the carbon impacts of new housing.

The suggested amendments to refer to national flood risk guidance have not been included as this is considered a duplication of national planning policy and guidance and would not be appropriate.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Broadly supportive of policy.	201646 (Stapleford PC), 210958 (Great Shelford PC)
A formal standard of what defines the required marketing is needed to ensure adequate marketing is made.	201438 (Histon & Impington PC)
It is an unreasonable requirement to have to market a property for 12 months and not take the existing state of the property into account. The requirement for marketing information should be restricted to properties that are vacant but capable of accommodating employment uses, and which are not in poor condition.	208697 (Guilden Morden Developments Ltd)
Tall structures near to a working windmill are likely to have a detrimental effect therefore consideration should be made where a site is within 400m of a working windmill. The Histon and Impington Neighbourhood Plan HIM04 is an example of a policy regarding working windmills.	201438 (Histon & Impington PC)

Summary of issues raised in comments	Comments highlighting this issue
Concern that this policy is weakened by conversion of mobile home temporary permissions to permanent dwellings in the open countryside. Request consideration of tightening of this policy to reduce incidences of increased permissions in the open countryside.	201390 (Gamlingay PC)
Dwellings in the countryside risk eroding rural edges and should be prohibited in the Girton gap.	202266 (Girton PC)
There is a shortage of livery yards in South Cambridgeshire. Where stables are being converted to other use, alternative provision must be made to rehouse the horses.	201721 (S Jeggo)
The existing policy is out of date and conflicts with the provisions of Class Q. The proposed policy appears to replicate this issue and therefore requires reconsideration.	204613 (NP Architects)
Recommend that the 'Reuse of buildings in the countryside for residential use' refers to the need to place restrictions on changes of use within flood risk areas. The following bullet point could be added to this section: "The buildings are located outside of Flood Zones 2 and 3 and outside areas of high surface water flood risk, or a site-specific Flood Risk Assessment demonstrates that the development will be safe for its lifetime, taking into account the effects of climate change."	211171 (Environment Agency)
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably.	204067 (S Rogers)

Policy H/RM: Residential moorings

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was only one comment on this policy. However, the comment was actually focused on a residential mooring allocation from the adopted Local Plans rather than Policy H/RM: Residential moorings

Response to main issues raised in representations:

The residential moorings allocation from the adopted Local Plans was not carried forwards into the Draft Greater Cambridge Local Plan (2025) and this continues to be the case in the Proposed Submission Local Plan (2026). The reasons, as set out in the Sites Topic Paper 2025, are that the landowner stated that residential development is required to enable the marina / moorings, and this proposed development is unsuitable for the site, and our evidence found no specific need for more residential moorings. The criteria based policy will be used to assess any sites for residential moorings that do come forward.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Fen Road marina development (allocated in the Local Plans 2018) should not proceed as: • need mains sewage in the Fen Road area,	203000 (Fen House Property Ltd)

Summary of issues raised in comments	Comments highlighting this issue
• properly maintained footways are needed, and towpath from Chesterton Abbey bridge to Water Lane requires maintenance, widening, and paving, and • the level crossing is near capacity for road traffic, leading to delays and congestion - the local authority should advocate for improved signalling to reduce downtimes.	

Policy H/GT: Gypsy and Traveller and Travelling Showpeople sites

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

The Cambridge Green Party called for Gypsy and Traveller families to have the opportunity to live close to family members and for proposals to be considered on a similar basis to other proposals for residential development. Cambridgeshire County Council has highlighted that there is a need to ensure there are no inequalities for these communities when providing permanent pitches, and have provided a list of specific criteria to be considered.

They also suggested that strategic sites should, in addition to providing permanent Gypsy and Traveller pitches, provide for both negotiated stopping places and transit sites. It has been highlighted that the Local Plan does not mention transit or temporary stopping places despite their being a need identified for them in the Accommodation Needs Assessment, and it was commented that any transit sites or temporary stopping places need to respond to the gap in provision and be well managed and maintained.

An individual felt that the policy requirements were too strict and would limit the number of sites coming forward. In contrast, a PC was clear that proposals must respect Green Belt, flood risk and rural landscape considerations. The Environment Agency have requested that ‘essential utilities’ specifically refers to ‘mains foul drainage’ as this should be provided where possible, and that the policy clarifies that any proposals for new Gypsy and Traveller pitches must not be located within Flood Zone 3.

The need for further sites was challenged on the grounds that current pitches are being advertised as homes for rent and that

many pitches are occupied by non Gypsy and Traveller families despite planning conditions requiring this being attached to the planning permission. There was criticism that current planning breaches were not being enforced and that this resulted in over-development which was breaking fire regulations, and that the policy does not contain mechanisms or safeguards to ensure that the first and subsequent occupiers are Gypsies and Travellers.

It was also argued that there is a spatial imbalance in the provision of pitches with most being in the north of the area and relatively few being in the south of the area, and that a better geographical spread would support community cohesion.

A housebuilder objects to the requirement for strategic sites to include Gypsy and Traveller sites. They argue that the need is in rural areas and is not generated by new settlements, and that the policy requirement goes beyond what is suggested in the evidence base. They also point to practical delivery issues with providing pitches within strategic sites and argue that the Local Plan viability assessment does not take into account the delivery of pitches within strategic sites. An individual has requested details on the potential locations of new traveller sites.

Response to main issues raised in representations:

Our evidence shows that there is a need for additional Gypsy and Traveller pitches and Travelling Showpeople plots within Greater Cambridge, but that there are also existing vacant pitches and pitches that are not being occupied by those meeting the definition of a Gypsy and Traveller. It is therefore important that any new pitches or plots that are proposed demonstrate a clear need for the new pitches or plots and provide details on how the proposed residents meet the definition of a Gypsy and Traveller or Travelling Showperson.

Reflecting national planning policy, the criteria based policy in the Local Plan aims to ensure fair and equal treatment for travellers, facilitate the travellers way of life, and respect the interests of the settled community, whilst also limiting the

development of traveller sites in the open countryside. The policy sets out a series of requirements to be considered when any new pitches or plots are proposed in Greater Cambridge, which includes that any pitches or plots are located in a sustainable location, with the design and layout of any new sites or yards providing healthy, safe and secure living conditions for their occupants. Additionally, the policy provides the opportunity for proposed occupants to set out why the proposed new pitch or site is necessary, including why their needs cannot be met on existing sites.

Gypsy and Traveller pitches and Travelling Showpeople plots can be located in the countryside provided that the requirements within the policy are met, and this therefore provides greater flexibility for these residential uses compared to other residential developments. Where there is already national planning policy, such as Green Belt and flood risk, the supporting information highlights that this will be used when considering planning applications.

The Councils are reviewing the occupation of traveller sites within Greater Cambridge, and will be taking relevant action where occupation of sites is not in line with the conditions set out in the approved planning permission. Planning permissions for traveller sites include conditions relating to the number of pitches/plots and caravans that must not be exceeded on the site and also relating to the occupants. These conditions relate to the first and any subsequent occupants.

Licensing of caravan and park home sites is required by separate legislation – the Caravan Sites and Control of Development Act 1960 and the Mobile Homes Act 2013 – and the site licence will include specific conditions relating to model standards, such as safety and welfare requirements.

The approach to meeting the identified needs of travellers is covered within the Strategy Topic Paper. The Accommodation Needs Assessment 2024 (ANA 2024) sets out a series of options for meeting the identified accommodation needs of travellers, and the Councils have considered each of these options. Delivering traveller sites as part of strategic sites is part of the approach to meeting the identified needs, alongside windfall developments and optimisation of existing sites.

Strategic sites provide an opportunity to deliver Gypsy and Traveller pitches, alongside other types and tenures of housing, to ensure that new communities meet the needs of different groups in sustainable locations with access to services and facilities. As the Councils have an identified need for traveller sites, it is important that strategic sites contribute towards their delivery. Traveller sites within / on the edge of strategic sites is akin to there being traveller sites on the edge of existing villages. The proposed percentage of traveller pitches within the overall number of dwellings on a strategic site is similar to the relationship between existing settlements and traveller pitches.

The policy allows for traveller sites to be provided both within strategic sites, but also on other land in close proximity to the strategic site. By including requirements for strategic sites to deliver traveller sites within the policy, this allows them to be considered from the outset and planned into the development. The existing strategic sites with planning permission all have conditions within the outline planning permission that refer to the delivery of housing to meet the needs of a variety of groups in the community, and this includes the needs of travellers.

The Viability Assessment 2026 has considered the delivery of traveller sites within strategic sites, and finds that it is viable to do that alongside the other plan requirements.

The ANA 2024 considered the need for transit sites and temporary stopping places, and concluded that there is a need to provide temporary places for travellers to stop but that there was only a limited need for transit site provision. The ANA 2024 also highlights that in general councils are moving towards providing temporary stop over areas and negotiated stopping to help meet short-term transit need rather than developing transit sites. A temporary stop over area is known land which can be used on a temporary basis, and where temporary facilities can be provided when the temporary stop over is in use, but which would not require planning permission. Similarly, negotiated stopping involves councils coming to an agreement with Gypsies and Travellers to allow them to use a piece of land as a temporary stopping place. As temporary stop over areas and

negotiated stopping do not require planning permission, there is no need to refer to them in the Local Plan.

In response to the Environment Agency, the suggested amendments to note that Gypsy and Traveller pitches should not be located within Flood Zone 3 are considered to be a duplication of national policy and therefore not considered appropriate. However, the supporting text has been revised to reflect that Gypsy and Traveller pitches are a vulnerable user, as this a particularly specific point. Policy CC/IW addresses mains sewerage connections and therefore a change to this policy has not been made.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Challenge case that there is unmet demand for Gypsy & traveller plots. Holiday mobile homes are advertised for rent on Smithy Fen and Moor Drove in Histon on Facebook and Rightmove.	202063 (I Grimshaw)
Current planning breaches should be enforced. Of current pitches that are occupied on Smithy Fen many are not occupied by those from the traveller community, they are privately rented. The closeness of caravans breaks fire safety regulations.	202063 (I Grimshaw)
Any such proposals must respect Green Belt, flood risk, and rural landscape.	202267 (Girton PC)
Recommend adding to the end of Point 1a “taking into account the needs and preferences of the proposed residents” so that a site is not refused simply because an alternative exists elsewhere in the Local Plan area, particularly where proximity to family members is important.	203752 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
Recommend adding to Point 1g that proposals are to be considered against the same thresholds as standard settled accommodation, preventing refusal on grounds such as traffic where comparable built development would be permitted.	203752 (Cambridge Green Party)
Should require strategic sites to identify land for negotiated stopping and transit provision.	203752 (Cambridge Green Party)
Most Gypsy and Traveller sites in South Cambridgeshire are in the north of the district and there is an imbalance. A better geographical spread would support community cohesion.	208759 (E Diaz)
There is no mention of transit and temporary stopping place provision for Gypsies and Travellers despite the need for such being identified in the Traveller Accommodation Needs Assessment 2023-24.	203655 (R Robertson)
All Gypsy and Traveller pitches or Travelling Showpeople plots or transit or temporary stay sites on allocated or unallocated sites must be well designed, and any proposals for temporary or transit must: • Fill a gap in the provision of such facilities across the country or respond to a known need such as proximity to a hospital, • Be planned to be well managed and maintained, • Set, and require application of, maximum stay dates of appropriate lengths.	203655 (R Robertson)

Summary of issues raised in comments	Comments highlighting this issue
This policy sets quite a high bar for provision. The number of sites the travelling community actually get is small so there is a need to commit to providing more. The Gypsy & Traveller community have every right to their way of life, and to be treated without prejudice like the rest of us.	205082 (B Nicolson)
It is recognised that strategic sites can play a part in meeting traveller needs.	211571 (Martin Grant Land Limited)
The identified need is overwhelmingly rural and not generated by new settlements, and the ANA explicitly recommends a criteria based policy and only lists inclusion within strategic sites as an option, not an evidence-led requirement. Part 3 of the Policy goes beyond the evidence base, and should be deleted.	208974 (Persimmon Homes East Midlands)
There are practical delivery problems with providing pitches within strategic sites – issues with finding 1-2 hectares within tight masterplans, integrating the pitches in a way that works operationally, and willingness of traveller households to relocate.	208974 (Persimmon Homes East Midlands)
The Viability Assessment does not take account of providing pitches within strategic sites.	208974 (Persimmon Homes East Midlands)
We welcome criterion 1g.	210180 (Historic England)
Need to provide information on potential location of Traveller sites and from which roads these sites be accessed.	205902 (P Harradine)

Summary of issues raised in comments	Comments highlighting this issue
Two sites on the edge of the village are occupied as small travellers sites in breach of planning control. Planning applications were submitted for each of the sites. Neither application complied with planning policy.	209061 (Fowlmere PC)
The policy seeks to ensure that proposed occupiers of any site for which permission is sought will be members of the gypsy or traveller community, however the draft policy does not contain mechanisms or safeguards to ensure that subsequent occupiers are only members of the gypsy or traveller community.	209062 (Fowlmere PC)
In the provision of permanent pitches, need to ensure there are no inequalities for these communities and therefore that: • Sites are located within 1.5 miles of a primary school and 2 miles of a GP surgery, • Sites provide satisfactory amenity for neighbouring occupiers, • Pitch size facilitates good quality accommodation, • Sites include play provision, and that noise and disturbance are mitigated, • The health and safety of occupants are not put at risk from poor air quality, noise, contamination or flood risk.	210550 (Cambridgeshire County Council)
Have previously encountered issues in relation to foul sewage disposal at the permanent traveller sites in the area, as these sites are not connected to the mains foul sewage system, instead utilise multiple package treatment plants that produce inadequately treated final effluent. Pleased to see that section 2(f) includes the need for provision of essential utilities including drainage and	211172, 211173 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
sewerage, but unclear if the term ‘essential utilities’ refers to ‘mains’ sewerage as it is preferable that ‘mains foul drainage’ should be provided where possible. Would welcome establishing mains foul sewage system connection for pitches.	
Recommend that this policy clarifies that any proposals for new Gypsy and Traveller pitches must not be located within Flood Zone 3. Annex 3 of the NPPF classifies caravans, mobile homes and park homes intended for permanent residential use as ‘highly vulnerable’ and table 2 of the Planning Practice Guidance: Flood Risk and Coastal Change indicates that ‘highly vulnerable’ development should not be permitted within Flood Zones 3a or 3b.	211174 (Environment Agency)

Consultation Statement

Appendix 14: Response to Representations - Infrastructure



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan - Regulation 19 consultation (August 2026 - September 2026)

GREATER CAMBRIDGE
SHARED PLANNING

Summaries of Draft Plan Representations, and Response to Main Issues Raised

Infrastructure

Infrastructure Introduction

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Responses to the Infrastructure chapter were generally supportive of the positive approach set out in the Local Plan to infrastructure planning, as well as various key principles established in its policies, including vision-led transport planning and the prioritisation of active travel and sustainable travel modes. Some suggested that sustainable food should be added as a cross-cutting infrastructure category alongside transport, water, homes, energy and green space.

A range of concerns were raised in relation to identified capacity shortages and gaps in existing infrastructure, and negative experiences when using various infrastructure in Greater Cambridge. In particular, congestion and unreliable bus services were highlighted in a number of responses. Various challenges were identified in relation to the pressure that the growth levels and

specific strategic allocations proposed in the Local Plan would place on infrastructure, including water, roads, wastewater treatment, flood risk mitigation measures, energy and healthcare facilities. Specific concerns were raised about pressure arising from other developments not identified in the Local Plan, including data centres, and sought to understand how the Local Plan has considered cumulative impacts of different proposed allocations and in combination cross-boundary developments (such as Universal Studios or proposed new town at Tempsford) on infrastructure.

Various responses requested that the Local Plan and its evidence do more to meet specific infrastructure needs, including emergency services, cultural facilities, youth and community centres and measures to address digital poverty. Some suggested that the Plan should focus more on addressing current infrastructure capacity gaps, including in rural areas. Several respondents expressed concern at the absence of a Transport Strategy in support of the Local Plan.

There were a number of comments raised about specific planned infrastructure schemes in Greater Cambridge, with a particular focus of various comments on the East West Rail route. Others highlighted alternative options for infrastructure improvements, such as the reopening of the Haverhill railway as an alternative to the planned busway. Hertfordshire County Council and West Suffolk Council highlighted the importance of cooperating on cross boundary matters.

A range of comments were raised in relation to the wording of different Infrastructure policies, with recurrent themes around the specificity and clarity of key terms and thresholds, cross-references to the strategies, policies and priorities of other public sector bodies and authorities, and the need for greater clarity around how infrastructure will be introduced in a timely manner to support the phasing of developments. Some comments requested the Local Plan go further and establish firmer requirements and/or mandatory standards, for example in relation to requirements around sustainable transport provision, the permeability of sites, and

creating walking and cycling links. Other comments, however, sought greater flexibility in the policies, such as in relation to the requirements of specific sectors or around how requirements might be applied in different contexts.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The Councils recognise the significant strength of feeling expressed on the need for effective, coordinated and timely infrastructure planning and delivery to support future development of the area. The proposed strategy for growth is predicated on various key infrastructure projects being delivered ahead of development to ensure there is sufficient capacity across the area, including planned transport and water infrastructure schemes, and we have strengthened a number of our policies, including our strategic site allocation policies, to limit development from coming forward until such major constraints are resolved and to ensure that infrastructure is delivered in a timely way to support phased development.

In general, the spatial strategy focuses development where it is capable of being served by existing or new infrastructure, as opposed to a more dispersed development strategy. Opportunities to deliver growth in and on the edge of Cambridge are accompanied by further development in existing and planned new settlements. These are of a sufficient scale that they can viably support substantial contributions to infrastructure, and the Plan establishes clear requirements to ensure that they address their own infrastructure needs and ensure the delivery of key infrastructure and services in-line with development, to avoid pressures on other local facilities. This includes in neighbouring authority areas, and the Councils will continue to work with all neighbouring local planning authorities on the infrastructure requirements arising from planned growth proximal to its boundaries, to identify the potential need for cross-boundary infrastructure.

Identified capacity pressures on infrastructure are acknowledged, and the Council has taken a proactive approach to identifying where such constraints exist, what improvements will be needed to address these and how planned developments could contribute; noting we can only seek funding for infrastructure from development which is necessary to make the development acceptable in planning terms, is directly related to the development, and is fairly and reasonably related in scale and kind to the development. The Council's Infrastructure Delivery Plan (IDP) has been developed using an evidence-led methodology that evaluates current infrastructure capacity and increased demand resulting from planned housing and commercial development, identifying a range of infrastructure measures working closely with delivery stakeholders.

A further update of the IDP was commissioned following the Regulation 18 consultation on the Draft Local Plan, as well as further, detailed studies which provide additional evidence on specific infrastructure needs, including cultural infrastructure, community facilities and food growing. We are working closely with public sector partners to understand their own infrastructure needs, priorities and strategies and identify how development might contribute, including with: the emergency services; the County Council (with respect of services such as education and waste); and the Central East Integrated Care Board and local NHS trusts, to ensure alignment between emerging plans for neighbourhood health hubs and planned growth across the area. This work is also expected to expand upon and develop the evidence around healthcare infrastructure provision which will likely include acute and secondary healthcare facilities, including hospital infrastructure.

The IDP is a live document and will continue to be updated regularly as the Local Plan progresses to reflect changes in infrastructure planning, funding availability and stakeholder input. This will involve further engagement with infrastructure providers and other stakeholders to identify the potential impact of demand arising and additional specific infrastructure needs to support the development strategy and site allocations proposed.

Following a period of close working between the local planning authority, transport authority and local highways authority, the Cambridgeshire and Peterborough Combined Authority has published a draft interim Greater Cambridge Transport Strategy alongside the Proposed Submission Local Plan, and is committed to adopting a final Strategy in time to support the submission of the Local Plan. The draft interim Transport Strategy identifies transport measures for the area, including proposed solutions to address the severe congestion challenges experienced in Cambridge. In combination, these site specific and strategic measures demonstrate that the sites included in the plan can be delivered. The final Transport Strategy will be adopted before the Local Plan is submitted for independent Examination. Alongside this, the Councils will update the IDP to reflect the final strategy once relevant information is confirmed and shared. Additionally, further evidence has been prepared to understand the cumulative effects of planned growth sites and identify where further mitigation may be needed; for examples, potential in-combination transport impacts of planned development in the A14 corridor and at Cambourne North.

The range of comments on the focus, framing and effectiveness of the Plan’s policies on infrastructure are noted. These have been afforded further consideration in relation to the relevant policies, addressed elsewhere in this Topic Paper. While noting the concerns raised around the design and routing of the EWR and GCP corridor schemes, these are matters for their respective delivery bodies, the East West Rail Company and the Greater Cambridge Partnership.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Multiple distribution centre proposals between Girton and Boxworth on the A14 will add large numbers of HGVs and smaller vehicles onto a congested road which is prone to accidents. Mitigation will be needed to avoid defeating the economic imperative. Concern that proposed development at Cambourne North and EWR station will lead to further congestion and increase traffic on narrow local roads between the A428 and the A14, including through villages of Boxworth, Elsworth, Dry Drayton, Knapwell and Madingley. The Plan should consider a new road to connect the A428 with the A14.	205421 (W East), 201305 (A Mansey), 205398 (A East)
We approve of the housing and infrastructure changes but have concerns over EWR, specifically the route it's taking. We used to live in Northstowe and would really have liked a station there. The southern route however goes very close to lots of villages, without providing them any benefit or access to stations	201364 (R Earl)
I reside in Boxworth. Village road carrying too much traffic now. Very concerned that no one has assessed combined effect of EW Rail and new station nr Knapwell plus Cambourne North plus logistic developments at Cambridge Services and Bar Hill plus further new housing north of A14 etc. A14 junction 24/24A is poorly designed and lacks capacity; Swavesey South roundabout is undersized and even now traffic has trouble leaving from Boxworth/services at peak times. Similarly, no assessment of	201493 (P Rainey)

additional strain on water, sewage, flood risk as water is sent via Swavesey to the Great Ouse. I seriously doubt we'll cope.	
My concern about sustainability is that information and forward planning on basic issues such as roads and transport are not yet available. In particular areas of intense concentration of development such as North Cambourne the local roads are not suitable for the current volume of traffic, will be under huge pressure with the new station at. Cambourne, never mind what will happen once the house building starts.	202189 (M Stevenson)
Share concerns very concerned that there will not be enough water to support the very high level of growth planned for Greater Cambridge; plus and making it a centre for water thirsty AI data centre growth.	205296 (Federation of Cambridge Residents' Association)
The A1307 route into South Cambridge from the east should have been implemented long ago and the alternative of cutting through virgin green belt is more expensive and more damaging to the environment. I have not heard a logical argument in favour of the green belt route.	202730 (D Grey)
Concern at the lack of a completed transport plan / strategy in support of the Plan.	202730 (D Grey), 205398 (A East), 210793 (C Deer)
I support Cambridge Junction and Create Cambridge in asking that: • cultural infrastructure is embedded across strategic chapters, not confined to Wellbeing • culture is treated with parity alongside housing, transport and utilities as core civic infrastructure • Create Cambridge is engaged as advisor/consultee on the further development of the Cultural Infrastructure Strategy and the Local Plan where this relates to cultural infrastructure and embedding	202068 (H Chamberlain), 202154, 202321, 202900, 20294 (Cambridge Junction), 202209 (H Tam), 202403 (J Webber), 202422 (T Shaw), 202432 (Kettle's Yard),

Culture across the city's plans. This reflects how cultural venues function in practice and ensures consistent delivery across the plan.	202473 (K Jones), 202695 (T Altmann), 202725 (W Townsend), 202769, 204200, 205437 (Cambridge Junction / Create Cambridge), 202947 (R Tarry), 202962 (T Flinders), 203375 (N Ellis), 203456 (S Ashworth), 203496 (L Heap), 203650, 203882, 205088 (University of Cambridge), 203860 (N Yeni), 204419 (New International Encounter), 204878 (L Matthews), 205153 (H Paterson), 205232 (J Walsh), 205382 (L Howse), 205386 (N Oakley), 205450 (A Seiglow), 203036 (The Arts Theatre Cambridge)

HCC are simply highlighting plans and strategies in Hertfordshire that could impact and may assist in mitigating the impact of development on infrastructure, particularly the transport network, both sides of the county border. This includes Local Transport Plan, growth and transport plans around the A505 corridor. Highlight the importance of cooperation on transport matters.	204074 (Hertfordshire County Council)
The overall level of growth planned for Greater Cambridge and in particular these two planned developments, Cambridge east (S/CE) and Grange Farm (S/GF), will require a strategic transport assessment to consider the cumulative impact on the highway network and highway safety in particular on the A14, A11 and A1307. West Suffolk will engage in collaborative working to fully understand how this will be assessed, what the infrastructure requirements are and any mitigation of impact in particular on Haverhill, in the context of the A1307 and its capacity. This in particular will require careful consideration of the impact on commuting traffic travelling from Haverhill to Cambridge and the A14.	204862 (West Suffolk Council)
Additional housing will exacerbate road congestion in Cambridge, as shown by the hour□and□a□half bus journey from the town centre to Cherry Hinton, and will increase traffic□related pollution. Many residents rely on cars for work and for transporting heavy luggage, so incentives to walk or cycle are unlikely to reduce car use.	209166, 208613, 208614 (R Smith),
Introduce mandatory permeability standards based on site size. Walking and cycling connections should be required, not optional.	202511 (H Brown)
I don't think that a lot of places that people walk for pleasure are public rights of way but are instead either informal tracks used without permission. Perhaps these could be upgraded?	202704 (S Berridge)

CPCA's Statement of Intent (September 2025) states its Greater Cambridge Transport Strategy (GCTS) will be approved by December 2026. The CPCA cannot confirm its position on Transport policies or the Transport Mitigation Measures until the GCTS is finalised. The Mayor has set out his ambitions for a light rail system for Cambridge through the 'Get Cambridgeshire and Peterborough Moving' initiative, and light rail is a key element in this. The CPCA therefore requires the Plan to consistently refer to 'high-quality public transport corridors', including within site-specific sections, as the most appropriate mode for each corridor has yet to be determined.	205404 (Cambridgeshire and Peterborough Combined Authority)
GCSP's Local Plan says its overarching objective is sustainable development, targeting to add 73,300 jobs and 48,195 homes by 2045 – equivalent to a second Cambridge City next to the existing one. GC is under serious water stress now, it is urgent to provide new water infrastructure (but none anticipated before 2032) and reduce current demand (how effective are proposed measures). With uncertainties, risks, lack of control over timing, costs and deliverables we believe the LP's water plan is not sustainable. We are similarly concerned on transport, wastewater, energy, healthcare, and on significant additional growth pressure from Government and CGC.	203656 (Cambridge Approaches)
EEAST welcomes the proposal to work with the health sector, and this should include emergency ambulance services. The ICS Estates Strategy does not provide many details of the estate and other requirements for emergency ambulance hubs as this is managed by the lead commissioning ICS. Therefore, direct communication with EEAST is required. EEAST would request: • A full Health Impact Assessment covering all NHS services including ambulance capacity • Assessment of travel time from ambulance stations to the site during peak congestion, as this directly affects Category 1 and 2 compliance.	210338 (East of England Ambulance Service NHS Trust)

Universal Studios site in Bedfordshire- EEAST would recommend consideration of the impact of additional car travel arising from visitors travelling to the proposed Universal Studios site in Bedfordshire. More traffic is expected on major routes, including A14, A421/A428. Increased rail usage may also arise as a result of this development.	210341 (East of England Ambulance Service NHS Trust)
ECC expect Greater Cambridge councils to ensure the necessary highway and transportation assessments, with mitigation requirements and provision arising from the spatial strategy and new developments identified, including impacts on both the local and wider highway and transportation network. With consideration given to cross boundary impacts and needs associated with any growth proposals. ECC recommends that emphasis is placed on promoting integrated sustainable transport; with sustainable travel plans and passenger transport options in new developments and the connectivity between housing and employment areas to ensure an integrated transport package of solutions are developed. This is particularly important for the larger sites that may offer an opportunity for a step change in provision and in some cases will link to, or even place a burden on, services and facilities in neighbouring authorities.	210468 (Essex County Council)
Support for Policy I/EV's vehicular and cycle parking standards and design requirements. Request to update Part 2h to allow for cycle parking in alternative residential types, such as flats or maisonettes, by including provisions for communal secure areas. Concerns regarding the vagueness of the 5-10% requirement for non-standard cycle parking in Part 3; request for a defined threshold and specific types of non-standard cycles to be accommodated. Request for clarification on the threshold for large-scale major developments regarding the submission of a site-wide electric vehicle charging strategy as stated in Part 6.	204467 (Cambridge Investment Partnership)

The respondents object to Policy I/EV, advocating for a design-led approach to parking provision that considers site location, use types, and safety issues. They suggest encouraging innovative car parking solutions and the inclusion of electric charging points, tailored to the specific characteristics of individual sites. Part 1 of the Policy is seen as inflexible, requiring Transport Assessments for all developments, which should instead adopt a site-specific, evidence-based approach. Part 2 of the Policy is viewed as overly prescriptive regarding cycle parking design, suggesting that flexibility is necessary. The respondents recommend that any requirement for electric vehicle parking be excluded from the Policy, as it is already covered by Building Regulations.	203122 (Barrat David Wilson Homes and the North West Cambridge Consortium of Landowners)
Policy I/EV outlines the proposed parking standards that are to be applied to new developments. Accordingly, the draft Policy provides guidance with regards to the design considerations to inform car and cycle parking provision, as well as the quantitative parking standards to be applied. Whilst the proposed parking standards are considered to be acceptable in principle; the draft Policy text is lengthy and consideration should be given as to whether it may be appropriate to include reference to the compliance with the parking standards within the parking text with the parking standards themselves instead provided within an appendix to the Local Plan or alternatively within a separate Parking Standards Supplementary Planning Document	211293 (Woolsington One Ltd)
The respondent objects to Draft Policy I/SI, particularly the designation of land southwest of Comberton on the Policies Map, which is subject to the East West Rail Safeguarding Direction. The respondent accepts the wording of Draft Policy I/SI in principle but strongly opposes the identification of the land under Policy I/SI due to its implications for their site. The respondent has a legal interest in the land	204555 (Bellway Strategic Land)

through an Option Agreement with the landowner and has made formal representations to East West Rail during the Non-Statutory Consultation. The respondent is concerned about the proposed alignment of the East West Rail track and its use of their site as a construction compound, and they are in discussions with the EWR Company to address these issues. The respondent requests that designations under Policy I/SI on the Policies Map be updated before the Regulation 19 Consultation to reflect the latest developments with East West Rail.	
The respondent seeks clarification on the plan-making and decision-taking role of Policy I/SI, particularly regarding the application of safeguarding for the East West Rail scheme. While the principle of safeguarding is accepted, the policy lacks clarity on acceptable development circumstances within safeguarded areas. The supporting text suggests consultation with National Highways and/or East West Rail is required, but does not specify when development may be permissible. The current wording of the policy may lead to an overly restrictive interpretation of safeguarding, creating uncertainty. The respondent recommends amending Policy I/SI to clarify that safeguarding does not imply a presumption against development and to provide clear criteria for proposal assessments. The suggested amendments should include the role of consultation, opportunities for design mitigation, and specific circumstances where development may be supported. Without these clarifications, the respondent believes the policy lacks precision and may be ineffective and unsound.	204146 (Emmanuel College)
ECC acknowledges the reference to the Infrastructure Delivery Plan (IDP) accompanying the Local Plan. It is however notable that following a review of the IDP there is no reference to cross boundary matters, and the anticipated priorities for the future. For instance, strengthening links to London Stansted airport from future employment and housing growth locations, in particular through sustainable	210470 (Essex County Council)

modes (including but not limited to rail). ECC also draw attention to our previous comment that highlights the matters for consideration within the Highways and Transportation evidence base.	
ECC aims to assist Greater Cambridge authorities in drafting the emerging Plan and therefore draws attention to the Uttlesford Inspectors Report and Main Modifications that is published (links provided). The inspectors and main modifications include an addition of policy regarding the approach to noise exposure. It recommends the addition - “for aviation transport sources, the Significant Observed Adverse Effect Level is considered to occur where noise exposure is above 63dB LAeq,16hr (57dB LAeq,8hr at night) and the lowest observed effect level is considered to be 51DB LAEQ, 16HR (45DB LAEQ, 8HR at night)”. This wording may be appropriate for the Plan. Furtehrmore it is also important to note that the Inspectors for Uttlesford also welcomed the addition of reference to outdoor noise on school sites should not exceeding 55DB LAEQ (30 MIN) (reference from the Main Modification - MM32). Similarly to the above, Greater Cambridge authorities may seek to adopt a similar approach.	210476 (Essex County Council)
The need for aggregates, required for building the proposed new developments, could have an impact on available supplies, and their transportation, for development in Suffolk. Such matters may need to be given further consideration as the plan progresses and as more detailed information becomes available.	210637 (Transport 2000 Cambs & W Suffolk)
ECC is keen to inform, shape, support and help refine development strategy and policies, given the potential cross border impacts for ECC and involvement is necessary and beneficial: • Highway and Transportation Authority, including responsibility for the development and delivery of the Essex Local Transport Plan; lead authority for Education including Early Years and Childcare (EYCC), Special Education Need (SEN) and Disabilities, and Post 16 education; Minerals and Waste Planning	210465 (Essex County Council)

Authority; Waste Disposal Authority; LLFA; lead advisor on public health; and has responsibilities for adult social care in relation to the securing the right housing mix which takes account of the specialist housing needs of older people and adults with disabilities; • infrastructure funding partner which seeks to ensure that development proposed is realistic and does not place an unnecessary (or unacceptable) cost burden on the public purse and, specifically, ECC's capital programme; • major provider and commissioner of a wide range of local government services throughout the county, many of which are accessed by those who reside in adjoining authorities.	
The policies should be strengthened to include: references to lighting and cameras in relation to active travel; clearer criteria to secure shops, youth and community centres at an earlier stage of the build to encourage new community development and to stimulate social capacity at an early stage; reference to digital poverty in relation to Digital Infrastructure. S106 money delivery needs to be standardised and made easier to access.	210536 (Cambridgeshire County Council)
Need for greater focus on delivering communities facilities (education, schools, libraries, healthcare, community centres and halls, culture, faith spaces, youth spaces) up front, to encourage community development, stimulate social capital and provide alternative spaces for the first residents.	210537 (Cambridgeshire County Council)
Request to ensure accurate references to Cambridgeshire County Council strategies are accurate. The Plan should also include references to: the requirement for developers to submit Transport Assessments; Rights of Way Improvement Plans (ROWIP) (https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-andpolicies/rights-of-way-improvement-plan) where connectivity/community & social	210523, 210559 (Cambridgeshire County Council)

inclusion is discussed, noting there is already a network that can be built upon or improved for this. The Royston to Granta Park Strategic Transport Study should be refereed to in relation to the southern biotech cluster.	
There is a need for a effective public transport serving a wide range of destinations, with more effective planning for and investment in public transport. Large amounts of money have been wasted encouraging people to drive to car parks before taking short guided bus journeys. The Council should plan ahead more effectively to encourage much more efficient development and infrastructure.	206546 (A Gresham)
In the medium to long term, a railway or tram line from Haverhill into Cambridge with appropriately placed stations would be a more efficient solution than a busway.	206547 (A Gresham)
Aside from traffic generation from development sites, when land is allocated within proximity to the SRN, the increased number of residents will likely be impacted by noise pollution from the SRN. National Highways will not allow noise barriers, and other structures on its land. In addition, National Highways will not accept third party connections to its drainage systems as highlighted within paragraph 59 of the Circular 01/2022. Paragraph 59 also states that developments must not add extra run off to existing systems where existing informal or formal connections exist.	209013 (National Highways)
In addition to this, due to the proximity of allocations around the SRN, some locations may result in potential severance issues. Consequently, provision needs to be accounted for infrastructure, such as overbridges, to minimise severance across settlements and new developments. As stated above, any crossings of the SRN will be subject to the correct structural and safety assessments completed and appropriate agreements ensuring ongoing maintenance and required funding are met. Once any	210848 (National Highways)

requirements for additional crossings of the SRN have been established, National Highways recommends engagement with appropriate teams.	
Add an explicit ‘Sustainable Food’ theme as a cross-cutting infrastructure category alongside transport, water, homes, energy and green space	206960 (Y Dignon), 208190 (Cambridge Sustainable Food)
Previous mistakes in how Cambourne was planned should not be repeated in future development, including the lack of a high street with smaller shops, facilities for young people and a swimming pool. This should be provided up-front.	201853 (R Logan)
Welcome the emphasis on sustainable transport but the strategic priority for the chapter should include a greater focus on people and how people are served by transport.	203753 (Cambridge Green Party)
Supportive of the commitment to vision-led transport planning.	204922 (Innovate Cambridge)
Fire and rescue, police and ambulance services should be referenced under the strategic priority for infrastructure policies.	207518 (Cambridge Fire and Rescue Service)
Large-site allocations present a significant opportunity for sustainable travel, but walking, cycling, and public transport must be prioritised from the beginning.	207540, 205435 (R De Beaux)
In planning for the area, the Council should safeguard existing NGET assets including overhead lines, underground cables and substations, and existing and potential access routes required for the delivery and removal of equipment associated with the construction, replacement and maintenance of transmission-scale equipment; and support future network reinforcement and expansion works. Council should encourage early engagement with NGET to identify and resolve any potential impacts at the earliest possible stage of the planning process.	208042, 208043,208044, 208045, 208046 (National Grid Electricity Transmission)

CLAF supports the overall vision of the Draft Greater Cambridge Local Plan but urges stronger, more explicit policy commitments to protect, enhance and integrate public rights of way and access networks across Greater Cambridge. Essential that PROWs and other access networks recognised and safeguarded as core infrastructure. Relevant policies should include wording to prevent loss, severance or compromise of PROWs, and any development resulting in alterations should deliver like-for-like or improved access for different users, recognising how important these links are in rural areas.	208162 (Cambridgeshire Local Access Forum)
The Plan should be more infrastructure-led to avoid issues as a result of scale of growth, clearly defining phases for large schemes.	202210 (Storeys Way Residents Association)
The Plan should include clearer requirements for required infrastructure to come forward as agreed (and early in the development process).	203606 (Cambridge City Council Liberal Democrat Group)
The Plan lacks sufficient focus on existing problems in the City of Cambridge – including the volume of traffic, narrow pavements, and poor bus services. There seems to be little effort to actually change anything substantive. So I find it hard to take all the stated commitments to sustainability seriously.	201032, 205513 (T Pfaff)
Need to demonstrate more clearly how cumulative impacts of development on infrastructure will be addressed.	207381 (R Baker)
Notes that proposed buildout rate means provision of infrastructure will be a long time coming.	210793 (C Deer)
Need to improve public transport so there is less need for people to use their cars; rather than just making it more difficult to drive.	201153 (B Raynaud)

The Plan is too focused on improving bus services and needs to make reference to the need for Mass Rapid Transport (MRT).	201266 (A Duff)
The Plan must prioritise public transport and active travel over electric cars, which still cause congestion and road safety issues. The focus should be on improving bus services, not just infrastructure.	203119 (S Hughes)
The Plan includes lots of focus on major transport schemes and corridors, but less focus on everyday rural infrastructure and cumulative impacts on this – including roads, drainage, school capacity, healthcare, reliable digital infrastructure. Should be more focus on smaller settlements and providing necessary rural facilities.	203181 (Cambridgeshire ACRE)
The Universal Studios development should be included in the evidence base, with transport impacts modelled and mitigated. Similarly, the Plan's evidence base will need to take account of the proposals at Tempsford and their impacts on transport and housing / employment demand through robust modelling.	208224, 208225 (Bedford Borough Council)
The Topic Paper has not been updated following the Government announcement of funding withdrawal to support the Cambridge WWTW relocation. We generally support Anglian Water's view that the Local Plan consider safeguarding land for new infrastructure that they may need to provide to support development.	211186 (Environment Agency)
In order to provide a broader representation of MOD interests, and to ensure prospective developers are aware of the implications of developing within an area containing MOD safeguarded zones, the joint Local Plan for Greater Cambridge should include at future stages of the Local Plan, policy wording that makes clear that only those applications for development which would not compromise, restrict or	209251 (Defence Infrastructure Organisation)

otherwise degrade the operational capability of safeguarded MOD sites and/or assets will be supported. The MOD asks that the plan contain clear safeguarding language is used to prevent any development – including tall buildings, wind turbines or large solar-PV installations – from compromising the operation of defence assets such as the East Wide Area Multilateration network and aviation safety, and that any proposals that would do so be refused or subject to conditions.	
Actie Travel routes and PROWs should be bridleway to include horseriders. New developments should have perimeter bridleways and bridleway connections to/from other nearby places.	204072 (S Rogers)

Policy I/ST: Sustainable transport and connectivity

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the vision-led approach and principles set out in the policy, noting that development of separate dedicated public transport links where public transport is unaffected by general traffic congestion are essential for growth, and that the strategy should reflect this more fully by directing growth towards the most sustainable, well-connected villages, or on the edge of Cambridge. Some comments noted a mismatch between the principles set out in this policy and the sites chosen for development, suggesting that they actively avoid existing sustainable travel infrastructure and, in some cases, are in close proximity to major roads. Some comments suggested that rather than restricting development in areas with lack of sustainable transport, the plan could be more ambitious in supporting enhanced rural connectivity, and that the plan doesn't do enough to connect some settlements to high quality sustainable transport, including existing and planned stations. Some suggested the inclusion of specific transport measures for individual villages or to address site specific concerns. Some comments that infrastructure improvements and their timely delivery are vital to avoid delay to the build out of development.

Comments reflected that the policy should support widening of travel choices and support genuine choice of modes, indicating the need for greater balance given all modes play a role, and suggesting that the policy should require proposals to adhere to the sustainable travel hierarchy. Some indicated that achieving a mode shift away from car requires the provision of well-designed public transport systems, walking and cycling routes and infrastructure. Others suggested that the key requirements

in the policy could be made more specific and measurable, seeking general clarification, with various respondents requesting the inclusion of mandatory permeability standards based on site size.

Various commented that walking and cycling connections should be required not optional. Some suggested that opportunities should be sought to maximise the provision of new active travel routes, and that the policy should embed the five active travel design principles – coherent, direct, safe, comfortable and attractive, recognise the need for active travel connections for leisure and recreational purposes, including equestrian users, and seek improvements appropriate to the nature of the route. Some comments sought clearer definition of key terms, such as what was meant by the use of the ambiguous term “Rights of Way”.

A number of comments suggested that the policy could go further in emphasising the role of buses, facilitating direct and efficient bus operation, and supporting improved bus services, noting a lack of a comprehensive strategy to enhance the bus network. Concerns were raised about the impact of specific planned transport schemes including GCP busways and EWR, and the closure and relocation of Waterbeach railway station, and that the Plan should establish mitigation principles and safeguards to maintain village character and cohesion. Comments that the existing and planned busways are not integrated or joined up, and that an integrated mass rapid-transit (MRT) network is needed to support the scale of growth as an urgent priority, extending beyond Greater Cambridge and that the Local Plan should facilitate its delivery.

Comments suggested railway stations need access strategies and better active travel and bus connections and wayfinding to surrounding villages, and noting that barrier down times are deterring passengers and need mitigation.

Concerns were raised that there is disproportionate emphasis on reducing car use, while underplaying factors such as cleaner vehicle technology and hybrid and electric transition, realistic travel distances in dispersed communities and the economic and social costs. Some commented that the policy could be clearer around how trip budgets will be enforced and what the legal

basis is for doing so.

Some comments suggested that electric cars should not be considered a form of sustainable transport, which is contrary to the vision to minimise reliance on the private car, noting electric private cars have the same impacts on congestion and road safety. Concern was expressed about the impact of HGV traffic volumes and the lack of available HGV parking. Some reflected that the transport needs of certain development, such as freight and logistics, are likely to be different, with the need to balance strategic location and strong sustainable transport measures. Concern that the plan does not provide a cumulative impact assessment for four proposed logistics sites, and a lack of traffic forecasts makes it hard to evaluate access and mitigation measures, noting issues arising from congestion and rat-running in the surrounding area.

Further issues raised include that the Plan should reflect recent announcements regarding EWR, including Cambridge Station Eastern Access, Cambridge East Station and Cambourne Station, that there should be clearer references to the requirement for developers to submit Transport Assessments, and it could be useful to refer to the Royston to Granta Park Strategic Transport Study when talking about the southern biotech cluster.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The development strategy co-locates the majority of development with existing or planned high quality public transport schemes, such as East West Rail (EWR) and proposed GCP public transport corridor schemes; this will widen travel choice and support genuine choice of modes for new and existing residents and workers, improving inclusivity and helping to reduce the reliance on the private car. High quality public transport requires a significant concentration of people to achieve patronage levels and ensure

they are viable; substantial development at villages to sustain such provision needs to be balanced against wider potential harms. Development will be phased to ensure it keeps pace with the delivery of necessary transport (and other) infrastructure, to avoid harmful impacts (including cumulative impacts) on the wider transport network. It is acknowledged that new public transport proposals continue to be explored, including the potential for an area wide mass rapid transit scheme, however it is not appropriate to include these within the plan until there is greater certainty of their delivery.
There were suggestions for inclusion of specific transport measures for individual villages or to address site specific concerns. These are matters for the Greater Cambridge Transport Strategy (GCTS), and as such have been shared for consideration with the Cambridgeshire and Peterborough Combined Authority for their consideration. However, reflecting the consensus of responses around particular types of transport measures, such as missing connections between villages and nearby stations and mobility hubs, focused changes have been made to the policy to identify general transport network connections that new developments could meaningfully address or contribute towards.

Concerns were raised in relation to the impact of EWR and GCP corridor schemes; these are matters for their respective delivery bodies, the East West Rail Company and the Greater Cambridge Partnership, and the Councils are engaging with these delivery bodies to ensure these schemes minimise and mitigate their impacts in accordance with environmental and place making policies in the Local Plan and maximise the benefits and opportunities for local communities, for example through improved connectivity. Noting concern was expressed about HGV traffic and parking, the policy requires development to assess and mitigate their impacts, and Policy S/RRA/SCS: Land to the south of Cambridge Services, A14 makes provision for approximately 150 additional HGV spaces.

It is accepted that all modes play a role in addressing the travel needs across Greater Cambridge and the policy has been

amended to ensure it addresses each, including strengthening the public transport wording and adding clarification the text in relation to new roads and accesses. Other changes include refinement of the criteria relating to active travel to embed the five active travel design principles into the policy and recognise the use of routes for recreational and leisure purposes, including equestrian users, seeking to create a joined-up network of routes. Further clarifications have been made around how key terms are defined, including “Rights of Way”, and to address concerns that the policy should be made more specific and measurable, noting that the policy applies to all types, scales and locations of development.

In response to concerns that there is a disproportionate emphasis on reducing car use over wider factors such as cleaner vehicle technologies, whilst this is noted, it should be recognised that cleaner vehicle technologies the policy is consistent with the road user hierarchy which prioritises vulnerable road users and sustainable modes ahead of cars. New strategic sites on the edge of Cambridge and new settlements will be designed to prioritise movement by non-car modes to be more inclusive and reduce the reliance on the car through provision of substantial improvements to active and public transport to provide genuine travel choice and due to constraints on the already congested highway network; this will be achieved through vehicular Trip Budgets, which will be enforced through a monitor and manage approach to ensure that the development remains within the agreed trip budget for the site throughout its delivery.

In response to the specific comments raised in relation to Public Rights of Way (PROW), while the Councils recognise the important role that they play in delivering the Local Plan’s objectives for green infrastructure, sustainable transport and health and wellbeing, including bridleways and multi-user routes, the IDP is intended to identify strategic, costed infrastructure projects required to support planned growth. PROW enhancements are typically delivered through site-specific design, masterplanning and planning obligations, rather than as discrete, plan-wide infrastructure projects. For this reason, they are not identified as a separate costed

infrastructure category within the IDP. The IDP should be read alongside Rights of Way Improvement Plans and other supporting strategies, as referenced in the revised supporting text for the policy, which provide the detailed framework for prioritising and delivering PROW enhancements in a coordinated manner.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
We are broadly supportive of this policy.	201647 (Stapleford PC)
The policy should make clear that opportunities should be sought to maximise the provision of new active travel routes (ie, hard-surfaced routes for utility travel) and new 'leisure' routes comprised of PROW (ie, soft-surface routes that provide enhanced countryside access).	210612 (Cambridgeshire County Council)
We welcome the ambition to protect and improve existing non-motorised user routes. It should be noted that "improvement" works such as re-surfacing a soft-surface PROW to a tarmac facility, can potentially be damaging to the pre-existing network of PROW. This potentially introduces disbenefits to the established user base and to biodiversity, and so does not always neatly marry with a desire to "protect" the network. Accordingly, the document should acknowledge that improvements to PROW will take place "where appropriate", and in a manner that is sympathetic to the existing nature of the PROW.	210613 (Cambridgeshire County Council)

Public health support the transport user hierarchy promoting active travel above the use of all other vehicles. Public Health recommend that active travel routes and sustainable travel opportunities in developments should: • contribute to maintaining, improving and adding to connectivity for pedestrians, cyclists, users of wheeled mobility aids • be well defined, lit, feel safe with natural surveillance wherever possible • respond to the needs of people with disabilities and reduced mobility • maintain, improve and add to rail, bus and community transport connectivity • provide infrastructure to facilitate sustainable transport.	210609 (Cambridgeshire County Council)
Throughout the Plan, reference is made to 'Rights of Way'. This is not a class of highway and it is ambiguous as to whether the document is referring to public, permissive, or private rights of way. If the Plan is intending to refer to public rights of way, i.e., Public Footpaths, Bridleways, Restricted Byways, and Byways Open to All Traffic, then it should be unambiguous about this and use the term 'public rights of way' - easily abbreviated to 'PROW'. If the reference to 'Rights of Way' is also intended to encompass permissive rights of access or other privately managed routes, then this should be clarified.	210559 (Cambridgeshire County Council)

Mention of active travel but needs reference to lighting, cameras so that learning can be taken from Northstowe bus route antisocial behaviour and thefts. • The need for shops at an earlier stage of the build, youth and community centres also to encourage new community development and to stimulate social capacity at an early stage. • S106 money delivery needs to be standardised and made easier to access. • Digital infrastructure does not refer to digital poverty.	210536 (Cambridgeshire County Council)
Make sure references to strategies are correct e.g. CCC Active Travel Strategy for Cambridgeshire.	210523 (Cambridgeshire County Council)
Response by chair and Vice-chair of Environment and Green Economy CommitteeWhile this is not intended to be a transport strategy, the absence of ring roads, dedicated public transport routes through the city centre, and an active travel ring road or strong inter-village connections means the plan does little to reduce reliance on private car travel. New towns are predominantly planned to the north of the city, while most employment opportunities are located to the south, and connectivity—particularly for journeys from the north—is not consistently strong.	211003, 20800 (Cambridgeshire County Council)
Suggested amended/additional wording highlighted in full representations document to improve points 1., 2., 2a., and 2e.	210525 (Cambridgeshire County Council)

The County Council welcomes the continued close working on the Local Plan with GCSP and looks forward to continuing this close working relationship with further development of the Plan and associated transport evidence. Recent announcements regarding EWR including Cambridge Station Eastern Access, Cambridge East Station and Cambourne Station should be reflected in the Local Plan. There should be clear references to the requirement for developers to submit Transport Assessments. It could be useful for the Local Plan to refer to the Royston to Granta Park Strategic Transport Study when talking about the southern biotech cluster.	210510 (Cambridgeshire County Council)
Walking and cycling connections should be required, not optional, and standards should be produced to mandate this.	203885 (J Prince), 205146 (J Grantham), 201703 (M Hickford), 203097 (S Hughes), 204946 (Mothers CAN Cambridge), 204963 (A Brown), 205015 (M Cleminson), 205317 (R De Beaux), 205371 (A Williams), 205445 (P Colledge), 201815 (J Baumberg), 202883 (J Williams), 203310 (A Hoare) , 201815 (J Baumberg), 204694 (R Humphrey)

Introduce mandatory permeability standards based on site size.	205146 (J Grantham), 203097 (S Hughes), 204946 (Mothers CAN Cambridge), 204963 (A Brown), 205105 (B Nicolson), 205317 (R De Beaux), 205445 (P Colledge), 202294 (R MacDonald), 202883 (J Williams), 205371 (A Williams), 203310 (A Hoare), 203719 (A Hofer), 203735 (D Peters), 204050 (K ap Garth), 204546 (D Potts), 204585 (R Hoadley), 201815 (J Baumberg), 201998 (D Langley)
The GC policy accepts that people can only live in smaller villages such as Great Wilbraham if they have access to a car. This policy impacts children, non-drivers and people without a car, consigning them to dependency and social isolation- and is unfair. Rather than prohibiting because of lack of transport, the Local Plan should be ambitious about improving rural connectivity – for example, for Great Wilbraham a rural transport hub in Fulbourn with car and bike parking, a more frequent connecting bus route to the nearby larger villages, safe cycle routes to adjacent villages and support for EV charging.	206560, 203386 (Great Wilbraham PC)

I fully agree with sustainable transport and connectivity goals outlined here. However, the weakness in many developments is connectivity to the surrounding area. The brochures show a community able to walk and cycle within its red line. While the only access is typically a large junction designed for motor car though put. Never something appealing to new residents wishing to walk or cycles. I would like to see mandatory standard for development's connectivity to the surrounding areas. With policy supporting improvement of these connections to minimum safety standards as part of the development's impact mitigation requirements.	201834 (T McKeown)
The existing transport corridor in west Cambridge does not appear to exist yet. If it were developed it should be confined to cycling and walking and take great care to avoid Grantchester Meadows.	200986 (R Howard)
The plan doesn’t do enough to connect some settlements to high quality sustainable transport such as busways, railways or other frequent public transport connections. Some villages, such as Cottenham, have been impacted by speculative development, resulting in inadequate public transport options for residents, particularly those without access to a vehicle. Others, such as Haslingfield and Harlton, have even more limited links and would benefit from better connections to Park and Rides / Travel Hubs, with cars remaining the only practicable way to get around. Development in such locations should be restricted. A priority should be establishing direct transport links to rail stations, as well as the Guided Busway, to reduce reliance on single occupancy vehicles.	200999 (D Smith), 201035 (S Jackson), 205204 (E Wilson)
The plan should do more to promote better connections to planned and existing stations, for example the new Cambridge South station.	201047 (P Spowart)

Recent and planned developments in Cambridge are resulting in particular transport pressures on Cambridge United matchdays. Public transport should be increased to help accommodate the traffic (up to 14,000 people), including greater park and ride provision in line with match times.	201157 (R Carling)
The East West Rail route will directly affect the peace and tranquillity of communities along the route and the construction will affect wildlife.	201362 (C Harrod)
Although East–West Rail is not allocated through the Local Plan, its potential impacts on villages such as Newton are clearly material considerations. Paragraph 22 of the NPPF requires plans to anticipate long-term infrastructure change. Increased rail services and associated development pressures may affect local road networks, connectivity and village character. The Plan should therefore include clearer recognition of these impacts and establish mitigation principles, including protection of local roads, integration of active travel routes and safeguards to maintain village character and cohesion.	206694 (Cllr R Williams)
Regarding EWR. The chosen southern approach to Cambridge (which we oppose) requires it to solve two very significant problems, to which it does not currently appear to have solutions. It has potential impact at both construction and operational stages on the rare barbastelle bat at Eversden and Wimpole Woods SAC. It also has potential adverse impact on the Mullard Radio Astronomy Observatory. Figures in Table 90 of the Transport Evidence Report do not provide enthusiastic support for a southern approach to Cambridge. How will the larger number from Cambourne who go to work in north east Cambridge or Northstowe get there by public transport? If EWR were to take a northern approach to Cambridge, not only could a station be built at Northstowe, but it could call at all three Cambridge stations, not something a southern approach can achieve.	208096 (Great Shelford PC)

Concerns raised around the closure of the existing Waterbeach station. This will disadvantage existing residents who live in the village. It is heavily used, reduces traffic, maintains clean air, improves connectivity for people and is sustainable. Closing the existing station would result in a 35 to 40 minute walk, encourage more car use and unfairly disadvantage elderly and disabled station users. There are examples of other stations elsewhere in Greater Cambridge that are similarly close together. Support for two stations to serve both existing village and new development and belief that there would be enough usage to warrant this, and it would keep through traffic from using Way Lane and Cody Road.	201363 (R Matthews), 201432 (J Cattermole), 201433 (C Munck), 201444 (A Cotton), 201634 (L Doe), 201371 (S Jeffery), 201365 (S Orbell), 201412 (A Richards), 201425 (J Jenkinson) 201428 (P Jordan), 201429 (S Reeves), 201472 (K Orbell), 201685 (J Martin), 201904 (S O'Donnell), 202996 (R Jones)
I would find it difficult to get to the new station & I would be quite lost without it.	201370 (J Plumb)
Additional park and ride needed east of Cambridge as a result of planned developments.	201441 (J Newton)
The policy does not adequately recognise the need for active travel connections for recreational purposes, including equestrian users, and focuses too heavily on connectivity and providing efficient links from A to B. The benefits of recreational walking and other activities such as cycling and horse riding should be fully acknowledged and planned for. Existing roads between villages are often designed for 60mph with no pavements, making them unsafe for vulnerable road users. Similarly, the IDP does not explicitly identify public rights of way as infrastructure to be delivered alongside growth, despite being essential to achieving the Local Plan's objectives for sustainable transport, green infrastructure, health and wellbeing.	201637 (P Cutmore), 201793 (Cambridge Group of Ramblers), 210972, 202016 (Swavesey PC), 201687, 208653 (British Horse Society), 204075 (S Rogers), 201717 (S Jeggo)

Part 2e of the policy is ambiguous on whether it applies to informal walking routes (permissive paths, tracks etc.). It is suggested that routes frequently used should be upgraded to public right of way (PRoW) status for better management and safety and to provide more routes for recreational purposes.	Stapleford PC (201648)
Support for the principles set out in the policy; however, noting that the strategy should reflect this more fully by directing growth towards the most sustainable, well-connected villages, or on the edge of Cambridge.	201961 (KG Moss Will Trust & Moss Family), 203907 (Hill Residential (Fulbourn Site)), 204436 (Hill Residential (Great Abington Site)), 201972, 201978 (Shelford Investments), 202372 (The CLC Trust), 202586 (Ely Diocesan Board of Finance), 205199 (North Barton Road Landowners Group), 205503 (T Woodcock), 211250 (Manor Oak Homes), 204217 (Hill Residential (Hardwick Site))

Need for greater focus on cumulative impact of consented and proposed developments on local infrastructure, particularly regarding traffic volume from HGVs, delivery vehicles, and cars. Without this, there is a risk of wider impacts not accounted for in the assessments (e.g. rat running in villages, bridges sinking under the cumulative load of traffic). It is recommended that all major development sites provide traffic and transport data on cumulative impacts rather than just site-specific impacts.	201972, 202016 (Swavesey PC)
Concern about lack of HGV parking causing issues and dangers in and around villages and the A14. Additional HGV parking is vital for any consented development.	201972, 202016 (Swavesey PC)
Key requirements in the policy should be made more specific and measurable and key terms should be defined. For example, what “sufficient” means in terms of different transport measures (for example, spacing of cycle routes every 250-400 metres in dense built-up areas), or “maximised opportunities for sustainable travel” in part 4, which needs strengthening and defining more precisely as it is not clear what baseline an application would be compared against. Terms that provide discretion should be removed; for example, removal of the word “appropriate” in relation to pedestrian prioritisation, setting firmer requirements around modal filters, and avoiding use of “should” instead of “must” in relation to the requirement for measures to be in place at early occupation. This will make the policy more enforceable and reduce the risk of car-reduction intent being watered down at application stage.	202601 (A Lawrence), 230567 (P Tribble), 204946 (Mothers CAN Cambridge), 204296 (Cambridge Past, Present and Future)

Safe walking and cycling connections should be provided between Girton, Eddington, and Darwin Green, in particular a well-lit, grade-separated underpass beneath Huntingdon Road that prioritises pedestrian and cycle movements over motor traffic and reduces risks to safety. This would better align with the basis on which Darwin Green and Eddington developments were allocated, promoting walking and cycling as the primary modes of local movement.	202268, 202410 (Girton PC)
Concern that CSET is designed to parcel off green belt for development, rather than improving public transport in an existing corridor.	203078 (T Lane)
Concern that CSET exploits inaccurate mapping of the Gog Magog Hills and conflicts with the green infrastructure aims of the draft Local Plan, suggesting an alternative on-road route could mitigate this issue.	209684 (Stapleford PC)

Objections to the CSET element of the transport strategy. Inconsistency noted between the green infrastructure objectives of the draft Local Plan and the transport strategy concerning the CSET busway. Concern over the harmful impact of the proposed CSET route on the Gog Magog Hills. Support for alternative, on-road bus route along the A1307 from the A11 to the The historically and geologically important Gog Magog Hills and their adjacent chalkland fringe, despite being given priority status for enhancing strategic green infrastructure across Greater Cambridge, are not given any consideration or protection when evaluating the environmental and landscape impacts of the proposed CSET busway. Its proposed section, from the east of Stapleford Granary to where it passes Nine Wells Local Nature Reserve will slash across the lower slopes of the Gog Magog Hills. The Gog Magog Hills, despite being a priority for enhancing strategic green infrastructure across Greater Cambridge, are not being accorded sufficient value and hence protection when evaluating the environmental and landscape impacts of the proposed route of the CSET busway. The lengthy section of the busway from where it crosses the track to the east of Stapleford Granary and continues in a north-westerly direction to where it passes Nine Wells Local Nature Reserve near Cambridge South Station will use the lower slopes of the Gog Magog Hills. There is, therefore, a glaring inconsistency between the green infrastructure aims of the draft Local Plan and its transport strategy. This inconsistency could be at least partly mitigated if an alternative, on-road route along	202637 (I Smith), 202678 (A Gannon), 203086, 203078 (T Lane), 203111 (N Campbell), 203124 (C Schofield), 203171 (J Jasiewicz), 203183 (D Morgan), 203206 (V Morgan, 203902 (H Painter), 204115 (A Baker), 204460 (N Pond), 204672 (M Fyfe), 204967 (O Arthurs), 205008 (C Arthurs), 207658 (K Foreman), 208558 (J Robinson)

the A1307 corridor from the A11 to the Cambridge Biomedical Campus (The proposed alternative route by 'Better Ways for Busways) was pursued instead. Building a new transport corridor through green space is manifestly inappropriate. It will reduce the recreational value of both Magog Down and Nine Wells among others, by generating increased noise, light and visual disturbance. I see no evidence that attention has been paid to light pollution.	
The current planned route for the CSET effectively destroys a region of Green Belt adjacent to Great Shelford, but provides no realistic additional transport options for the vast majority of village residents. Routing CSET along the so-called southern access road (page 51 of the draft Infrastructure Delivery Plan) extended to the Hinton Way roundabout and then on a dedicated bus lane along the A1307, whilst not benefiting any travellers from Great Shelford, would greatly diminish the destruction to the village Green Belt amenity and also reduce traffic along Hinton Way.	208092 (Great Shelford PC)
Great Shelford Parish Council is very strongly in favour of the alternative route for CSET proposed by Better Ways for Busways along A1307; it is both more economical and efficient and less deleterious to the countryside. We note that the slides used by GCSP on 15 January suggest that development at CBC will need to contribute to CSET. This has the potential to introduce a re-examination of the costs of the proposals of the Greater Cambridge Partnership relative to alternatives	208093 (Great Shelford PC)

We agree that improvements to key corridors should be pivotal to the transport strategy. However, CSET is not proposed to sit within a public transport corridor. Rather, it will create a new bus road across Green Belt land from the A11 at Grange Farm travelling north to terminate at Cambridge South Station. Better Ways for Busways has proposed an alternative route which does recognise the existing transport corridor and is, therefore, less environmentally destructive, improves accessibility for a range of different users, and is more cost-efficient. We would be happy to provide more detail of this alternative route if requested.	208102 (Great Shelford PC)
The policy reflects a misalignment between the plan and transport strategies pursued by the councils and GCP and the plan lacks a comprehensive strategy to enhance the bus network as a whole. There is a reliance on a bus-based strategy linked to park and ride sites, but a mismatch with the transport solutions identified on the ground (e.g. at grade crossings, lack of bus gates to prioritise buses) which risk slowing buses down and lack suitable modal prioritisation.	202821 (Cambridge Past, Present and Future), 203097 (S Hughes)
he Draft Plan places heavy reliance on future public transport improvements, including a relocated railway station and new bus infrastructure. As a resident, I am concerned that: - These schemes may not be delivered early enough. - Day□to□day travel for work, education, healthcare, and caring responsibilities will remain car□dependent. - There is insufficient policy emphasis on accessible transport for disabled and elderly residents. This risks non□compliance with the Public Sector Equality Duty.	208979 (J Williams)

The policy could do more to support improved bus services, including new developments designed for direct and efficient bus travel through them, ensuring an adequate bus services on first occupation of new developments, and that key bus routes should have frequent services available seven days a week, with long operating hours and guaranteed last bus home.	203097 (S Hughes),
Concern that this policy does not include any reference to heritage and propose an additional clause is added: 1g: Protect and enhance any heritage assets and their setting.	202821 (Cambridge Past, Present and Future)
Electric cars should be exempt from the restrictions in this policy	203097 (S Hughes)
The policy could go further in prioritising deliverable, near-term measures such as demand management (congestion charge/parking levy), a connected Park & Ride network, frequent reliable bus services, and upgraded stops near education sites. Clear milestones for zero-emission buses, robust Travel Plans, and stronger coordination of roadworks are essential to protect capacity and support net zero.	203006 (Hills Road Sixth Form College)
Rather than restricting development in areas with lack of sustainable transport, the plan could be more ambitious in supporting enhanced rural connectivity, such as travel hubs with car and cycle parking in larger villages, feeder bus services and safe cycle routes to those large villages, and EV charging points.	203886 (Great Wilbraham PC), 204128 (N Wilson)
There is a mismatch between the principles set out in this policy, (which are supported), and the sites chosen for development in this plan which actively avoid existing sustainable travel infrastructure and, in some cases, are in close proximity to major roads.	203567 (P Tribble), 203626 (H Thomas)

The policy could benefit from changes to make it clearer and more precise, including: removal of or clearer definition of “vision-led approach” in criterion 1; identifying specific “walkable neighbourhood” principles in criterion 2e; and including reference to other mode-mode interchanges in 2c. The last part of 2c should be strengthened to reflect the evidence that additional facilities help hubs to function better as valued, safe community assets.	203754 (Cambridge Green Party)
An explicit requirement for proposals to adhere to the sustainable travel hierarchy should be added.	204946 (Mothers CAN Cambridge)
The policy should embed the five active travel design principles – coherent, direct, safe, comfortable and attractive – as a clear policy test for all development.	202294 (R MacDonald), 201709 (J Anderson), 201778 (J O’Sullivan)
Considering the relative speed and effort needed for active travel trips compared to car trips, the plan should require making routes more direct by active travel than by car to generate more walking and cycle trips. For instance, new development could have mandated minimum number of links out of the development based on the size of the development.	203678 (T Preud'homme)
The policy could go further by clarifying that maximising sustainable travel opportunities should take precedence over road capacity interventions. There is also a lack of acknowledgment that developments can offset transport impacts through mode-shifting existing trips, which may conflict with CIL Regulation 122 (b). No clear guidance is provided on how mode-shifting can reduce the need for road capacity upgrade investments.	204296 (Cambridge Past, Present and Future)

The supporting text to the policy should be clearer around how trip budgets will be enforced and what the legal basis is for doing so, given the lack of highways powers to enforce and planning conditions cannot retrospectively identify additional measures needed if a trip budget is exceeded	204318 (Cambridge Past, Present and Future)
Support for the principle of the policy, noting that development of separate dedicated public transport links where public transport is unaffected by general traffic congestion are essential for growth. Only by making public transport reliable and frequent will the problem of congestion be resolved	205070 (D Davies)
The policy could go further in emphasising the role of buses in addressing traffic congestion in Cambridge, especially on weekends, with long queues of cars waiting for the car parks, mostly running engines and spewing out pollution and carbon.	205162 (M Clarke)
The policy should recognise that the needs of pedestrians, wheelers and cyclists are different and sometimes clash. Lack of segregation between modes disadvantages walkers and wheelers who often don't feel safe close to fast cyclists and scooters	205259 (D Stoughton), 205322 (D Spiegelhalter)
Infrastructure policies should support widening of travel choices and support genuine choice of modes.	205485, 205477 (Cambridge and Peterborough Combined Authority), 208835 (D Smith)
A sustainable transport strategy is not one that replaces car dependency with cycling dependency. It is one that reduces unnecessary trips, supports realistic modal choice, and recognises that different people, journeys and locations require different solutions.	208835 (D Smith)

Walking, cycling, public transport and cars all have a role to play, therefore the plan should encourage sustainable choices where they are realistic and safe, maintain road access where alternatives are not viable, avoid road closures that displace traffic rather than reducing it, and avoid policies that are not inclusive to all.	208836 (D Smith)
Currently, the plan places disproportionate emphasis on reducing car use, while underplaying factors such as cleaner vehicle technology and hybrid and electric transition, realistic travel distances in dispersed communities and the economic and social costs of restricting road access. Meanwhile, while safer, better connected cycling is supported, this should not be prioritised over road capacity where there are no alternatives or drive design decisions on new communities based on assumptions about uptake. Cycle infrastructure should be proportionate, well-designed and integrated, without excluding other users.	208837 (D Smith)
The Plan should avoid: • designing entire communities around cycling assumptions, • removing road capacity without viable alternatives, • or assuming high cycling uptake regardless of age, ability, weather, terrain or trip purpose.	208840 (D Smith)
The Plan must: • maintain reasonable road access, • avoid road closures that displace traffic rather than reduce it, • and assess impacts on emergency access, deliveries and local businesses.	208841 (D Smith)
Bar Hill would benefit from a joined up pathway around the perimeter road, which has been requested by local councillors previously but not implemented.	205571 (P Spowart)

Reference to LTN 1/20 for cycling infrastructure but needs reference to LTN 1/24 which gives guidance for bus infrastructure design.	202520 (University of Cambridge)
References to e-scooters should be tweaked to saying e-scooters that are part of a DfT approved scheme e.g. Voi	202520 (University of Cambridge)
Residents of villages with limited or non-existent public transport often rely on driving to the nearest station to access rail services. Until realistic alternatives are in place, the Plan should ensure that station parking policies support inclusive access to public transport and do not undermine sustainable travel by inadvertently increasing car dependency by discouraging multi-modal trips.	204550 (Cllr T Bygott)
The policy could be updated to reflect that the transport needs of certain development, such as freight and logistics, are likely to be different, with the need to balance strategic location and strong sustainable transport measures. While the plan relies on the 2024 the NPPF, the more recent draft framework (2026) clarifies the importance of specific locational and operational requirements for freight and logistics development, advocating for a sector-specific approach.	204547 (Tritax Big Box Developments)
However, given the rapidly evolving policy landscape, forthcoming spatial planning strategies and other interdependencies, alongside a complex governance environment, it is important that the plan ensures explicit consideration of how uncertainty is managed in applying a vision-led approach to transport. Greater clarity on how the vision-led approach will remain robust and adaptable in the face of change would strengthen its effectiveness and support confident delivery.	203540 (Cambridge Ahead)
The policy should consider the importance of development phasing, ensuring transport improvements are secured and implemented progressively as communities develop.	204620 (Redrow South Midlands)

Clarification is needed on the definition, funding, and maintenance of “mobility hubs” in criterion 2c.	204620 (Redrow South Midlands)
I fully support the response which has been written by Camcycle. It's a remarkably detailed and insightful piece of work, and I would struggle to express any part of it better in my own words. I've read the draft version, which is currently available here: https://www.camcycle.org.uk/images/blog/Camcycle-DraftLocalPlanresponse-Jan2026.pdf We must be careful not imbed car dependency into future developments, and we must also remember that electric cars are still very much cars (with many of the problems associated non-electric cars and several entirely new and unique ones).	202606 (D Roberts)
How will the traveller and gypsies site be policed to ensure they stick to the rules of the land as we all know at times they tend to be a law unto themselves with the police avoiding any contact and I speak from experience. My son had his car stolen but the police would not go to Willingham to get the car back.	201403 (P Johnson)
Greater Cambridge Local Plan needs to acknowledge the importance of PROWs for leisure purposes. The areas that are a priority mentioned in attached are: • Having a vision and plan based on a map of future growth with gaps in PROW network identified Having officers and councillors with responsibility for PROWS • Having identified funding routes for improving the PROW network • Consulting with non motorised users groups and organisations at an early stage of Master Planning.	208883,208884,208885,208886,208887,208888,208889,208890,208892 (Cambridge Group of Ramblers)

• Omission of the importance of PROWs for wellbeing and green infrastructure • Lack of recognition of the distinct and different needs for active travel and for leisure activities • No policies for funding the improvement of the PROW network • No mapping of the areas for growth with the gaps in the existing PROW network • No mechanism to ensure developers contribute to addressing the gaps • No proposals to engage with organisations and users of PROWs	208883,208884,208885,208886,208887,208888,208889,208890,208891 (Cambridge Group of Ramblers)
Rights of way are included in the Glossary under Green Infrastructure, but not mentioned elsewhere. References to green spaces to access opportunities to benefit new homes and jobs but not the importance of rights of way for health and well being, BNG opportunities, the environment. Rights of way are the inclusive leisure network distinctive from urban style walking and cycling active travel provision. Vision does not meet NPPF para 105 December 2024, PPG policies promoting inclusion of rights of way and users. Nothing to highlight the need for this provision.	201687 (British Horse Society)
The British Horse Society objects because it considers that the Infrastructure Delivery Plan is not fully effective or justified as it does not explicitly identify public rights of way as infrastructure to be delivered alongside growth. Rights of way, including bridleways, are essential to achieving the Local Plan's objectives for sustainable transport, green infrastructure, health and wellbeing. Their omission from the IDP risks inconsistent delivery and missed opportunities to secure improvements through development. The IDP should explicitly include rights of way and equestrian access, aligned with the Rights of Way Improvement Plan, to ensure coordinated and effective infrastructure delivery.	203598 (British Horse Society)
The policy should be strengthened to ensure equestrian access is embedded as a core requirement rather than an optional consideration.	208654 (British Horse Society)

1/ST 2 - please include equestrian 1/ST 2 e - add 'retain the rural character of rights of way' 1/ST 2g1 - add equestrian users	201717 (S Jeggo)
Vision-led integration of vehicular transport, prioritising active transport and better connectivity: with reference S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) project, support reduced reliance on vehicular transport and better integration of pedestrians and active transport users within a car-dominated infrastructure. Support integration of a bus network to mitigate reliance on vehicular traffic in this central, congested area. the new urban realm surrounding the infrastructure must achieve better connectivity N/S and E/W by redesigning the roundabout transport node, Prioritise pedestrian and cyclist desire lines and active transport modes (pedestrians, cyclists a.o.)	204276 (A Giarlis), 204286 (L Cooke), 204401 (NEUBAU Architecture Ltd), 205015 (M Cleminson), 205233 (Cambridge Junction/Create Cambridge), 205365, 205377 (University of Cambridge)
With reference S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project, I strongly object to proposals to demolish the Underpass. Safer, surface-level crossing for pedestrians and cyclists' can be achieved without demolition. The current on-grade arrangement offers no safe way for a low-speed, active transport participant. There are no pedestrian crossings or suitable crossing lines, nor any integrated cycle paths protecting cyclists. The current roundabout is car-centric, which could be addressed fairly quickly - by prioritising active transport, and in the long term, by integrating vehicular transport considerations with multi-disciplinary, urban design addressing the infrastructure as a whole.	204592 (T Woodcock)

Transportation using arterial roads and commuter routes (Motorways and Railways) should prioritise linking each end of a Local Government sphere with the surrounding Local Government spheres, such as Southport at the very northern tip of Merseyside where transportation links are much weaker with Lancashire in the north and east than with the rest of Merseyside to the south.	210372 (Community Campaigner D Barton), 210373 (Community Campaigner D Barton)
Given that emergency service access is highly dependent on a safe road environment, EEAST supports Vision Zero principles. Health infrastructure resilience depends partly on safe transport routes, which flooding and poor design can disrupt. EEAST requests: • Clear sightlines at junctions and crossings • Sufficient road width to enable emergency vehicles to pass parked vehicles • Designing road/rail infrastructure to reduce incidents and • Speed-reducing design features (gateways, lighting, junction tightening) • Safe, accessible cycle parking for all cycle types (e-bikes, trikes, reclining, mobility scooters) and also need that disabled or older people may not have the strength to lift cycles onto racks • Secondary streets: provide sufficient road width to enable emergency vehicles to pass parked vehicles. • Car-free Zones: provide easy access and egress for emergency services in pedestrianised areas which include sufficient space for public to stand clear of moving emergency vehicles. • EEAST would advise speed humps/cushions can create issues for emergency ambulance services when responding under blue light conditions. This includes issues such as hindering delivery of clinical care and may contribute to damage to emergency ambulance vehicles and staff.	210339 (East of England Ambulance Service NHS Trust)

Congestion is one of the most significant contributors to ambulance delay. EEAST requests: • A transport assessment explicitly modelling blue-light travel times • No design element should obstruct emergency access (eg parked vehicles, pinch points, shared surfaces, traffic calming measures as these impact time taken to traverse a speed hump - each hump can add 8–16 seconds, driver behaviour to divert avoid Interfere with CPR and life-saving treatments, Increase pain and risk for patients with spinal injuries, fractures or trauma) • Full swept-path analysis demonstrating unrestricted ambulance movement for all ambulance types including bariatric, multi-victim and standard van ambulances. • Connectivity between locations – any pedestrianised areas need to ensure there are refuge places for pedestrians to safely stand to allow transit of emergency vehicles. Connectivity between housing and industrial estates for emergency services is also vital as every seconds delay could adversely affect life, long-term health outcomes and property.	210340 (East of England Ambulance Service NHS Trust)
Ensure transport corridors need to ensure access for emergency services in and between neighbourhoods. Provision of access for emergency services at regular intervals to access the Guided Busway/Railways in the event of an incident.	210342 (East of England Ambulance Service NHS Trust)

The link between enabling active travel and improved physical and mental health, reduced health inequalities, and the prevention of chronic disease should be emphasised, as this provides a stronger rationale for prioritising active travel in all new developments. It is suggested that wording in the supporting information could be amended to include: Active travel such as walking, wheeling, and cycling, plays an important role in supporting the health and wellbeing of communities. Regular physical activity can reduce the risk of chronic diseases including heart disease, stroke, diabetes and some cancers, whilst also supporting healthy weight management and mental health. Prioritising active travel in neighbourhood design can also help to reduce health inequalities by making healthy choices easier and more accessible for all, including those who may not have access to a car.	210634 (Transport 2000 Cambs & W Suffolk)
The A1307 is a part of the strategic road network and an important corridor which should be referenced on all maps. SCC is committed to working collaboratively with GCSP, as well as West Suffolk Council and Cambridgeshire County Council to improve safety and reduce the impacts of congestion on the A1307. Safety and congestion levels on the A1307 between Haverhill and Cambridge are a concern to SCC, and we urge Greater Cambridge to take every reasonable step to mitigate the transport impacts of new growth and solve existing problems on this key route, with a focus on sustainable transport.	210642 (Transport 2000 Cambs & W Suffolk)

The A1307 was intended as a special road for HGV access only; using it for a site with significant HGV movements would conflict with vulnerable road users and the cycleway, so an alternative access arrangement is required for Slate Hall Farm. In addition, the continuity of the cycleway must be retained and protected to avoid loss of priority. Therefore, we would require alternative access arrangements to be made for any development on the Slate Hall Farm location.	208075 (Northstowe TCl)
Transport is a problem in Cambridge. There is support for active travel and policies on local buses (not the busway). Residents are concerned about the proposed route of the C2C busway from Cambourne to Cambridge, which would pass through the ward. There is local concern that the C2C busway will lead to the development of the West Fields, between Grange Road and the M11.	210675 (Newnham Labour)
Good public transport must be placed firmly at the heart of future development. Public transport, including active travel, should shape development outcomes rather than respond to them. Trains, buses, and active travel are the genuinely sustainable modes of transport. We cannot accept the premise within the draft plan that electric vehicles form part of a sustainable transport solution. While they have a role to play in decarbonisation and improving air quality, electric vehicles contribute to many of the problems the plan seeks to address, including congestion, land take, and particulate pollution from tyres and brake dust and low costs of EV charging will encourage modal shift away from buses and trains - opposite of the stated aims of the Local Plan.	208029 (Railfuture East Anglia)

While the focus of development close to the city's three railway stations is supported, the regional railway network outside the city, including its seven local stations, has been largely overlooked in the draft plan, except around Cambourne, which is a station yet to be built. The railway already shapes major travel flows in the area. Stations at Whittlesford Parkway, Shelford, Ashwell & Morden, Meldreth, Shepreth, Foxton, and Waterbeach are vital assets and the passenger flows from these stations are substantial. The draft Local Plan must explicitly recognise the importance of these local and city stations and the potential for existing rail lines to operate as a formal metro system serving key employment and development areas.	208030 (Railfuture East Anglia)
Local stations at Ashwell & Morden, Meldreth, Shepreth, Foxton, Whittlesford Parkway, Shelford, and Waterbeach village are already well used, but access must be improved. The plan should commit future authorities to: • Providing step-free access at all stations, including lifts and footbridges between platforms. • Work with Network Rail and Greater British Railway to safeguard land for platform extensions, new footbridges, lifts etc as appropriate.• Delivering safe, direct cycling and walking routes linking stations to their villages and surrounding villages building on the Greenway network. It is particularly concerning that there is currently no safe walking and cycling route between Sawston, Duxford, and Whittlesford Parkway	208032 (Railfuture East Anglia)

In East Cambridge, the plan should commit to working towards a new station on the Newmarket line near Yarrow Road and Gazelle Way, ideally with the removal of the level crossing and its replacement by a bridge. In connection with these developments the future authority should demonstrate its backing of the restoration of double tracking of the Newmarket railway with Newmarket becoming the turnback station for EWR. Land along Gazelle Way should also be safeguarded for a future light rail line linking east Cambridge to the airport site and Cambridge North continuing via Orchard Park to Darwin Green, Eddington, and Cambridge West, potentially using the part of the guided busway corridor.	208037 (Railfuture East Anglia)
Points 2a) to h) are broadly supported. It is however questioned what is meant by “mobility hubs” and how these would be funded and maintained. Point 3 is broadly in accordance with the NPPF paragraph 116, though the wording could be simplified. Policy I/ST may want to mention the relevance of development phasing, where transport improvements are secured and implemented over time as communities grow.	204622 (Redrow South Midlands)
Travel and traffic management are critical for the villages north of the A428, with concerns about the lack of the Combined Authority’s Travel Strategy.	210452 (P Deer)

If you approve the CSET off-road busway it will carve a 14 meter wide swathe through the green belt at a cost of more than £160 million of public funds. Even using the GCP's highly dubious calculations to justify the business case, the Benefit to Cost Ratio is significantly less than 1. Which means that you get less than a pound's economic value for every pound spent. A guaranteed loss. You cannot justify supporting that to local residents. In contrast, if the GCP's old scheme along the A1307 corridor was built at a cost of £60 million, the BCR increases to about 1.5. While this isn't a great return on investment, it does at least mean that the public are getting some value for their taxes.	208137 (M Harper)
The GCP's scheme does not include the cost of carbon or biodiversity net gain requirements that are now law for all private developments.	208138 (M Harper)
I agree that improvement to key transport corridors should have a high priority, but the proposed CSET route does not lie within an existing transport corridor. It will unnecessarily compromise the important landscape on the south east side of Cambridge, including the lower slopes of the Gog Magog Hills and the River Granta river valley, when it could be routed alongside the A1307 at a much lower cost. The latest cost estimate I have seen was £160m. This will almost certainly increase to well above £200m by the time it is built, and possibly considerably more. This is a ridiculously high burden on the public purse for an 8 km roadway when a much cheaper and shorter option is available.	208181 (J Coppendale)
In the medium to long term, there is a need for an efficient railway or tram line from Haverhill into Cambridge with suitably placed stations along the way is required. I think it will be a big mistake if this need is ignored. Trains and trams are more efficient than buses. Go to Nottingham to see trams working well – they even stop at the front door of the hospital there	206545 (A Gresham)

Improve bus services At present there is a short term need is for more efficient buses running to and from an area. This can be achieved relatively cheaply and effectively with strategically placed bus lanes on the A1307, a spur road to Addenbrooke's and much more effective traffic management in and around the Addenbrooke's site and on Hills Road into Cambridge. It requires better layouts, lanes, traffic management systems and better operation of traffic lights. Improve bus services on Babraham Road, Perne Road and Netherhall Gardens, where current provision is limited or absent, to encourage alternatives to car use. Increase evening and weekend bus frequencies (currently every 30 minutes) to Addenbrookes Hospital and the main rail station. Provide more information and a more regular bus service between Ely Station and the city centre, together with better promotion of the service.	206544 (A Gresham), 203236, 203246 (G Heathcock)
In my opinion, all this proposed busway might do is to encourage some people working at Addenbrooke's to drive to a new Park and Ride site and then use the busway. This busway will also not provide a benefit to most people in Sawston, Stapleford and Shelford because the busway stops for those villages will be too far away from most people in those villages unless they use their cars to get there.	206543 (A Gresham)

I object to this proposed busway because it will not deliver a major benefit to people living in the area from Cambridge to at least as far as Haverhill who need to travel to and from Cambridge (not just the Addenbrooke's site). I also consider that if the busway is constructed it will be a big waste of money and it will make several existing problems much worse. The major need is to make significantly effective improvements to public transport into Cambridge from further away – in this case at least as far as Haverhill.	206542 (A Gresham)
Planners have wrongly endorsed CSET despite sound arguments against it. A busway will • not improve transport to, from, in or around the campus. • Not come from far away or go on into the city. Improvement of existing corridors is less destructive, serves more people and is more cost-efficient. Multi-modal access road isn't needed. Instead a spur off the Hinton Way roundabout would: • connect all of the Campus with the Station.• Ease local traffic.• Be close to Babraham P&R. Why have another P&R nearby at Four Wentways?• Give better access for ambulances.	203193 (A Gresham)
It is noted that the transport evidence base draws from the new Cambridgeshire and Peterborough transport model. The model does not currently take account of the impacts of Universal Studios or the two proposed new towns. The inclusion of Universal Studios impacts on transport will be essential to modelling for all plans across the Ox Cam region and should be incorporated in the modelling undertaken for Greater Cambridge's emerging plan. Bedford Borough Council is working with National Highways and other partners to facilitate this and would advise that Greater Cambridge LPA liaise with National Highways to ensure that the impacts are fully and transparently accounted for on a consistent basis across the region where it is expected that there will be cross boundary movements.	208228 (Bedford Borough Council)

I would like to see this policy extended to existing communities. Existing Towns, Rural Centres and Minor Rural Centres all would benefit from improvements to sustainable transport and connectivity. I would the Local Plan to give these communities greater opportunity to retrofit these improvements into their existing layouts. Best practice is often dismissed as irrelevant outside urban centres, it would be beneficial for the Local Plan to state this is not the case.	201836 (T Mckeown)
Active travel/sustainable travel must in at the beginning at the centre. Not a decoration. It needs to be easier than the alternatives, otherwise people will use them. Make it easier, pleasant, and lovely. Make the necessary journeys short and sweet.	202193 (R Forder)
Cambridge should have a community taxi. So probably cost more than bus but less than ordinary taxi. For awkward routes or times people could use ordinary buses one way and cherish taxi the other.	202293 (F Blows)
No Comment.	202653 (C Pointon)
New developments must be designed to facilitate direct and efficient bus operation, following the principles set out in Bus Services & New Residential Developments (Second Edition).	203220 (Cambridge Area Bus Users)

Bus services are as, if not more important, for bus travel as dedicated bus infrastructure. The Local Plan must set out a service pattern for key routes (frequent services, 7 day a week operation, long operating hours, guaranteed last bus) that will make bus travel attractive for all everyday journeys, not just travel to. Measures to enable buses to travel into and through Cambridge unimpeded are essential. Without these, bus services to and from new developments will be highly unreliable, slow and expensive to run. Buses should also serve key destinations (employment, education, medical and leisure) directly.	203221 (Cambridge Area Bus Users)
Travel by bus must be easy and attractive from day one of occupation of a new development, and developer contributions should support bus services for an extended period (we suggest ten years) so residents have the services they need to build the habit of bus travel.	203222 (Cambridge Area Bus Users)
The ability of residents in new developments to travel by bus depends to a large part on the quality of the whole bus network (which is currently inadequate for its communities' needs), not just the quality of the infrastructure/services that come with new developments, The Local Plan should establish methods to raise funds for an expanded bus network across Greater Cambridge.	203223 (Cambridge Area Bus Users)
A good bus network is a lifeline, connecting people with social networks, personal development opportunities and essential services at a cost they can afford. It is particularly important for young people, whose transport options are limited and financial circumstances often challenging. Bus travel is therefore an important tool to boost health, wellbeing and social inclusion. The Local Plan should recognise it as such, and establish policies to bring about easy bus access to key services, education providers and community, sports and leisure facilities, especially those delivered via the Plan.	203224 (Cambridge Area Bus Users)

The Plan treats electric cars as a form of sustainable transport. This is contrary to its vision to minimise reliance on the private car. Electric private cars also have the same impacts on congestion and road safety as petrol or diesel cars. The Plan must be explicit that it prioritises travel by public transport, walking/wheeling and cycling.	203225 (Cambridge Area Bus Users)
We support new development minimising carbon emissions and reliance on the private car. The high level of private car traffic in and around Cambridge is already a significant hindrance to reliable and attractive bus transport. Despite the ambitions, it is not clear the policies it contains will achieve this aim. The Transport Evidence Report estimates that only just under half of trips from new developments will be made by non-car modes, therefore a mismatch between the vision and the expected outcomes. The Local Plan would be more likely to achieve its Vision if a greater percentage of the new housing was planned for sites in and on the edge of Cambridge, or next to existing public transport hubs, instead of in new settlements miles from the city. Planning to locate sites of employment closer to new developments would also help the Plan to bring about its stated transport goal.	203226 (Cambridge Area Bus Users)
The phrase ‘sustainable transport’ is not defined in this policy, however elsewhere in the Plan, electric vehicles are included as a form of sustainable transport. The Local Plan will not achieve its vision of minimising reliance on private cars if electric vehicles are treated as a sustainable transport mode.	203227 (Cambridge Area Bus Users)

It should be made clear throughout the Plan that the ambition is to encourage the greatest possible movement by walking, wheeling, cycling and public transport. Policy I/ST should be renamed ‘Walking, wheeling, cycling and public transport’ and subsequent references in the text updated accordingly. The definition of sustainable transport in the glossary should also be amended to remove low and ultra-low emission vehicles.	203228 (Cambridge Area Bus Users)
Policy could be strengthened: 1- ‘Reduce reliance’ should be replaced with ‘minimise reliance’ 2 - suggest Amed to read "‘'Planning permission will only be granted for development where the site will, by first occupation, prioritise integration and accessibility by walking, wheeling, cycling and public transport.'" 2b - the phrase ‘to provide real travel choice’ should be repeated 2b - suggest new wording as follows: "Ensuring major developments are supported by high quality public transport routes and frequent services linking them to Cambridge city centre, and other key destinations including major centres of employment, education and services, to provide real travel choice for all journeys.’ 2bi Public transport services to and from new developments should: - Run at least every 15 mins in peak periods - Run 7 days a week - Run in the early mornings and late at night - Include a guaranteed last bus"	203229 (Cambridge Area Bus Users)

In section 2c - The list of facilities should include comfortable waiting areas. The phrase starting ‘located within walking,' should be strengthened so that it reads ‘located within easy walking, wheeling and cycling travel distance of residents.’ 2g - The needs of buses are entirely missing from 2g. Revise: 2gii - ‘it restricts through access for private cars where appropriate’, so as not to exclude buses' There needs to be a new sub-section in between 2gi and 2gii as follows:- It [new road and road access] is designed to facilitate direct and efficient bus operation	203230 (Cambridge Area Bus Users)
The supporting information that accompanies this policy should make clear that streets in new developments should be designed as outlined in Bus Services & New Residential Developments (Second Edition) in line with expectations set out in DfTCircular LTN01/24 “Bus User Priority”. There should also be an additional sub-section about adoption of new roads by The Highway Authority. Cambridgeshire County Council should adopt new roads as early as possible in the construction process. As explained in the blog Embedding public transport in new developments: time to adopt a new approach? (Bus Centre of Excellence 2024.	203231 (Cambridge Area Bus Users)
The importance of tackling existing challenges around bus travel in Greater Cambridge. We welcome the inclusion of ‘services’ in this subsection, alongside infrastructure and behavioural change measures. We emphasise that for bus travel, services are as, if not more important, as dedicated bus infrastructure. The final phrase of this sub-section should be amended to ‘to encourage the use of walking, wheeling, cycling and public transport.’ It should be clear that electric private cars, while preferable to diesel and petrol vehicles, are not the modes of transport the Plan prioritises.	203232 (Cambridge Area Bus Users)

We also welcome inclusion of the phrase ‘to address transport infrastructure in the wider area’ (our emphasis) in this sub-section. The geographical consideration is relevant to services as well as infrastructure, however. The point should read: “to address transport infrastructure and services in the wider area including across thedistrict boundary, or behavioural change measures….”	203233 (Cambridge Area Bus Users)
If new development is going to minimise reliance on the private car, then the Local Plan and the accompanying Greater Cambridge Transport Strategy must have a wider aim of making public transport convenient and much more reliable across Greater Cambridge (or more widely), not just to provide new bus links to Cambridge from new developments. Will a resident of Grange Farm consider bus travel a real choice if bus services to and from that development are highly unreliable due to motor traffic congestion along Hills Road in Cambridge? Will that household forgo purchasing a car or a second car if few daily journeys are easily achievable by bus?	203234 (Cambridge Area Bus Users)
Criteria 3 - it is essential that travel by bus is easy, safe and attractive from day one of occupation of a new development, otherwise driving a car will immediately become the default choice. The wording ‘to meet the first or early occupation of a site’ is too ambiguous and should be tightened. We also suggest that developer contributions should support bus services for at least ten years (or five years af full occupation of a site, whichever is the longer), so residents have the services they need to build the habit of bus travel, as is set out in The City of York adopted plan (p294/295).	203236 (Cambridge Area Bus Users)
Provide more information and a more regular bus service between Ely Station and the city centre, together with better promotion of the service.	203247 (G Heathcock)

We welcome the inclusion of public toilets and cafes in travel hubs (para 1.c).	203607 (Cambridge City Council Liberal Democrat Group)
The cycling infrastructure in Cambridge is not adequate considering the number of cyclists in the city. I approve of this policy because it encourages the development of more cycling infrastructure.	203737 (W Clements)
The principle of reducing reliance on private car travel and the promotion of sustainable, inclusive and well-connected development through a vision-led approach is strongly supported and align with objectives for Papworth South. Of particular support is subsection (c) which requires the provision of new mobility (travel hubs) to enable interchange between different modes of sustainable transport. It is considered that the wording used to define travel hubs are expanded to other community and connectivity requirements, to provide flexibility to the community in question.	207028 (Mac Mic Land)
Shifting away from car use also requires the provision of well-designed public transport systems, & provision of walking & cycling routes and infrastructure.	207321 (A Hoare)

There is no provision for active travel along Elizabeth Way. The cycle lanes are death traps disappearing where the roadway narrows as cars get priority. It is a private car dominated road with varying widths and no evidence of public transport. The pavements are uninviting and narrow. Removing this second outer lane would prevent accidents. The pedestrian crossing at the junction of Chesterton Road and Elizabeth Way is treacherous. Keeping a 20 mph zone at 100 metres either side of the crossing might dissuade motorists from speeding. The area is between areas on the Local Plan, but has been neglected for many years. Fund planting on the remaining front gardens to make the route inviting and less of a heat trap in summer and plant shrubs in the central island of Elizabeth Bridge	208022 (S Stickley)
We are broadly supportive of this policy. Policy I/ST clauses 2d and 2e – it should be recognised that many walking routes in daily use are not public rights of way but are instead either informal tracks used without permission (often around the edges of farmland) or permissive paths (lapsed or otherwise). They are an integral and largely unmanaged part of the daily walking network and improve connectivity in the absence of an adequate network of public rights of way. It is unclear how clause 2e could be applied under such circumstances. Therefore, routes in daily use should be upgraded to PRoW status such that they can be managed appropriately and better and more safely improve local connectivity. Dual benefits will accrue from their use for recreational purposes.	210959 (Great Shelford PC)

Despite being just 4 miles from the centre of Cambridge the road journey into the city is both unreliable and slow, often taking a disproportionate time to travel the four miles. This is due to traffic congestion and the failure of the City Access Programme to improve non-car travel into the centre of Cambridge. This long standing issue requires urgent attention. We note that the CPCA has committed to preparing, engaging on - there appears to be no commitment to public consultation - and finalising the sub-regional Greater Cambridge Transport Strategy in time to support the finalisation of the draft Local Plan. This seems an extremely ambitious timetable as we have not seen any proposals on City Access Proxy or any other related matter to date.	210889 (Great Shelford PC)
Great Shelford is relatively well served by bus routes. However, like all other motorised transport buses suffer from extreme levels of congestion in and out of Cambridge and CBC at rush hours. Infrequent service in the evenings and at weekends contributes to the use of cars and taxis.	210888 (Great Shelford PC)
It would be beneficial to residents of the parish to have a direct active travel route to Whittlesford Parkway station, taking in Dernford Reservoir and the nearby SSSI and Sawston Business Park. Great Shelford benefits from the Genome/Chisholm cycle path, however it has a poor surface with very poor lighting. In addition the connection into CBC is currently very poor due to construction work for Cambridge South station. The extension in the form of the Sawston Greenway is a shadow of the original proposals. The draft IDP refers to “Proportionate contributions to Addenbrooke’s Road to Shelford Tier 2 active travel network (LCWIP route)” and “Additional pedestrian and cycle connections from Babraham Road, south of Nine Wells”. We are not familiar with these projects, both of which appear to be within the parish.	210887 (Great Shelford PC)

It is important that long term future traffic developments in and around Great Shelford are carefully planned to accommodate the physical infrastructure of the village and also the interests of the village inhabitants. It is unclear how current transport plans will achieve this. Known existing problem areas identified in the draft Infrastructure Delivery Plan at page 28 do not, but should, include the A1301 through Great Shelford and the level crossings on Granhams Road and Hinton Way. Outside Great Shelford, the Addenbrookes Relief Road is a (significant problem.	208090 (Great Shelford PC)
Shelford benefits from having a station on the Cambridge to Liverpool Street railway line. However trains typically stop only every hour during the day and every 30 minutes at peak times. This is insufficient to provide a realistic alternative to much car use. We are completely opposed to any private vehicle traffic being able to use the proposed entrance to Phases 3 and 4 of CBC from Granhams Road as this will unquestionably worsen the traffic through the village and at the High Green junction. Private car parking for these parts of CBC should be in the Babraham Park and Ride or the Trumpington Park and Ride.	208091 (Great Shelford PC)

Policies within the Infrastructure theme (including sustainable transport and connectivity) are central to reducing reliance on cars and supporting active travel. CLAF endorses the move towards pedestrian and cycle priority, but highlights the need for: • A strategic approach that maintains rural rights of way connectivity, not only within built areas. • Recognition that, for many people accessing the countryside, rights of way are the primary means of travel for recreation and short utility journeys Where new development is likely to increase recreational pressure on the countryside, CLAF supports: • Proactive mitigation measures, including improved access infrastructure and circular routes, to disperse recreational use and reduce impacts on sensitive landscapes. • Securing access improvements through planning agreements to ensure timely delivery and long-term maintenance. 6. Monitoring and Delivery CLAF recommends that: • The Monitoring Framework includes specific indicators related to rights of way condition, connectivity and user satisfaction. • Delivery mechanisms are clearly identified for the implementation of access improvements, including collaboration with parish councils, landowners and user groups..	208172, 208168 (Cambridgeshire Local Access Forum)
Welcome the inclusion of a policy for sustainable transport and connectivity. While this Local Plan will be tested against the December 2024 NPPF, Recommend that the Council consider making reference to the Department for Transport's Connectivity Tool in order to future-proof the Local Plan. Part 3 of the policy states that 'development will only be permitted where they do not have an unacceptable transport and highways safety impact'. This should be updated to reflect the 2024 NPPF's requirement to avoid severe highway safety impacts.	208698 (Guilden Morden Development Ltd)

We ask that as a strict condition of the Draft Local Plan with its planned level of accelerated jobs and housing growth proceeding to full approval, there is a firm guarantee. of the transport wherewithal being in place in good time to ensure that the planned 20 percent reduction in traffic on our road network is achieved well in advance of 2045 and maintained thereafter.	208740 (Trumpington Residents Association)
The policy states that developers of “large developments” or proposals with “significant transport implications” will be required to demonstrate that opportunities for sustainable travel have been maximised through the submission of a vision led Transport Assessment and Travel Plan. While the intent of this requirement is supported, it is considered that this wording more appropriately relates to validation requirements rather than policy itself.	210269 (Vistry Group)
The policy requires a vision-led approach to transport rather than the predict and provide model, which reflects the shift in national planning policy. The National Trust supports this approach and would welcome opportunities to help connect new developments to our sites through sustainable new connections and transport modes.	211085 (The National Trust)
Local transport systems are failing to meet current needs and are completely inadequate to support the scale of growth in the Cambridge region, both historical and planned. The plan should state unequivocally that an integrated mass rapid-transit (MRT) network is an urgent regional priority, extending beyond Cambridge to towns such as Huntingdon, St Ives, St Neots/Tempsford, Ely, Newmarket, Haverhill and Peterborough.	208197 (Cambridge Connect)

A phased construction timetable and explicit financing mechanisms (e.g., land-value capture, workplace parking levy, green infrastructure bond) are needed to deliver the MRT network and link growth clusters to it.	208198 (Cambridge Connect)
The Cambridgeshire Guided Busway should not be described as ‘high quality’ because busways lack the capacity, frequency and reliability of European light-rail systems. The existing and planned busways also suffer from the major weakness that they are not integrated, or joined up. Nor do they extend into the core of the city. This lack of multi-modal and spatial integration greatly extends overall journey times, and acts as a serious disincentive to people in their decisions about use of public transport.	208199 (Cambridge Connect)
Support EWR. We suggest Cambourne could be better served by light rail mass transit linking to Cambridge City and the central rail station. The route we propose follows parallel to the A428 via the Girton Interchange / Eddington / West Campus, and would provide a twenty-minute journey time into the city. A more southerly direct route would save money that could be directed to finance the light rail connection. We encourage the Government, local authorities and EWR to consider this option.	208200 (Cambridge Connect)
The proposed C2C busway should be opposed on strategic (poor city-centre integration) and environmental (habitat loss at Coton Orchard) grounds. The lack of integration across the city will suppress demand and serve to perpetuate poor uptake of public transport. Destruction of habitat at Coton Orchard when there are viable alternatives, including use of the existing transport corridor of the A428 is objected to. The GCP has failed to consider alternatives properly when selecting the C2C route.	208201 (Cambridge Connect)

We note development at Grange Farm, Babraham Research Campus, Granta Park, Genome Campus and CBC. We strongly support transport improvements to meet these needs. However, we oppose CSET due to its unnecessary compromise and impact on chalk-stream ecology and the Green Belt. A viable and less damaging alternative transport option exists nearby on the ready-made former rail corridor leading to Granta Park / Haverhill.	208202 (Cambridge Connect)
Re-use of the former rail corridor to Granta Park / Haverhill could serve both new housing, campuses and surrounding villages and local communities with frequent and rapid shuttle services and providing 24-hour autonomous shuttles. Moreover, many of those working at the southern biotech campuses reside in Haverhill (~14% of the CBC workforce), which provides much-needed housing at relatively lower cost.	208203 (Cambridge Connect)
A tunnel is essential for any MRT system in the historic core to protect heritage assets and the River Cam, and to free the surface for pedestrians and cyclists. The Local Plan should consider how mass rapid transit can be spatially integrated into the historic city, and at a minimum should review international case studies for strategic guidance. A tunnel is only likely to be viable for mass rapid transit such as metro or light rail. Buses and busways will never attract finance for a tunnel.	208204 (Cambridge Connect)
We welcome provision to “require developments to contribute towards the cost of these transport schemes”. However, the Local Plan needs to be more imaginative and consider a wider range of financing options, as this lies at the core of delivery of transport improvements. The strategy needs to be specific about the spatial plan – ie about clusters and corridors of growth – and how they will be facilitated and supported in a practical and sustainable way by the transport network.	208205 (Cambridge Connect)

Existing village stations lack safe active-travel routes such as multi-use paths linking them to surrounding villages (e.g., Sawston to Whittlesford Parkway, Thriplow to Foxton, Whaddon to Meldreth).	208410 (Cam Valley Community Rail Partnership)
Stations such as Whittlesford Parkway and Meldreth require lifts and ramps to provide full accessibility for all users.	208411 (Cam Valley Community Rail Partnership)
Frequent and prolonged level-crossing barrier downtimes at stations like Shelford, Shepreth and Foxton deter passengers and need mitigation.	208412 (Cam Valley Community Rail Partnership)
Wayfinding and mapping for active-travel access to local rail stations are inadequate or missing and should be improved.	208413 (Cam Valley Community Rail Partnership)
Bus connections to stations are insufficient and should be prioritised, with links to strategic sites incorporated into Section 106 agreements.	208414 (Cam Valley Community Rail Partnership)
An integrated station-access strategy is required for local stations, covering on-site accessibility and active-travel routes for neighbouring communities.	208415 (Cam Valley Community Rail Partnership)
Improvements to existing local rail station will require partnership funding. It is unclear how Section 106 and CIL contributions from new developments will be allocated beyond the primary growth communities; clarification is needed.	208416 (Cam Valley Community Rail Partnership)

We look forward to the opening of the new station at Cambridge South which will be a brilliant addition to the local and regional rail network. Its full potential depends on access and onward travel factors at both ends of the passenger journey. An integrated access strategy for Cambridge South should include safe, direct pedestrian and cycle routes, clear wayfinding, and seamless interchange with bus and shuttle services. Onward travel from the station to destinations near to CBC or the outside of the campus area should be clear and should address accessibility issues to and from the station to mitigate further road congestion and associated problems.	208417 (Cam Valley Community Rail Partnership)
The plan does not provide a cumulative traffic assessment for the four proposed logistics sites, which is a significant shortfall.	206370 (Boxworth Parish Meeting on behalf of A14 Logistic Forum), 211439 (Boxworth Parish Meeting)
No developer has supplied high- or low-case traffic forecasts, making it impossible to evaluate access and mitigation measures despite numerous requests at the public consultations and in parish engagements. This is disappointing and makes meaningful assessment of proposed access to the sites and any mitigations difficult, if not impossible. Developers should be required to make this public prior to the next round of consultation.	206372 (Boxworth Parish Meeting on behalf of A14 Logistic Forum), 211440 (Boxworth Parish Meeting)
Structural problems on the A14 bridges at junctions 24 and 25 are worsening and require permanent solutions, which the plan does not address.	206373 (Boxworth Parish Meeting on behalf of A14 Logistic Forum), 211441 (Boxworth Parish Meeting)

Existing congestion at the B1050/A1307 junction, the Swavesey south roundabout, and the weight-restricted Boxworth Road is severe and the plan provides no mitigation. There are general comments made regarding traffic calming and other restrictions, but such measures have already been installed and have not made a significant impact on traffic flows.	206374 (Boxworth Parish Meeting on behalf of A14 Logistic Forum), 211442 (Boxworth Parish Meeting)
It is difficult to see how the existing road network through the villages either side of the A14 corridor will accommodate increased traffic. As a minimum, consideration needs to be given at an early stage to new roads providing effective bypasses for Dry Drayton, to prevent traffic rat running between the A14 and A428, Boxworth and Knapwell to remove traffic rat running between the extended Cambourne and the new station and villages to the north and north east. Elsworth needs a by pass that will take traffic from the north and north west which already rat runs through the village to the new developments.	206375 (Boxworth Parish Meeting on behalf of A14 Logistic Forum), 211443 (Boxworth Parish Meeting)
The timing of infrastructure improvements is vital, not just in relation to new roads. It is too often the case that infrastructure improvements lag the construction of new developments by many years. This is unacceptable. New infrastructure needs to be in place before any significant development takes place. The Plan is silent on specific public transport proposals which will support the proposed developments and the surrounding communities. It is unreasonable to ask local communities to respond to the Plan consultation in the absence of information on how these traffic issues will be addressed and without sight of the Regional Transport Strategy that is not due to be completed until the end of 2026.	206376 (Boxworth Parish Meeting on behalf of A14 Logistic Forum), 211445 (Boxworth Parish Meeting)

Policy I/ST Para 3 should be amended to require any logistics development above a defined size to demonstrate access from the National Highways network, including necessary junction upgrades.	206378 (Boxworth Parish Meeting on behalf of Logistic Forum), 211431 (Boxworth Parish Meeting)
Policy I/ST seeks to promote sustainable transport and connectivity through new developments, which is supported in accordance with Paragraph 110 of the Framework. However, Part 3 of the draft Policy text identifies that developments will only be permitted where they do not have an unacceptable impact on transport and highway safety. This part of the Policy must be amended, whereby the proposed wording presently conflicts with Paragraph 116 of the Framework which is explicit that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe. This amendment should be implemented to ensure that the Draft Plan is capable of being found sound at Examination in accordance with Paragraph 36 of the Framework which requires that Local Plans must be consistent with national policy.	211292 (Woolsington One Ltd)
Policies TI/2 (Transport Infrastructure) and TI/3 (Infrastructure Delivery) must ensure that walking, wheeling, and public transport routes are safe, step-free, and accessible from the outset. The Plan should acknowledge that much growth is proposed in areas where existing pavements are not accessible and require developers to address these deficiencies as part of development proposals.	208954 (CPRE Cambridgeshire and Peterborough)
Transportation using arterial roads and commuter routes (Motorways and Railways) should prioritise linking each end of a Local Government sphere with the surrounding Local Government spheres, such as Southport at the very northern tip of Merseyside where transportation links are much weaker with Lancashire in the north and east than with the rest of Merseyside to the south.	210374 (Mr Community Campaigner David Barton)

We are mindful of ambitious national growth plans for Greater Cambridge, and of potential and already developing new towns, rail stations and other transport infrastructure, including East West Rail. Existing local rail networks in the South Cambridgeshire Cam Valley CRP area, and the advent of Cambridge South Station, hold huge potential to positively contribute to sustainable travel.	211113 (Cam Valley Community Rail Partnership)
It is recognised that it is important that transport impacts of development should be managed, and new development should be located, designed and connected to the transport network to enable travel by sustainable modes.	211572 (Martin Grant Land Limited)
We support the development of the A11 travel hub.	213269 (Horseheath PC)
EWR Co also supports the Plan's focus on promoting patterns of development that enable low carbon transport modes, shifting away from a reliance on private cars, which is reflected in the Climate Change and Infrastructure strategic priorities and draft Policy I/ST.	211886 (East West Rail)

Policy I/MH: Mobility hub facilities

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy's overall aim to deliver a more sustainable integrated transport network through enhancing existing travel hubs and delivering new hubs across Greater Cambridge. Responses recognised the importance of travel hubs as strategic infrastructure to support modal shifts away from private cars and to improve connectivity from rural areas to employment centres and existing transport networks. Comments reflected the importance of travel hubs serving new growth areas across Greater Cambridge, with some respondents also raising the importance of delivering smaller-scale travel hubs in villages, to improve connectivity to nearby Park and Ride Sites.

Various comments sought clearer definitions of the function, role and components that make up a travel hub. One respondent suggested that the policy should set out more clearly the differences between travel hubs and park and ride sites, in terms of their function and purpose within the transport network. Some responses indicated that the interchangeable use of the terms mobility hub / travel hub in the policy (and elsewhere in the Plan) was confusing. It was suggested by Cambridgeshire County Council that the policy should include reference to the Cambridge and Peterborough Combined Authority (CPCA) emerging Mobility Hubs Strategy.

Concerns were raised that the policy was too focused on intensifying existing travel hubs, specifically existing Park and Ride (P&R) sites, indicating that undue precedence was given to P&R facilities. Some felt that relocating and/or expanding existing P&Rs would only provide a sustainable alternative for part of people's journeys. Respondents were also concerned that that the existing road

networks would not have capacity to sustain increased volumes of traffic as a result of expansion. Several responses called for the policy to go further by explicitly promoting a modal shift away from car use and to ensure that new travel hubs are integrated into existing active travel routes. One response highlighted the importance of safeguarding land at the earliest stages where new locations for travel hubs are identified.

Various comments were received surrounding the delivery, design and management of travel hubs, including: the need for maintenance and management plans to be included with proposals; the importance of setting clear car and cycle parking standards based on objectively determined need rather than forecast demand; the delivery of specific features and components including public toilets, electric vehicle charging interchange infrastructure and lighting to support public safety and other supporting facilities. The importance of travel hubs facilities being fully accessible and incorporating step-free access was also raised.

Comments were also received around site-specific travel hub proposals that are set out in CPCA Local Plan Transport and Connectivity Plan and in respective growth area/site proposals in the Local Plan. Support was received for A11 travel hub proposals, as well as proposals for new hubs at Foxton station and Whittlesford Parkway to serve key employment areas and growth areas. Proposals were also received for the delivery of a travel hub at Rectory Farm to relieve pressure at Madingley Road Park and Ride or replace the site.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

Since the Regulation 18 consultation on the Draft Local Plan, the Councils have been working with CoMo UK and CPCA on the emerging Mobility Hubs Strategy and Delivery plan which, once adopted, will be a sub-document to the Local Transport and Connectivity Plan. The emerging Mobility Hubs strategy and delivery plan provides details of the various typologies of mobility hubs and essential and desirable components for each type of mobility hub, including an overview of potential mobility hub locations in the CPCA area. In March 2026, government guidance around delivering quality mobility hubs was published. This guidance sets out the concept and purpose of a mobility hub and the process from which they can be delivered. Based on this updated evidence, and reflecting the broad themes emerging from the representations, the Councils took the decision to recast the policy to better align with emerging strategy and national guidance. The policy name has therefore been amended to the I/MH ‘Mobility Hubs’ and now focuses on the mobility hubs model. Conceptually a mobility hub is similar to a traditional transport interchange, however, the mobility hubs model is more focused on bringing together multiple transport components including active travel, shared transport and public transport services and integrating in non-transport components such as community facilities. The policy promotes the delivery of new mobility hubs across all scales including district and neighbourhood level that integrate into existing mobility networks. It is through the expansion of the network that individuals have greater opportunity to make multi-modal trips to their destinations, which in turn will increase modal choice and promote a shift away from private car use.

The Councils acknowledge that the policy as previously proposed was too focused on the enhancement of P&R sites. The policy has been revised to ensure that it not only supports proposals to integrate these sites into wider mobility hub networks but also enable opportunities to enhance other existing interchanges, including bus and railway stations. The aim is to ensure that existing transport infrastructure is integrated into the mobility hub network alongside more localised hubs that will be delivered as part of proposed strategic allocations.

In response to the emerging Mobility Hubs strategy, new national guidance and comments made through the Reg 18 consultation, the revised policy establishes criteria for essential components to be delivered as part of all mobility hub proposals, and other facilities which may be appropriate subject to the scale and context of the scheme. Reflecting comments received, criteria have been added to secure appropriate management and maintenance agreements, cycle parking and car parking (as appropriate to the scale and location of the proposal). The design of mobility hub needs to respond to the location both in terms of the type of components and their scale. The policy makes clear that not all components will be necessary subject to the scale of the mobility hub being delivered.

Regarding issues around increased traffic, as part of a planning application a vision-led Transport Assessment which identities and sets out appropriate mitigation measures to address the transport impacts would be required.

The importance of safeguarding land to deliver of new mobility hubs is acknowledged. The Councils' approach to safeguarding important transport infrastructure is set out in Policy I/SI Safeguarding Important Infrastructure and the relevant section of the Infrastructure Topic Paper. Individual policies associated with the proposed strategic site allocations elsewhere in the Local Plan set out where proposals must safeguard land for and deliver mobility hubs as part of the development.

We note the identification of the Rectory Farm site as a potential location for a travel hub; however, this would be a matter for the strategic transport authority to consider as part of the preparation of the Greater Cambridge Transport Strategy and the next statutory Local Transport Plan.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Rectory Farm site (2025 Call for Sites reference 222cfe) is proposed as an ideal location for a new travel hub, which could relieve pressure on Madingley Park-and-Ride and free that site for housing or employment development. The proposals are comparable to the Cambridge South West Travel Hub, which has received planning permission and is progressing with enabling works.	202045, 206073, 206074, 206078, 206094, 206099, 206101, 206102 (Wimpole Associates Ltd)
Local Transport Infrastructure like a travel hub should also be considered appropriate development within the Green Belt, as per paragraph 154 criterion h (iii) of the NPPF (2024).	202045 (Wimpole Associates Ltd)
Park and Ride should be the default option for transport into Central Cambridge.	201048 (P Spowart)
All schools should be required to provide buses for their pupils from the P&Rs.	201048 (P Spowart)
Buses should not always go into Cambridge - how about a ring service to connect Cambridge South station, north west Cambridge villages on the A14 corridor and the Science Park, for instance?	201048 (P Spowart)
The main concern is the impact on the roads and the volume of traffic around the Four Wentways roundabout and the A1307 in the surrounding area which is already beyond capacity at peak travel times.	201315 (Shudy Camps PC)
The Policy and supporting paragraphs give undue precedence to P&R facilities. Building new and expanding existing P&Rs promotes car dependency by encouraging driving to those P&R's and merely provides a more sustainable alternative for part of the journey.	201649 (Stapleford PC), 201845 (T Mckeown), 210960 (Great Shelford PC)
Travel Hubs and Travel Hub facilities must be appropriate to the location. We would support them in principle at Whittlesford Parkway, where there is currently an underused station.	201649 (Stapleford PC), 210960 (Great Shelford PC)

P&R travel hubs promote car dependency. Would like to see the policy assisting sustainable modes from Rural Centres and Minor Rural Centres, including the following: - Village travel hub where cycle parking is provided by bus stops. - Improved walking and cycling connections within villages to make accessing bus routes easier. - Improved cycling connections from villages to P&R sites for multi-mode trips without private motor vehicles. Provision for local shuttle buses from village bus stops for onward travel interchange at P&R sites.	201845 (T Mckeown)
While I strongly support a transport network based on Travel Hubs, the policy must clearly define a travel hub's nature and purpose and recognise that park and ride sites generally serve different functions. Travel hubs should be proactively planned and delivered as a connected network, with every railway station, urban centre, and retail centre provided with one from the outset as foundational infrastructure, not left to speculative proposals. The restrictions in section 2.a are unhelpful, as successful hubs must integrate seamlessly with other viable uses. Section 2.e misunderstands appropriate locations, and section 3 should ultimately seek to replace Park and Ride sites.	203577 (P Tribble)
Travel hubs should facilitate safe and comfortable walking access to residents within a 30-minute walk of a site, they should not only serve visitors arriving by car, bus or cycle.	201525 (S Houlihane)
New locations need land safeguarded at an early stage. Such as early stage that challenges as to viability can be readily made. There may need to be much more assertion, so that space that needs to be available is safeguarded, so that it is there for the future. As usual in planning it all comes down to weight given to competing options. That has to be for the ambition of the planning authority. This policy needs to be more aggressive else the ambition will not be met.	201666 (G Duck)

Since any sort of hub would need a maintenance and management plan, the policy should require inclusion of details about how they are managed and by whom.	202521 (University of Cambridge)
Provision at such sites should include EV charging for bus services and driver rest facilities and interchange between 'normal buses' and park and ride services.	202521 (University of Cambridge)
To be consistent with policy I/ST the list of amenities in para 10.18 should include public toilets.	203609 (Cambridge City Council Liberal Democrat Group)
Travel hubs are an indication of planning failure. They are required when people don't live in places which have the amenities they want, and don't have suitable public/active transports to take them from their homes to those amenities. The plan should focus on how to eliminate the need for travel hubs, rather than trying to use them to address its own failures.	203622 (H Thomas)
The policy would benefit from stronger and clearer commitments to accessibility and sustainability. Travel hubs should explicitly include accessible parking and facilities to ensure disabled people who cannot use public transport are not excluded	203755 (Cambridge Green Party)
References to "safe and secure" cycle parking should be expanded to set clear expectations for genuinely secure provision, informed by best practice and consultation with local cycling organisations.	203755 (Cambridge Green Party)
The policy should encourage travel hubs to be developed or redeveloped using sustainable, low-carbon and environmentally responsible construction methods wherever possible.	203755 (Cambridge Green Party)
Active Travel and PROWs and perimeter routes should be bridleway so that provision is inclusive or horseriders.	204076 (S Rogers)

Currently there is inconsistent use of the terms 'mobility hub' and 'travel hub', with a preference for 'Travel (mobility) hub' for clarity.	204343 (Cambridge Past, Present Future)
Policy I/ST's definition of a mobility/travel hub should clarify that it does not include traditional Park & Rides, which are inefficient and carbon intensive.	204343 (Cambridge Past, Present Future)
The number of parking spaces at a Travel Hub should reflect assessed need, considering local dwellings and active travel infrastructure. The Councils should prescribe maximum and recommended numbers of parking spaces at Travel/Mobility hubs, based on objectively determined need rather than forecast demand.	204343 (Cambridge Past, Present Future)
Parking charges should be implemented to manage demand and ensure availability for those who need parking.	204343 (Cambridge Past, Present Future)
The definition of a travel hub should facilitate interchange between Sustainable Modes of Transport and include essential facilities.	204343 (Cambridge Past, Present Future)
The current definition of Sustainable Modes of Transport should be revised to clarify the inclusion of multi-occupancy vehicles and their sustainability.	204343 (Cambridge Past, Present Future)
Travel Hubs must integrate with Girton’s Active Travel priorities, not encourage increase increased car travel or sever community areas	202269 (Girton PC)
Tritax recognise its role in supporting the development of new travel hubs and the improvement of existing sustainable transport infrastructure to deliver modal shift away from private car use in line with Local Plan objectives and direction of travel.	204552 (Tritax Big Box Developments)

Tritax Park, Cambridge, is currently exploring options for sustainable transport enhancements, including the potential for a travel hub facility and the rerouting of bus services to better integrate with wider active travel and public transport networks.	
Travel Hubs must connect directly to safe cycle links. Hubs must support vulnerable users and school routes.	207167 (Girton PC)
Ensure any travel hub upgrades align with Active Travel corridors (DG2/3, Eddington, Histon).	207168 (Girton PC)
The policy should prioritise safety, lighting and segregation and avoid car-dominant hub expansion within the parish.	207168 (Girton PC)
Rapid deployment of modular Smart Travel Hubs that enhance Greenways, P&Rs, connect villages by integrating shared passenger and cargo vehicles, secure micromobility parking, charging, and lightweight shelters within existing footprints. These hubs complement core public transport by solving first/last-mile access, supporting inclusive mobility, and enabling low-carbon local trips and deliveries. Using smart tech, solar power, and recyclable materials, our compact designs improve user experience and increase safety and security. The hubs extend safe day-to-night site use for commuters, workers, and visitors, reducing car dependency and congestion - deliverable quickly, cost-effectively, aligning directly with Greater Cambridge's objectives for sustainable, integrated transport.	205423 (Cambridge Electric Transport Limited)
The Policy could refer to CPCA emerging strategy work Mobility Hub Strategy and need to strengthen links with EV charging infrastructure.	210581 (Cambridgeshire County Council)
The policy is set out well. However, this for new locations needs land safeguarded at an early stage. Such as early stage that challenges as to viability can be readily made. There may need to be much	201666 (G Duck)

more assertion, so that space that needs to be available is safeguarded, so that it is there for the future. As usual in planning it all comes down to weight given to competing options. That has to be for the ambition of the planning authority. This policy needs to be more aggressive else the ambition will not be met.	
These contributions should also be referenced in relation to the impact on energy consumption impact within the Greater Cambridge area from large scale neighbouring authority large infrastructure projects (National Infrastructure Projects) at Tempsford/EastWest rail station (30,000 houses and interchange EW rail station)	201394 (Gamlingay PC)
Unsustainable local infrastructure, with large housing developments continuing in Haverhill and surrounds making this junction too busy already. Development will cause unnatural and damaging change to surrounding local environment.	201893 (I Webb)
Support the role of travel hubs as strategic components of the sustainable transport network and considers them to be particularly important in the context of town extensions, which are a key component of the local plan development strategy. It is suggested that an additional criterion is added under part 2, i.e as clause (g) for the following lines to include accessibility of facilities: “(g) they incorporate inclusive and step-free access between transport modes, appropriate lighting and natural surveillance”. This would strengthen the effectiveness of the policy, whilst also ensuring that the delivery of these travel hubs are future proofed and inclusive of wider population needs.	207027 (Mac Mic Land)
The Greater Cambridge Partnership proposals for rail-based travel hubs must be fully implemented. Foxton Station: the proposed travel hub intercept car journeys along the A10 into Cambridge,	208031 (Railfuture East Anglia)

particularly for trips to the Biomedical Campus, Cambridge Central Station area, Cambridge North, the Science Park, and Waterbeach. Whittlesford Parkway: A similar travel hub should be delivered here to intercept vehicle movements from the south-east of Greater Cambridge and to serve the nearby Genome Campus, as well as the M11 motorway.	
McDonald's Restaurants Ltd supports the proposed role of Travel Hubs. The role of Travel Hubs can be enhanced through the provision of suitable, well used, supporting facilities, such as a takeaway. Such provision will provide an additional level of service for people when using the Travel Hub, allowing the public, commuters and tourists the opportunity to get some refreshments before or after using the bus. The definition of supporting facilities should be broadened within paragraph 10.18 to include takeaway facilities, which can cater for breakfast, lunch and dinner, along with coffee.	207981 (McDonald's Restaurants Ltd)
It is recognised that it is important that the Local Plan supports the development of new travel hub sites in order to optimise their contribution towards delivering modal shifts away from private car use in line with the adopted Transport Strategy objectives.	208273 (Martin Grant Land Limited)

Policy I/CV: Cycle and vehicle parking

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Comments were made in support of car free developments or lower levels of car parking, particularly within and to enable higher density developments, when paired with measures to enable and encourage use of public and active transport. Some suggested keeping car parking to an absolute minimum to discourage car ownership and use, that it should only be available as an option with significant extra costs, and that there should be monitoring of usage post-occupation in major developments, with mechanisms for reallocating space.

Some commented that the minimum cycle parking requirement should be raised and sought greater clarity on the design criteria to ensure provision is well located and designed to be secure, safe and accessible for all users, including ensuring sufficient provision (5-20%) to accommodate non-standard cycles and avoiding the use of two-tier stands.

Comments in relation to electric vehicle charging suggested the policy should promote electric vehicles as a sustainable mode of transport, that charging infrastructure should be future proofed to accommodate increased demand, that consideration needed to be given to charging delivery lorries and refuse trucks, and that the policy does not provide for home charging in properties without off-road parking and the need to avoid obstruction on pavements. Support was expressed for the requirement of a site-wide electric vehicle charging strategy for large-scale developments.

Comments were received raising points of clarification around the interpretation of the policy elements, and in relation to the application of mobility scooters, suggesting further guidance was needed. Other issues raised include the need for parking enforcement, space for car club vehicles, provision for taxi drop-off spaces (with appropriate charging facilities), management of e-scooter and e-bike parking.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

Car and cycle parking should be determined on a site-by-site basis using a vision-led and design-led approach. Additional clarity has been added around the range of factors that should be considered in determining appropriate levels of provision, including the scale, density and mix of development, the frequency of public transport and availability of active travel routes. The policy also clarifies that car-free or car-capped development will be acceptable in certain circumstances, and consider opportunities to reduce levels of car parking.

The proposed cycle standards are a minimum requirement and higher levels may be appropriate as determined on a site-by-site basis using a vision-led and design-led approach. Further clarification has been added to the policy wording and supporting text to ensure cycle parking is at least as convenient as car parking, accessible and suitable for people of all abilities and designed appropriately, particularly in sensitive locations. This includes limiting the use of two-tiers stands, how parking should consider the different needs of users including clarification of non-standard cycles, and how it should be sympathetically integrated into the streetscene and residential developments. Larger developments are required to ensure appropriate space for micromobility modes such as dockless cycles.

The policy requires electric charging provision in accordance with Building Regulations. Further guidance has been added to the supporting text to guide the type and power output of chargers, and to ensure their design avoids street clutter and conflict with other highway users.

Further clarification has been added to the policy on the interpretation of policy elements, including guidance around the design of car parking and provision for drop-off/pick-up and car clubs. In response to comments received, a new requirement has been added to the policy requiring appropriate storage space for micromobility modes such as dockless cycles and e-scooters to be provided where the proposal leads to increased demand.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for the policy, including: • Support is expressed for a site-wide electric vehicle charging strategy for large-scale developments • Support strong policies promoting active travel • The policy's support for sustainable travel is welcomed, and cycling is recognised as central to Cambridge's character.	201974 (Swavesey PC), 202522 (M Parsons), 203610 (Cambridge City Council Liberal Democrat Group) 204583 (M Mckay)
Comments in support of lower levels of car parking: • Higher density housing needs to be paired with lower levels of car ownership and strong alternatives to driving, to encourage use of public and active transport, and improve quality of life. • Parking should only be available as an option with significant extra costs, so that there is a financial benefit to people not owning cars.	201993 (D Langley), 202443 (R MacDonald), 204958 (Mothers CAN Cambridge), 205580 (Mothers CAN

• Parking space should be kept to an absolute minimum to discourage car ownership and use. Car sharing should be encouraged as far as possible. • Allow lower levels of car parking in developments where residents demonstrate willingness to be car-free or low car use through sustainability charters. • High parking availability raises housing costs, forcing non-car-owning households to subsidise parking through higher prices. • Plan should require optional parking, separated from housing, and transparently priced to ensure density is seen as an opportunity. • Parking should not have to feature in all developments, and developments should not assume residents have the "right" to keep a car. • Parking should be located separately from housing (perhaps underground), and priced transparently *and separately from housing* to encourage car-free-living. • The 'Transport assessment statement' should include car ownership levels compatible with climate change goals, avoiding a 'predict and provide' model based on unsustainable growth. • Large (car) vehicle parking must be an optional and exceptional add-on to all properties, with limited quotas and careful design to deter abuse by those inconsiderate of broader city needs. Instead, dense developments need to be built around, not just include, extensive storage for diverse wheeling and very light vehicles which are hyperlocal (not just nearby) and highly accessible, walking, and public transport.	Cambridge), 207587 (A Lawrence), 204916 (A Brown), 205580 (H Tardrew), 205397 (P Colledge)
Comments on car parking provision include: • It is recognised that it is important policy clearly sets out the requirements for vehicle parking. • All new houses should have maximum 0.5 parking spaces per house and all electric vehicle provision. • Higher density development can be appropriate if supported by real infrastructure and services. However, removing parking without alternatives raises housing costs, pushes parking into surrounding streets, and penalises residents who cannot cycle or use public transport. Policy	202523 (H Brown), 208842 (D Smith), 210375 (Community Campaigner D Barton), 208274 (Martin Grant Land Limited), 208731

should be: flexible, location-specific, and responsive to real demand — not ideological targets. People should not be forced to pay for poor planning through inconvenience or reduced quality of life. • Car Parking on and off street should be supported to ensure freedom of choice for everyone, accessibility and connectedness. • Car Parking abodes should be tastefully designed like modern-day stables for vehicles that are in-keeping with the built historic environment. • Free Car Parking may be monitored through expected proof of purchase when visiting, eg. minimal £1.00 at a shop encouraging partnerships between private businesses and LAs. • Minimising cars and car infrastructure inside developments due to the visual blight they cause. Not to say they should not be present but as much is possible I believe they should be pooled at the edge of developments	(Cllr M Morgan Cambs County Council)
Explicit outcomes for sustainable travel The Plan should require measurable outcomes for walking, cycling and public transport rather than relying on general support for sustainable travel. ● Major developments must be required to meet explicit mode-share targets for walking, cycling and public transport; ● Clear car-trip reduction requirements must be set at the Plan level and applied consistently across major sites; ● Trip budgets, where used, must be accompanied by binding mode-share outcomes and clear consequences if they are not met. **Transport carbon as part of net zero**	209066, 209068 (Camcycle)

The Plan’s net zero approach must fully account for the carbon impacts of travel. ● Transport emissions must be included within net zero assessments, alongside operational and embodied building carbon. ● Development should be assessed on lifetime travel carbon, including the carbon impacts of car-dependent land use patterns. ● Electric cars should not be treated as a sustainable transport mode or a substitute for mode shift. ● The Sustainability Appraisal should be revised so it meaningfully differentiates between spatial options based on transport outcomes, including realistic mode share potential and lifetime transport emissions. The appraisal should not treat fundamentally different locations as broadly equivalent in sustainability terms. ● The Transport Evidence Report should be revised with a modelling approach to test higher ambition scenarios and policy levers, including Eddington-level mode share assumptions for edge of Cambridge sites, parking restraint, mandatory permeability, early delivery of high quality cycling networks, and stronger trip internalisation through mixed-use local amenities. **Mandatory layout and permeability standards** Good outcomes for walking and cycling depend on early layout decisions that cannot be left to later stages. ● Mandatory permeability standards should be introduced based on site size, requiring multiple direct walking and cycling connections. ● Development layouts must be required to support coherent, direct, safe, comfortable and attractive routes as a policy test.	

● Cul de sac layouts and single access sites should not be supported where they undermine sustainable travel. **Strategic walking and cycling infrastructure** Strategic walking and cycling links must be treated as essential infrastructure. ● Key walking and cycling connections must be secured through planning policy and conditions, not left to future funding rounds. ● Critical links, including bridges and crossings, must be identified, safeguarded and tied to development phasing. ● Development should not proceed where essential active travel infrastructure is not secured.	
High-density development should not assume private car ownership as the default. Draft Plan's approach to cycle parking contains good principles, including that cycle parking should be as convenient as car parking, step-free, well-lit and easy to use. However, the supporting expectations risk being undermined by an overly simplistic focus on the quantities of parking and by allowing very high proportions of two-tier stands.	209070, 209072, 209073, 209074, 209075, 209076

Cycle parking requirements must be worded to maximise the convenience, accessibility and attractiveness of cycling facilities. ● Control the proportion of two-tier parking, with a clear presumption that single-level stands are the default and two-tier requires justification ● Require equivalence with car parking in both location and journey quality, including step-free access and minimal barriers ● Limit reliance on detached cycle hubs by requiring convenient destination cycle parking at, or directly adjacent to, building entrances Separate accessible cycle parking from oversized cycle parking, with a minimum of 5% for each on larger sites. Camcycle is also concerned about the growing use of mobility hubs to group cycle parking in one place within larger developments, away from the individual buildings which users are seeking to access.	
Comments in relation to cycle parking include: • It is recognised that it is important policy clearly sets out the requirements for cycle parking. • Policy does not mandate the provision of cycle parking • Allows for 90-95% of cycle stands to be double-stacker stands, which is unacceptable – control their use, only permit them only in constrained city centre locations where justified • Establish a higher minimum provision level • Specify a minimum spacing of 1m between stands, necessary to prevent unusable layouts • In family-oriented areas, cargo or oversized bikes often replace cars for school runs and shopping. The proportion of parking for non-standard bikes should be higher for family units, with secure, enclosed cargo bike spaces to reduce car dependency.	201171 (M Lucas-Smith), 203610 (Cambridge City Council Liberal Democrat Group) 203756 (Cambridge Green Party), 204532 (D Potts), 204786 (R De Beaux), 204958 (Mothers CAN Cambridge), 204960 (K Brightwell), 205141 (J

• Requiring safe, secure and convenient cycle parking, is particularly important and should be supported by a clear commitment from the council or site manager to ongoing maintenance and management before locations are agreed. • Separate accessible cycle parking from oversized cycle parking, with suggestions for ensuring a minimum of 5-20% for each on larger sites • Oversized parking is also essential, for example for cargo cycles, cycles with trailers, adapted cycles, and longer or wider cycles. • Ensure equivalence with car parking in terms of location and journey quality, including step-free access and minimal barriers • Limit reliance on detached cycle hubs by requiring convenient cycle parking at or adjacent to building entrances • Establish clear security and personal safety standards, including properly secured stands and good lighting, to prevent cycle theft • Support for cycle parking provisions, with a recommendation to future-proof requirements for growth in cycling without additional planning applications. • A wide variety of bikes, such as cargo bikes should be accommodated. Suggestion to specify 'non-standard cycles' in policy. • Concern is raised about the expectation for cycle stores to be located at the front of every dwelling, which can be impractical or harmful in constrained urban sites, conservation areas, or where better access exists from the side or rear. The requirement is therefore considered overly restrictive, and it is recommended that greater flexibility is allowed, with cycle storage assessed on a case-by-case basis based on convenience and context. • Take a more flexible approach to cycle parking which takes into account the projected employment demand for cycle parking on the basis of trip generation and monitoring, rather than a fully workplace-based workforce.	Grantham), 205333 (S Nuttall) 205337 (A Williams), 205617 (A Williams), 204583 (M Mckay), 205141 (J Grantham), 202523 (H Brown), 204916 (A Brown), 203592 (The Crown Estate), 203756 (Cambridge Green Party), 209072, 209073, 209074, 209075, 209076 (Camcycle), 204902 (Hill), 208274 (Martin Grant Land Limited), 211408 (Persimmon Homes East Midlands)

• Where level changes are required, ramped access should be the preferred solution. Shallow stepped routes may be acceptable only where they are accompanied by convenient accessible and oversized parking on the ground floor, or by lifts suitable for wheeling cycles in and out. Where a lift-only solution is proposed, a minimum of two suitably-sized, walk-in/walk-out lifts should be provided to ensure resilience. • Para 2h should be revised to accommodate cycle parking provisions for various residential types, such as flats and maisonettes, where traditional placements are not feasible. • More specificity is sought on 5-10% non-standard parking for minor developments	
Comments on points of clarity in relation to mobility scooters: • that the paragraph regarding mobility scooters is unclear, particularly whether the requirements pertain to mobility scooters or if covered parking applies to non-scooter users • it is unclear whether the proposed provision for mobility scooter storage and charging is • sufficient, and further justification or guidance would be helpful. • We recommend that Limb 4 of the policy is refined to apply specifically to specialist forms of accommodation, such as extra care, sheltered housing or other developments designed for older or disabled people, where mobility scooters is clearly required. For general residential development, provision should be determined on a case-by-case basis through design and accessibility standards or apply specifically to the provision of Category M4(3) housing.	201171 (M Lucas-Smith), 203756 (Cambridge Green Party), 211409 (Persimmon Homes East Midlands)
Comments raising points of clarification: • Paragraph 5 uses the term 'parking' ambiguously, necessitating clarification on whether it refers to car parking or other types. • Comment that the policy lacks clarity regarding the standards for car parking and should include guidance as a starting point, similar to the approach taken for cycle parking • Request for clarity on whether certain points relate to car or cycle parking, emphasising the need for clear specifications on the number of spaces.	201171 (M Lucas-Smith), 202522 (M Parsons), 204958 (Mothers CAN Cambridge), 201392 (Gamlingay PC), 202523 (H Brown), 202574 (P Tribble),

• Parking standards should be made clear - policy appears muddled and a tabular form would be clearer. • Clarification in relation to the policy required for ‘appropriate charging facilities’ whether this solely relates to charging provision for mobility scooters, or whether it also encompasses electric vehicle charging infrastructure for cars and other vehicles • Policy is unclear, is the provision for 'spaces' car parking spaces or bike spaces. • Section 4 specifies minimum spaces, but does not state what they're spaces *for*. The text implies mobility scooters, but that's clearly inappropriate. If cars, the provision is clearly too high and would lead to car-dominated development in violation of the Plan's core vision. • Part 3 a - what is a non-standard cycle? • There appears to be a table under Part 4 - is that a car parking ratio table? • The use list under item 4 is unclear for car, cycle or mobility scooter parking. • Clarification is sought on the threshold for large-scale major developments regarding the submission of a site-wide electric vehicle charging strategy	205110 (Abbey Properties Cambridgeshire Ltd), 201714 (K Mak), 210271 (Vistry Group), 204902 (Hill)
Comments in relation to electric charging: • Your proposals DO NOT 'promote all forms of sustainable transport' - you do not promote electric vehicles. Focus is on slowing traffic and reduced parking. • Parking stress already affects Girton; EV strategies must not worsen congestion or obstruct pavements. Require EV infrastructure that does not obstruct pavements. Prioritise mobility□impaired safety and school routes. Encourage EV charging at hubs, not along narrow streets. • The policy should allow a balanced mix of active and passive EV charging provision, consistent with national guidance; provide flexibility for strategic sites to vary parking standards across phases; ensure alignment with grid capacity constraints. • Support is expressed for a site-wide electric vehicle charging strategy for large-scale developments, detailing charge point locations, phasing, and grid capacity. However, the	201241 (S Williams), 202270 (Girton PC), 202522 (M Parsons), 205029 (M Cleminson), 205196 (M Evans), 201392 (Gamlingay PC), 210345 (East of England Ambulance Service NHS Trust), 208995 (Barrat

University notes a decline in the need for charging associated with staff parking due to increased home charging and improved battery technology. • Query whether it is reasonable or necessary as part of the electric vehicle strategy for developers to demonstrate grid capacity for large-scale sites given that confirmation around network capacity falls within the remint of the relevant utility provider. • EV charging infrastructure should be future-proofed to accommodate increased demand, and developments should avoid excessive car parking provision which encourages car dependency • Policy does not provide for home EV charging for properties with no scope to park in their front gardens, including terraced housing. Policy needs to allow for cables to be laid temporarily across the pavement under cable trays • Further consideration is needed for the need to electrically charge delivery lorries, and refuse trucks- essential to build in electric charging for all new commercial/industrial building applications throughout the district. • To support move to Carbon Net Zero EEAST would request an EV charging strategy is developed to enable public organisations to have access to centralised EV charging locations. Local authority, health, social and emergency vehicles should maximise usage of each other's charging resources such as those provided by private providers and bus companies. They would need to be of sufficient width to accommodate these vehicles and be without penalty for repeated usage.	Homes Northampton), 210272 (Vistry Group),
Enforcement of parking regulations is critical, and poorly delivered across the city at present. A parking enforcement plan should be specified in every transport assessment, specifying frequency of monitoring, number of additional parking attendants required, etc.	202443 (R MacDonald)

Comment that the policy should also include provision for taxi drop-off spaces, and for larger developments, taxi ranks near travel hubs or stations. Also, EV charging facilities should be provided for taxis and visitors to support sustainable transport.	203610 (Cambridge City Council Liberal Democrat Group)
Comment that the policy does not address the management of e-scooter and e-bike parking and drop-off areas, which currently present significant accessibility challenges, particularly for disabled people, and should be explicitly planned for within developments.	203756 (Cambridge Green Party)
Recommendation for monitoring parking provision and usage post-occupation in major developments, with mechanisms for reallocating space to sustainable modes if car parking demand is lower.	204958 (Mothers CAN Cambridge)
Request for inclusion of car club space requirements in the policy.	204958 (Mothers CAN Cambridge)
Support the minimum size for garages 3.3m*6m for car and adding 1m for cycles within the garage.	201392 (Gamlingay PC)
Section 2.h conflicts with Policy H/SS (the commentary in 9.47 which talks about the amenity space including space for a garden shed for bicycles).	202574 (P Tribble)
Significant provision for pooled e-car and e-micro-car facilities should be required for large developments. E-micro-cars AKA 'Quadricycles' with lower ranges, lower top speeds, and less powerful engines weigh less and do far less road damage, while meeting the needs of those who only need to do short journeys.	203821 (A Carpen)
This policy needs to be proportionate to the scale of development proposed and should recognise the differences between Transport Statements and Transport Assessments.	203396 (ESCO Prospect)

Comment that the policy should be renamed to reflect its content, including cycle parking, car parking, and electric vehicle charging	201171 (M Lucas-Smith)
There is not enough focus on emissions from transport: - We should be challenging employers to only allow EVs to be parked at work for employees earning more than a certain amount - Much more needs to be done to encourage car clubs. There should be at least one car club EV in each of the Cambridgeshire villages. - Active transport should be a much higher priority. It is much lower carbon than even EVs, reduces congestion and has significant health benefits. Cycle paths need to be higher quality (LTN1/20), more numerous, better maintained and gritted	204988 (S Webster)
Electric vehicles are not a perfect solution, but they are a meaningful part of the transition, especially for: people with mobility issues, shift workers, families with caring responsibilities, rural and semi-rural residents. Reducing emissions should focus on: reducing avoidable trips, improving traffic flow (not worsening congestion), supporting cleaner vehicles, and aligning homes, jobs and services more sensibly. Punitive approaches that slow journeys, force detours, or increase congestion risk increasing emissions, not reducing them.	208838 (D Smith)
The policy must be applied with sufficient flexibility to respond to evolving travel behaviours, technological change and advances in vehicle charging infrastructure over the plan period. Flexibility is also required to reflect the specific characteristics of individual sites, including their location, accessibility to public transport, availability of active travel options and existing cycle infrastructure.	210270, 210271 (Vistry Group)

The policy would be more effective if it clearly recognised that car parking and EV charging provision must respond to the specific characteristics of individual sites. Large or complex developments often have distinct operational requirements, travel patterns and accessibility constraints that cannot be addressed through uniform or prescriptive standards. The policy should therefore adopt a proportionate, evidence-based and site-specific approach, consistent with national policy, to support sustainable transport objectives without undermining development viability or deliverability.	204165 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)
The policy should be amended to ensure proportionality and flexibility. Transport Statements should only be required where appropriate, with minor schemes allowed to address transport matters through Design and Access Statements. The requirement for 5–10% non-standard cycle parking and one space per bedroom should be justified or removed. Cycle parking standards should be less prescriptive and reflect different urban and rural contexts. EV charging requirements should be deleted as they duplicate Building Regulations. Part 2(h) should allow cycle storage in the most secure and appropriate location (front, side or rear), including rear gardens, to support inclusive, design-led solutions.	204623 (Redrow South Midlands)
The policy would be more effective if it clearly recognised that car parking and EV charging provision must respond to the specific characteristics of individual sites. Large or complex developments often have distinct operational requirements, travel patterns and accessibility constraints that cannot be addressed through uniform or prescriptive standards.	204564 (Tritax Big Box Developments)
The policy has been significantly watered down and we object to this. The standards were updated in 2018 from the previous Local Plan precisely because developers consistently installed cycle racks which were difficult, sometimes impossible, to access in terms of spacing, poorly located, or required users to use steep ramps or lift their bikes. There is no explanation of why elements have been	210526 (Cambridgeshire County Council)

removed which are essential to ensure high quality cycle parking for all new developments. The topic paper suggests that in combining the Local Plans from 2018 simplicity has been prioritised whilst favouring more cycle parking, but this simplicity will result in the poor provision that was a common feature of pre-2018 cycle parking.	
Policy would benefit from reference to both CCC and CPCA Active Travel Strategies.	210582 (Cambridgeshire County Council)

Policy I/SD: Servicing and last-mile deliveries

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy's aim of promoting sustainable servicing and last-mile delivery solutions to reduce congestion, improve air quality and lower emissions. Comments generally welcomed the emphasis on delivery consolidation, micro-hubs and innovative approaches to freight and logistics.

Some sought a stronger focus on sustainability and decarbonisation, with comments suggesting that Delivery and Servicing Plans should explicitly consider climate objectives and apply a sustainable servicing hierarchy. Support was expressed for the use of cargo bikes, e-cargo bikes, electric vehicles and other low-emission delivery methods. Some comments also highlighted the potential role of rail freight, freight exchange methods and edge-of-settlement consolidation hubs in reducing road-based freight movements.

Support was expressed for local parcel lockers, local collection points and other infrastructure that could reduce unnecessary delivery journeys and improve convenience for residents. Some comments also highlighted the importance of ensuring consolidation centres have suitable charging and electrical infrastructure to support electric vehicle fleets.

Concerns were raised regarding the impact of servicing and deliveries on local communities. Comments emphasised the need to avoid congestion and pavement obstructions, and maintain wheeling and cycling routes, particularly when located near schools.

Requests were made for safe, unobtrusive servicing solutions and carefully designed servicing arrangements that minimise impacts on residents and active travel users. Concerns were also expressed around the cumulative transport impacts of logistics activity, including increased HGV and delivery vehicle movements, pressure on local roads and infrastructure, and lack of adequate HGV parking provision.

Further representations sought greater flexibility regarding the policy's approach to consolidation facilities, including support for larger-scale facilities and rural or edge-of-settlement locations where these could deliver sustainable logistics benefits.

Overall, comments generally supported the policy direction whilst seeking stronger sustainability requirements, measures to reduce local impacts and greater flexibility in the delivery of logistics infrastructure.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The Councils recognise the increasing importance of the planning system in promoting more innovative and sustainable approaches to deliveries and servicing, recognising that the fundamental shift towards the use of online businesses has led to both benefits to individuals, in terms of speed and convenience, but also wider societal challenges arising from increasing numbers of delivery movements. A number of these challenges have been highlighted in responses received through the Regulation 18 consultation on the Draft Local Plan, including safety, emissions and congestion. Notwithstanding the broad support expressed by representations on the general emphasis of the policy, focused changes have been proposed in response to general feedback that the policy could go further in promoting a focus on sustainability and decarbonisation. These are designed to ensure that a range of alternative approaches and emerging technologies are considered more proactively by applicants when considering appropriate

servicing and delivery arrangements. While the previous version of the policy already emphasised the importance of safe delivery and servicing arrangements, this has been further clarified in the proposed policy, with location-specific challenges put forward in representations (including active travel routes and schools) highlighted more prominently in the supporting text. Noting comments received in relation to specific villages, it is not the role of this policy to prohibit final-mile delivery routes in particular locations, but to set a general framework through which local context can be taken into consideration in assessing proposed delivery and servicing arrangements, including delivery routes. Focused changes have been made to the supporting text of the policy to clarify the intent.

The Councils note the range of specific measures suggested that can contribute to sustainable servicing and deliveries. Reflecting that a range of different solutions will need to be deployed in different contexts, the policy does not dictate a 'one size fits all approach' or aim to limit the range of measures that could be utilised to achieve safe, sustainable and low emission servicing and deliveries. Several of the measures frequently mentioned in representations, such as delivery lockers, micro-hubs, electric vehicles and cycle couriers, are already explicitly mentioned and prioritised in the policy. While others are not identified explicitly, such as rail freight and rural or edge-of-settlement logistics hubs, their deployment is not precluded should they support the delivery of the policy and comply with the criteria established.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
As part of the vision for reducing emissions and road transport, the policy should include support for servicing by rail in suitable locations.	202630 (P Tribble)

We support this policy but believe that the Delivery and Service plan required for proposals should explicitly require that climate targets are considered, and a sustainable servicing hierarchy should be used.	204961 (Mothers CAN Cambridge)
Servicing must not increase pavement obstruction, congestion, or conflicts with Active Travel, especially near schools. Key Points: Girton faces narrow pavements and constrained junctions. Last□mile servicing should be cycle□compatible. Distribution activity must avoid increasing severance. GPC Requests: Require safe, unobtrusive servicing solutions. Encourage e□cargo, micro□hubs, or off□street delivery points. Design servicing away from school approaches.	202271 (Girton PC)
• Provision should be made for freight exchanges on the edge of Cambridge (and new towns) to enable local cycle/-ecycle couriers to undertake last mile deliveries, reducing the motor traffic of heavy vans. • Provision should be made to charge for the facilities - which in the longer term equalises the playing field with the high street. • Provision should be made for allied/additional facilities such as 'micro-e-car-hire' AKA 'Quadricycles' which are e-cars with shorter ranges, lower top speeds, and less powerful engines that otherwise meet the needs for short journeys and do far less road damage.	203819 (A Carpen)
It is essential that parking bay provision is made at the front of properties for couriers: If it at the rear of premises the couriers will not use it. Holding up traffic causes more pollution and impacts upon the efficiency of the economy and costs to the economy. These poor people work long hours, are under time pressure, and need all the help they can get.	202378 (S Hegarty)
Can't see mention of lockers, I would hope planning authority would be supportive of proposals to install lockers in communities to avoid unnecessary car journeys.	204052 (Histon and Impington PC)

Currently many unnecessary journeys to Milton where Tesco's hosts lockers, would like to see accessible space in new towns and strong support for installation of lockers in existing communities.	
As noted, online shopping peaked during COVID lockdown. However, the demand for home delivery seems to be tailing off as residents return to working in the office. Care should be taken to ensure "last mile" delivery proposals reflect current needs, not following 5-year-old statistics.	201413 (Cllr P Sandford)
Traffic – Strong concerns re cumulative impact on local villages • Increase in volume of traffic, both HGVs, delivery vehicles and cars (employees). • Increase in rat-running of vehicles through villages alongside the A14. • Concerns over integrity of A14 flyovers, which are already sinking under existing traffic flows. • HGV parking – causing issues and dangers in and around villages and the A14. Additional HGV parking is vital for any consented development. • Cumulative impact of increased traffic from already consented housing developments in this area, as well as proposed development including business and warehouse parks is required. • A1307 – Local road, concerns over cumulative increase in traffic volume • A1307 should not be used as an access road to/from a development park. It was provided for local access, to keep local traffic off the A14 and allow a safer route for local residents.	201976 (Swavesey PC)
The policy should require consolidation of deliveries and the use of cargo bikes or electric vehicles for last-mile delivery wherever feasible. This is essential to reduce congestion and emissions.	205038 (M Cleminson)
Distribution centres and consolidation hubs must evidence access to an adequate electrical supply and EV provision to enable a fully-electric fleet to operate from them - either through on-site provision or by proximity to existing charging facilities.	202660 (C Pointon)

We support micro- consolidation centres and encouraging sustainable last mile movements by cycles, EVs and other innovative solutions.	203612 (Cambridge City Council Liberal Democrat Group)
Objects to the wording of Policy I/SD, arguing it is overly focused on urban areas and lacks flexibility for rural and edge-of-settlement employment sites. The respondent references the NPPF (2024) Chapter 6, highlighting the need for planning policies to support economic growth and be flexible to accommodate unanticipated needs. The NPPF 2026 indicates that substantial weight should be given to the economic benefits of commercial development, including logistics, which may require locations outside urban centres. The respondent recommends amending Policy I/SD to support consolidation facilities at rural and edge-of-settlement locations and to allow for larger-scale facilities when justified. These amendments are suggested to enable sustainable logistics development, aligning with national policy objectives and examples like Tritax Park, Cambridge. Policy I/SD should be amended to explicitly support; (1) consolidation facilities at edge-of-settlement and rural locations serving nearby towns, villages and business areas; and (2) consolidation facilities that exceed “micro” scale where justified, provided they deliver equivalent outcomes in reduced vehicle mileage, lower emissions and improved delivery efficiency.	204575 (Tritax Big Box Developments)
LDL notes Policy I/SD and endorses limb 4 which requires that “Proposals for any new industrial and distribution centres that will generate significant freight traffic must provide sufficient facilities for long-term and overnight lorry parking.” The GCLP also considers the general (non-scheme specific) overnight lorry parking need being met by the expansion of the existing facilities at J24 of the A14, as	205167 (Lolworth Developments Limited)

proposed in allocation ‘S/RRA/SCS Land to the south of Cambridge Services’. We consider this distinction in the two types of overnight lorry parking to be appropriate.	
Uses supporting local needs for “last mile” delivery should be prioritised: A typical last-mile delivery to the Greater Cambridge area is currently served from a hub in Peterborough 33 miles away. Serving these from a more local hub would reduce traffic movements when viewed as a whole.	208076 (Northstowe TC)
Last-mile delivery is referenced, but this should more explicitly consider solutions such as delivery lockers within new communities at the earliest planning stages. There is also an opportunity to support how people live today by retrofitting existing communities. Can planning policy actively support the provision of parcel lockers, particularly given the widespread closure of post offices? This is a significant driver of unnecessary car journeys.	211005, 208005 (Cambridgeshire County Council)
Letterboxes and parcel storage also require attention. Where letterboxes are inaccessible, for example, located behind gated or locked entrances, it becomes much harder for residents to receive deliveries and manage day-to-day life. Safe, secure, and accessible locations for letterboxes and parcel storage should be a priority in new developments. Anecdotally, residents often redirect deliveries to parents’ homes to avoid these issues, which in turn increases travel demand and undermines trip budgets for schemes.	211006 (Cambridgeshire County Council)
Final-mile delivery routes must avoid the villages of Dry Drayton, Boxworth, Elsworth and Knapwell, and developers should demonstrate how they will achieve this.	206383 (Boxworth Parish Meeting on behalf of A14 Logistic Forum), 211446 (Boxworth Parish Meeting)

It is recognised that it is important that development proposals include adequate provision for servicing and deliveries.	211573 (Martin Grant Land Limited)

Policy I/SI: Safeguarding important infrastructure

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Comments in support of the policy were received from: the Deference Infrastructure Organisation for the proposed safeguarding of the Bassingbourn Barracks and Barton Road Rifle Range; the University of Cambridge for the proposed safeguarding of Lord's Bridge observatory; and, in principle, from the East West Rail Company for identifying the area subject to the Secretary of State's safeguarding direction for East West Rail.

Various comments requested that the policy should do more to proactively safeguard land for prospective future transport schemes, travel hubs, active travel routes and infrastructure related to proposed site allocations. Specific comments were received from Tarmac requesting safeguarding of their rail facility at the proposed North East Cambridge site and from Anglian Water requesting safeguarding of the consented Waste Water Treatment Plant Relocation project.

Some comments expressed concern that the policy was not clear enough about the effect of the East West Rail safeguarding directions and that clearer criteria should be included to guide development. Others expressed concerns about the area covered by the safeguarding direction, including potential conflicts with other proposed developments.

General concerns were raised about the East West Rail project more generally, including its route, design and the level of consultation undertaken on the scheme.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The Councils note comments received on the East West Rail project, however these are matters for its respective delivery body, East West Rail Company.

The Local Plan may safeguard specific routes and/or sites critical to developing transport infrastructure where there is robust evidence to support it. The suggestions put forward for additional schemes and projects that should be safeguarded have been considered and changes have been proposed to the policy to add safeguarding areas to several additional planned transport schemes, where it was judged there was sufficient evidence to clearly identify which land should be safeguarded. Some of the projects identified through the consultation, such as the proposed MRT scheme and new mobility hubs, are at a relatively early stage of the design and consenting process, such that it would not be possible to justify the safeguarding of a specific route or site at this stage of the process. The Councils will continue to keep this under review as the preparation of the Plan progresses. In response to the feedback received on site-specific infrastructure, strategic site allocations are accompanied by spatial frameworks which identify, indicatively, where key infrastructure connections should be located. Site allocation policies have also been reviewed and updated to be clearer where land should be safeguarded through the planning process for transport infrastructure, including active travel routes and mobility hubs.

Safeguarding of the Tarmac site at North East Cambridge and the Waste Water Treatment Works Relocation project fall outside the scope of the Local Plan. In the case of the Tarmac site, this already benefits from a safeguarding policy and consultation area in the adopted Cambridgeshire and Peterborough Minerals and Waste Plan 2021. National planning policies prevent the Local Plan from replicating policies covered elsewhere in the Development Plan. This policy, and the proposed policy for North East Cambridge

(where the site is located), have been updated to reference these existing designations more clearly. Safeguarding of the Waste Water Treatment Works Relocation project will be considered as part of the next Minerals and Waste Plan for the area.

In response to comments on the effectiveness of the policy criteria for the East West Rail, additional criteria have been proposed to make it clearer how the safeguarded area should be considered in relation to planning applications. While comments on the boundaries of the East West Rail safeguarding area are noted, the Councils are required by the Safeguarding Direction issued by the Secretary of State to consult the East West Rail Company on planning applications falling within this area and have no power to modify it.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Support for the protection afforded by the policy for current and future military operational needs at Bassingbourn Barracks and Barton Road Rifle Range.	201163 (Defence Infrastructure Organisation)
Current and prospective future travel hub sites should be safeguarded in the plan.	203388 (G Duck)
The plan should safeguard potential future corridors capable of accommodating LRT and MRT, preventing development that may prejudice future options.	205465 (Cambridgeshire and Peterborough Combined Authority), 204527 (Cllr T Bygott)

The East West Rail route has been confirmed with insufficient consultation with local residents. The route travels too close to homes and schools and the route should be adjusted, and further analysis done around the negative impacts this will have in terms of noise and disruption.	201585, 201587 (P Brown)
The plan should do more to proactively safeguard key active travel links associated with various strategic site allocations, rather than relying on such links to come forward as part of future strategies, and mandate the early delivery of walking and cycling links. For example, this includes the NIAB bridge and a tunnel under Huntingdon Road, linked to the Eddington allocation.	202272 (Girton PC), 205252 (J Thomas)
Support for the protection afforded by the policy to the Lord's Bridge observatory.	202525 (University of Cambridge)
The policy should safeguard Tarmac's operations at North East Cambridge, which is an essential rail facility used to support the sustainable transportation of construction materials. It is essential that these are included within this safeguarding policy to ensure these uses are safeguarded from any adverse impacts or conflicts of land use from future development.	208763 (Heatons)
Various concerns raised around conflicts between the proposed protection afforded by the policy for the proposed East West Rail alignment and other proposed developments, including: land to the south-west of Comberton; land at Station Road West, where two planning permissions have previously been granted; and land at North East Cambridge, which includes land where car parking is to be re-provided.	204555 (Bellway Strategic Land), 204191(Brookgate Land Ltd and Network Rail Infrastructure Ltd)
The policy lacks clarity on what would be regarded acceptable development within the safeguarded areas, creating uncertainty, and should not imply a presumption against all development. Clearer criteria should be included, including opportunities for design mitigation and specific circumstances where development may be supported.	204191 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)

The draft Local Plan policies map includes the area safeguarded by the Safeguarding Directions, reflecting Policy I/SI. Following publication of the draft Plan and map, the Secretary of State updated the Safeguarding Directions. The policies map needs updating to show current safeguarding land. Showing the area safeguarded by the current EWR Safeguarding Directions will help those considering development in the area, as it will facilitate early engagement between developers and EWR Co. 10.45 sets out that 'important infrastructure', including EWR, should be safeguarded from any adverse effects that may arise from development, the policy itself does not include any wording to require this. EWR Co requests that the relevant allocation policies included in the Plan are amended to require development to avoid conflicting with, or prejudicing the delivery of EWR.	209087, 211890 (East West Rail Company)
EWR Co notes that draft Policy I/SI safeguards Mullard Radio Astronomy Observatory (MRAO) at Lord's Bridge, in line with the adopted Local Plans. The EWR route will pass through the Lord's Bridge Restricted and Consultation Areas, as shown on the policies map. EWR Co is continuing to work with the University of Cambridge to assess the potential for electro-magnetic interference between the proposed railway and the MRAO.	211891 (East West Rail Company)
I believe the proposed route of East West Rail (EWR) is wrong. More consultation with locals should be carried out to establish a better alternative route that does NOT affect local rural people with noise, disruption and mental stress. The current EWR route travels too close to rural resident's houses and schools; a more respectful route should be chosen or adjusted. EWR travels just 100mtrs from CVC; terrible.I think the housing plan extends too far north and is too close to rural villages, ruining the core value of their countryside location. In particular it is too close to Knapwell.	201585 (P Brown)

Overall, I appreciate the way the public have been allowed to comment on the GCP. The opposite can be said about EWR. The entire plan was done behind people's backs. The proposed route has been forced upon local people who have lived in rural locations for many years but now have the face the nightmare of a noisy and disruptive railway in the back gardens. GCP needs to assess the true negative impacts of the EWR route on local people's lives and question the poor decision making of the EWR management team. Totally incompetent and untrustworthy management team.	201587 (P Brown)
Relocate EWR to avoid virgin farmland- use brown field sites more instead. Avoid build EWR near Barbastelle bat breeding and feeding areas. EWR needs a lot more wildlife bridges than is planned. Build more lakes for wild birds and wildlife throughout the region. Sow billions more wild flowers and of more diverse flower varities ASAP to save insects and birds.	201588 (P Brown)
Active Travel and PROWs are both important infrastructure networks. These and perimeter routes should be bridleway so that provision is inclusive or horseriders.	204079 (S Rogers)
CWWTPR: Anglian Water considers that until such time as the opportunity to deliver the CWWTPR expires, the Local Plan should recognise the CWWTPR project. We request that the policy provides appropriate safeguarding of the consented relocation site and this is appropriately identified on the Policies Map. We would welcome the opportunity to discuss the inclusion of a safeguarding clause with the Greater Cambridge Shared Planning Service.	210216 (Anglian Water Services)
There is an area marked as a safe guarded area and it looking at the area we are assuming this is linked to EWR. There is a Safeguarded area and a colour we've not seen on the maps before we are assuming its land for EWR.	210628 (Little Shelford PC)

Safeguarding land: could the plan be more explicit about protecting land around the rail routes for future stations – re. point above about Cambridge Eastern Access, Cambridge East station, Cambourne station and even a Fulbourn station which was inc. in past transport plans etc. and with EWR and recent mayoral transport priorities it may feel like a missed opportunity to not at least have a line in policy. Can only see vague references with regards rail freight and sidings.	210511 (Cambridgeshire County Council)
ECC notes and welcomes that the emerging Plan includes this policy for safeguarding important infrastructure within Greater Cambridge. It is noted that there is reference to Airport Public Safety Zones and Airport Air Safeguarding Zones within this policy. However, the policy fails to include Air Safety Safeguarding Zones that considers the needs from cross boundary aerodromes; namely London Stansted Airport and Carver Barracks Military aerodrome within Uttlesford. ECC draws attention to the recent Uttlesford Local Plan Inspectors Report (January 2025) and the Main Modifications in particular reference MM22. MM22 recommends the inclusion of a new safeguarding policy that includes reference to the Duxford Aerodrome, as well as Carver Barracks and London Stansted Airport. ECC recommends that the Greater Cambridge Authorities consider this policy wording for the emerging Local Plan, and also discussions with the relevant airport operators, to ensure that the Air Safety Safeguarding Zones appropriate for Greater Cambridge are set out in future planning policy.	210475 (Essex County Council)
The policy identifies land that is subject to safeguarding directions, including EWR. Mac Mic Land are concerned with the extent of land safeguarded for EWR which is contained within the ownership boundary of Crow's Nest Farm (Site Ref. 48096). Our view is the land safeguarded and subsequently confirmed on the draft Prosposals Map has not been justified by EWR and extends northwards into Site	207029 (Mac Mic Land)

Ref 48096 and so prejudices the site's development potential. It is unclear why such an extensive tract of land is safeguarded beyond the proposed route of the railway. For the avoidance of doubt, Mac Mic Group strongly supports the principle of EWR as a catalyst to realising the regions growth potential but land should be safeguarded in a proportionate and justified manner that does not sterilise the development potential of adjacent land.	
As the Councils are aware, the Fens Reservoir is a project of national significance for new water resources, which will provide water supply to Anglian Water and Cambridge Water customers. The reservoir will be determined under the Planning Act 2008 as a Development Consent Order. The Fens Reservoir project will continue to evolve and given its strategic nature, Anglian Water requests that the preferred route for this associated water infrastructure and the preferred location of the service reservoir at Madingley are safeguarded from inappropriate development in order that the delivery of this project of national significance is not compromised. We would therefore like to request that a specific safeguarding policy relating to the Fens Reservoir project as it affects South Cambridgeshire is included in the Greater Cambridge Local Plan.	210217 (Anglian Water Services)
It is critical that important infrastructure, including the East West Rail Scheme, are safeguarded from any adverse impacts that may arise from development.	211574 (Martin Grant Land Limited)

Policy I/AD: Aviation Development

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was support for aviation development that was conscientious of noise abatement in the local area.

Comments were made about the loss of economic benefit of aviation to Cambridge with the planned closure of Cambridge Airport. The provision of flight training, high value transport, aviation engineering, maintenance and logistics will all be considerably reduced. Skilled work, local economic benefits and benefits of high value visitors should be part of an aviation forward planning approach to re-balance the provision in a sensible manner.

One respondent agreed that noise and other factors should be considered for new airports, but believed established airports like Cambridge Airport should not face restrictions due to noise from nearby developments. Another respondent requested significantly stronger noise and pollution restrictions and further research about the impact of drone deliveries. The Cambridge Green Party requested changes to the policy to have regard for the health impacts on local residents and the potential carbon emissions and wider climate impacts of proposed developments.

Concerns from Girton PC were raised about the impact aviation activity, including aircraft noise has on community wellbeing. The policy should require Noise & Flight Path Impact Assessments, public monitoring/reporting, and mitigation (route optimisation, quiet-operations, hours controls) for any aviation development or operational change. Ground-access impacts must also be managed to protect school routes and Active Travel corridors. Mothers CAN Cambridge policy considered the

policy to be weak from an environmental sustainability and climate mitigation point of view and do not support it. The policy focused on noise and amenities with no direct reference to greenhouse gas emission associated with aviation and associated infrastructure.

Further responses received included comments from the Imperial War Museum requesting that the policy recognise different types of flying activities have different noise impacts. An advanced aviation and related technologies hub at IWM Duxford would include for research and development, prototype testing and manufacture for low and zero carbon advanced air mobility technologies and supporting operations. The environmental impacts compared to conventional aircraft will be less which the policy should recognise.

Essex County Council drew attention to the published Uttlesford Inspectors Report and Main Modifications Report which include an addition of policy regarding the approach to noise exposure. It recommends the addition - “for aviation transport sources, the Significant Observed Adverse Effect Level is considered to occur where noise exposure is above 63dB LAeq,16hr (57dB LAeq,8hr at night) and the lowest observed effect level is considered to be 51DB LAEQ, 16HR (45DB LAEQ, 8HR at night)”.

Response to the main issues raised in representations

The Councils’ response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The policy guides development proposals related to aviation and sets out in the circumstances where proposals would be acceptable along with any specific aviation noise impact related requirements. It has been amended to establish clearer criteria around the specific requirements aviation related proposals would need to satisfy as part of the planning application process. The policy also now refers to national noise limits set by Defra. Reference to specific metrics have been removed to ensure that updated guidance provided by Defra can be applied at the point the application is received.

More general matters relating to different sources of pollution are considered under Policy WS/HS: Pollution, health and safety which will ensure any noise and, or health concerns are addressed including any other potential environmental concerns specific to an aviation proposal are considered. Aviation safety is also considered under Policy I/SI: Safeguarding Important Infrastructure. Policies under the Local Plan's Climate Change chapter will have regard to the potential carbon emissions and, or wider climate impacts of the proposed development.

The policy has also been broadened to include aircraft noise impacts to include other non-traditional forms of aviation including Unmanned Aerial Vehicles (UAV) or Unmanned Aircraft System (UAS) – drones – given their increased use in day-to-day activities. Specific requirements for a Business Plan will allow the benefits of either economic or emergency services aviation proposals to be more clearly assessed.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Aviation activity is causing significant aircraft-noise, flight-path and community wellbeing concerns in Girton & Histon. Draft Policy I/AD should require Noise & Flight Path Impact Assessments, public monitoring/reporting, and mitigation (route optimisation, quiet-operations, hours controls) for any aviation development or operational change. Ground-access impacts must be managed to protect school routes and Active Travel corridors. Where impacts cannot be mitigated adequately, proposals should be refused to safeguard health, wellbeing, and rural character.	202277 Girton PC
With the upcoming closure of Cambridge Airport, the economic benefit of aviation to Cambridge is being considerably reduced. The provision of facility for flight training, high value transport, aviation	203050 (B Hatton)

engineering and maintenance and logistics is all considerably reduced with the draft GCLP. An aviation forward planning approach is needed to retain skilled work, local economic benefits and benefits of high value visitors. A key example of this is the plans to relocate the air ambulance station, a critical provision that needs immediate replacement and approval.	
The draft GCLP is anti-aviation and suggests it lacks consultation with the local aviation community. While noise and other factors should be considered for new airports, however established airports like Cambridge should not face restrictions due to noise from nearby developments.	203136 (G Buxton)
Fowlmere airfield is already very conscientious of noise abatement in the local area. Support for aviation development anywhere in the country especially in Fowlmere.	203552 (R Ince)
Aviation proposals should explicitly consider both public health and climate impacts, aligning the policy with sustainability and community wellbeing objectives.	(203759) Cambridge Green Party
Impose significantly stronger noise and pollution restrictions if possible. Also explore the impact of drone deliveries- commission a research paper if necessary.	(203822) A Carpen
Draft Policy I/AD focuses on noise and amenities and does not directly reference greenhouse gas emission associated with aviation and associated infrastructure. The policy should explicitly consider greenhouse gas emissions, include conditions based on climate impact of any developments, distinguish between different purposes of aviation, and specify any development will align with national aviation decarbonisation pathways.	204925 (Mothers CAN Cambridge)
ECC draws attention to the Uttlesford Inspectors Report and Main Modifications that is published. The inspectors and main modifications include an addition of policy regarding the approach to noise exposure. It recommends the addition - “for aviation transport sources, the Significant Observed	210476 (Essex County Council)

Adverse Effect Level is considered to occur where noise exposure is above 63dB LAeq,16hr (57dB LAeq,8hr at night) and the lowest observed effect level is considered to be 51DB LAEQ, 16HR (45DB LAEQ, 8HR at night)". This wording may be appropriate for the Plan. Furthermore, it is also important to note that the Inspectors for Uttlesford also welcomed the addition of reference to outdoor noise on school sites should not exceeding 55DB LAEQ (30 MIN) (reference from the Main Modification - MM32). Similarly to the above, Greater Cambridge authorities may seek to adopt a similar approach.	
Point 4 of the policy recognises there are different types of flying activities which have different noise impacts and provides examples. IWM in partnership with Gonville and Caius College and Henry Boot Development (HBD) is bringing forward proposals, led by HBD for an advanced aviation and related technologies hub at IWM Duxford. This would include for research and development, prototype testing and manufacture for low and zero carbon advanced air mobility technologies and supporting operations. The environmental impacts compared to conventional aircraft will be less. This being the case it should be recognised in the policy and supporting text. It is suggested this be amended to read as set out in the full representation.	208281 (Imperial War Museum)
Though this Policy lists the factors to consider for development of airfields, land contamination has not been included. We would recommend revisions to highlight the need to consider contamination which may have resulted from the operation of the airfields, with particular reference to PFAS as a major potential risk to the groundwater environment. Contaminated Land Assessments should be completed as per guidance in the NPPF, Environment Act 1990 and other recent or superseded guidance.	211185 (Environment Agency)

Policy I/EI: Energy infrastructure masterplanning

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy and the need to support energy infrastructure and renewable energy generation in a joined up way. Comments were made in relation to further clarity on district heat networks, and how the impacts of cross boundary development was considered in terms of energy. Concerns were raised by some developers around the feasibility and need to provide a separate document for energy master planning and the potential impact on deliverability. Further responses referred to the need to incorporate micro-grids, village energy generation and micro-grids. Comments were made by the EA about the potential for pollution of the water environment due to abnormal and emergency situations at BESS developments, in particular fires.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

Energy consumption from large scale neighbouring authorities will be picked up by UKPN and wider Local Area Energy Planning to ensure that there is sufficient capacity in the grid to accommodate development in the pipeline. The impact of some strategic scale projects in neighbouring areas is also being considered as part of the National Energy System Operators (NESO) Regional Energy Strategic Plan (RESP).

The Kingsway Solar Farm proposal is a nationally significant infrastructure project. As such, the Councils' are a consultee only

on these applications and the decision is made by the Secretary of State.

Policy CC/RE: Renewable energy projects and infrastructure in the Climate Chapter supports the development of a district heating system in Cambridge city centre and community-led low-carbon heating infrastructure. The policy plans positively for this, but there are some limitations to the role of planning policy and there are wider Council strategies to support this.

The Local Plan is supportive of district heat networks in appropriate locations – i.e. where there is need, low and zero carbon networks, connects to existing development and plays a key role in retrofitting of development. The National District Heat Zoning Legislation will set out how development can connect to district heat networks and there is further secondary legislation in the pipeline to be published which will further inform our approach at a local level.

The Cambridgeshire Local Area Energy Plan has identified the need for significant upgrades of existing and new grid infrastructure to support both growth and wider decarbonisation. Further work to help support the Greater Cambridge Local Plan has also helped to refine this information and has been shared with UKPN to inform their ED3 plans.

Site based Energy Infrastructure master planning is necessary to achieve a more joined up approach to infrastructure provision, support the transition to a net zero carbon society and open up the potential for some infrastructure to be forward funded to help speed up the delivery of key development sites. This includes heat networks. Some additional detail as to the content on the energy masterplans has been added to the policy, while further detailed guidance on energy infrastructure plans requirements and district heat heating will be provided in technical notes and the sustainability checklist. The assessment of the most suitable heat source is very site, context and scale and type of proposed development specific. Hence the need to weigh this up with other factors, and its inclusion in the climate chapter.

Once the secondary legislation for District Heat Network zoning comes into force this will not be controlled as part of the

planning process as it is currently and zone co-ordinators will facilitate district heat network connections. There is a risk that putting further detail in the Local Plan will conflict with this emerging guidance, but the principle of District Heat Network use in the appropriate location with low and zero carbon heat sources is supported.

Energy flexibility is an important part of managing energy infrastructure. This has been included in the policy and will be supported by technical guidance to ensure this is appropriate for development type and scale.

Cambridgeshire County Council has a community energy fund which could support and enable village-scale renewable energy. This policy does not prohibit these types of projects going forward. There are wider energy projects funded by the Councils and third parties which will bring renewable energy generation to rural and urban areas.

The need for a specific energy masterplan (separate to a sustainability statement) reflects the intention to apply energy masterplanning requirements to a higher threshold of development. Furthermore, there are specific technical requirements that this document will need to respond to. A separate masterplan will enable this information to be shared with and reviewed by third parties and consultees such as UKPN and NESO more easily, facilitating a more joined up approach for future energy masterplanning and the business planning of the distribution systems operators like UKPN; thus ensuring there is enough capacity in the grid for the future pipeline of development.

The threshold for 250 units is set at a level of development that would require significant pre-planning due to its impact on the grid. The allocated sites in the Local Plan have already been built into the LAEP and assumptions have been made on the energy demand to feed into this planning. This has also been shared with UPRN for ED3 modelling. Early engagement with network providers is encouraged to ensure suitable provision for energy needs in projections.

The Councils' note the comment from the Environment Agency and will reflect this in a future technical note to support energy

infrastructure. It is deemed that this is too detailed for inclusion in the policy wording.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Concerns about the impact of Kingsway Solar Farm.	202032 (Weston Colville PC)
The importance of ongoing and meaningful engagement with key stakeholders in this process to ensure they are willing to support facilities coming forward through new development.	210273 (Vistry Group)
Policy is a positive step forward in supporting energy infrastructure but could be more ambitious in promoting renewable energy generation. Safeguarding land could include sites for small-scale solar, wind or biomass not just grid connections with additional criteria for the policy suggested.	203760, 203761 (Cambridge Green Party)
The policy could support experimental or more efficient policies to integrate sustainable energy generation and reduce reliance on grid reinforcement.	203760, 203761 (Cambridge Green Party)
Plan should require developers to demonstrate how energy infrastructure will be future-proofed including capacity for renewable energy generation, storage and smart grid integration	205051 (M Cleminson)
Contributions should also be referenced in relation to the impact on energy consumption impact within the Greater Cambridge area from large scale neighbouring authority large infrastructure projects (National Infrastructure Projects) at Tempsford/EastWest rail station (30,000 houses and interchange EW rail station).	201394 (Gamlingay PC)

In terms of infrastructure, notably heat networks and the planning of heating, cooling and sources of renewable electricity in clusters and communities that reduce the demand on external connections. In the short term, district heating can provide a highly efficient, low carbon solution. Heat networks should be used for futureproofing to provide district heating and cooling capability. Heat networks can be adapted from the urban environments to rural situations where different energy sources can be applied.	202155 (R Stobart)
Energy planning should support local renewables, micro□grids, and community energy connected to key sites (e.g., Pavilion, youth spaces). Renewable energy supports community wellbeing and resilience. Infrastructure must fit rural character. Localised energy reduces network stress.	202273 (Girton PC)
While not within the immediate scope of the Local Plan, there are concerns about how energy demand will be met to support the Plan alongside other growth strategies. The complexity of managing energy highlights the importance of a strategic, master-planned approach. We encourage engagement (convened through Cambridge Growth Company) with regulators, national government and local authorities to support early investment in local energy infrastructure and the development of an integrated energy masterplan aligned with planning and growth strategies across the region.	203542 (Cambridge Ahead)
Solar farms provide ideal opportunity for creating permissive bridleway provision.	204080 (S Rogers)
Support for policy. The policy appropriately recognises the need for new development to be underpinned by resilient, future-proofed and low-carbon energy infrastructure, consistent with national and local climate objectives and emerging energy system requirements. Tritax places sustainability and energy efficiency at the heart of its projects, with new buildings designed to achieve net zero carbon in construction, alongside EPC A ratings and BREEAM Excellent as a minimum target.	204582 (Tritax Big Box Developments)

The respondent questions the appropriateness of requiring an Energy Masterplan for all schemes exceeding 250 dwellings, citing unclear rationale for the threshold. Requirement should be proportionate to scale of development for energy masterplans, and there should be clear guidance around discussion with National Grid. Policy is critiqued for not considering that new substations may be more effectively located elsewhere, and clarity is requested regarding which substations may require upgrades. Considerations of timescales is integral to development of policy.	204629 (Redrow South Midlands)
The Environmental Agency note the mention of battery energy storage sites and recommend that additional wording be added to the policy to set out that there is potential for pollution of the water environment due to abnormal and emergency situations at BESS developments, in particular fires.	211175 (Environment Agency)
It is recognised that it is important that large scale developments masterplan for energy infrastructure to help facilitate decarbonisation and make best use of grid infrastructure.	211575 (Martin Grant Land Limited)

Policy I/ID: Infrastructure and delivery

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the Policy subject to making suggested amendments.

A number of representations from local residents, parish councils, amenity groups and local organisations sought reference to be made in the Policy to the requirement to secure specific forms of infrastructure provision, including flood mitigation, blue light services, natural greenspaces, integrated public transport, cultural, digital, and healthcare infrastructure; or ensure infrastructure is delivered to a particular standard, for example ensuring roads are constructed to adoptable standards. Some neighbouring authorities sought reference to the provision of cross-boundary infrastructure and the need to effectively mitigate potential impacts on services and facilities as a result of development on or near their administrative boundary.

There was strong support for the requirement for infrastructure to be delivered in tandem with the build out of the development, with a number of respondents suggesting this should be strengthened.

Several respondents raised concerns with the Infrastructure Delivery Plan (IDP). This included omissions around forms of infrastructure, such as adult social care and youth services, the use of inadequate standards, uncertainty around water supply and strategic transport, and a lack of detail on the cost of certain infrastructure and how they will be funded. Views were also shared about the need to address existing deficiencies, specifically for water, waste water, and healthcare, before planning for more homes and jobs. A concern was also raised about the Viability Assessment and the absence of a specified S106 cost.

A number of developers raised concern around the requirement to prepare and submit a Utilities Statement, which they considered was onerous and could lead to additional costs and delays. They sought amendments to the policy to ensure current capacity constraints or objections from utility providers would not prevent development from coming forward if reasonable mitigation or phased development delivery was possible. Other issues raised included the definition of ‘adequate capacity’ and its alignment with provider obligations; that planning obligation assessments should consider the latest information set out in Council’s Infrastructure Funding Statements; and that the Policy should not reference Community Infrastructure Levy (CIL), which they considered was premature as a CIL for the Greater Cambridge area has not yet been adopted.

Response to the main issues raised in representations

The Councils’ response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

There are detailed policies in the Local Plan that address the various forms of infrastructure that need to be considered depending on the nature, scale and location of a proposal. These policies establish how the need is to be assessed, the standards to be applied, as well as the preferred approach to provision. It is therefore not necessary or appropriate to try to list in this one policy all forms of infrastructure that may be sought from development or particular standards that should be met, when the plan is intended to be read as a whole.

The wording of the policy has been amended to further strengthen the requirement for infrastructure to be provided in a timely manner to support occupation of the development, including where development is to be phased and built out over a longer period of time.

The updated IDP will, where information exists, seek to address the shortcomings identified by respondents. However, much of the certainty sought is reliant on whether the relevant service provider has detailed proposals for provision. Where such detail is

currently unavailable, broad estimates will need to be used, and the IDP further updated and refined as each of the infrastructure projects are worked up in more detail. A revised IDP has been published to support this Proposed Submission Local Plan, and the Councils' intend to prepare a further update prior to submission of the Plan for examination.

The Viability Assessment is based upon a residual land value model and shows the funds available accounting for all development costs and required profit that can be put towards planning obligations (S106 & CIL). The Viability Assessment will be updated and will include a S106 cost derived from the IDP.

Amendments have been made to clarify that Utilities Statements should set out the mitigation to address current capacity constraints, including appropriate phasing of development; but with the express need to demonstrate that, if additional capacity is required, this is capable of being secured at the appropriate time to support the build-out and occupation of development.

Periodically updating the IDP and annual reporting on infrastructure delivery through the Infrastructure Funding Statement are the means by which the Councils will monitor infrastructure provision to support planned growth. However, it is not considered necessary for this to be referenced in the policy itself.

CIL currently forms part of the planning obligations regime in England, alongside Section 106 Agreements. All Councils can introduce a CIL for their area. The Councils have signalled a clear intention to bring into effect a CIL for Greater Cambridge and it is therefore right and appropriate for the policy on infrastructure and delivery to reference this.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
These contributions should also be referenced in relation to the impact on energy consumption impact within the Greater Cambridge area from large scale neighbouring authority large infrastructure projects (National Infrastructure Projects) at Tempsford/EastWest rail station (30,000 houses and interchange EW rail station)	201393 (Gamlingay PC)
Concern around the risk of flooding and that the plan is based on the latest flood risk data, reflecting current capacity issues, surface water flood risk, historic patterns of flooding and cumulative data on impact of proposed developments. The plan must contain solid measures to prevent risk of flooding, including front-loaded mitigation, with S106 contributions negotiated for on-site and off-site mitigation to address local flood risk concerns and improve existing infrastructure.	201464 (M Lucchetta-Redmond), 201980 (Swavesey PC), 202274 (Girton PC)
The requirement for necessary infrastructure aligns with NPPF paragraph 35, but may overlap with s106 and emerging Infrastructure Tariffs, potentially leading to duplication. Questions arise regarding the definition of 'adequate capacity' and its alignment with provider obligations due to the broad definition of 'infrastructure' in the policy. The policy should clarify that planning obligations assessments will consider the latest information from the Council's Infrastructure Funding Statement to avoid double payments for infrastructure. Concerns exist that requiring a full Utilities Statement for all major developments could lead to additional costs and delays; reliance on DNO and provider scoping statements should be allowed.	204743 (Redrow South Midlands)

The policy on viability is generally supported, but clear parameters for independent review costs and timings should be established to promote transparency.	
New infrastructure needs to be delivered in timely manner, reflecting needs and speed of build out, reflecting previous experience (e.g. Northstowe and existing Cambourne) and the known problems in health and social care and education.	201903 (C Deer)
The Infrastructure Delivery Plan (IDP) lacks finalised costings, funding streams, and delivery bodies for many priority schemes, making the plan unjustified. In some cases, it lacks infrastructure solutions by deferring identification of specific measures (e.g. for energy supply).	202033 (Haslingfield PC)
There is uncertainty around water supply and transport, which may undermine the effectiveness of the plan. The plan relies on critical water infrastructure not expected to be available until 2032-2037, and a transport strategy that is not due for completion until end 2026.	202033 (Haslingfield PC)
There are identified bottlenecks in waste transfer capacity and a lack of confirmed primary care spaces, indicating ineffective joint working amongst stakeholders.	202033 (Haslingfield PC)
Support for cultural infrastructure to be recognised as core civic infrastructure, cultural venues to be integrated into infrastructure planning, phasing and investment pathways and a partnership-owned Cultural Infrastructure Pipeline is established for new provision and renewal, the plan to recognise that significant investment is required, coordinated public/private/philanthropic investment is enabled, potential for community asset transfer is strengthened with governance support and capital access, and Create Cambridge is engaged as an advisor on cultural infrastructure strategy development.	202059 (H Chamberlain), 202144 202312, 202326, 202757, 202881, 202884, 204176, 205411 (Cambridge Junction / Create Cambridge), 202904 (Cambridge Junction R Tinkler) 202202 (H Tam),

	202390 (J Webber), 202415 (T Shaw), 202463 (K Jones), 202688 (T Altmann), 202718 (W Townsend), 202786 (S Lee), 202936 (R Tarry), 202970 (T Flinders), 203351 (N Ellis), 203442 (S Ashworth), 203483 (L Heap), 203544 (D Lever), 203633 (Z Svendsen), 203853 (N Yeni), 203874 (J Fritsch), 204408 (New International Encounter), 204691 (NEUBAU Architecture Ltd), 204706 (A Giarlis), 204843 (L Matthews), 205021 (Wysing Arts Centre), 205055 (L Sheerman, Impact facilitator, University of Cambridge), 205101 (H Paterson), 205208 (J

	Walsh), 205315 (A C de Azevedo Lamha), 205346 (N Oakley), 205348 (L Howse), 205409 (A Seiglow)
Part 2 of the policy does not specify the phasing of infrastructure compared with development and should be reworded to require necessary infrastructure provision to be put in place before the corresponding development. It could also be clarified that conditions may be implemented to ensure that construction can only commence when necessary infrastructure is established.	202576 (P Tribble), 203614 (Cambridge City Council Liberal Democrat Group)
Welcomes recognition in supporting text of the need for parks, open spaces and land for biodiversity, but would be better framed as providing strategic and local green infrastructure, in support of the biodiversity and green infrastructure policies elsewhere in the plan. The supporting text should also include reference to natural greenspaces.	202943 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 204390 (Cambridge Past, Present and Future)
Concern that the IDP: - Uses inadequate Fields in Trust standards to assess green infrastructure provision and does not reflect quantity of strategic green infrastructure needed to address historic deficiencies - Fails to acknowledge land availability in the right places as constraint to green infrastructure delivery	202943, 202949, 202952, 202953 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 204390 (Cambridge Past, Present and Future)

- Is inconsistent with the Planning Obligations SPD and other evidence base documents around average prices for agricultural land or costings for specific habitat creation measures, including natural greenspaces	
Developers should be required to construct roads to adoptable standards, as previously agreed at joint Cabinet.	203614 (Cambridge City Council Liberal Democrat Group)
Policy lacks definition of key terms, including “acceptable in planning terms,” “appropriate physical and social infrastructure” and “adequate capacity”, making it unclear what developers are responsible for. It would benefit from clear references to supporting documents, including what coordination and phasing are required, which types of infrastructure are included, and how capacity should be assessed on- and off-site, to increase certainty and ensure delivery of sustainable, healthy communities.	203763 (Cambridge Green Party), 204753 (Redrow South Midlands)
Funding should be allocated to infrastructure projects in villages that come under pressure due to the expansion of Cambridge. For example, small standalone water treatment works or GP surgeries. This would also support the future expansion of these villages.	203832 (R Gould)
Active Travel routes and PROWs should be bridleway to include horseriders.	204081 (S Rogers)
The policy prematurely references a CIL which has not yet been adopted for Greater Cambridge, and should only refer to planning obligations or contributions via S106.	204132 (E W Petter Ltd), 204202 (Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204298,

	204563 (Bellway Strategic Land), 204778 (Vistry)
Argues that utility company objections should not unreasonably delay or prevent planning applications, which should not be solely refused on the basis of capacity constraints if feasible mitigation or phased delivery is possible.	204132 (E W Petter Ltd), 204202 (Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204298, 204563 (Bellway Strategic Land), 204778 (Vistry)
The policy is too rigid, requiring developers to secure all necessary infrastructure despite this not all being within their control. This may require place unmanageable obligations on them that cannot be fulfilled and is not consistent with national planning policies.	204250 (Railpen), 204489 (Cambridge Investment Partnership)
The policy should clarify that planning obligations assessments will consider the latest information from the Council's Infrastructure Funding Statement to avoid double payments for infrastructure.	204753 (Redrow South Midlands)
Concerns exist that requiring a full Utilities Statement for all major developments could lead to additional costs and delays; reliance on DNO and provider scoping statements should be allowed.	204753 (Redrow South Midlands)
The policy on viability is generally supported, but clear parameters for independent review costs and timings should be established to promote transparency.	204753 (Redrow South Midlands)
Concern that part 3 of the policy, as drafted, places sole liability on developers for addressing historical infrastructure deficiencies. Requirements should be focused on the direct impact of the proposed development.	204909 (Hill)

The policy should clearly identify health infrastructure as essential in the Local Plan, requiring development to fund healthcare infrastructure necessitated by new housing. Developer contributions must be consistently leveraged to address the demand for health and care services, including cumulative impact of smaller housing growth. The plan should include a section outlining the process for determining developer contributions for health infrastructure, ensuring alignment with NHS requirements, with flexibility for providers to request financial contributions or new purpose-built facilities.	205166 (NHS Cambridgeshire and Peterborough ICB)
Historically little thought has been given to the public realm as a cohesive experience. Piecemeal proposals for small shops or playgrounds do not, on their own, support community. Provision of a wide range of service, easily maintained public space and facilities for meeting an entertainment are critical, allowing people to meet and fostering shared belonging.	205415 (D Stoughton)
Fire, Resue, Police and Ambulance services should be referenced in the policy and supporting text	207488 (Cambridgeshire Constabulary), 207518 (Cambridge Fire and Rescue Service)
Agree that ‘new development must be co-ordinated and phased in tandem with the provision of appropriate physical and social infrastructure’, and, in the case of accessible greenspace provision, this is particularly important where housing is located close to sensitive sites at risk of recreational pressure (e.g. SSSIs).	207640 (Natural England)
Major deficiencies in hospital infrastructure should be addressed before further jobs and homes are allowed.	208741 (Trumpington Residents’ Association)

The IDP should address missing forms of essential infrastructure, including children and adult care social services and youth services, which are essential to the wellbeing and social inclusion aspirations of the plan.	208741 (Trumpington Residents' Association)
There needs to be an explicit plan for funding the Fens Reservoir and water recycling effluent re-use schemes, as referenced in the IDP. Concern about the nature of the River Cam abstraction scheme and the extent to which it can leverage opportunities.	208741 (Trumpington Residents' Association)
Should be clearer that integrated mass rapid transport is needed to support sustainable development and that it should be designed and delivered as an urgent regional priority, serving an area beyond Greater Cambridge (recognising the functional travel to work area). The plan should reflect that a high quality public transport network is essential for driving modal shift and overcoming congestion and depressed productivity. To be successful, the network must be attractive, frequent, reliable, fast, affordable, spatially and multi-modally integrated and practically accessible. It should consider how it could be spatially integrated into the city, examining the likely need for a tunnel which could only attract financing through metro or light rail as opposed to buses. This should be embedded into the plan's vision.	208754, 208756, 208758 (Cambridge Connect)
The Local Plan should state unequivocally that an integrated mass rapid transit network is needed to support sustainable development within the region. This mass rapid transit network needs to be designed and delivered as an urgent regional priority to address pressures of growth and meet economic, social and environmental goals. The Local Plan should acknowledge that its radius (for local government administrative reasons) is too small to cover the functional travel to work area, and as such is an inadequate basis for a regional mass	208742 (Trumpington Residents Association)

rapid transit system. The development of Greater Cambridge over the next 10-30 years will inevitably require quick, cheap, reliable, safe public transport connections to surrounding towns, not least Huntingdon, St Ives, St Neots / Tempsford, Ely, Newmarket, Haverhill, and indeed Peterborough. Imminent reorganisation of local government should go some way to meeting this weakness in the draft Local Plan, although the current planning authorities could anticipate and seek to address the deficiency.	
The Strategic Priority to "Plan for transport, water, energy and digital networks; and health, education and cultural facilities; in the right places and built at the right times to serve our existing and growing communities" is an aspiration, not a strategy, and requires clearer definition. However, the plan should be more imaginative around financing options be specific about the spatial plan (i.e. clusters and corridors of growth) and how they will be facilitated and supported in a practical and sustainable way by the transport network.	208755 (Cambridge Connect)
The plan should incorporate a strategic transport assessment to consider the cross-boundary impacts of the proposed Cambridge East and Grange Farm allocations on the highways network, including requirements for mitigation on the A1307 at Haverhill, reflecting commuting patterns.	204890 (West Suffolk Council)
The impact of proposed growth at Grange Farm on the capacity of education and health facilities must be evaluated to ensure timely development and avoid pressures on Haverhill's services, reflecting timing and phasing of development. Additional detail should be set out around how effective mitigation would be delivered.	204890 (West Suffolk Council)
I support Create Cambridge in asking that: • further development of the local plan refers to the Create Cambridge Insights Report as evidence base	204180 (Cambridge Junction / Create Cambridge)

with regards to the development of Cambridge's digital cultural infrastructure • digital cultural infrastructure is recognised within infrastructure expectations/GCCIS • commitment to common metrics, aggregated data and measurement tools • digital capability is included within the definition of cultural infrastructure • the Cultural Infrastructure Pipeline incorporates shared platforms, interoperable systems, aggregated data tools and organisational digital capacity • low digital maturity is addressed, including that only 9.2% of venues currently use connected booking systems	
In terms of infrastructure delivery to support growth across our region, it is important that we take account of the longer-term ambitions for growth that will be brought forward by the Cambridge Growth Company, in addition to that being proposed in the Greater Cambridge Local Plan (GCLP) when assessing current and future infrastructure needs	209155 (Anglian Water Services)
Anglian Water supports the policy requirements to ensure that infrastructure capacity is available or can be made available in time to serve the development, including the submission of a phasing strategy to align with the timing of additional infrastructure investment. We agree that a Utilities Statement should support this to provide details including foul and surface water drainage and details of any engagement and agreements made. We encourage developers to undertake early engagement with Anglian Water including the submission of pre-planning enquiries to establish sustainable points of connection to our combined, surface water, and foul drainage networks, and capacity at our WRCs. We provide detailed information on our website on how developers can apply for these assessments based on those which best suits the development. Noting the requirements for developers, in submitting accompanying	210218 (Anglian Water Services)

statements to support development proposals, it should be clear that separate surface water drainage strategies may be prepared and the Sustainability Statement would also lead to submissions regarding potable water supply and water efficiency. The local plan could help to clarify how these additional statements should be incorporated and prepared, as they may in some circumstances become signposts to other documents on larger schemes, or for smaller/minor developments, become part of the Planning Statement.	
We are pleased to see that reference to Foul and surface water drainage has been included in this policy, together with the requirement to demonstrate adequate capacity exists.	211176 (Environment Agency)
Infrastructure should be appropriately considered for existing and new areas so that no one area is at risk of becoming congested through traffic for a particular commodity, such as Schools, Doctor Practice, Dental Practice, etc.	210371 (Community Campaigner D Barton)
The council should consider developing dementia ready housing as part of its IDP. West Yorkshire Combined Authority has created a guidance document on dementia ready housing: Dementia-ready housing	210335 (East of England Ambulance Service NHS Trust)
HEMS support EEAST in delivering high level critical care and transportation to specialist hospitals for patients that have severe or life-threatening injuries and medical conditions. To accommodate the different airframes that operate in this region, an equivalent size of a football field would be required to support both day and night landings. This space needs to be free of overhead and ground level obstacles eg trees and overhead cables and ideally be centrally located within the development with easy road access to and from. It would be preferable if ground lighting was available for the helicopter	210337 (East of England Ambulance Service NHS Trust)

to land, but is not essential. As a minimum helicopter landing could easily be included in developers existing plans for open, leisure or sport space. Ambulances and critical care vehicles are often used to transport patients to the helicopter landing site.	
A small number of pupils, living in Greater Cambridge, attend schools in Suffolk (and, indeed, vice versa). Any development proposal near the border with Suffolk should include consideration as to whether or not any resulting demand for school places will result in demand being placed upon Suffolk schools. In rare circumstances, developer contributions may be required. Please see the Section 106 Developer's Guide to Infrastructure Contributions in Suffolk for further information on the County Council's approach to seeking education and other infrastructure contributions.	210631 (Transport 2000 Cambs & W Suffolk)
Much like education, a small number of residents, living in Greater Cambridge, will use Suffolk County Council's infrastructure including Haverhill's Recycling Centre which opened in August 2024. Any development proposal near the border with Suffolk will need to include consideration as to whether or not any resulting demand will result in demand being placed upon Suffolk's infrastructure. In some circumstances, developer contributions may be required. Please see the Section 106 Developer's Guide to Infrastructure Contributions in Suffolk for further information on the county council's approach to seeking waste and other infrastructure contributions.	210638 (Transport 2000 Cambs & W Suffolk)
The Local Plan must include strong policies to support the introduction of the following (which should also be detailed in the Infrastructure Delivery Plan): - Measures to enable buses to travel through Cambridge freely, e.g. more bus gates; traffic filters, a circulation plan, road charging.; Schemes to raise funds to invest in public transport e.g. Workplace Parking Levy; road charging; These policies will	203235 (Cambridge Area Bus Users)

enable the delivery of an expanded bus network and the provision of the attractive, reliable services our communities require to make bus travel a genuine choice for all.	
With the exception of major bus infrastructure schemes already in development (C2C, CSET), details of the additional public transport measures to connect sites to Cambridge are vague. These additional public transport measures will largely determine whether bus travel is a genuine choice for residents. A detailed IDP should be established, including both infrastructure and services. As already noted, measures to enable buses to travel through Cambridge freely (e.g. more bus gates, traffic filters, a circulation plan, road charging) and schemes to raise funds to invest in public transport (e.g. Workplace Parking Levy, road charging) are also crucial and should be included as strategic transport measures.	203240 (Cambridge Area Bus Users)
The policy I/ID is deemed overly rigid, requiring developers to secure all necessary infrastructure, which may not be within their control. The respondent highlights that strategic and utility infrastructure is often delivered by statutory undertakers under separate frameworks. The National Planning Policy Framework states that policies should be deliverable and reflect reasonable expectations of developers. Requiring developers to demonstrate arrangements for infrastructure risks placing unmanageable obligations on them. The policy wording may exceed statutory tests for planning obligations, potentially delaying development and conflicting with national objectives. Changes to plan: The policy should therefore be amended to acknowledge that the delivery of certain infrastructure will be dependent on, and led by, third-party infrastructure providers. Without this clarification, the policy risks being ineffective, undeliverable and inconsistent and therefore fails NPPF tests of soundness by lacking effectiveness, deliverability, and alignment with national policy	204250 (Railpen)

The respondent objects to policy I/ID as it references Community Infrastructure Levy (CIL) which has not been adopted in the Greater Cambridge Area, suggesting the policy should only refer to planning obligations via S106 agreements. While supporting the objective of sufficient infrastructure capacity for new development, the respondent believes that objections from utility providers should not unreasonably delay or prevent development. The respondent recommends that the policy clarifies that development should not be halted due to current capacity constraints if reasonable mitigation or phased delivery is possible. It is requested that the policy be revised to ensure that objections from water companies do not automatically prevent development and that appropriate conditions or obligations should allow for capacity issues to be addressed. It is requested that the policy and/or supporting text be revised to make clear that objections from water companies cannot automatically prevent development, and that development should proceed where reasonable mitigation or planning mechanisms can address infrastructure requirements.	204298 (Bellway Strategic Land)
Large numbers of new dwellings should not be built until the infrastructure for providing water (and for disposing of waste water) is in place. Developers should contribute to the cost of establishing this water infrastructure.	203290 (J Palmer)
National Highways have reviewed the Draft Infrastructure Topic Paper, published as part of this consultation. It is understood that this document will feed into the work currently being prepared by the Cambridgeshire and Peterborough Combined Authority (CPCA), and the preparation of the Local Transport and Connectivity Plan (LTCP). National Highways will continue to work with the LPA and the	210849 (National Highways)

CPCA to ensure the appropriate level of mitigation is secured as part of the Local Plan to accommodate the proposed allocations and the growth across the district.	
The policy refers to the submission of a Utilities Statement. It is considered that such requirements are more appropriately addressed through the Council's validation requirements rather than through policy wording.	210274 (Vistry Group)
Page 73 of the IDP- amend the sentence to the following: School sizes vary considerably across Greater Cambridge. In the city, provision ranges from small one-form entry schools (such as St Paul's CE Primary and the Spinney Primary) to larger three-form entry schools (such as St Matthew's and Trumpington Park).	210530 (Cambridgeshire County Council)
We do not believe that the draft IDP makes adequate provision for the secondary and tertiary healthcare needs of the existing, let alone the growing, population.	210890 (Great Shelford PC)
We are broadly supportive of the policy.	210961 (Great Shelford PC)
Concerns regarding the Regulation 18 viability study - The modelling does not include any allowance for Section 106 obligations or other infrastructure contributions (e.g. CIL). By excluding s.106 and CIL costs from its modelling, the current viability evidence does not demonstrate that the proposed affordable housing requirements are viable once realistic development contributions are taken into account. Nor does it show the impact of those requirements on the funding available for essential infrastructure. The viability study should be revisited to include realistic assumptions for Section 106 and infrastructure costs, so that the balance between affordable housing provision and infrastructure delivery can be properly tested.	211071 (Cllr R Williams)

We are pleased to see that the IDP references the WCS evidence document and includes the need for investment at WWTWs to accommodate the growth outlined in the Local Plan. Future needs are also referenced, along with the current engagement Anglian Water is undertaking with key external stakeholders to find solutions to capacity challenges, including around solutions for Cambridge WWTW following the withdrawal of funding for the relocation project. We note the IDP may be updated with further information on priority investments once the next version of the DWMP is published and capacity solutions have been identified. We encourage an update to the document to ensure the evidence base remains sufficient over the lifetime of the plan.	211187 (Environment Agency)
CPPF strongly supports the use of CiL to enable the delivery of green and blue infrastructure policies. CPPF welcomes the recognition of the need for parks, open spaces, and biodiversity land, suggesting the explicit inclusion of 'strategic green infrastructure' or 'natural greenspaces' in the text. CPPF notes ongoing work on Green Infrastructure and Public Open Spaces, emphasising that changes in standards must be reflected in the IDP. CPPF highlights inconsistencies in costs for strategic green infrastructure across various documents, expressing concern that some costs are underestimated, particularly for agricultural land. CPPF stresses the need for consistency in GI and Infrastructure policies to ensure adequate financial contributions from new developments for strategic natural greenspace.	204360 (Cambridge Past, Present and Future)

CPPF shares concerns regarding the appropriateness of the Fields in Trust standards used in the IDP, advocating for a bespoke standard. CPPF strongly supports the initiatives listed in IDP Table 17.2, asserting that sufficient financial contributions from new developments are essential for their delivery.	
Section 6.b - is incompatible with Policy CC/NZ which prohibits the use of gas for new development. Should 6.b be present?	205579 (P Tribble)
See attached IDP Addendum Evidence to assist with the update of both the Greater Cambridge Local Plan IDP and the North East Cambridge Area Action Plan IDP. Cambridgeshire Constabulary suggestions for updates Greater Cambridge Local Plan IDP including to sections 14.1 Existing Situation, 14.2 Future Needs, Table 14.3 Priority Projects, Table 18.1- Cost summary for identified Infrastructure. For the NEC IDP we suggest amendments to Table 5.13, Table 6.1, Table 6.3.	207496 (Cambridgeshire Constabulary)
Policy I/ID: Infrastructure and delivery (p.669) - Add the term “and facilities” after ‘infrastructure’ in relation to each criterion 1-4 Policy I/ID: Infrastructure and delivery - Supporting Information, para 10.69 (p.700) - After ‘healthcare’ in line 3 add “fire & rescue, police, ambulance” Infrastructure reference, para 10.70 (p.701) - After ‘delivery of’ in line 2 add “safe, cohesive, resilient” Infrastructure reference, para 10.3 and 10.74 Add “fire & rescue, police and ambulance”	207487, 207519 (Cambridgeshire Constabulary)

See attached IDP Addendum Evidence to assist with the update of both the Greater Cambridge Local Plan IDP and the North East Cambridge Area Action Plan IDP. Cambridge Fire and Rescue makes suggestions to update chapter 14 of the GCLP IDP, including modifications to section 14.1 Existing Situation, Section 14.2 Future Needs, Table 14.3 Priority Projects and Table 18.1- Cost Summary for identified infrastructure. Regarding the NEC IDP we make suggested amendments to section 5.5.3, Table 5-13, Table 6.1 and Table 6.3.	207520 (Cambridgeshire Constabulary)
13.2.1. "Facilities such as [...] Northstowe Community Centre offer integrated services, including libraries, leisure, health, and Early Years provision." We do not recognise this description. We note that all parties are currently in default of a S106 obligation providing for health and library facilities in Northstowe. 15.2. We note that delivery of a Swimming Pool for Northstowe has been secured and are highly supportive of it being realised in line with the Phase 2 S106 agreement. We would welcome early engagement with SCDC as they form their strategy plan for delivery of essential infrastructure.	208073 (Northstowe TC)
It is recognised that it is important for all parties to plan so as to ensure there is sufficient infrastructure capacity to support and meet all the requirements arising from the new development, and at the time when they are needed.	211576 (Martin Grant Land Limited)

Policy I/DI: Digital and telecommunications infrastructure

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy's objective of promoting high-quality digital and telecommunications infrastructure to support communities, businesses and future technological innovation. Comments received welcomed the inclusion of requirements for digital connectivity within new development.

Comments were made seeking stronger requirements to ensure that new developments are provided with high-quality digital infrastructure from the outset. Comments highlighted ongoing difficulties in securing fibre broadband connections in some recently completed developments, particularly where roads remain unadopted or where leasehold and management arrangements create barriers to installation. Comments were also made regarding the need for the policy to remain flexible and responsive to future technological change.

Concerns were raised regarding the visual impact of telecommunications infrastructure. Respondents sought stronger measures to minimise street clutter, including telecommunications cabinets, masts and associated infrastructure, and requested greater use of underground ducting and coordinated infrastructure provision. Particular emphasis was placed on ensuring that telecommunications equipment is sensitively designed and sited, protects heritage assets and views, and does not obstruct pavements, active travel routes or the character of rural communities.

Additionally, concerns were raised regarding the thresholds that have been specified within the policy and the onus that the policy places on developers to secure upgrades that they would not be responsible for delivering.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The Councils note the various concerns raised in relation to the visual and amenity impacts of digital and telecommunications infrastructure. Noting that some telecommunications infrastructure and specific network operators benefit from permitted development rights, which enable installation, alterations or replacement without the need for planning permission, in many cases the Councils have no means of objecting to the principle of such development. Where prior notification is required, the Councils may consider the siting and appearance of the proposal. Having reflected on the range of representations received, the Councils have proposed some targeted changes to the policy which respond to the points raised, so that in-combination (cumulative) effects of different telecommunications and digital infrastructure are considered when considering siting, and visual amenity effects are considered for all proposals. While a range of other considerations were highlighted, it is considered that many points raised are already addressed by the Local Plan in the round through other development management policies, for example those that address design and the historic environment for all applications.

Noting the challenges highlighted in some representations in relation to the timeliness of providing internet connections, the policy has been strengthened to require high-quality digital infrastructure is secured in tandem with build-out and occupation of commercial development and public buildings. The Building Regulations already require residential development to include gigabit-ready broadband physical infrastructure and a functional connection before first occupation.

Reflecting on the range of views put forward on the approach to securing the right telecommunications infrastructure to support development, the Councils believe that the proposed policy strikes an appropriate balance, establishing reasonable thresholds for the provision of necessary infrastructure and the assessment of existing infrastructure deficiencies. The policy is already clear that responsibility for delivering upgrades to mobile telecommunications infrastructure does not lie with applicants. However, noting emerging evidence that developments are increasingly being completed with inadequate outdoor mobile coverage (as cited in a recent government consultation), our view is it is not unreasonable for applicants to assess the potential impacts of their proposals on mobile coverage and enter into early engagement with network operators with a view towards securing necessary upgrades, as required by the policy.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
Broadly support - however many new developments remain fibre inaccessible potentially due to unadopted roads or leasehold owner creating complicated installation requirements such as in blocks of flats. Planning permissions particularly for new developments should make access to full market of fibre providers an essential requirement for development. Some conditions/ covenants/ contracts etc to homeowners in developments are preventing access. In Orchard Park on Cranesbill Road some fibre providers won't install on unadopted roads and flat owners are forced to negotiation for years with management companies to get fibre installed.	204061 (Histon and Impington PC)

We welcome criterion 1c.	210181 (Historic England)
There will be increasing numbers of devices and means of communication evolving. Internet of Things, LoraWAN those are the phrases with these additional machine to machine comms that will be part of life.	203384 (G Duck)
I support Create Cambridge in asking that: •further development of the local plan refers to the Create Cambridge Insights Report as evidence base with regards to the development of Cambridge's digital cultural infrastructure •digital cultural infrastructure is recognised within infrastructure expectations/GCCIS •commitment to common metrics, aggregated data and measurement tools •digital capability is included within the definition of cultural infrastructure •the Cultural Infrastructure Pipeline incorporates shared platforms, interoperable systems, aggregated data tools and organisational digital capacity •low digital maturity is addressed, including that only 9.2% of venues currently use connected booking systems	202060 (H Chamberlain), 202145, 202313, 202890 (Cambridge Junction), 202327, 202760, 204180, 205414 (Cambridge Junction/ Create Cambridge), 202203 (H Tam), 202392 (J Webber), 202416 (T Shaw), 202429 (Kettle's Yard), 202464 (K Jones), 202689 (T Altmann), 202719 (W Townsend), 202788 (S Lee), 202939 (R Tarry), 202969 (T Flinders), 203355 (N Ellis), S Ashworth (203444),

	203482 (L Heap), 203545 (D Lever), 203634, 203875, 205058 (University of Cambridge), 203854 (N Yeni), 204412 (New International Encounter), 204693 (NEUBAU Architecture Ltd), 204709 (A Giarlis), 204846 (L Matthews), 205109 (H Paterson), 205212 (J Walsh), 205321 (A C de Avedo Lamha), 205352 (L Howse), 205353 (N Oakley), 205413 (A Seiglow),
Section 1.a is insufficient. For new developments, the policy should be to prohibit pavement clutter. Especially as pavement clutter is a significant obstacle to active travel, which is one of the key policies. Either underground ducting, or adequate areas set aside for telecommunications and other infrastructure should be a requirement for all new development. Section 4 needs strengthening to match.	202628 (P Tribble)

Section 3 should allow for the minimum connection speed to be increased over time, as gigabit connections ought to be the minimum standard now and that standard should be expected to increase in the future.	
Girton Position Digital infrastructure should enhance connectivity without harming rural character or obstructing routes. Key Points: Village needs dependable broadband/mobile access. Telecoms installations must be sensitively sited. GPC Requests: Require sensitive design and siting. Protect heritage assets and views. Avoid obstructive street furniture.	202275 (Girton PC)
The thresholds set at 30 and 250 dwellings appear arbitrary and risk imposing significant technical and financial burdens, adding to the already extensive list of pre application requirements. These obligations—such as assessing mobile coverage, securing agreements with multiple providers, or accommodating future equipment—may be disproportionate for schemes that are not large strategic sites. Clearer coordination with utilities and network operators at plan making stage would help avoid ambiguity and reduce delays at application stage, ensuring that digital infrastructure requirements remain achievable, proportionate, and consistent with delivery viability.	204744 (Redrow South Midlands)
It is not clear that the draft policy offers protections equivalent to the current Local Plan policies 84 and 65. If this is the case, it should be addressed.	203019 (K Wiemer)

Given that the previous City-wide digital infrastructure upgrade to fibre optic cable left most pavements and road surfaces in a very poor condition, the policy should give the relevant authority the recourse to require immediate remedial work where needed. Previous upgrade work did cause harm to the highway and detrimental impacts to the safety of active travel infrastructure, with nothing done to rectify the harm.	
Lessons from previous digital infrastructure upgrades should be applied and the policy should require highways and active travel networks to be left in satisfactory unharmed condition after upgrade work requiring trenching and re-surfacing is completed. The policy is vague regarding the requirements of proposals in historic environments. More detail of what proposals would be assessed on beyond 'special regard' would be helpful. Clarity regarding notified neighbour lists for planning applications would be helpful, especially if the requirement for pre-consultation is dropped. At a minimum, all properties that would lose visual amenity and those close to the site should be notified.	208624 (Madingley Road Area Residents Association)
Policy I/CM sets out how developments should contribute to Greater Cambridge's access to broadband, telecommunication infrastructure and smart infrastructure. For telecommunications infrastructure, part 6 requires for schemes of 30 or more dwellings to include suitable infrastructure that would support any future rollout of appropriate telecommunications equipment such as small cell mobile communications technology or mobile masts and towers. CIP do not object to the principle of the policy but request the wording is updated to ensure full responsibility is not placed on the developer to provide the appropriate infrastructure.	204493 (Cambridge Investment Partnership)

It is requested that the wording is amended to ensure liability is not solely placed on the developer to provide digital and telecommunications infrastructure.	
Wysing Arts Centre and Create Cambridge asks that: • Reference should be included in the local plan to the Create Cambridge Insights Report as evidence base with regards to the development of Cambridge's digital cultural infrastructure.digital cultural infrastructure is recognised within infrastructure expectations/GCCIScommitment to common metrics, aggregated data and measurement toolsdigital capability is included within the definition of cultural infrastructurethe Cultural Infrastructure Pipeline incorporates shared platforms, interoperable systems, aggregated data tools and organisational digital capacitylow digital maturity is addressed, including that only 9.2% of venues currently use connected booking systems	205155 (Wysing Arts Centre)
EEAST would also request ensuring modern building construction does not impinge on phone/broadband signals – thereby requiring boosters which use more energy. A policy which supports homes and commercial premises are built for modern connectivity as the more equipment requires the use of internet/WiFi.	210346 (East of England Ambulance Service NHS Trust)
EEAST would highlight the need for increasing demand for digital connectivity for emergency services and direct links to hospitals. The ability for rural areas to have access to superfast broadband as this will help farm/rural live diversification and building of business that will help keep employment local to smaller villages, hamlets and individual farms.	210347 (East of England Ambulance Service NHS Trust)
The supports the principle the policy regarding developments contributing to broadband and telecommunications infrastructure but suggests that the wording should be revised to clarify that	204917 (Hill)

developers should not bear full responsibility for infrastructure that is typically provided by third parties or statutory undertakers.	
Paragraph 6 states that “planning applications that include either 30 dwellings or more, or commercial floorspace of 1,000m2 or more must include suitable infrastructure that would support any future rollout of appropriate telecommunications equipment such as small cell mobile communications technology or mobile masts and towers.” While the principle of future proofing development is supported, it is unclear how applicants are expected to deliver or secure infrastructure that is ultimately dependent on network operators’ investment decisions, which are outside the control of developers.	210275 (Vistry Group)
Paragraph 7 requires that “planning applications that include the development of either 250 dwellings or more or 10,000m2 or more commercial floorspace must assess the suitability of mobile coverage… and, where mobile coverage deficiencies are identified, provide details of proposed improvements and agreements with network operators or neutral host providers.” Vistry and The Quy Estate consider this requirement to be disproportionate, as developers have no direct control over mobile network coverage or the delivery of off-site upgrades, in a similar manner to utilities such as water and electricity.	210276 (Vistry Group)
We are pleased to see that the IDP references the WCS evidence document and includes the need for investment at WWTWs to accommodate the growth outlined in the Local Plan. Future needs are also referenced, along with the current engagement Anglian Water is undertaking with key external stakeholders to find solutions to capacity challenges, including around solutions for Cambridge WWTW following the withdrawal of funding for the relocation project. We note the IDP may be updated with further information on priority investments once the next version of the DWMP is published and capacity	211187 (Environment Agency)

solutions have been identified. We encourage an update to the document to ensure the evidence base remains sufficient over the lifetime of the plan.	
Digital connectivity is essential infrastructure. Policy TI/3 should explicitly require high-quality broadband provision, including fibre or equivalent, in all new developments. Particular attention must be given to rural areas, where poor connectivity risks deepening inequality and undermining economic viability, remote working, education, and access to healthcare. This approach aligns with NPPF paragraph 114 and the Town and Country Planning Act 1990.	208955 (CPRE Cambridgeshire and Peterborough)
It is recognised that it is important that developments contribute to Greater Cambridge's access to broadband, telecommunication infrastructure and smart infrastructure.	211577 (Martin Grant Land Limited)

Policy I/CM: Construction management

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was general support for the overall aim and intention of the policy, with several responses acknowledging its importance in ensuring proportionate measures are implemented to mitigate potential adverse impacts on the environment and amenity during the construction of development

Comments were made around the details required to be contained within DMPs, CEMPs and DCEMPs and several respondents requested the policy should make reference to various additional requirements, including minimising flood risk, maintaining travel routes, imposing strict working hours and protecting school routes. One response suggested that temporary impacts on the public realm and accessibility caused by construction should also be considered and assessed when planning applications are submitted.

Cambridge Past Present and Future suggested a policy requirement requiring developers to repair damage and compensate the highway authority for accelerated wear of the public highway via a formula for calculating the cost of accelerated wear to the road network. This would enable developers to estimate costs in advance and funds to be secured on completion of the development.

Several respondents queried whether the policy would, in effect, require Noise and Vibration Demolition Environmental Management Plans, Construction Environmental Management Plans or combined DCEMPs as a validation requirement at

application stage. Some requested a more flexible approach to managing construction impacts, with the level of documentation managed on a case-by-case basis and the use of standard planning conditions where minimal impacts are likely.

Response to the main issues raised in representations

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

In light of the comments received, the Councils have reviewed and updated the list of matters DMPs, CEMPs and DCEMPs should address, adding additional information to ensure that management plans have fully considered the impacts of construction. In response to comments raised around the impact of construction projects on the condition of highways, the policy has been revised to require details of how appropriate highways monitoring will be carried out where they impact on non-adopted highways. Noting the Local Highways Authority already has legal powers to recover costs in relation to adopted highways, the proposed amendment to the policy focuses on non-adopted highways where the costs of repairs would need to be borne by individuals. The Councils deem that other issues raised in representation around the detail required in management plans are adequality addressed in the policy and the Sustainable Design and Construction Supplementary Planning Document (SPD), which provides further, more detailed guidance around how such plans should be prepared.

As is set out in the supporting text of the policy, there is a preference for DMP's, CEMP'S or DCEMPs to be submitted as part of the planning application for a proposed development, rather than being sought later by way of condition particularly where demolition and/or construction could have a significant adverse impact on nearby sensitive premises or natural assets. These plans are sought at the point of application to allow officers to fully consider the potential impacts when assessing a planning application.

The Councils have reflected on the responses received and taken the decision to retain the proposed requirement for DMP's, CEMP'S or DCEMPs to be prepared for all major development and other development that is likely to lead to adverse impacts. The Councils deem this not to be an unreasonable requirement given the policy allows flexibility around the level of detail that will be required, which will be proportionate to the scale and nature of the proposed development and determined on a case-by-case basis.

Table of representations:

Summary of issues raised in comments	**Comments highlighting this issue**
We are broadly supportive of this policy. We have learnt through recent experience of major development in greenbelt to the east of Stapleford that clause 2j on p708 (compliance monitoring) is critical; however, the emphasis should not be on self-monitoring by the constructor but should instead sit with the LPA/planning enforcement.	201650 (Stapleford PC), 210962 (Great Shelford PC)
Construction must avoid severance, protect school routes and minimise flood and noise impacts.	202276 (Girton PC)
Traffic management is essential during works. Construction can worsen flooding if drainage is disrupted. Dust/noise affect wellbeing.	207169 (Girton PC)
Girton Parish Council request the Councils require Construction Management Plans to Maintain Active Travel routes, avoid disruption to brooks/drainage, protect schools access and impose strict working hours.	207170 (Girton PC)
We support the policy in full.	201981 (Swavesey PC)

Include to the policy as a requirement • For applications to include a full assessment of impact on the public realm during construction. • For developers to repair damage and compensate the Highway Authority for accelerated wear of the public highway. • Set (in agree with the Highway Authority) a formula for calculating the cost of accelerated wear so that developers can estimate it in advance, and price it in.	204380 (Cambridge Past, Present and Future)
The policy requires a Noise and Vibration Demolition Environmental Management Plan, a Construction Environmental Management Plan, or a combined DCEMP for all major development and any development that may have adverse effects during construction. • The requirement is very broad and could capture relatively small schemes unnecessarily. • It mandates multiple documents before commencement, even where a lighter touch approach would be proportionate. • Statutory control of construction noise and nuisance already exists under the Control of Pollution Act 1974 and Environmental Protection Act 1990, risking duplication. We suggest making the following change to the policy: Introduce wording that allows the extent of documentation to be proportionate, e.g.: "…proportionate to the scale, nature and likely impacts of the development, and may not be required where impacts are minimal or can be addressed through standard planning conditions."	204745 (Redrow South Midlands)
While responsible construction management is essential, particularly on large strategic site the policy adopts an overly broad and inflexible approach that risks capturing development where such detailed documentation is disproportionate or unnecessary. A more flexible approach would allow the local	208996 (Barrat Homes Northampton)

planning authority to determine the appropriate level of documentation required on a case-by-case basis, avoiding unnecessary burdens while still securing robust mitigation where justified.	
Paragraph 1 of the policy states that “all major development, infrastructure development or development that, due to its nature or location, is likely to have an adverse impact on the local environment and amenity during construction must be informed by a Noise and Vibration Demolition Environmental Management Plan (DMP) and Construction Environmental Management Plan (CEMP), or a combined Demolition and Construction Environmental Management Plan (DCEMP), which should be agreed by the Local Planning Authority prior to the commencement of development.” It is unclear whether this requirement is intended to operate as a validation requirement at application stage or whether such document are expected to be secured by a planning condition. Vistry and The Quy Estate consider that this requirement should be secured through appropriately worded planning conditions rather than as a policy requirement at plan level.	210277 (Vistry Group)
The requirements set out in paragraph 2 of the policy would be more suitable addressed through the use of standard or bespoke planning conditions.	210278 (Vistry Group)
Modern Methods of Construction are able to utilise schemes such as Prisoners Build Homes which have successfully reduced reoffending rates, provide skills and employment post release. Similar schemes exist for those preventing and entering the justice system.	210348 (East of England Ambulance Service NHS Trust)
It is recognised that it is important that construction management details are agreed with the local planning authority prior to the commencement of development.	211578 (Martin Grant Land Limited)

Consultation Statement

Appendix 15: Response to Representations - Appendices



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

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
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.	201679 (British Horse Society)
Update needed to entry for Cambridgeshire and Peterborough Minerals and Waste Plan	210607 (Cambs County Council)

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
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.	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)
An adjustment to the housing requirement should be made to reflect the affordable housing needs of villages.	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)
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	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

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)
Relationship between Appendix D housing requirements and Neighbourhood Plans needs to be clarified, as not clear whether the housing requirements: • 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
The housing trajectory is based on over optimistic delivery rates for major sites, that are well above historic 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), 206214 (Granta Land Ltd – Land at Valley Farm, Meldreth), 208776 (Croudace Homes), 208783 (Axis Land Partnerships Ltd) 211416 (Cala Homes)
The projected delivery assumptions are unrealistic.	204937 (Pigeon), 205077 (Endurance Estates), 211670, 211671 (Smithson Hill)
Comments on the delivery of North West Cambridge: • 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.	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)
Comments on the delivery of Northstowe: • Historic maximum annual delivery rate of 278 dwellings in 2018/19. Only 92 dwellings completed in 2023/24.	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

Summary of issues raised in comments	Comments highlighting this issue
• 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: • 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 quoited 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)

Consultation Statement

Appendix 16: Response to Representations - SA/HRA



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

Sustainability Appraisal and Habitats Regulations Assessment

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Comments on the Sustainability Appraisal:

Comments primarily focus on choices made around the allocation of specific sites. It was challenged whether the Sustainability Appraisal justified the approach to development in villages. Also, that reasonable alternatives for higher growth levels or release of Green Belt on the edge of Cambridge had not been adequately assessed. Comments questioned whether the appraisal had considered housing market absorption issues, the role of grey belt, and the impacts of higher jobs growth. Also, whether alternatives had tested different density and layout approaches to maximising transport mode shift. Some comments questioned individual scores and the assessment results from the Housing and Economic Land Availability Assessment. Some comments sought clarity on why sites were rejected, including why sites at smaller villages were not assessed, or why grey belt sites were not appraised. Historic England noted the assessment identified a number of uncertain effects. They requested that some sites policies were not grouped together in the assessment, and that summary tables and recommendations should be provided.

Comments on the Habitats Regulations Assessment:

National Trust requested that the outcome of the HRA is more closely reflected in the Local Plan with regard to control of recreational pressure on protected sites. Natural England raised issues around the assessment of water issues, seeking greater clarity. A number of comments said that the HRA should consider the in-combination effects with the East West Rail project.

Response to Representations:

Comments have been reported to the consultants who carried out the assessments, for consideration when preparing the assessments of the Proposed Submission Local Plan. Detailed responses to comments and how they have been addressed are provided in Appendix A of the Sustainability Appraisal and Appendix F of the Habitats Regulations Assessment.

Table of representations:

Representations on the Sustainability Appraisal

Summary of issues raised in comments	Comments highlighting this issue
Object, the Sustainability Appraisal supports: • The Southern Cluster's potential to enhance housing location relative to employment centres and provide new services, which is endorsed by Endurance Estates. • Endurance Estates advocates for a balanced growth strategy in the district's villages to maintain essential services, expressing concern that the current strategy overlooks necessary growth in the Southern Cluster. It is not considered that this choice is robustly justified by the SA. • Endurance Estates promotes Land East of Gazelle Way (Site ID 115222, HELAA ID 40250) for a large mixed-use development, highlighting its sustainability and potential benefits from planned investments, despite it not being proposed for allocation. The Sustainability Appraisal has assessed the East of Gazelle Way scheme positively, yet it remains unallocated, while the allocation of Cambridge East is supported along with its proposed mitigations.	205124 (Endurance Estates)
Object, concerns with the SA: • Failure to adequately assess the full breadth of reasonable alternatives, particularly in relation to land release from the Green Belt near Cambridge. • The inadequacy of the SA risks the overall soundness of the plan and must be urgently rectified.	206865 (Endurance Estates)

SA and Rural Centres: • The Southern Cluster, which the SA confirms includes Linton, amongst other Rural Centres, Minor Rural Centres and Group Villages with 'very good' public transport access. This is a significant factor in planning considerations.	206866 (Endurance Estates)
Land at Cambridge Road, Gt Shelford (Site reference 115766, previous HELAA Site ID -2023- 40413) A number of site assessment scored need to be updated to reflect the sustainability of the site, including the overall 'Suitability Score' is currently rated RED, which the respondent contests, arguing that a GREEN score is more appropriate based on submitted evidence. This is critical to ensure that the site has been properly considered through the Sustainability Appraisal and consideration of Reasonable alternatives. The respondent emphasises that the site is standalone and should not be linked to another site being promoted for a larger housing development.	204978 (Great Shelford Ten Acres LLP)
We note that many of the policies are assessed as having significant positive or minor positive effects. However, there are quite a number of policies where effects re assessed as uncertain. It would appear that some of the site allocations have been grouped together for assessment (e.g. City sites). This means that is it very difficult to see what the effects of particular site allocation policies would be. We expect future iterations of the SA to consider each site. The SA would benefit from an overall summary table. It would be helpful if the SA included a series of clear recommendations for the Regulation 19 version of the Plan.	210302 (Historic England)

In my opinion (given the severity of the climate crisis), all new housing developments should be required to have Air Source Heat Pumps (ASHPs) rather than gas boilers in future. I know some local authorities make this a requirement so there is NO excuse for us not to, especially as central government has bottled out of making a decision to do this.	207501 (FutureIN)
Given that Cambridge has been branded one of the most unequal cities in the UK, I also believe that those profiting from its growth should be made to contribute to those in need. I therefore suggest that social value plans be made mandatory for all developments above a certain value (say £5m construction value), and that these plans must include a commitment to employing apprentices and contributing to local charities.	207502 (FutureIN)
S/GF: Land adjacent to A11 and A1307 at Grange Farm: Since Little Abington will be separated from the site solely by the A1307, the objective referred to in Para 5.196 is impossible to achieve in respect of that village	208113 (Sawston PC)
In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). The Council should ensure that the results of the SA process conducted through the preparation of the Local Plan clearly justify the policy choice made, including proposed site allocations (or decisions not to allocate sites) when considered against reasonable alternatives. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected.	208327 (Gladman Developments)

JMS Planning notes that production of a Sustainability Appraisal is a live and ongoing process throughout the production of an emerging Local Plan. With this in mind, JMS Planning would like to underline the importance of the Council considering ‘reasonable alternatives’ at all consultation stages in order to comply with Article 5(1) of the Directive. JMS Planning recommends that further information be provided to substantiate the consultation draft SA regarding the assessment of reasonable alternatives, and specifically the role that the rural areas surrounding Group Village settlements and above can have in enabling sustainable development.	208670 (Guilden Morden Developments Ltd)
The Sustainability Appraisal (October 2025) evaluates spatial options against several objectives, referring to Appendix E for the full assessment and justification of the strategy adopted. JMS Planning disagrees with the proposition in the Development Strategy Topic that if Group Villages do not have a train station then they should be removed from the Development Strategy (paragraph 5.220) The approach of curtailing growth in the rural area to those that are designated as neighbourhood plan areas or those settlements with ‘very good’ public transport links is a potential unnecessary narrowing of locations suitable for sustainable development. Spatial strategies involving smaller settlements can positively contribute to the plan’s resilience and implementation. It is questionable as to why settlements with good access to public transport are removed from the development strategy for the area.	208702 (Guilden Morden Developments Ltd)

The results of the SA will need to explain clearly why some policy options have progressed and others have been rejected through a comparative and equal assessment of all reasonable alternatives. Although the Council have considered a range of alternatives, it should be noted that no assessment has currently been undertaken concerning Grey Belt land. Paragraph 148 of the current Framework states that where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt land which is not previously developed and then other Green Belt locations. The Council has considered the release of Green Belt land but not Grey Belt land, and therefore this should be considered as a reasonable alternative to help inform the proposed spatial strategy.	208896 (Nightingale Land and Hill Residential)
The Sustainability Appraisal (October 2025) prepared by LUC recognises the benefits of accommodating growth in close proximity to Cambridge and places a strong emphasis on delivering an appropriate quantum and mix of housing. Vistry and The Quy Estate maintain that opportunities such as Fen Ditton perform well against these objectives, benefiting from proximity to existing services and facilities, whilst also being of a scale capable of delivering its own complementary infrastructure and contributing meaningfully to the delivery of the development strategy. An appendix with alternative SA scoring is provided.	210225 (Vistry Group)

The Development Strategy contained within Policy S/DS focuses on the creation and extension of new settlements and strategic sites, with smaller scale development limited to only Melbourn, Duxford and Caldecote. This is not in accordance with the provisions of paragraph 73 of the NPPF and this approach is not justified within the Sustainability Appraisal (SA). GCSP should revisit their Development Strategy to identify site allocations across the Rural and Minor Rural Centres to ensure an effective distribution of growth on small and medium sites can be delivered in the early years of the plan period.	211095 (GW Balaam & Son)
The Sustainability Appraisal 2025 raises concerns about development 'jumping' the green belt, leading to less accessibility to services and facilities, contradicting the Plan’s Vision and NPPF sustainability principles.	211100 (Miller Homes)
The Sustainability Appraisal which supports the Regulation 19 Draft Local Plan must consider Grey Belt allocations as an alternative scenario should the Authority require greater levels of growth, which may include a review of Green Belt release to accommodate additional allocations.	208230 (Corpus Chrisi College Cambridge)

SA also does not adequately address the options for growth in relation to affordable housing as it does not reflect the “very acute” need identified in the Iceni Paper. The viability issues of larger sites which could result in lower affordable housing levels being provided are stated to be offset by smaller developments, however there are very limited smaller, sub strategic level, sites being allocated. This needs to be addressed with some more dispersed allocations in sustainable Minor Rural Centres with good sustainable transport options. The inclusion of Branch Road, Comberton (HELAA Site ID 40316) would be entirely in accordance with making the most of existing and planned sustainable transport links, and as currently drafted the Local Plan fails to make the most of the sustainable transport in and around Comberton, existing and planned, including the Greenway, East West Rail and the Cambourne Cambridge Busway.	211527 (Endurance Estates)
Choices around the spatial distribution of development is relevant to considerations of market absorption. Cambridge Housing Delivery Study Addendum (October 2025) rases this issue. It is unclear how this is factored into the Sustainability Assessment when assessing different strategic options.	211598 (LGH Hotels Management Ltd)

Sustainability Appraisal at 4.26 notes that “larger developments could result in a lower level of affordable housing provision due to greater costs to deliver additional infrastructure, but this may be offset overall by smaller sites coming forward within the other sources of supply in this option.” To this end, there is no real acknowledgement in the Sustainability Appraisal as to the role that the Golden Rules (notably the provision of 50% affordable housing) would have as an assessed alternative. Through the Sustainability Appraisal scoring development in the Green Belt is marked as lower scoring as it is not considered as being an “efficient use of land.” There is a general lack of depth to the way in which the Sustainability Appraisal seeks to grapple with options that would involve development of the Grey Belt. We would question if such an assessment criteria appropriately reflects where national Green Belt policy has moved to, notably Grey Belt. It would be appropriate for the Sustainability Appraisal to distinguish between options that would involve Green Belt vs those that would involve the use of Grey Belt.	211601 (LGH Hotels Management Ltd)
The Sustainability Appraisal seems to “mark down” Green Belt sites on the edge of Cambridge (which we would assume Bar Hill could fall under) as “as applications cannot be ‘twin-tracked’ alongside plan making due to the need to demonstrate very special circumstances for Green Belt release.” We are unaware of any provisions that would prevent this twin tracking taking place and have had experience in doing this with other local planning authorities.	211602 (LGH Hotels Management Ltd)

The Spatial Options assessed includes: Spatial Option 9a; - Spatial Option 10a; Spatial Option 11a; Spatial Option 11b. Reviewing the description at Paragraph 4.17 of the Sustainability Appraisal (2025) it is clear that relatively limited/no development in the villages is a constant across all four options. Whilst appreciating that it is not necessary for soundness for a Sustainability Appraisal to assess every single reasonable option, given the concerns mentioned in other aspects of the evidence base around market absorption rate associated with relying on larger, strategic developments as well as their delivery rates (due to reliance on infrastructure) an option assessing more mid-ranged size development (i.e. 200 – 700) would seem a reasonable alternative to assess.	211603 (LGH Hotels Management Ltd)

The Sustainability Appraisal of the draft GCLP (October 2025) sets out the background to the reasonable alternatives that have been considered for the overall quantum of housing and job growth underpinning Policy S/JH, including the rationale (this is separate to the reasonable alternatives that are tested for the spatial distribution of growth, which are set out earlier in the SA in Chapter 4). Within the SA (p.178) GCSP set out that draft Policy S/JH is the preferred option in terms of overall growth quantum because it meets the minimum standard method and the 'most likely' job growth scenario. The assertion that the higher jobs forecast is not 'reasonable' is not consistent with the EHNU and other evidence of economic growth potential set out previously. Furthermore, excluding it on the basis that it is 'not the most likely scenario' does not withstand basic scrutiny; applying this logic, any SA would only test one scenario - the most likely - which is clearly not the purpose of SA. Given the 'high' job growth is only c.25% above the 'central' (which can be considered a baseline level of job growth, since it would arise based on the minimum amount of housing that must be provided in any event), it is clear that the 'high' job growth scenario represents a reasonable alternative that should have been tested through the SA. Update the SA to include alternative, higher, housing and job growth scenarios.	211665 (Smithson Hill)

The [2011] Census shows that for people commuting into Greater Cambridge from elsewhere, the vast majority – nearly 80% - travel by car (this actually rises to 84% when people who travel as passengers are included). Although the completion of East-West Rail might be expected to achieve some shift in commuting patterns, this will only occur insofar as (1) housing development outside Greater Cambridge is focused on areas where EWR stations are proposed, and (2) those people travel to employment opportunities in Greater Cambridge that are accessible via EWR stations. It should be noted that East-West Rail would be unlikely to impact the Rural Southern Cluster, where the Site is located, due to the areas it serves. The same two points are true for other transport initiatives, such as the Cambridge South East Trasport (CSET) programme. On this basis EWR (and other initiatives) are still fundamentally unlikely to shift the balance of in-commuting into Greater Cambridge away from the private car being the predominant mode of transport. This is especially true for employment centres (such as research campuses) that are spread across the rural part of South Cambridgeshire. A strategy in which employment growth in Greater Cambridge is not matched by commensurate housing growth within the area will therefore almost certainly result in an increase in in-commuting to Greater Cambridge, the majority of which will be by private car, with knock-on impacts on traffic/congestion, air quality, climate change and overall quality of life. For these reasons, we also dispute the finding of the SA regarding the overall development strategy in Policy S/JH, which states “the housing target is supported by a substantial level of job growth in the area, which is likely to help support self-containment and minimising long distance commuting, as	211666 (Smithson Hill)

Greater Cambridge residents will be able to benefit from nearby employment opportunities" (SA para 5.30). The substantially higher levels of job growth likely to be generated by the draft GCLP will clearly not result in self-containment given they are not matched by an equivalent level of housing, as set out above.	
Grange Farm did not appear in the 2021/22 Call for Sites and appears to fill the gap left by the Cowley Road wastewater site, which remains a far more sustainable brownfield option and is publicly stated to be expected to come forward in time. Other potential locations, including land at Six Mile Bottom and more distributed growth across surrounding villages, should be properly reconsidered.	211719 (J Clifford)
What other options have been considered if there is genuinely a need for additional housing specifically in the Abington area? It is well understood that there is a need for housing in the region in general: I myself (and I suspect the vast majority of residents in local villages) fully appreciate this, and would be supportive of appropriate and locally sensitive developments.	211727 (P Seddon)

Camcycle has reviewed the Sustainability Appraisal that accompanies the Plan and it clearly fails to reflect the transport-related carbon consequences of different spatial choices. In particular, it does not meaningfully distinguish between locations with fundamentally different potential for walking, cycling and public transport, and therefore risks treating very different places as broadly equivalent in sustainability terms. The Sustainability Appraisal acknowledges that transport is a major contributor to emissions, but it does not robustly compare the lifetime transport impacts associated with dispersed, car-dependent growth versus compact, well-connected urban locations. Nor does it test credible alternative scenarios where land use, density, layout and connectivity are deliberately designed to maximise mode shift. This weakens the link between the Plan's climate objectives and its spatial strategy and makes it harder to justify difficult but necessary choices.	211762 (Camcycle)

Representations on the Habitats Regulation Assessment

Summary of issues raised in comments	Comments highlighting this issue
HRA: Should a Local Plan be likely to have significant effects on European habitats or species, the LPA should undertake a Habitats Regulation Assessment as per the Conservation of Habitats and Species Regulations 2010 (as amended). The Sustainability Appraisal should also take the findings of the HRA into account (as per the PPG, paragraph 11, ID11-011-20140306).	208671 (Guilden Morden Developments Ltd)
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".	211086 (National Trust)

We advise that the HRA and AA should assess water quality impacts to protected sites in greater detail (4.117 onwards), and consider protected sites on an individual basis (as has been done for water quantity at 4.110 onwards). The impacts to sites will vary based on their current condition and capacity to cope with changes. We acknowledge that the HRA necessarily has to be at a fairly high level, but it still needs to be robust. Our main concerns are in relation to Portholme SAC and the Ouse Washes. • Additionally, from 5.71 onwards, we advise that the HRA requires more detail and separation of water pollution impacts to the Upper Ouse catchment and the Cam and Ely Ouse catchment. Development that depends on a Sewage Treatment Works that drains into the Upper Ouse catchment will affect the Ouse Washes, which is currently failing its water quality targets. • The HRA references the Stantec report (Greater Cambridge Integrated Water Management Study (IWMS) from Stantec) but it is not clear which Sewage Treatment Works / Water Recycling Centres (StW / WRC) are in scope here. For example, Utton's Drove StW effluent drains into the Ouse and so will flow into the Ouse Washes. Uttons Drove WRC serves significant growth areas including Cambourne and Northstowe and currently has considerable issues, according to the IWMS. • The Non-Toxic Contamination (which can contribute to nutrient enrichment) (4.41 onwards), and Direct pollution / run-off section of the HRA (4.123) both use '500m from a Habitats site' as the screening distance. We do not agree with this methodology, and strongly recommend	207641, 207642, 207643, 207644, 207645 (Natural England)

that the screening is reviewed with the criteria '500m from any waterway that is hydrologically connected to a Habitats site'. This may bring some sites into consideration, particularly in relation to Portholme SAC and the Ouse Washes which are already suffering from pollution and nutrient issues. • We agree that Eversden and Wimpole Woods SAC should be included in the AA, particularly in relation to 'Physical Damage and Loss of Habitat – Functionally Linked Habitat' and 'Non-Physical Disturbance – Functionally Linked Habitat'. We note however that a 10km screening distance has currently been used (pages 32, 36). As mentioned in our recent discussions, Natural England's Impact Risk Zone (IRZ) for this SAC is about to be updated to a 6km core sustenance zone (CSZ) and a 10.2km landscape connectivity zone (LCZ) for barbastelle bats. We will share the final IRZ wording with you, once it has been confirmed for the next IRZ update, and will arrange further discussions about this with the Natural Environment team shortly	
The Local Plan fails to comply with the Habitats Regulations 2017 and UK law in that the HRA for Eversden and Wimpole Woods SAC does not list or consider all the relevant development proposals which, in combination and cumulatively with those in the GCLP, pose threats which may adversely affect the integrity of the SAC and its CSZ. Major infrastructure transport plans and projects are serious omissions, including EWR which alone could extinguish the SAC's Barbastelle bats. We consider that the HRA undertaken by LUC for the GCLP is lacking in the evidence necessary to inform a robust Appropriate Assessment.	203638, 203645 (Cambridge Approaches)

HRA: The Local Plan's reliance on East West Rail (EWR) for development north of the A428 lacks an assessment of EWR's impacts on the Eversden Woods and Wimpole Special Area of Conservation (SAC), raising concerns about environmental constraints being overlooked. Other HRAs prepared elsewhere (e.g. Oxfordshire) have included the cumulative effects of EWR. The proposed EWR route risks habitat fragmentation for the barbastelle bat population, with existing evidence suggesting that limited mitigation measures like bat bridges may not be effective in preserving the integrity of the SAC. The Local Plan assumes that effective mitigation solutions for EWR will be developed later, without evidence of their feasibility or cost, which undermines the plan's effectiveness. EWR Co and GCSP have not demonstrated compliance with the Habitats Regulations, as EWR's impacts have not been adequately assessed in the Local Plan, contradicting national policy requirements and going against the precautionary principle. Local naturalists are willing to engage with GCSP to provide insights on the barbastelle bat population and its implications for the planning process.	202014 (Haslingfield PC), 210927 (Great Shelford Parish Council)

Although the HRA 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.	210927 (Great Shelford PC)
The respondent believes the Habitats Regulations Assessment is incomplete, particularly in its failure to consider the in-combination effects of the East West Rail project, which could significantly impact the Eversden and Wimpole Woods SAC. Concerns have been raised by both South Cambridgeshire District Council and Cambridgeshire County Council regarding the potential adverse effects of East West Rail on the maternity roost of rare barbastelle bats. The respondent references a 2012 paper indicating that barbastelle bats do not rely on linear landscape features for commuting, suggesting that proposed bat bridges and viaducts may be ineffective. The respondent advocates for a tunnel solution for East West Rail to protect the bats' habitat during construction.	204841 (A Sykes)

Consultation Statement

Appendix 15: Response to Representations - Appendices



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

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
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.	201679 (British Horse Society)
Update needed to entry for Cambridgeshire and Peterborough Minerals and Waste Plan	210607 (Cambs County Council)

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
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.	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)
An adjustment to the housing requirement should be made to reflect the affordable housing needs of villages.	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)
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	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

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)
Relationship between Appendix D housing requirements and Neighbourhood Plans needs to be clarified, as not clear whether the housing requirements: • 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
The housing trajectory is based on over optimistic delivery rates for major sites, that are well above historic 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), 206214 (Granta Land Ltd – Land at Valley Farm, Meldreth), 208776 (Croudace Homes), 208783 (Axis Land Partnerships Ltd) 211416 (Cala Homes)
The projected delivery assumptions are unrealistic.	204937 (Pigeon), 205077 (Endurance Estates), 211670, 211671 (Smithson Hill)
Comments on the delivery of North West Cambridge: • 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.	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)
Comments on the delivery of Northstowe: • Historic maximum annual delivery rate of 278 dwellings in 2018/19. Only 92 dwellings completed in 2023/24.	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

Summary of issues raised in comments	Comments highlighting this issue
• 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: • 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 quoited 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)

Consultation Statement

Appendix 16: Response to Representations - SA/HRA



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

Sustainability Appraisal and Habitats Regulations Assessment

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Comments on the Sustainability Appraisal:

Comments primarily focus on choices made around the allocation of specific sites. It was challenged whether the Sustainability Appraisal justified the approach to development in villages. Also, that reasonable alternatives for higher growth levels or release of Green Belt on the edge of Cambridge had not been adequately assessed. Comments questioned whether the appraisal had considered housing market absorption issues, the role of grey belt, and the impacts of higher jobs growth. Also, whether alternatives had tested different density and layout approaches to maximising transport mode shift. Some comments questioned individual scores and the assessment results from the Housing and Economic Land Availability Assessment. Some comments sought clarity on why sites were rejected, including why sites at smaller villages were not assessed, or why grey belt sites were not appraised. Historic England noted the assessment identified a number of uncertain effects. They requested that some sites policies were not grouped together in the assessment, and that summary tables and recommendations should be provided.

Comments on the Habitats Regulations Assessment:

National Trust requested that the outcome of the HRA is more closely reflected in the Local Plan with regard to control of recreational pressure on protected sites. Natural England raised issues around the assessment of water issues, seeking greater clarity. A number of comments said that the HRA should consider the in-combination effects with the East West Rail project.

Response to Representations:

Comments have been reported to the consultants who carried out the assessments, for consideration when preparing the assessments of the Proposed Submission Local Plan. Detailed responses to comments and how they have been addressed are provided in Appendix A of the Sustainability Appraisal and Appendix F of the Habitats Regulations Assessment.

Table of representations:

Representations on the Sustainability Appraisal

Summary of issues raised in comments	Comments highlighting this issue
Object, the Sustainability Appraisal supports: • The Southern Cluster's potential to enhance housing location relative to employment centres and provide new services, which is endorsed by Endurance Estates. • Endurance Estates advocates for a balanced growth strategy in the district's villages to maintain essential services, expressing concern that the current strategy overlooks necessary growth in the Southern Cluster. It is not considered that this choice is robustly justified by the SA. • Endurance Estates promotes Land East of Gazelle Way (Site ID 115222, HELAA ID 40250) for a large mixed-use development, highlighting its sustainability and potential benefits from planned investments, despite it not being proposed for allocation. The Sustainability Appraisal has assessed the East of Gazelle Way scheme positively, yet it remains unallocated, while the allocation of Cambridge East is supported along with its proposed mitigations.	205124 (Endurance Estates)
Object, concerns with the SA: • Failure to adequately assess the full breadth of reasonable alternatives, particularly in relation to land release from the Green Belt near Cambridge. • The inadequacy of the SA risks the overall soundness of the plan and must be urgently rectified.	206865 (Endurance Estates)

SA and Rural Centres: • The Southern Cluster, which the SA confirms includes Linton, amongst other Rural Centres, Minor Rural Centres and Group Villages with 'very good' public transport access. This is a significant factor in planning considerations.	206866 (Endurance Estates)
Land at Cambridge Road, Gt Shelford (Site reference 115766, previous HELAA Site ID -2023- 40413) A number of site assessment scored need to be updated to reflect the sustainability of the site, including the overall 'Suitability Score' is currently rated RED, which the respondent contests, arguing that a GREEN score is more appropriate based on submitted evidence. This is critical to ensure that the site has been properly considered through the Sustainability Appraisal and consideration of Reasonable alternatives. The respondent emphasises that the site is standalone and should not be linked to another site being promoted for a larger housing development.	204978 (Great Shelford Ten Acres LLP)
We note that many of the policies are assessed as having significant positive or minor positive effects. However, there are quite a number of policies where effects re assessed as uncertain. It would appear that some of the site allocations have been grouped together for assessment (e.g. City sites). This means that is it very difficult to see what the effects of particular site allocation policies would be. We expect future iterations of the SA to consider each site. The SA would benefit from an overall summary table. It would be helpful if the SA included a series of clear recommendations for the Regulation 19 version of the Plan.	210302 (Historic England)

In my opinion (given the severity of the climate crisis), all new housing developments should be required to have Air Source Heat Pumps (ASHPs) rather than gas boilers in future. I know some local authorities make this a requirement so there is NO excuse for us not to, especially as central government has bottled out of making a decision to do this.	207501 (FutureIN)
Given that Cambridge has been branded one of the most unequal cities in the UK, I also believe that those profiting from its growth should be made to contribute to those in need. I therefore suggest that social value plans be made mandatory for all developments above a certain value (say £5m construction value), and that these plans must include a commitment to employing apprentices and contributing to local charities.	207502 (FutureIN)
S/GF: Land adjacent to A11 and A1307 at Grange Farm: Since Little Abington will be separated from the site solely by the A1307, the objective referred to in Para 5.196 is impossible to achieve in respect of that village	208113 (Sawston PC)
In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). The Council should ensure that the results of the SA process conducted through the preparation of the Local Plan clearly justify the policy choice made, including proposed site allocations (or decisions not to allocate sites) when considered against reasonable alternatives. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected.	208327 (Gladman Developments)

JMS Planning notes that production of a Sustainability Appraisal is a live and ongoing process throughout the production of an emerging Local Plan. With this in mind, JMS Planning would like to underline the importance of the Council considering 'reasonable alternatives' at all consultation stages in order to comply with Article 5(1) of the Directive. JMS Planning recommends that further information be provided to substantiate the consultation draft SA regarding the assessment of reasonable alternatives, and specifically the role that the rural areas surrounding Group Village settlements and above can have in enabling sustainable development.	208670 (Guilden Morden Developments Ltd)
The Sustainability Appraisal (October 2025) evaluates spatial options against several objectives, referring to Appendix E for the full assessment and justification of the strategy adopted. JMS Planning disagrees with the proposition in the Development Strategy Topic that if Group Villages do not have a train station then they should be removed from the Development Strategy (paragraph 5.220) The approach of curtailing growth in the rural area to those that are designated as neighbourhood plan areas or those settlements with 'very good' public transport links is a potential unnecessary narrowing of locations suitable for sustainable development. Spatial strategies involving smaller settlements can positively contribute to the plan's resilience and implementation. It is questionable as to why settlements with good access to public transport are removed from the development strategy for the area.	208702 (Guilden Morden Developments Ltd)

The results of the SA will need to explain clearly why some policy options have progressed and others have been rejected through a comparative and equal assessment of all reasonable alternatives. Although the Council have considered a range of alternatives, it should be noted that no assessment has currently been undertaken concerning Grey Belt land. Paragraph 148 of the current Framework states that where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt land which is not previously developed and then other Green Belt locations. The Council has considered the release of Green Belt land but not Grey Belt land, and therefore this should be considered as a reasonable alternative to help inform the proposed spatial strategy.	208896 (Nightingale Land and Hill Residential)
The Sustainability Appraisal (October 2025) prepared by LUC recognises the benefits of accommodating growth in close proximity to Cambridge and places a strong emphasis on delivering an appropriate quantum and mix of housing. Vistry and The Quy Estate maintain that opportunities such as Fen Ditton perform well against these objectives, benefiting from proximity to existing services and facilities, whilst also being of a scale capable of delivering its own complementary infrastructure and contributing meaningfully to the delivery of the development strategy. An appendix with alternative SA scoring is provided.	210225 (Vistry Group)

The Development Strategy contained within Policy S/DS focuses on the creation and extension of new settlements and strategic sites, with smaller scale development limited to only Melbourn, Duxford and Caldecote. This is not in accordance with the provisions of paragraph 73 of the NPPF and this approach is not justified within the Sustainability Appraisal (SA). GCSP should revisit their Development Strategy to identify site allocations across the Rural and Minor Rural Centres to ensure an effective distribution of growth on small and medium sites can be delivered in the early years of the plan period.	211095 (GW Balaam & Son)
The Sustainability Appraisal 2025 raises concerns about development 'jumping' the green belt, leading to less accessibility to services and facilities, contradicting the Plan’s Vision and NPPF sustainability principles.	211100 (Miller Homes)
The Sustainability Appraisal which supports the Regulation 19 Draft Local Plan must consider Grey Belt allocations as an alternative scenario should the Authority require greater levels of growth, which may include a review of Green Belt release to accommodate additional allocations.	208230 (Corpus Chrisi College Cambridge)

SA also does not adequately address the options for growth in relation to affordable housing as it does not reflect the “very acute” need identified in the Iceni Paper. The viability issues of larger sites which could result in lower affordable housing levels being provided are stated to be offset by smaller developments, however there are very limited smaller, sub strategic level, sites being allocated. This needs to be addressed with some more dispersed allocations in sustainable Minor Rural Centres with good sustainable transport options. The inclusion of Branch Road, Comberton (HELAA Site ID 40316) would be entirely in accordance with making the most of existing and planned sustainable transport links, and as currently drafted the Local Plan fails to make the most of the sustainable transport in and around Comberton, existing and planned, including the Greenway, East West Rail and the Cambourne Cambridge Busway.	211527 (Endurance Estates)
Choices around the spatial distribution of development is relevant to considerations of market absorption. Cambridge Housing Delivery Study Addendum (October 2025) rases this issue. It is unclear how this is factored into the Sustainability Assessment when assessing different strategic options.	211598 (LGH Hotels Management Ltd)

Sustainability Appraisal at 4.26 notes that “larger developments could result in a lower level of affordable housing provision due to greater costs to deliver additional infrastructure, but this may be offset overall by smaller sites coming forward within the other sources of supply in this option.” To this end, there is no real acknowledgement in the Sustainability Appraisal as to the role that the Golden Rules (notably the provision of 50% affordable housing) would have as an assessed alternative. Through the Sustainability Appraisal scoring development in the Green Belt is marked as lower scoring as it is not considered as being an “efficient use of land.” There is a general lack of depth to the way in which the Sustainability Appraisal seeks to grapple with options that would involve development of the Grey Belt. We would question if such an assessment criteria appropriately reflects where national Green Belt policy has moved to, notably Grey Belt. It would be appropriate for the Sustainability Appraisal to distinguish between options that would involve Green Belt vs those that would involve the use of Grey Belt.	211601 (LGH Hotels Management Ltd)
The Sustainability Appraisal seems to “mark down” Green Belt sites on the edge of Cambridge (which we would assume Bar Hill could fall under) as “as applications cannot be ‘twin-tracked’ alongside plan making due to the need to demonstrate very special circumstances for Green Belt release.” We are unaware of any provisions that would prevent this twin tracking taking place and have had experience in doing this with other local planning authorities.	211602 (LGH Hotels Management Ltd)

The Spatial Options assessed includes: Spatial Option 9a; - Spatial Option 10a; Spatial Option 11a; Spatial Option 11b. Reviewing the description at Paragraph 4.17 of the Sustainability Appraisal (2025) it is clear that relatively limited/no development in the villages is a constant across all four options. Whilst appreciating that it is not necessary for soundness for a Sustainability Appraisal to assess every single reasonable option, given the concerns mentioned in other aspects of the evidence base around market absorption rate associated with relying on larger, strategic developments as well as their delivery rates (due to reliance on infrastructure) an option assessing more mid-ranged size development (i.e. 200 – 700) would seem a reasonable alternative to assess.	211603 (LGH Hotels Management Ltd)

The Sustainability Appraisal of the draft GCLP (October 2025) sets out the background to the reasonable alternatives that have been considered for the overall quantum of housing and job growth underpinning Policy S/JH, including the rationale (this is separate to the reasonable alternatives that are tested for the spatial distribution of growth, which are set out earlier in the SA in Chapter 4). Within the SA (p.178) GCSP set out that draft Policy S/JH is the preferred option in terms of overall growth quantum because it meets the minimum standard method and the 'most likely' job growth scenario. The assertion that the higher jobs forecast is not 'reasonable' is not consistent with the EHNU and other evidence of economic growth potential set out previously. Furthermore, excluding it on the basis that it is 'not the most likely scenario' does not withstand basic scrutiny; applying this logic, any SA would only test one scenario - the most likely - which is clearly not the purpose of SA. Given the 'high' job growth is only c.25% above the 'central' (which can be considered a baseline level of job growth, since it would arise based on the minimum amount of housing that must be provided in any event), it is clear that the 'high' job growth scenario represents a reasonable alternative that should have been tested through the SA. Update the SA to include alternative, higher, housing and job growth scenarios.	211665 (Smithson Hill)

The [2011] Census shows that for people commuting into Greater Cambridge from elsewhere, the vast majority – nearly 80% - travel by car (this actually rises to 84% when people who travel as passengers are included). Although the completion of East-West Rail might be expected to achieve some shift in commuting patterns, this will only occur insofar as (1) housing development outside Greater Cambridge is focused on areas where EWR stations are proposed, and (2) those people travel to employment opportunities in Greater Cambridge that are accessible via EWR stations. It should be noted that East-West Rail would be unlikely to impact the Rural Southern Cluster, where the Site is located, due to the areas it serves. The same two points are true for other transport initiatives, such as the Cambridge South East Trasport (CSET) programme. On this basis EWR (and other initiatives) are still fundamentally unlikely to shift the balance of in-commuting into Greater Cambridge away from the private car being the predominant mode of transport. This is especially true for employment centres (such as research campuses) that are spread across the rural part of South Cambridgeshire. A strategy in which employment growth in Greater Cambridge is not matched by commensurate housing growth within the area will therefore almost certainly result in an increase in in-commuting to Greater Cambridge, the majority of which will be by private car, with knock-on impacts on traffic/congestion, air quality, climate change and overall quality of life. For these reasons, we also dispute the finding of the SA regarding the overall development strategy in Policy S/JH, which states “the housing target is supported by a substantial level of job growth in the area, which is likely to help support self-containment and minimising long distance commuting, as	211666 (Smithson Hill)

Greater Cambridge residents will be able to benefit from nearby employment opportunities" (SA para 5.30). The substantially higher levels of job growth likely to be generated by the draft GCLP will clearly not result in self-containment given they are not matched by an equivalent level of housing, as set out above.	
Grange Farm did not appear in the 2021/22 Call for Sites and appears to fill the gap left by the Cowley Road wastewater site, which remains a far more sustainable brownfield option and is publicly stated to be expected to come forward in time. Other potential locations, including land at Six Mile Bottom and more distributed growth across surrounding villages, should be properly reconsidered.	211719 (J Clifford)
What other options have been considered if there is genuinely a need for additional housing specifically in the Abington area? It is well understood that there is a need for housing in the region in general: I myself (and I suspect the vast majority of residents in local villages) fully appreciate this, and would be supportive of appropriate and locally sensitive developments.	211727 (P Seddon)

Camcycle has reviewed the Sustainability Appraisal that accompanies the Plan and it clearly fails to reflect the transport-related carbon consequences of different spatial choices. In particular, it does not meaningfully distinguish between locations with fundamentally different potential for walking, cycling and public transport, and therefore risks treating very different places as broadly equivalent in sustainability terms. The Sustainability Appraisal acknowledges that transport is a major contributor to emissions, but it does not robustly compare the lifetime transport impacts associated with dispersed, car-dependent growth versus compact, well-connected urban locations. Nor does it test credible alternative scenarios where land use, density, layout and connectivity are deliberately designed to maximise mode shift. This weakens the link between the Plan's climate objectives and its spatial strategy and makes it harder to justify difficult but necessary choices.	211762 (Camcycle)

Representations on the Habitats Regulation Assessment

Summary of issues raised in comments	Comments highlighting this issue
HRA: Should a Local Plan be likely to have significant effects on European habitats or species, the LPA should undertake a Habitats Regulation Assessment as per the Conservation of Habitats and Species Regulations 2010 (as amended). The Sustainability Appraisal should also take the findings of the HRA into account (as per the PPG, paragraph 11, ID11-011-20140306).	208671 (Guilden Morden Developments Ltd)
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".	211086 (National Trust)

We advise that the HRA and AA should assess water quality impacts to protected sites in greater detail (4.117 onwards), and consider protected sites on an individual basis (as has been done for water quantity at 4.110 onwards). The impacts to sites will vary based on their current condition and capacity to cope with changes. We acknowledge that the HRA necessarily has to be at a fairly high level, but it still needs to be robust. Our main concerns are in relation to Portholme SAC and the Ouse Washes. • Additionally, from 5.71 onwards, we advise that the HRA requires more detail and separation of water pollution impacts to the Upper Ouse catchment and the Cam and Ely Ouse catchment. Development that depends on a Sewage Treatment Works that drains into the Upper Ouse catchment will affect the Ouse Washes, which is currently failing its water quality targets. • The HRA references the Stantec report (Greater Cambridge Integrated Water Management Study (IWMS) from Stantec) but it is not clear which Sewage Treatment Works / Water Recycling Centres (StW / WRC) are in scope here. For example, Utton's Drove StW effluent drains into the Ouse and so will flow into the Ouse Washes. Uttons Drove WRC serves significant growth areas including Cambourne and Northstowe and currently has considerable issues, according to the IWMS. • The Non-Toxic Contamination (which can contribute to nutrient enrichment) (4.41 onwards), and Direct pollution / run-off section of the HRA (4.123) both use '500m from a Habitats site' as the screening distance. We do not agree with this methodology, and strongly recommend	207641, 207642, 207643, 207644, 207645 (Natural England)

that the screening is reviewed with the criteria '500m from any waterway that is hydrologically connected to a Habitats site'. This may bring some sites into consideration, particularly in relation to Portholme SAC and the Ouse Washes which are already suffering from pollution and nutrient issues. • We agree that Eversden and Wimpole Woods SAC should be included in the AA, particularly in relation to 'Physical Damage and Loss of Habitat – Functionally Linked Habitat' and 'Non-Physical Disturbance – Functionally Linked Habitat'. We note however that a 10km screening distance has currently been used (pages 32, 36). As mentioned in our recent discussions, Natural England's Impact Risk Zone (IRZ) for this SAC is about to be updated to a 6km core sustenance zone (CSZ) and a 10.2km landscape connectivity zone (LCZ) for barbastelle bats. We will share the final IRZ wording with you, once it has been confirmed for the next IRZ update, and will arrange further discussions about this with the Natural Environment team shortly	
The Local Plan fails to comply with the Habitats Regulations 2017 and UK law in that the HRA for Eversden and Wimpole Woods SAC does not list or consider all the relevant development proposals which, in combination and cumulatively with those in the GCLP, pose threats which may adversely affect the integrity of the SAC and its CSZ. Major infrastructure transport plans and projects are serious omissions, including EWR which alone could extinguish the SAC's Barbastelle bats. We consider that the HRA undertaken by LUC for the GCLP is lacking in the evidence necessary to inform a robust Appropriate Assessment.	203638, 203645 (Cambridge Approaches)

HRA: The Local Plan's reliance on East West Rail (EWR) for development north of the A428 lacks an assessment of EWR's impacts on the Eversden Woods and Wimpole Special Area of Conservation (SAC), raising concerns about environmental constraints being overlooked. Other HRAs prepared elsewhere (e.g. Oxfordshire) have included the cumulative effects of EWR. The proposed EWR route risks habitat fragmentation for the barbastelle bat population, with existing evidence suggesting that limited mitigation measures like bat bridges may not be effective in preserving the integrity of the SAC. The Local Plan assumes that effective mitigation solutions for EWR will be developed later, without evidence of their feasibility or cost, which undermines the plan's effectiveness. EWR Co and GCSP have not demonstrated compliance with the Habitats Regulations, as EWR's impacts have not been adequately assessed in the Local Plan, contradicting national policy requirements and going against the precautionary principle. Local naturalists are willing to engage with GCSP to provide insights on the barbastelle bat population and its implications for the planning process.	202014 (Haslingfield PC), 210927 (Great Shelford Parish Council)

Although the HRA 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.	210927 (Great Shelford PC)
The respondent believes the Habitats Regulations Assessment is incomplete, particularly in its failure to consider the in-combination effects of the East West Rail project, which could significantly impact the Eversden and Wimpole Woods SAC. Concerns have been raised by both South Cambridgeshire District Council and Cambridgeshire County Council regarding the potential adverse effects of East West Rail on the maternity roost of rare barbastelle bats. The respondent references a 2012 paper indicating that barbastelle bats do not rely on linear landscape features for commuting, suggesting that proposed bat bridges and viaducts may be ineffective. The respondent advocates for a tunnel solution for East West Rail to protect the bats' habitat during construction.	204841 (A Sykes)