Appendix 13

Regulation 19 - Representation Summaries and Responses (November 2026)



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan Regulation 22 Consultation Statement (November 2026)

GREATER CAMBRIDGE
SHARED PLANNING

Summary of Representations made at the Regulation 19 Stage

This document provides:

1. Overview of all numbers of representations made
2. Summary and response to representations on each chapter of the Local Plan

Overview of all numbers of representations made

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Chapter 1: About the Plan	**42**	**44**	**6**	**33**	**35**
Chapter 2: Development strategy	**115**	**208**	**10**	**128**	**171**
Policy S/JH: New jobs and homes	**90**	**114**	**15**	**84**	**94**
Policy S/DS: Development strategy	**114**	**158**	**10**	**131**	**142**
Policy S/SH: Settlement hierarchy	**62**	**74**	**8**	**60**	**64**
Policy S/DE: Defined development extents	**41**	**47**	**7**	**33**	**35**
Policy S/GB: The Cambridge Green Belt	**55**	**65**	**7**	**45**	**54**
Policy S/MO: Monitoring	**14**	**17**	**1**	**11**	**11**

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Chapter 3.1 Cambridge urban area	0	0	0	0	0
Policy S/C/LCR: Land at Clifton Road (including Cambridge Junction and Cambridge Leisure)	10	11	4	3	5
Policy S/C/SMS: Garages between 20 St. Matthews Street and Norfolk Street	1	1	0	0	0
Policy S/C/HTR: 137-143 Histon Road	2	2	1	0	0
Policy S/C/HGH: Henry Giles House, 73-79 Chesterton Road	2	2	0	1	2
Policy S/C/HRC: Horizon Resource Centre, 285 Coldham's Lane	1	1	1	0	0

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Policy S/C/PDC: Cambridge Professional Development Centre, Foster Road	4	4	0	2	2
Policy S/C/PPS: Police Station, Parkside	2	2	0	2	2
Policy S/C/NCA: North Cambridge Academy, 108, Arbury Road	5	5	1	3	3
Policy S/C/ER: 1-99 Ekin Road and 1-8 Ekin Walk	2	2	0	1	1
Policy S/C/DR: 2-28 Davy Road and Garage Blocks	2	2	0	1	1
Policy S/C/HPC: 1-78 Hanover Court, 1-49 Princess Court and Garage at Newtown Garages	2	2	0	1	1
Policy S/C/GER: Former Garage Block, East Road	1	1	0	0	0
Policy S/C/SH: 1-33 Stanton House,	2	2	0	1	1

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Christchurch Street					
Policy S/C/MRG: Milton Road Garages	3	3	1	1	1
Policy S/C/SCL: Land South of Coldham's Lane, Cambridge	2	2	0	2	2
Policy S/C/BRN: Land at Barnwell Road and Newmarket Road	3	3	0	1	1
Policy S/C/TRP: Travis Perkins, Devonshire Road	1	1	0	0	0
Policy S/C/OPK: Parcel Com4, Orchard Park	2	2	0	0	0
Policy S/C/BFS: Brookfields	1	1	0	0	0
Policy S/C/SRW: Station Road West	4	4	1	1	1
Policy S/C/BJH: Betjeman House, Hills Road	2	2	0	0	1
Policy S/C/OPM: Old Press/Mill Lane	4	4	0	4	4

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Policy S/C/NMD: New Museums, Downing Street	2	2	1	0	0
Policy Areas in the Cambridge Urban Area	0	0	0	0	0
Policy S/PA/CC: Cambridge City Centre	2	2	0	1	1
Areas of Major Change in the Cambridge urban area	0	0	0	0	0
Policy S/AMC: Cambridge Areas of Major Change	5	5	1	3	3
Policy S/AMC/NEC: North East Cambridge Area of Major Change	27	34	6	18	22
Policy S/AMC/AS: Abbey Stadium Area of Major Change	4	4	2	1	1
Policy S/AMC/BC: Beehive Centre Area of Major Change	8	8	1	4	5

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Policy S/AMC/EB: East Barnwell Area of Major Change	1	1	1	0	0
Policy S/AMC/FBG: Fitzroy/Burleigh Street/Grafton Area, Area of Major Change	2	2	0	1	1
Policy S/AMC/SCL: South of Coldham's Lane Area of Major Change	4	5	1	1	2
Policy S/PRIA: Public Realm Improvement Areas (PRIA) in Cambridge	3	3	0	2	2
Policy S/PRIA/CRP Cambridge Retail Park	3	3	0	2	2
Policy S/PRIA/EG: Eastern Gate	28	28	15	2	2
Policy S/PRIA/HRRS: Hills Road and	3	3	0	1	1

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Regent Street Corridor					
Policy S/PRIA/MC: Mitcham's Corner	5	5	0	4	4
Policy S/PRIA/MR: Mill Road	7	8	2	3	3
Policy S/PRIA/OPML: Old Press/Mill Lane	3	3	0	3	3

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Chapter 3.2 Edge of Cambridge	3	3	0	2	2
Policy S/CE: Cambridge East	38	39	13	12	18
Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital)	26	110	4	32	102
Policy S/NWC: Eddington	7	7	1	4	6
Policy S/WC: West Cambridge	4	4	0	3	4

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Policy S/HHR: Land between Huntingdon Road and Histon Road	5	5	0	2	4
Policy S/EOC/NWO: Land north of Worts' Causeway	2	2	0	1	1
Policy S/EOC/SWO: Land south of Worts' Causeway	2	2	0	1	2
Policy S/EOC/BS: Bell School, Babraham Road	1	1	0	1	1
Policy S/EOC/FRE: Fulbourn Road East	3	3	0	1	2
Policy S/EOC/IDH: Ida Darwin Hospital	2	2	0	1	1
Areas of major change Edge of Cambridge	0	0	0	0	0
Policy S/AMC/FH: Fulbourn Hospital Area	2	2	0	2	2

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Chapter 3.3 New Settlements	5	5	0	4	5
Policy S/CBN: Cambourne North	39	69	5	48	52
Policy S/CB: Cambourne	9	9	2	5	7
Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm	342	351	1	332	331
Policy S/NST: Northstowe New Town	11	20	4	3	9
Policy S/WNT: Waterbeach New Town	15	18	3	12	15
Policy S/BA: Bourn Airfield New Village	10	10	1	4	8

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Chapter 3.4 The rural southern cluster	**6**	**6**	**0**	**3**	**5**
Policy S/WGC: Wellcome	**5**	**5**	**0**	**1**	**5**

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Genome Campus, Hinxton					
Policy S/BRC: Babraham Research Campus	8	8	1	4	6
Policy S/RSC/MF: Land at Maarnford Farm, Hunts Road, Duxford	5	5	0	2	2
Policy S/RSC/BR: Land south of Babraham Road, Sawston	3	3	0	1	3
Policy S/RSC/FSS: Former Spicers Site, Sawston Business Park, Sawston	11	11	0	3	6
Policy S/RSC/CC: Comfort Café, Fourwentways Little Abington	1	1	0	0	1
Policy S/SCP: Policy Areas in the Rural Southern Cluster	1	1	0	1	1
Policy S/PA/LN: South of A1307, Linton	0	0	0	0	0

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Policy S/AMC/GP: Granta Park Area of Major Change	4	4	0	1	3
Policy S/AMC/WHD: Whittlesford Parkway Station Policy Area, Whittlesford Bridge Area of Major Change	13	13	2	7	9
Policy S/AMC/WGC: Wellcome Genome Campus	3	3	0	1	2
Policy S/AMC/IWM Imperial War Museum Area of Major Change	8	9	0	5	7

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Chapter 3.5 Rest of the rural area	12	18	1	15	17
Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)	26	26	3	16	20

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Policy S/RRA/ML: The Moor, Moor Lane, Melbourn	4	4	1	3	4
Policy S/RRA/H: Land at Highfields (phase 2), Caldecote	2	2	0	1	1
Policy S/RRA/SCS: Land to the south of Cambridge Services, A14	9	9	1	6	8
Policy S/RRA/BBP: Land at Buckingway Business Park, Swavesey	3	3	1	2	2
Policy S/RRA/SNR: Land to the north of St Neots Road, Dry Drayton	2	2	1	1	1
Policy S/RRA/OHD: Old Highways Depot, Twenty Pence Road, Cottenham	1	1	0	1	1
Policy S/RRA/NW: Norman Way, Over	1	1	1	0	0

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Policy S/RRA/CRH: Land adjacent to Cambridge Road (A10) and Mill Lane, Hauxton	2	2	0	1	1
Policy S/RRA/CH: Land at Compass House, Chivers Way, Histon and Impington	2	2	1	1	1
Policy S/RRA/CR: Land to the west of Cambridge Road, Melbourn	3	3	0	3	3
Areas of Major Change in the rest of the rural area	0	0	0	0	0
Policy S/AMC/PH: Papworth Hospital Area of Major Change	1	1	0	1	1
Policy S/AMC/FD: Fen Drayton Former Land Settlement Association Estate	2	2	1	1	1
Policy S/AMC/HIS: Mixed Use	1	1	0	1	1

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Development in Histon & Impington Station Area					
Policy S/AMC/GT: Optimisation of Gypsy and Traveller sites	7	7	0	2	3

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Chapter 4: Climate change	7	7	1	5	5
Policy CC/SD: Sustainable development and the climate emergency	18	18	2	11	15
Policy CC/DC: Designing for a changing climate	21	13	7	14	15
Policy CC/NZ: Net zero carbon new buildings	32	33	6	23	23
Policy CC/WE: Water efficiency in new developments	40	43	11	28	30

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Policy CC/IW: Integrated water management, sustainable drainage and water quality	29	30	6	21	21
Policy CC/FM: Managing flood risk	8	8	2	2	5
Policy CC/RE: Renewable energy projects and infrastructure	10	11	3	5	6
Policy CC/CE: Supporting a circular economy and sustainable resource use	15	15	2	11	12
Policy CC/CS: Supporting land-based carbon sequestration and carbon sinks	10	11	1	8	9
Policy CC/SR Sustainable Retrofit	3	3	2	1	1

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Chapter 5: Biodiversity and green spaces	4	4	1	2	1
Policy BG/BG: Biodiversity and geodiversity	51	55	5	39	45
Policy BG/GI: Green infrastructure	28	33	4	16	19
Policy BG/UGF Urban Greening Factor	25	26	1	20	23
Policy BG/TC: Tree cover and the tree population	17	19	1	14	16
Policy BG/RC: River corridors	15	15	3	10	10
Policy BG/PO: Protecting open spaces	14	16	1	12	14
Policy BG/EO: Providing and enhancing open spaces	23	25	2	18	20

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Chapter 6: Wellbeing and social inclusion	4	4	0	3	3
Policy WS/HD: Creating healthy new developments	8	8	2	4	5
Policy WS/NC: Meeting the needs of new and growing Communities	28	30	2	19	21
Policy WS/CF: Community, sports, and leisure facilities	9	9	2	7	7
Policy WS/CH: Cultural and creative hubs	1	1	0	1	1
Policy WS/MU: Meanwhile uses during long term redevelopments	1	1	1	0	0
Policy WS/IO: Creating inclusive employment and business opportunities through new developments	8	8	0	6	7

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Policy WS/HS: Pollution, health and safety	15	17	2	13	14
Policy WS/PH: Public houses	1	1	1	0	0

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Chapter 7: Great places	2	2	0	2	2
Policy GP/PP: People and place responsive design	10	11	4	4	4
Policy GP/QD: Achieving high quality development	10	12	1	9	11
Policy GP/HD: Housing density	7	8	0	5	7
Policy GP/ST: Skyline and tall buildings	15	15	0	13	14
Policy GP/QP: Establishing high quality landscape and public realm	12	13	0	11	12
Policy GP/LC: Protection and enhancement of	17	17	0	11	14

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
landscape character					
Policy GP/HE: Historic environment	6	6	0	5	5
Policy GP/HA: Designated heritage assets	8	8	0	7	7
Policy GP/ND: Non-designated heritage assets	2	2	1	0	0
Policy GP/CC: Adapting heritage assets to climate change	1	1	1	0	0
Policy GP/AR: Archaeology	1	1	0	1	1
Policy GP/SF: Shopfronts	1	1	1	0	0

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Chapter 8: Jobs	2	2	0	2	2
Policy J/NE: New employment development proposals	16	16	5	5	8

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Policy J/RE: Supporting the rural economy	5	5	0	4	4
Policy J/AL: Protecting the best agricultural land	7	7	3	3	3
Policy J/PB: Protecting existing business space	3	4	1	0	2
Policy J/AW: Affordable workspace and creative industries	26	38	1	35	37
Policy J/EP: Supporting a range of facilities in employment parks	4	4	2	1	1
Policy J/MS: Markets and street trading	1	1	0	1	1
Policy J/RC: Retail and other complementary town centre uses	2	3	0	3	3
Policy: J/SA: Cambridge City's	0	0	0	0	0

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Primary Shopping Area					
Policy J/VA: Visitor accommodation, attractions and facilities	5	5	0	4	4
Policy J/FD: Faculty development and specialist/language schools	0	0	0	0	0

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Chapter 9: Homes	6	6	2	4	4
Policy H/AH: Affordable housing	32	35	4	18	24
Policy H/ES: Exception sites for affordable housing	8	9	2	6	6
Policy H/HM: Housing mix	12	12	3	6	8
Policy H/GL: Garden land and subdivision of existing plots	3	4	1	3	3

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Policy H/SS: Residential space standards and accessible homes	16	18	3	12	13
Policy H/SH: Specialist housing	5	5	1	4	4
Policy H/CB: Self and custom build homes	18	20	1	13	18
Policy H/BR: Build to rent homes	3	3	1	2	2
Policy H/CL: Co-living	3	3	0	2	2
Policy H/MO: Houses in multiple occupation (HMOs)	27	27	1	23	24
Policy H/SA: Student accommodation	4	4	2	2	2
Policy H/DC: Dwellings in the countryside	2	2	0	1	1
Policy H/RM: Residential moorings	0	0	0	0	0
Policy H/GT: Gypsy and Traveller and	6	6	0	2	4

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Travelling Showpeople sites					

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Chapter 10: Infrastructure	21	25	1	14	19
Policy I/ST: Sustainable transport and connectivity	49	60	7	32	37
Policy I/MH: Mobility hub facilities	4	4	1	2	2
Policy I/CV: Cycle and vehicle parking	28	28	0	25	25
Policy I/SD: Servicing and last-mile delivery	2	2	1	1	1
Policy I/SI: Safeguarding important infrastructure	15	15	4	7	9
Policy I/AD: Aviation development	3	3	0	2	2

Chapter / policy	Respondents	Representations	Support	Object	Raising Soundness?
Policy I/EI: Energy infrastructure masterplanning	6	6	1	3	3
Policy I/ID: Infrastructure and delivery	32	40	2	21	28
Policy I/DI: Digital and telecommunications infrastructure	8	8	0	6	6
Policy I/CM: Construction management	3	3	0	3	3
Appendices	36	59	1	46	58
Policies Map	26	33	0	23	28
Sustainability Appraisal	27	36	0	23	32
Habitats Regulation Assessment	18	22	0	19	18

Consultation Statement

Summary of Representations and Councils' response - About the Plan



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Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
About the Plan	42	44	35	6	33

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Consultation process	Question whether the consultation process has met the legal and procedural requirements for meaningful engagement.	Noted. The Greater Cambridge Local Plan has been consulted on throughout its preparation. The consultation statement sets out how the Councils have involved residents and key stakeholders in preparing the plan in accordance with Regulations 18 and Regulations 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The plan also complies with Regulation 22 (1)(c) and demonstrates that consultation has been undertaken in accordance with the relevant Regulations and the Councils' jointly adopted Statement of Community Involvement (SCI) 2024. Both recent Regulation 18 and Regulation 19 consultations were carried out for eight weeks with the consultation and events publicised through public notices, emails, letters, social media and our website.

Cooperation and engagement with neighbouring Local Authorities	Welcome positive collaboration in preparing the Local Plan by the Local Highway Authority (Cambridgeshire County Council) and Huntingdonshire District Council.	Noted. The Councils have sought to maintain ongoing and effective cooperation with statutory bodies and neighbouring authorities.
Plans focus on growth	Support the focus of the Plan on growth and supporting infrastructure to enable it.	Support noted.
Plans balanced vision and strategic priorities	Support for the decrease in climate and environmental impacts whilst creating thriving neighbourhoods with jobs, homes and supporting infrastructure including from Central Bedfordshire Council.	Support noted.
National Planning Policy Framework	The most recent National Planning Policy Framework was adopted in August 2026. The Plan should be updated to reflect the most recent legislation and to align with the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012.	Noted. A legacy Local Plan has been prepared and will be tested at examination, against the NPPF 2024. The NPPF 2026 and its national Decision Making Policies will be material considerations at the planning applications stage.
Local Plan period	The start and end dates of the Local Plan should be amended to be consistent with national policy and as a more appropriate strategy to deliver homes and jobs.	Noted. The plan addresses an appropriate period, covering beyond the minimum 15 year period strategic policies should cover form the date of adoption (as required by NPPF (2024) paragraph 22).
Level of growth	Concerns regarding the level of growth, growth should be directed to other parts of the country.	Noted. The Strategy section of the local plan identifying the homes and jobs that should be planned for reflects evidence of local needs, and has also responded to the government’s standard method for identifying each

		districts housing need. The plan has identified how the growth can be accommodated with an appropriate development strategy which has considered the available alternatives.
Green Belt and Grey Belt	Concern that evidence exploring the location of grey belt has not acknowledged the importance of land for recreation of village character.	Noted. National Planning policy requires that as part of the Local Plan review process authorities performing a review of Green Belt Boundaries should have up to date green belt assessments. The government introduced the concept of grey belt in the National Planning Policy Framework in 2024, to priorities areas which did not strongly contribute to green belt purposes if there was a need to release land from the green belt to meet development needs. It then published Planning Practice Guidance in 2025 specifying how assessments should be carried out. The 'Greater Cambridge Green Belt Assessment - Review following changes to National Policy and Guidance 2026' built on the findings of the Cambridge Green Belt Study 2021, updating it to take account of the changes to national planning guidance including the grey belt definition. The study identifies, based on the criteria established regarding contribution to green belt purposes, which parcels of land would potentially meet the governments definition. This is a technical assessment, carried out by consultants who specialise in this type of assessment. Land potentially meeting the grey belt definition does not automatically mean it is suitable for development. There

		may be many reasons why an area which met the definition of grey belt is not suitable for development, and that could include its importance for recreation or biodiversity.
Heritage	Plan fails to recognise and respond to the heritage significance of Cambridge, and the finite physical capacity of the historic city and its hinterland.	Noted. The preservation and enhancement of Greater Cambridge's historic environment has been positioned as a central pillar of the Local Plan's wider development strategy. Policy GP/HE provides a strategic-level framework that outlines how the various heritage assets and systems that embody Greater Cambridge's wider historic environment will need to be mobilised to balance the growth of Greater Cambridge's world-renowned industries with the preservation of Greater Cambridge's historic character and its globally recognised landmarks. Given the support for the policy received from Historic England, it is considered that no further changes are needed.
Water supply and demand	The Plan is based on a number of assumptions and delivery of water infrastructure that are outside of the controls of the Councils.	Noted. The plan acknowledges where it is reliant on other statutory process and the delivery of infrastructure by other bodies. The Councils have worked closely with those bodies to understand the delivery timelines for this infrastructure. One of the benefits of having an up-to-date local plan is that it provides a clear planning basis for other to understand development needs and proposals, so that they can be appropriately addressed. The plan is supported by evidence exploring how the water supply needs will be met, which has been prepared

		in cooperation with the Cambridge Water Scarcity Group, established by government to bring together relevant agencies to address issues facing the Cambridge area.
Infrastructure and viability	Infrastructure strategy and viability assessment should identify the timing, cost, funding arrangements and delivery responsibilities for essential strategic infrastructure, and that plan is viable.	Noted. The plan is accompanied by an Infrastructure Delivery Plan, prepared in consultation with a range of stakeholders, identifying the infrastructure that will be needed to support development. This will need to be maintained as a live document. The plan is also accompanied by a viability assessment demonstrating that the policies of the plan are deliverable.
Infrastructure and viability	Noting that responses from NHS Central East Integrated Care Board will continue to engage with GCSP in preparing the Infrastructure Delivery Plan.	Noted. Through the preparation of the Infrastructure Delivery Plan which accompanies the local plan, the councils have engaged closely and effectively with health providers to understand the infrastructure needs associated with planned development. That engagement will need to continue.
Infrastructure and viability	Sport England highlight further refinement is needed on the Playing Pitch Strategy.	Noted. The Councils have continued to develop the evidence around sports provision engagement with providers and Sport England, to ensure it provides a robust assessment.
Public Rights of Way	No policy or mechanism that details PRoW for site-specific proposals for new settlements.	Noted. Protection and enhancement of the rights of way network is required by a number of policies, in particular Policy I/ST Sustainable transport and connectivity.
Housing density	The plan lacks clarity on capacity of sites and housing density, and sites have departed from plan density at the planning application stage.	Noted. The rationale for the approximate capacity of the allocations is set out in Appendix A of the Sites Topic Paper (2026). Capacity considers a range of issues including site context, constraints and opportunities. The

		figures provided are approximate, as capacity will be refined at the planning application stage when more detailed design takes place.
HELAA methodology	The HELAA is inconsistent in its methodology and therefore is not accurate or robust in assessing sites promoted.	Noted. Each individual site has been tested according to a proportionate and robust screening and testing process, as documented in the Housing and Economic Land Availability Assessment Update (2026).
Harston Parish Neighbourhood Plan	Harston Parish Council raise a number of local issues, and future aspirations for the village.	Noted. The village raise a wide range of comments and issues around specific points in Harston, many of which would be best addressed through a neighbourhood plan.
Equalities Impact Assessment (EqIA)	The Equalities Impact Assessment does not consider accommodation needs for working-age disabled adults, under Disability.	Noted. The EqIA identifies possible negative impacts on individuals and groups with protected characteristics, plana mitigating action and seeks to maximise opportunities to advance equality within Council activities. The Proposed Submission Local Plan contains policies underpinned by studies that provide an understanding of the existing context and identify issues which need to be addressed and/or mitigated. The Housing Needs of Specific Groups in Cambridge and South Cambridgeshire (2025) report provides evidence on the type and mix of housing necessary to meet the needs of different communities across the Greater Cambridge area. One action set out in the EqIA is to undertake consultation and review feedback relating to disability and see if there are any issues raised. Responding to this comment, it is

		proposed that the EqIA is amended to further reflect needs for working-age disabled adults.

Consultation Statement

Summary of Representations and Councils' response - Development Strategy



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Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Development strategy	115	208	171	10	128

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for the development strategy	General support expressed for the proposed development strategy and the Local Plan's aspirations for Greater Cambridge.	Support noted.
Promotion of an omission site	Comments seeking the reassessment of an omission site through a revised Housing and Economic Land Availability Assessment (HELAA), or the allocation of an omission site as part of the Local Plan.	Noted. It is considered that the Local Plan sets out an appropriate strategy, which has taken into account reasonable alternatives for development dispersal across Greater Cambridge, and is based on proportionate evidence that accords with national planning policy and the Councils' objectives for Greater Cambridge. Each individual site has been tested according to a proportionate and robust screening and testing process, as documented in the Housing and Economic Land Availability Assessment Update (2026). The spatial strategy and site allocations have also been subject to considerable assessment, including Sustainability Appraisal. Therefore, the Councils will not be considering

		omission sites further, unless requested to do so by the Inspectorate.
Dependence on larger sites	Concerns raised that the Local Plan relies too heavily on strategic sites and new settlements to deliver on local housing needs and questions the deliverability of this approach.	Noted. 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 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. The Infrastructure Delivery Plan (July 2026) identifies the infrastructure requirements relevant to each of the strategic sites included within the Local Plan, including identifying funding and delivery timings. The Housing Delivery Study – Addendum (June 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.
Development in villages	Comments suggesting that the Local Plan does not allocate enough development in villages or the rest of the rural area.	Noted. The strategy aims to provide 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. Alternatives to the proposed strategy, including greater dispersal of development across South Cambridgeshire's villages, has been evidenced to have transport impacts that could not be mitigated.
Allocating grey belt	Comments suggesting that the Local Plan should allocate more grey belt sites.	The Councils have carefully considered the evidence and consultation feedback when preparing the approach to

		Green Belt in this Plan. Justification of location-specific exceptional circumstances has been identified for the release of Green Belt land at Cambridge Biomedical Campus and at the Babraham Research Campus. However, outside of these location-specific circumstances and having regard to the identification of other sources of land supply that can meet needs sustainably without the need for Green Belt release, exceptional circumstances that justify other Green Belt release to meet general development needs have not been identified by the Councils through the plan-making process.
More homes should be allocated	Concerns that the Local Plan is not consistent with national policy as it does not identify sufficient housing land to meet housing needs.	Greater Cambridge's housing needs have been assessed in accordance with national planning policy and guidance. The Local Plan identifies a supply of specific, developable sites for the plan period, including an appropriate level of additional "headroom" supply to deliver flexibility. Evidence accompanying the Plan demonstrates that the sites are be 'deliverable' or 'developable' in terms of the definitions set out in national planning policy and guidance. Further information is set out in Proposed Submission Development Strategy topic paper - Appendix 10: Housing Trajectory for the Local Plan.
More employment land should be allocated	Comments stating there is evidence of an immediate need for floorspace for Mid-tech uses and for Use Class B2 and B8 that is not satisfied by the Local Plan's allocations and strategy.	Greater Cambridge's identified employment land needs have been informed by evidence prepared in accordance with national planning policy and guidance. 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.
Balancing growth with Cambridge's special character	Concerns that the Local Plan prioritises economic expansion over the area's valued heritage and the protection of the local landscape character, and that continued growth in Greater Cambridge will result in new built development that does not respect local character.	The Local Plan's vision and strategic priorities recognise the locally distinctive heritage and landscapes and unique character and identities of Cambridge and South Cambridgeshire. To ensure future growth respects the area's historic character, extensive Heritage Impact Assessment, Landscape Character Assessment, and Skyline and Tall Building assessment work has been prepared to inform the Local Plan's site allocations and relevant policy requirements in relation to building heights, site layout and appropriate mitigation. Moreover, decision making will be guided by the Development Plan's requirements in relation to the historic environment and high-quality design, as well as any national planning policy and design guidance.
Balancing growth with infrastructure needs	Comments suggesting that the Local Plan fails to reconcile growth with critical constraints like water scarcity, healthcare deficits, and green infrastructure. Strategic sites are heavily dependent on major strategic infrastructure, raising questions about feasibility and deliverability.	Noted. The Councils recognise that the proposed development strategy and its strategic allocations will have significant impacts on Greater Cambridge's infrastructure. The impacts of the Local Plan have been carefully considered through extensive evidence developed in collaboration with relevant organisations, including for example evidence on water supply and wastewater capacity, transport, green infrastructure, healthcare and recreational facilities. For their respective topics, these studies provide a clear understanding of the infrastructure

		and policy measures required to mitigate the impacts of the planned growth. Drawing on this evidence, the Infrastructure Delivery Plan sets out for the plan as a whole and for each strategic scale allocation the infrastructure required to mitigate the impacts of development, including identifying funding and delivery timings. The allocation policies each include firm requirements to ensure that all impacts of development are addressed. The Housing Delivery Study – Addendum (June 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.
Collaboration and cross-boundary matters	Comments welcoming engagement and wishing to continue collaboration with the Councils to assist with the delivery of the Plan, including suggested amendments to wording to help facilitate collaboration with working partners and other third parties during decision making.	The requests for continued co-operation and engagement are welcomed. Coordinated engagement with external infrastructure planning and delivery partners has also been critical to the preparation of the preferred spatial strategy. Based on regular engagement with relevant bodies throughout our plan-making process, the Councils have not asked neighbouring districts to meet their development needs. No neighbouring authorities have asked Cambridge or South Cambridgeshire to take general development needs for employment or housing. 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.
Viability of the strategy	Comments suggesting that the viability evidence supporting the strategy does not appropriately consider the cost of s106	Noted. Policy requirements in the Proposed Submission Local Plan have been informed by proportionate evidence

	infrastructure alongside CIL for strategic sites.	of infrastructure assessed for regarding viability. The plan is accompanied by a Viability Assessment.
Changes to the section's wording and figures	Comments suggesting changes to the introduction's wording or figures.	Noted. The Councils will consider where minor modifications are necessary.
Consistency with the National Planning Policy Framework (August 2026)	Comments suggesting amendments are made to the Local Plan to ensure consistency with the NPPF (August 2026).	Noted. The Greater Cambridge Local Plan has been prepared under the legacy system (2012 regulations) and is therefore being assessed at Examination for compliance with the 2024 NPPF. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.

Policy S/JH: New jobs and homes

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/JH: New jobs and homes	90	114	94	15	84

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for Policy	Support for the positive approach to economic growth and housing delivery. Support provision for a range of employment types, and levels of housing above the objectively assessed needs, with flexibility to accelerate delivery if conditions are right. Support for the strategy approach not to release Green Belt.	Support noted.
Impact of development	Concern that the increase in jobs and associated increase in homes will contribute to water, climate and biodiversity issues.	Noted. Greater Cambridge's identified needs have been informed by evidence prepared in accordance with national planning policy and guidance.
The employment land requirement is too low	Concern that the employment provision is too low as it does not reflect the EHEU evidence for higher jobs growth, regional growth aspirations, Dev Co's ambitions or	Noted. Greater Cambridge's identified employment land needs have been informed by evidence prepared in accordance with national planning policy and guidance.

	NPPF. Comment that it should be provide a more ambitious and resilient employment land strategy, expressed as a minimum and the Policy should acknowledge the potential for growth beyond identified capacity. Concern with the requirement for logistics and warehousing, that it does not account for local and suppressed demands from displaced occupiers and due to ageing industrial stock and ignores strategic needs.	The Councils have taken an evidence-led approach to growth based on an understanding of the most likely future forecast for jobs. At the time of writing, the Government has not published a formal policy position in relation to its ambitions for Cambridge. Unless and until the Government publishes a formal plan to achieve its ambitions for this area, the Councils consider that it would not be appropriate to base the Local Plan on these ambitions. Similarly, aspirational scenarios included in the Local Growth Plan 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. Following this evidence-led approach, the jobs figure included in Policy S/JH represents the most likely forecast for jobs, which the Councils' consultant Iceni confirmed to remain robust for the Proposed Submission Plan. Whilst the Councils' employment evidence also identifies a higher employment scenario, Iceni considers this scenario to be less likely. The Councils have therefore rejected this scenario as not representing an objectively assessed need for development. The Local Plan employment land strategy is ambitious and resilient. Allocations in the Plan provide a flexible employment land supply that provides headroom above the identified objectively needs, which is sufficient to support substantial employment growth over and above the most likely jobs forecast, if it were to come forward. Policies in the Jobs chapter provide a framework for

		supporting further employment development in appropriate locations outside of allocated sites. The requirement for industrial and warehousing space 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. The warehousing needs identified in the plan are specific to the Cambridge market. 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.
The housing land requirement is too low/high	Comment that the housing target is an aggressive requirement predicated on an aggressive jobs assumption which should be monitored. Comment that less homes are needed. Concerns that the housing target is too low, not consistent with national policy or growth aspirations, will not deliver strategic priorities, that the jobs to homes ratio is inadequate leading to increased commuting, issues with recruitment, retention and impacting growth, and there needs to be flexibility to increase numbers	Noted. Greater Cambridge's housing needs have been assessed in accordance with national planning policy and guidance. The Councils have taken an evidence-led approach to growth based on an understanding of the most likely future forecast for jobs. At the time of writing, the Government has not published a formal policy position in relation to its ambitions for Cambridge. Unless and until the Government publishes a formal plan to achieve its ambitions for this area, the Councils consider that it would not be appropriate to base the Local Plan on these ambitions. Similarly, aspirational scenarios included in the Local Growth Plan have been discounted for the

	should employment growth continue at the pace of last 10 years. Comments that it does not take account of affordable housing need, that an increase in households associated with economic activity will worsen affordability. Comments that uplift is needed to address specialist housing to address needs of older people and disabled people, including supported housing for working-age disabled adults. Comments the calculation of housing needs should use the Sedgefield method, that the standard-method figure is a minimum not a ceiling, the supply headroom is insufficient, reliance on Neighbourhood Plans is unsuitable method of ensuring delivery, and that there is a case for increased housing allocations, including smaller sites in the short-term.	purposes of Local Plan making evidence which is an exercise focused on wholly evidencable historical sector and economy wide data. The housing figure included in Policy S/JH is the up-to-date Standard Method calculation housing need outcome set by Government, which is the minimum housing need that the Councils are required to plan for. However, the Councils' evidence demonstrates that this figure would support the most likely jobs outcome, following an approach to identifying housing need associated with jobs that has remained consistent throughout the plan-making process. That most likely jobs outcome is considered realistic and is embedded in past trends of known change. It assumes periods of strong growth, but also takes into account periods of cyclical slow down. 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 housing need identified in the policy addresses the accommodation needs of the total population, including the needs for affordable housing and specialist housing

		for different groups such as travellers, older and disabled people, and students. The specific accommodation needs set out for travellers, older and disabled people, and students form part of this overall housing need and are not additional to it. Policy H/AH in the Homes Chapter requires the provision of affordable housing on all major developments for housing. Therefore, the Local Plan, through a range of policies seeks to ensure that the accommodation needs of all groups will be met. The Housing Needs of Specific Groups Update (HNSG, August 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 calculations in the HNSG 2025 are compliant with national planning practice guidance, and are based on population forecasts linked to the standard method of calculating local housing need. Cambridgeshire County Councils' demand profiles for older and disabled people have been calculated using a different approach to assessing needs, and reflect adopted Local Plan housing requirements. The Local Plan seeks to ensure that a variety of different types of accommodation for both older and disabled people are provided across Greater Cambridge. Proposed Submission Development Strategy topic paper - Appendix 12: Meeting the specialist housing needs of older people and those with disabilities sets out

		anticipated delivery from a variety of sources of supply to demonstrate how the identified needs will be met. The supporting text to Policy H/SH is clear that development proposals should have regard to the Local Plan evidence base and the relevant Supported Housing Strategy, and sets out that most forms of specialist supported accommodation (other than housing for older people) are likely to be considered as affordable housing. Policy H/AH in the Homes Chapter requires the provision of affordable housing on all major developments for self-contained dwellings. Therefore, the Local Plan, through a range of policies seeks to ensure that the accommodation needs of both older and disabled people will be met. The Supported Housing Strategy will be undertaken in partnership with Cambridgeshire County Council, Registered Providers and other relevant stakeholders, and will include consideration of the needs of working-age adults with disabilities, autism and complex support needs. It is anticipated that the Strategy will be approved in 2027. The Local Plan identifies a supply of specific, deliverable and developable sites for the plan period, including an appropriate level of additional “headroom” supply to deliver flexibility. In addition, if housing were to come forward in line with faster employment growth than is currently forecasted, the strategic allocations included in the Plan provide a very significant level of housing land supply above the housing need figure that could accommodate this. Further to this, changes in employment growth and associated housing needs can be accommodated in future plan reviews.

		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. 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. It would also likely result 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 in the Green Belt, and our development needs alone do not provide the exceptional circumstances required by national planning policy to remove land from the Green Belt in this Local Plan. National planning policy requires local plans to set out a housing requirement for designated neighbourhood areas, however, 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. All the main issues raised in these comments relating to housing delivery have also been raised in the comments on Appendix D, and therefore the Councils' response to

		these comments on housing delivery is set out under Appendix D.
Support for aligning development with water and wastewater capacity	Infrastructure providers note ongoing engagement, Statements of Common Ground and regulatory funding routes provide confidence that water and wastewater capacity can align with planned growth, including support for aligning the delivery of development to 2032/33 when the Grafham Water Supply transfer is due to be completed.	Support noted. The Councils recognise the significance of the water supply challenge in Greater Cambridge, which the Councils have considered in depth with all relevant national and local partners. 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 that accounts for the Local Plan's proposed growth. 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 that are external to plan making, water supply is not a barrier to delivering the level of development proposed in the Local Plan.
Concerns with water supply	Concerns that there is insufficient water for existing demand, and that there should be no additional development until supply issues are resolved, due to over abstraction of chalk aquifer negatively impacts chalk streams and wetlands. Concern that the growth trajectory lacks binding Grampian-style phasing to bridge this infrastructure deficit.	Noted. The Councils recognise the significance of the water supply challenge in Greater Cambridge, which the Councils have considered in depth with all relevant national and local partners. 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

		that accounts for the Local Plan's proposed growth. 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 that are external to plan making, water supply is not a barrier to delivering the level of development proposed in the Local Plan.
Infrastructure	Concern for commensurate infrastructure growth in conjunction with Homes to support Jobs growth, including healthcare. Comment that there is a need for an expanded bus depot.	Noted. The Councils recognise that the proposed development strategy and its strategic allocations will have significant impacts on Greater Cambridge's infrastructure. The impacts of the Local Plan have been carefully considered through extensive evidence developed in collaboration with relevant organisations, including for example evidence on water supply and wastewater capacity, transport, green infrastructure, healthcare and recreational facilities. For their respective topics, these studies provide a clear understanding of the infrastructure and policy measures required to mitigate the impacts of the planned growth. Drawing on this evidence, the Infrastructure Delivery Plan sets out for the plan as a whole and for each strategic scale allocation the infrastructure required to mitigate the impacts of development, including identifying funding and delivery timings. The allocation policies each include firm requirements to ensure that all impacts of development are addressed. The Housing Delivery Study – Addendum (June 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 final Greater Cambridge Transport Strategy that supports the Local Plan identifies bus depot provision as a required intervention Councils continue to engage with the Local Transport Authority to confirm the detailed requirements and plans for this.
Wellbeing and social inclusion	Concern the strategic priority is not achievable unless the Plan requires a proportion of new homes at affordable rents local people can afford.	Noted. Policy H/AH in the Homes Chapter seeks to secure an affordable housing tenure mix that will meet a wide range of housing needs and create mixed and balanced communities, whilst also prioritising the need to deliver social and affordable rented homes. It sets out that within the affordable homes provided on major development sites for housing, 75% will be social and affordable rent homes, and 25% will be shared ownership or other affordable homes providing a route to homeownership. The proportions of different tenures of affordable homes 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.
Green Belt/Grey Belt	Concern that Grey Belt land has not been assessed and Green Belt land has not been released to meet development needs, noting that continued growth for villages within the Green Belt is only possible with the inclusion of sustainable, well-connected Grey Belt sites.	Noted. The Councils have carefully considered the approach to Green Belt in this Plan following national planning policy and national practice guidance requirements, drawing on up to date policy-compliant evidence, and taking into account the local Cambridge Green Belt purposes.

		Justifications for location-specific exceptional circumstances have been identified for the release of Green Belt land at Cambridge Biomedical Campus and at the Babraham Research Campus. However, outside of these location-specific circumstances, exceptional circumstances that justify further Green Belt release to meet general development needs have not been identified through the plan-making process. Further detail about this process is provided in the Proposed Submission Development Strategy Topic Paper, and in Appendix 4 and Appendix 8 of that Development Strategy Topic Paper.
Housing delivery and types	Concerns with the housing trajectory counting homes at NEC, windfall sites, and through Neighbourhood Plans, and any under delivery exposing villages to speculative development on appeal. Comment that it is unclear why the breakdown does not include all forms of accommodation, which makes it hard to assess the relationship of market houses and new jobs, and that if affordable housing is not prioritised it is likely to be challenged through appeals.	Noted. The Housing Delivery Study – Addendum (June 2026) confirms that the Councils housing trajectory for the Local Plan is realistic and deliverable. Proposed Submission Development Strategy topic paper - Appendix 10: Housing Trajectory for the Local Plan explains how the housing trajectory included in the Plan is based on a robust understanding of the status and expected delivery of each site identified within it. The housing trajectory includes anticipated completions at NEC that have planning permission or are allocated in the Local Plan. The Housing Delivery Study – Addendum (June 2026) confirms that the recommendations in earlier studies for the windfall allowance are realistic and reliable for use in plan-making in the Greater Cambridge area. The policies in the Greater Cambridge Local Plan do not seek to limit the delivery of windfall sites compared to current or previous policies, and therefore it is considered realistic that new homes will continue to be delivered on windfall sites. 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. The housing trajectory does not assume any delivery of housing to meet the identified needs to be delivered via neighbourhood plans. The housing need identified in the policy addresses the accommodation needs of the total population, including the needs for affordable housing and specialist housing for different groups such as travellers, older and disabled people, and students. The specific accommodation needs set out for travellers, older and disabled people, and students form part of this overall housing need and are not additional to it. Policy H/AH in the Homes Chapter requires the provision of affordable housing on all major developments for housing. Therefore, the Local Plan, through a range of policies seeks to ensure that the accommodation needs of all groups will be met.
Employment	Comment that the strategic locations must accommodate the full ecosystem necessary to commercialise innovation and generate economic value and avoid an unnecessarily narrow interpretation of appropriate economic uses where complementary activity is required for successful clusters.	Noted. The Councils recognise that the success of Greater Cambridge's key sector clusters depends on a wider business ecosystem. The employment land allocations in the Plan respond to a detailed evidence base that has explored the locational, space type and support needs of different sectors at different scales and stages within the evolution of business. The employment use classes identified for these allocations are broad enough to allow for a variety of sectors. Further to this, other policies in the Plan support a flourishing business ecosystem in other ways, for example via Policy J/AW: Affordable workspace and

		creative industries and Policy J/EP: Supporting a range of facilities in employment parks.
Plan period	Comment that the timescale covered by the plan is contrary to national policy, and any further delay would risk falling below the minimum 15 year timeframe.	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.
Cross-boundary matters	Seek assurance whether transport modelling considered cross-boundary impacts on key routes serving northern Uttlesford.	Noted. The transport evidence has modelled traffic impacts arising from the development strategy, including cross-boundary impacts in a proportionate way. Mitigation measures, focused on improving accessibility by non-car modes and including vehicular trip budgets have been identified within the strategic site allocation policies and included within the Infrastructure Delivery Plan. In combination these measures will minimise the number of vehicle trips arising from new development and thereby limit the impact on the local or strategic highway network within Cambridgeshire or across the boundary.
Collaboration	Plan does not demonstrate how unmet need from neighbouring authorities have been considered.	Noted. The Greater Cambridge Proposed Submission Plan Draft Statement of Compliance evidences how the Councils have met national policy requirements in relation to maintaining effective cooperation. It explains that a number of Statements of Common Ground either have been agreed, or are in the process of being agreed, with relevant bodies. Further to this, the Councils have worked with relevant bodies to produce/update Statements of Common Ground for submission alongside the Local Plan.

		The Statement of Common Ground identifies that Greater Cambridge is meeting its development needs in full, and has not asked any other authorities to take any unmet needs. No neighbouring authorities have asked Cambridge or South Cambridgeshire to take general development needs for employment or housing. In its response to the Proposed Submission consultation, Uttlesford District Council asked Greater Cambridge to take some unmet need for Gypsy and Traveller pitches. Engagement on this matter and the current position is set out in the Statement of Common Ground for submission. This issue was raised for the first time through the Proposed Submission consultation; therefore it is not practicable for the Councils to address this need at this late stage. In addition, Uttlesford District Council have not submitted evidence as to why the need cannot be met in their district, and have not yet considered whether they can meet the identified need within their own district through a review of their development plan as required by Core Policy 60 in the Uttlesford Local Plan (adopted in March 2026). See more detail in relation to Policy H/GT.

Policy S/DS: Development Strategy

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
S/DS	114	158	142	10	131

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for the spatial strategy	Representations supporting the overarching growth strategy, and the Plan's approach to housing and jobs.	Support noted.
The Local Plan needs to be more ambitious	Comments suggesting the Local Plan's growth assumptions are too conservative given the Government's commitment to accelerating growth.	The Councils have taken an evidence-led approach to growth based on an understanding of the most likely future forecast for jobs, and the homes required to support this, allied to a robust understanding of credible housing delivery rates and infrastructure that has a reasonable prospect of delivery.
Strategy's reliance on large strategic sites / new settlements	Concerns that the Plan is too reliant on large-scale strategic allocations, creating delivery risks due to dependencies on enabling infrastructure and long lead-in times for development completion.	Noted. 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 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. The

		Infrastructure Delivery Plan (July 2026) identifies the infrastructure requirements relevant to each of the strategic sites included within the Local Plan, including identifying funding and delivery timings. The Housing Delivery Study – Addendum (June 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.
More allocations in villages	More sites in villages are needed to support the vitality of communities and conform with the requirements of national planning policy.	The strategy aims to provide 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. Alternatives to the proposed strategy, including greater dispersal of development across South Cambridgeshire's villages, were considered during the plan making process but were not considered to deliver a sustainable development strategy.
The strategy and the settlement hierarchy	Concerns that the Plan focuses on Cambridge and that the settlement hierarchy is not a robust enough basis for determining relative suitability of rural settlements or scale of growth they should accommodate; more sites should be allocated in Minor Rural Centres and Rural Centres, including settlements in the Rural Southern Cluster.	Noted. 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 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. Alternatives to the proposed strategy were considered but not selected, including greater dispersal of development across South Cambridgeshire's villages

		which would not deliver a sustainable development strategy. Development sites proposed to the plan-making process at sustainable villages were considered for allocation individually. See Appendix 8 of the Proposed Submission Development Strategy Topic Paper. Settlement Hierarchy policy forms one part of the development strategy approach, which has carefully considered the approach to directing development to sustainable locations. The Councils consider that the Settlement Hierarchy Study 2025 is a robust and proportionate evidence base.
Employment floorspace approach is too restrictive	Comments that the Plan is overly restrictive in seeking to limit large warehousing units and needs to allocate more sites to meet employment needs, including sites for Mid Tech, industrial, logistics and warehousing uses.	Greater Cambridge's identified employment land needs have been informed by evidence prepared in accordance with national planning policy and guidance. The development strategy and the wider approach to the development of employment land across Greater Cambridge, including the proposed site allocations, sets out an appropriate approach to meeting these needs in a way that balanced economic growth can be achieved. The requirement for the industrial and warehousing space 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. For logistics, the Councils' evidence identifies a need for warehousing meeting Cambridge market needs. The Plan's limit on warehousing unit sizes seeks to ensure that development meets this specific local need. 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. 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.
Green Belt	Concerns with the process and result of Grey and Green Belt evidence, and how this has informed the strategy, with comments suggesting that exceptional circumstances exist to release land from the Green Belt, related to the significant need for housing and affordable housing, the need to support economic growth, and to direct development to sustainable locations.	The Councils have carefully considered the approach to Green Belt in this Plan following national planning policy and national practice guidance requirements, drawing on up to date policy-compliant evidence, and taking into account the local Cambridge Green Belt purposes. Justifications for location-specific exceptional circumstances have been identified for the release of Green Belt land at Cambridge Biomedical Campus and at the Babraham Research Campus. However, outside of these location-specific circumstances, exceptional circumstances that justify further Green Belt release to

		meet general development needs have not been identified through the plan-making process. Further detail about this process is provided in the Proposed Submission Development Strategy Topic Paper, and in Appendix 4 and Appendix 8 of that Development Strategy Topic Paper.
Housing delivery	Comments suggesting that the housing delivery assumptions – build-out rates and lead-in times – need to be re-assessed. Comments also suggesting that housing delivery relies on large strategic sites that are subject to long lead-in times and transport infrastructure for which funding and timings are uncertain. Comments suggesting that the Councils cannot currently demonstrate a five-year supply, that the Councils should use the Sedgefield method and not the Liverpool method when calculating their five-year housing land supply, and that the buffer used should reflect the latest Housing Delivery Test results.	Noted. All the main issues raised in these comments have also been raised in the comments on Appendix D, and therefore the Councils' response to these comments is set out under Appendix D.
Reliance on windfall sites and neighbourhood planning to meet identified needs	Comments suggesting that the strategy is too reliant on windfall development (including in relation to meeting the NPPF small sites requirement) and neighbourhood planning to meet Greater Cambridge's housing needs, giving rise to delivery uncertainty.	Noted. The Housing Delivery Study – Addendum (June 2026) confirms that the recommendations in the Housing Delivery Study (October 2021 and October 2025) for the windfall allowance are realistic and reliable for use in plan-making in the Greater Cambridge area. The policies in the Greater Cambridge Local Plan do not seek to limit the delivery of windfall sites compared to current or previous policies, and therefore it is considered realistic that new homes will continue to be delivered on windfall sites.

		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. 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. 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. It would also likely result 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 in the Green Belt, and our development needs alone do not provide the exceptional circumstances required by national planning policy to remove land from the Green Belt in this Local Plan. National planning policy requires local plans to set out a housing requirement for designated neighbourhood areas, however, 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.

Growth and Greater Cambridge's water supply	Concerns that the Councils and the Water Scarcity Group have not provided sufficient certainty that there will be adequate water supply, and that the Plan relies heavily on major water projects with delivery risks.	The Councils recognise the significance of the water supply challenge in Greater Cambridge, which the Councils have considered in depth with all relevant national and local partners. 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 that accounts for the Local Plan's proposed growth. 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 that are external to plan making, water supply is not a barrier to delivering the level of development proposed in the Local Plan.
Growth and Greater Cambridge's wastewater infrastructure	Concerns that there is insufficient certainty that adequate wastewater infrastructure will be delivered to sustain proposed levels of growth.	The Councils have engaged with Anglian Water across all stages of plan making to ensure that wastewater treatment capacity has been a constant consideration as the development strategy evolved. Anglian Water have committed to exploring the measures needed to address short, medium and long-term development needs, including development identified by the emerging Greater Cambridge Local Plan. The Draft Statement of Common Ground highlights that all parties will continue to work together to ensure the necessary wastewater infrastructure is planned for and

		delivered in a timely manner to support planned development. Through the Draft Statement of Common Ground, it has also been agreed that, subject to appropriate infrastructure planning and funding being provided for the required need, wastewater treatment capacity does not represent a barrier to delivering the level of development proposed in the Local Plan.
Growth and Greater Cambridge's transport infrastructure	Concerns that the strategy is too reliant on uncertain transport schemes that are not supported by an adopted Combined Authority Transport Strategy.	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 (IDP) and in relevant allocation policies. The IDP also sets out phasing requirements and the funding position for each scheme. The final Greater Cambridge Transport Strategy (GCTS) published for approval by the Combined Authority Board in November 2026 supports all the strategic transport schemes required to deliver the strategic sites identified in the Local Plan development strategy, including solutions to address the connectivity needs of Cambridge City Centre. Many of the schemes have funding allocated and are progressing through the consenting process. The GCTS refers to future processes that will progress the further development of schemes that require further development. Proposed Submission Development Strategy topic paper - Appendix 10: Housing Trajectory for the Local

		Plan as informed by the Greater Cambridge Housing Delivery Study Addendum Update (2026) explains how a clear understanding of the project status and expected delivery timing of strategic transport schemes has informed a robust housing trajectory for allocations dependent on such schemes.
Growth and Greater Cambridge's historic character	Concerns that proposed growth will have significant harm on the area's special character, with some suggesting the Plan lacks environmental and spatial capacity testing for the city and immediate hinterland to establish clear parameters for building heights and landscape protection.	The Local Plan's vision and strategic priorities recognise the locally distinctive heritage and landscapes and unique character and identities of Cambridge and South Cambridgeshire. To ensure future growth respects the area's historic character, extensive Heritage Impact Assessment (HIA), Landscape Character Assessment, and Skyline and Tall Building assessment work has been prepared to inform the Local Plan's site allocations and relevant policy requirements in relation to building heights, site layout and appropriate mitigation. Moreover, decision making will be guided by the Development Plan's requirements in relation to the historic environment, as well as any national planning policy and guidance published by Historic England. Therefore, the Councils consider that the Local Plan, together with supporting strategies and guidance, provides an appropriate framework for preserving the historic environment as Greater Cambridge evolves.
Growth and Greater Cambridge's natural environment	Comments suggesting that the strategy does not sufficiently balance growth with the protection of the natural environment, and that some of the Plan's large-scale	The Local Plan is ambitious in seeking a significant uplift in the area's natural environment and is adequately supported by appropriate technical assessment.

	developments – notably Cambourne North and Grange Farm – will have significant impacts on their immediate natural surroundings and ecological assets.	The Local Plan's strategy is supported by policies in the Biodiversity and Green Spaces chapter, which seek to preserve and enhance the natural environment through biodiversity net gains, urban greening and open space enhancement, and development control measures within and around protected ecological sites. The Local Plan has also been supported by a Habitats Regulation Assessment (HRA), which assesses the impacts of the Greater Cambridge Local Plan on protected Habitats Sites. At submission stage, there will be no adverse effects on the integrity of Habitats Sites. The preparation of site allocations has been informed by the recommendations of the HRA, as well as wider green infrastructure strategies and any site-specific ecological appraisals that determine the likely impact of development on protected species and/or habitats. Where relevant, tailored ecological safeguards and requirements have been included in site allocation policies to ensure that appropriate mitigation can be secured ahead of or in tandem with the site's delivery, and to ensure that local ecological networks can be resilient to any in changes to the environment or visitor pressure. For details of specific site mitigation measures, please refer to the Site Allocations Topic Paper (2025) and the Site Allocations Topic Paper (2026)

Testing reasonable alternative strategies and site options	Support for the sequential approach to preferred locations for growth, but comments raised suggesting the evidence does not demonstrate it has been applied when selecting sites, with some questioning whether the Plan has sufficiently explored reasonable alternatives strategies and site allocations to meet local and regional needs.	The Proposed Submission Development Strategy Topic Paper explains how the plan-making process, including Sustainability Appraisal, has considered the merits of alternative strategies and site allocation options. It is considered that the development strategy set out in the local plan provides an appropriate strategy, which has taken into account the reasonable alternatives, and is based on proportionate evidence.
Collaboration and cross-boundary matters	Comments from neighbouring authorities agree the Statement of Common Ground reflects the matters that have been discussed with the Councils, that there are no unresolved cross-boundary issues, and confirm they have not been asked to meet any unmet general development needs for employment or housing. Uttlesford District Council asked Greater Cambridge to take some unmet need for Gypsy and Traveller pitches.	Acknowledgment of the collaboration between the Councils and neighbouring authorities and external bodies is welcomed. The requests for continued co-operation and engagement are also welcomed. The Greater Cambridge Proposed Submission Plan Draft Statement of Compliance evidences how the Councils have met national policy requirements in relation to maintaining effective cooperation. The Greater Cambridge Proposed Submission Plan Draft Statement of Common Ground provides a succinct record of key areas of common and uncommon ground with relevant partners on strategic cross-boundary matters. It explains that a number of Statements of Common Ground either have been agreed, or are in the process of being agreed, with relevant bodies. Further to this, the Councils have worked with relevant bodies to produce/update Statements of Common Ground for submission alongside the Local Plan.

		The Statement of Common Ground identifies that Greater Cambridge is meeting its development needs in full and has not asked any other authorities to take any unmet needs. No neighbouring authorities have asked Cambridge or South Cambridgeshire to take general development needs for employment or housing. This issue was raised for the first time through the Proposed Submission consultation; therefore, it is not practicable for the Councils to address this need at this late stage. In addition, Uttlesford District Council have not submitted evidence as to why the need cannot be met in their district and have not yet considered whether they can meet the identified need within their own district through a review of their development plan as required by Core Policy 60 in the Uttlesford Local Plan (adopted in March 2026). See more detail in relation to Policy H/GT.
Minor changes to the policy's wording, the supporting text and figures for clarity	Comments suggesting minor changes to the policy's wording, the figures, or the supporting text.	Noted. The Councils will consider and identify any minor modifications necessary for clarity.
Consistency with the National Planning Policy Framework (August 2026)	Comments suggesting amendments are made to the Local Plan to ensure consistency with the NPPF (August, 2026).	Noted. The Greater Cambridge Local Plan has been prepared under the legacy system (2012 regulations) and is therefore being assessed at Examination for compliance with the 2024 NPPF.

Policy S/SH: Settlement Hierarchy

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
S/SH	62	74	64	8	60

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for policy	Support for various settlement designations. Support of amended policy wording and ability to deliver development at varying scales across the hierarchy. The policy provides a clear structure for directing development and prevent speculative development in least sustainable places. Support for Towns as a distinct category and for Cambridge at top of the Hierarchy.	Support noted.

Policy approach - strategic	Policy approach is inconsistent with Para 77, NPPF 2024 and NPPF 2026. Greater weight should be given to the deliverability and sustainability of sites in suitable locations in Policy S/SH, such as rail-connected settlements with a mainline railway station, close to Cambridge and employment and sustainable transport have been undervalued. Assessing villages in isolation is contrary to Para 83, NPPF 2024. Policy has not been applied consistently in allocating strategic housing. Response regarding absence of an assessment of sustainable villages means the settlement hierarchy is applied rigidly rather than being evidence-led, with no consideration given to whether directing growth to sustainable villages could support the Local Plan's wider objectives. Policy directs excessive growth to new settlements. Amend policy to support allocation of Grey Belt and edge-of-settlement sites where well served by infrastructure, services and public transport.	Noted. Settlement Hierarchy policy forms one part of the development strategy, which has carefully considered the approach to directing development to sustainable locations, including considering reasonable alternatives and being based on proportionate evidence. National policy and the Local Plan including Policy S/SH directs growth to those settlements which can support most growth sustainably, provided that adequate services, facilities and infrastructure are available or can be made available as a result of the development. A strategy alternative including focusing development at villages was assessed and rejected as being unsustainable. Development sites proposed to the plan-making process at sustainable villages were considered for allocation individually. See Appendix 8 of the Proposed Submission Development Strategy Topic Paper. The development strategy seeks 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. Details about how grey belt was considered in the making of the Plan are set out in the Proposed Submission Development Strategy Topic

	Response requests capacity review of the sustainable settlements; is land available within the framework boundary. Responses proposing removing indicative maximum scheme size limits in order to boost the supply of homes, arguing that such limits are unjustified, inflexible and inconsistent with national policy. Policy limits growth in rural locations and smaller villages. Combined with the Development Strategy's site-selection methodology, lower tier village classification can exclude sustainable small sites from allocation consideration. The plan should provide a proportionate mechanism for sustainable small sites in lower tier villages to be considered on their individual merits (Para 63 and Para 65, NPPF 2024). Responses request amending indicative maximum scheme sizes; raising indicative maximum scheme sizes; adding Rural Centres to include indicative maximum scheme size.	Paper, and in Appendix 4 of the same Development Strategy Topic Paper. Rather than considering the capacity of each settlement, the Councils consider that the proposed Policy S/SH, in conjunction with other policies in the Plan, provides a clear policy framework informing an appropriate response to planning applications ensuring that they can be considered on their own merits. Maximum scheme sizes form one part of directing growth to sustainable locations as a part of the development strategy. Making the policy more flexible, such as by removing or increasing scheme size limits, would undermine the development strategy. Rural Centres are the largest and most sustainable villages in the hierarchy, after Cambridge and Towns, and as such the development strategy approach would direct development to these villages as being locations that can accommodate growth sustainably. The Councils do not consider it appropriate therefore to add an indicative maximum scheme size for such locations. The Greater Cambridge Local Plan has been prepared under the legacy system (2012 regulations) and is therefore being assessed at Examination for compliance with the 2024 NPPF.

	Conflict with the NPPF 2026, which supports sustainable development within settlement boundaries regardless of scale.	
Evidence base conclusions	Responses to the settlement categories within the hierarchy requesting positional changes, higher or lower, reflecting the role and function of the settlement and/or any proposed growth delivery. Responses regarding Group villages, category too broad; differences in population, infrastructure, housing need, constraints, demography and community	Noted. The categorisation of settlements in a particular hierarchy category within the Settlement Hierarchy Study 2025 is a matter of judgement, drawing on, but not being wholly defined by, the sustainability scoring. The scoring itself is based on a rounded assessment of services and facilities; the study scoring is robust and proportionate. The conclusion is based upon the current position and is considered to remain robust; change in available facilities arising through growth can be reflected in future plan reviews.

	capacity, allow higher levels of development where appropriate. Response regarding Minor rural centres, add 'Well Connected Minor Rural Centres' category, to prioritise the more sustainable settlements. Responses proposing alteration to settlement categorisations where a settlement deemed suitable to change tier re: scale, infrastructure, services or sustainability, and/or regarding two settlements as one.	The settlement categories reviewed through the Settlement Hierarchy Study 2025 were updated to include categories 'Cambridge' and 'Towns' at the top of the hierarchy; further changes were not deemed necessary. Further change arising through future change can be reflected in future plan reviews.
Evidence base approach	Policy ineffective relying on an update not representing a comprehensive assessment of settlement roles and inter-relationships. Councils' approach to village classification is too narrow, lacking appropriate assessment. Policy is not justified or effective regarding treatment of rural settlements. The evidence does not fully reflect how rural communities function across networks of neighbouring villages or how their sustainability can change over time.	Noted. 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 2025 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. The scoring itself is based on a rounded and transparent comparative assessment of services and facilities.

	Responses regarding settlement sustainability not demonstrated consistently; evidence does not provide a transparent comparative assessment between categories.	
Policy wording – infrastructure requirements	Policy unsound as infrastructure capacity requirements not applied consistently across categories.	Noted. The policy is clear that that adequate infrastructure must be available or can be made available for all settlement categories allowing development of more than two dwellings.
Policy wording - Development in the countryside	Policy should recognise that farmyards, no longer compatible with modern farming practices, could represent suitable sites for growth.	Noted. In the countryside, development is generally restricted to uses that need to be located there. The plan includes some flexibility for reusing existing buildings, for development which supports the rural economy, and for other uses which need a countryside location as stated within Policy S/DE: Defined development extents.
Policy scope - Employment	Policy omits reference to employment growth, update supporting text providing clarity on the relationship with employment land policies.	Noted. Policy S/SH relates to residential development. Policy S/DS, and policies within the Jobs chapter set out the Plan's approach to supporting employment.

Policy S/DE: Defined development extents

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
S/DE	41	47	35	7	33

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Policy support	Broad support for policy and its retention. Support for the flexibility within Part 2 and for requirement for necessary infrastructure within defined settlement extents.	Support noted.
Policy wording	Policy not providing a flexible mechanism to maintain current and defensible settlement boundaries. Policy is not flexible to allow unallocated development adjoining and beyond the settlement boundary	Noted. Policy S/DE identifies 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.

Outside settlements	Policy should recognise that farmyards, no longer compatible with modern farming practices, could represent suitable sites for growth.	Noted. In the countryside, development is generally restricted to uses that need to be located there. The plan includes some flexibility for reusing existing buildings, for development which supports the rural economy, and for other uses which need a countryside location as stated within Policy S/DE: Defined development extents.
Settlement edges	Sustainability Appraisal did not comparatively appraise a flexible settlement-edge approach affecting submitted sites.	Noted. The development strategy set out in the local plan provides an appropriate strategy, which has considered the reasonable alternatives, and is based on proportionate evidence. Sustainability Appraisal Appendix G explains that the Councils did not consider adopting a more flexible approach to settlement edges to be a reasonable alternative for appraisal, because it would not provide certainty regarding development proposals, could impact settlement character and would result in gradual expansion of settlements into the countryside.
Policy wording (National Planning Policy Framework)	Policy fails to meet the requirements of Para 73a (identifying small and medium sites) and Para 83 (the promotion of sustainable development in rural areas...where there are groups of smaller settlements, development in one village may support services in a village nearby.) of the NPPF 2024.	Noted. Policy S/DE plays a role in supporting delivery of the wider development strategy, and enables development working in combination with other policies. As such Policy S/DE's purpose is not to amend the Defined Development Extent to enable development of a site. Changes have therefore not been made to bring in land which does not meet the definition.

	Policy S/DE should seek to accord with Policy S5, S5(J)(i), S5(1)(h) and E3 of the NPPF 2026.	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 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. 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. 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. Additionally, through policy S/SH: Settlement Hierarchy the categorisation of settlements is reviewed within the Settlement Hierarchy Study 2025 as 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.

		The Greater Cambridge Local Plan has been prepared under the legacy system (2012 regulations) and is therefore being assessed at Examination for compliance with the 2024 NPPF.
Policy wording - suggested changes	Policy criterion (d) is ambiguous, needs clarity. Policy is overly restrictive with Part 2. Add wording to 2d “where development is supported by other policies in this plan or by national policy”.	Noted. The Councils consider that Point 2d is clear, noting that the plan must be read as a whole. Making the policy more flexible for land outside defined development extents would undermine the development strategy, which seeks to focus development on sustainable locations responding to evidence including in relation to climate change and transport All planning decisions must be considered against the development plan, with national policy always being a material consideration. The Councils will be led by the Planning Inspectorate as to any further modifications to the Local Plan.
Approach to boundary change	Methodology emphasis on completed development for boundary change, with the strategic filtering of sites and settlement hierarchy, risks creating self-reinforcing spatial outcomes.	Noted. The development strategy set out in the local plan provides an appropriate strategy, which has taken into account the reasonable alternative strategies and sites, and is based on proportionate evidence. As part of the development strategy one purpose of Policy S/DE is to direct growth to more sustainable locations of the area. Development, including allocations, unless largely completed, and have therefore reached sufficient certainty regarding their boundaries, will be left outside of the

	Allocations within the plan should be identified as being within the development extents boundary.	defined development extents. Boundaries can be reassessed through future plan review. Making the policy more flexible, such as by removing the principle that development must be largely completed before amending the boundary, would undermine the development strategy.
Boundary alignment	Boundary largely unchanged since the Local Plan 2004, requests full boundary review reflecting individual settlements.	Noted. Defined development extent boundaries have been reviewed through the emerging plan process. The approach is robust and up to date with the current extent of the built-up area of the settlement and where planning permissions have been largely completed. Further detail is found within the Proposed Submission Development Strategy Topic Paper Appendix 19 Settlement Boundaries Review (2026)
Boundary alignment – omission sites	Omission sites requests for inclusion, for reserve sites, and associated S/DE boundary changes to support inclusions.	Noted. The Proposed Submission Local Plan provides an appropriate strategy and allocations for meeting identified development needs and is sound. Further allocations are therefore not required in order to make the plan sound. Defined development extents are up to date with the current extent of the built-up area of the settlement and where planning permissions have been largely completed.

Boundary alignment	Villages' boundary extents mean housing and affordable housing needs are not met. No support for existing services and facilities, or the delivery facilities. Nor policy requests and community aspirations within Neighbourhood Plans. The Plan should allocate small scale village-edge sites in sustainable locations where no developable land is available within the DDE.	Noted. 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 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.
Boundary alignment	Boundary alignments are not logical, or defensible settlement edge and absent of an evidenced extent.	Noted. Defined development extents are up to date with the current extent of the built-up area of the settlement and where planning permissions have been largely completed. The approach is considered robust and further detail is found within Proposed Submission Development Strategy Topic Paper Appendix 19 Settlement Boundaries Review (2026)

Policy S/GB: The Cambridge Green Belt

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
S/GB	55	65	54	7	45

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for the policy and approach	Support for maintaining the Cambridge Green Belt and the policy's approach to the protection of Green Belt land, and for the continued application of the Cambridge Green Belt purposes set out in the policy.	Support noted.
Green Belt Assessment parcelling	The Green Belt parcel assessments are based on parcels that are too large and prevent granular assessment.	Noted. The Greater Cambridge Green Belt Assessment - Review following changes to National Policy and Guidance (2026) ("the 2026 Review") is consistent with national guidance in terms of its approach to parcelling. The PPG suggests that localised variations in contribution may suggest a need for smaller parcels in some areas than in others, and the 2026 Review's parcelling reflects this, with smaller parcels (down to a single hectare minimum size) around urban edges. This reflects an approach in which parcels were defined to capture identified variations in contribution, rather than being pre-defined only on the basis of selected physical boundary features, so where larger parcels have been defined it is

		because no significant variation in contribution has been identified.
The Green Belt Assessment is not sufficiently accurate and evidenced	Green Belt parcel assessments are not assessed by ground surveys, not informed by an understanding of local significance for particular assets within the Green Belt, and does not account for cumulative impacts of releasing Green Belt land.	Noted. The Greater Cambridge Green Belt Assessment (GCGBA) was updated in 2026 to account for changes in planning context in Greater Cambridge, as well as changes in national planning policy. The original 2021 GCGBA looked in detail at each parcel and considered the characteristics of the parcel to make the assessment of its contribution in relation to each of the Cambridge Green Belt purposes. Site visits were undertaken to inform the assessment where necessary. In addition, it identified a list of designations to be treated as 'absolute constraints' to development, land subject to which was excluded from the assessment process. The assessment is a strategic study, and the Councils remain of the view that such an approach takes account of local assets within the Green Belt in a proportionate way as appropriate to a study of this nature whilst aligning with the requirements set out by national planning policy. Only two sites were identified as being able to demonstrate exceptional circumstances for Green Belt boundary amendments: Cambridge Biomedical Campus and Babraham Research Campus. The small number of sites and distance between them would not lead to cumulative impacts or undermine the rest of the Green Belt. Further detail about this process is provided in the Proposed Submission Development Strategy Topic Paper (2026), and Appendix 4 of that Development Strategy Topic Paper.

Consistency with national Green Belt purposes	The assessment of Green Belt parcels and grey belt is based on the Cambridge Green Belt purposes and is inconsistent with the NPPF and NPPG.	Noted. The Greater Cambridge Green Belt Assessment - Review following changes to National Policy and Guidance (2026) ("the 2026 Review") upholds that the long-established Cambridge Green Belt purposes provide a locally-specific application of the NPPF Green Belt purposes, a stance that has been supported by the Inspectors of previous local plans. Cambridge has a Green Belt only because of its historic character, and the Cambridge Green Belt purposes are a locally specific application of NPPF Purpose D ('to preserve the setting and special character of historic towns'). The 2026 Review was produced to consider changes to national planning policy and guidance, including the introduction of "grey belt" as a planning consideration. The Study makes clear how the approach to Green Belt parcelling and the assessment of individual parcels in the previous Greater Cambridge Green Belt Assessment (2021) conform with national planning policy and guidance and how the results of this previous study were used to identify which Green Belt parcels are identified as grey belt.
Challenging grey belt conclusions	Specific Green Belt parcels should be reconsidered as "grey belt" or objecting to the classification of land outside villages as "grey belt".	Noted. The Councils consider that the Proposed Submission Local Plan has been supported by a robust assessment of the Cambridge Green Belt and the individual parcels. The Greater Cambridge Green Belt Assessment - Review following changes to National Policy and Guidance (2026) is guided by a methodology that aligns with national planning policy and guidance. Therefore, the Councils are content that the parcel assessments are robust and accurate.

Omission site should be allocated	An omission site should be allocated as it represents grey belt in Greater Cambridge.	Noted. In terms of comments received protecting or promoting particular sites in the Green Belt, the identification of suitable sites for allocation has followed a rigorous process that started with the HELAA. The HELAA took a 'policy off' approach to the Green Belt and considered the suitability of all sites presented to the Councils, regardless of whether they were in the Green Belt. From there, potentially suitable sites were considered for allocation as part of the preferred development strategy. Further detail about this process is provided in the Proposed Submission Development Strategy Topic Paper (2026), and in Appendix 4 and Appendix 8 of that Development Strategy Topic Paper.
Green Belt land needs to be released to support the development strategy	Exceptional circumstances exist for the development of Green Belt land in the Greater Cambridge area and suggesting that Green Belt release on the edge of Cambridge / villages is needed for more sustainable development.	Noted. Justifications for location-specific exceptional circumstances have been identified for the release of Green Belt land at Cambridge Biomedical Campus and at the Babraham Research Campus. However, outside of these location-specific circumstances, exceptional circumstances that justify further Green Belt release to meet general development needs have not been identified through the plan-making process. As such, changes in national Green Belt policy have not altered the Councils' position regarding the Local Plan's preferred development strategy, which is founded upon considerable evidence and technical assessment work. The Proposed Submission Development Strategy Topic Paper (2026)- Appendix 4 provides further information.
Wording of Policy S/GB - removing	Policy S/GB(1)(c) should be amended to refer to towns and not communities.	Noted. A significant contributor to Cambridge's historic character and setting is the necklace of villages that

reference to “communities”		surrounds the city. The Cambridge Green Belt purpose that refers to ‘communities’ (part 1c of the policy) refers to preventing this necklace of villages from merging into one another and with Cambridge as this would erode Cambridge’s special character. Therefore, acknowledging the function of the Cambridge Green Belt, the Councils do not consider it necessary to alter the policy’s approach or wording.
Grey belt and the development strategy	It is unclear how grey belt has been weighted to inform the Local Plan’s development strategy and approach to the site allocations, including a suggestion that “grey belt” should be mapped as part of the Policies Map for transparency.	Noted. The Councils have carefully considered the evidence and consultation feedback when preparing the approach to Green Belt in this Plan. Whilst the Greater Cambridge Green Belt Assessment - Review following changes to National Policy and Guidance (2026) has identified areas of grey belt in line with national planning policy and guidance, the Councils have not identified exceptional circumstances for general development needs that would justify the further release of Green Belt land beyond the site-specific instances at Babraham Research Campus and Cambridge Biomedical Campus. The role of grey belt only becomes relevant if such exceptional circumstances are demonstrated. As such, the identification of such areas within the Councils’ evidence has not altered our conclusions regarding the preferred development strategy. The suggestion to map grey belt land has been noted. There is no requirement in national policy or guidance for councils to show grey belt as a separate designation on the Policies Map/Proposals Map. Grey belt is not a planning designation in its own right and the identification of grey belt land does not, of itself, indicate that

		development would be appropriate. Whether development on Green Belt land should be considered acceptable depends on a range of considerations, including the need for development, the sustainability of the location and compliance with relevant national policy requirements. The Councils therefore do not consider it necessary or appropriate to identify grey belt areas on the Policies Map. Maps showing the extent of grey belt are provided clearly in the Greater Cambridge Green Belt Assessment - Review following changes to National Policy and Guidance (2026). Full details about how Green Belt and grey belt were considered in the making of the Plan are set out in the Proposed Submission Development Strategy Topic Paper (2026), and in Appendix 4 of that Development Strategy Topic Paper.

Policy S/MO: Monitoring

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/MO Monitoring	14	17	11	1	11

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for the policy	Support the principle of the monitoring policy.	Support noted.
Responsiveness to under delivery of homes	The Plan's ability to react to the under supply of homes is slow. The monitoring framework should be used to allocate reserve allocations to ensure housing supply can be met and delivery issues can be responded to quickly.	Noted. Sites cannot be allocated outside of the Local Plan process. The development strategy set out in the local plan provides an appropriate strategy, which has taken into account the reasonable alternative strategies and sites, and is based on proportionate evidence. It has been demonstrated that the Local Plan will deliver a five year housing land supply and a supply of homes to meet the identified housing need for the plan period. Additional allocations for housing are not required.
Reactive approach to monitoring	The proposed approach to monitoring is reactive and therefore prohibitive of an effective approach to accelerating housing supply or addressing deficiencies in wider delivery.	Noted. The process for reviewing the Local Plan through the monitoring framework is aligned with national guidance.
Parish Councils	Local communities and Parish Councils should be consulted in the monitoring and review of policies.	Noted. Local communities and Parish Councils will be consulted on future Local Plan reviews in line national planning policy and regulations.

Inability to monitor Tree Canopy Cover	The Cambridge Urban Forest Strategy commits to an increase in tree canopy cover and the Local Plan policy no longer aligns with this.	Noted. The Local Plan does not propose a tree canopy cover percentage policy requirement and therefore is not required to monitor it using the Monitoring Framework.
Business base rates	Business-rate receipts are not an appropriate formal Local Plan monitoring indicator, although wider economic monitoring by local authorities and the Combined Authority should continue to consider the health and growth of the business base.	Noted. Business rate receipts are not included in the proposed Monitoring Framework in Appendix E to the Local Plan.
Duty to co-operate	Duty to co-operate on cross boundary issues should be considered in the management of responses to a target not having been met.	Noted. The Councils will continue to fulfil their obligations to cooperate on strategic cross-boundary matters through ongoing engagement with relevant organisations, including discussing any unmet needs arising in other local authority areas.
Monitoring of Houses in Multiple Occupation (HMOs)	The policy's monitoring arrangements do not contain a meaningful trigger for HMO concentration or a meaningful review mechanism.	Noted. The monitoring of HMOs is complex as not all HMOs require planning permission and the licensing of HMOs is a separate process. The review mechanisms included in the monitoring framework are proportionate to the control that planning has over HMOs.

Consultation Statement

Summary of Representations and Councils' response - Cambridge Urban Area



Greater Cambridge Local Plan

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GREATER CAMBRIDGE
SHARED PLANNING

Cambridge Urban Area

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Cambridge Urban Area	0	0	0	0	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
No responses		

Policy S/C/LCR: Land at Clifton Road (including Cambridge Junction and Cambridge Leisure)

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
S/C/LCR	10	11	5	4	4

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for the allocation vision and policy requirements	Support for the redevelopment of the site, for the improvement of the Cambridge Junction to provide a regional facility, and	Support noted.

	for masterplanning requirements to secure cohesive redevelopment across the site.	
The capacity of the Cambridge Junction and on-site facilities	Comments stating the Plan should propose an increase in public covered space and community spaces (e.g. a community centre) for recreation that is not linked to a commercial/paid-for activity, as well as an increase to the capacity of the Cambridge Junction.	Comments noted. The policy recognises the need and opportunity for enhancements to the Cambridge Junction to be brought forward as part of the site-wide redevelopment. During decision making, Policy S/C/LCR will be applied alongside the Local Plan's requirements for new community facilities as set out in the Wellbeing and Social Inclusion chapter, as well as the Local Plan's requirements for developer contributions set out in Policy I/ID.
Masterplanning and landownership	Concerns that the policy's detailed masterplanning, transport, infrastructure, employment and design requirements will delay development and constrain the ability of individual land interests to come forward.	Given the site's importance as a gateway to and from the city, providing opportunities for additional jobs, homes and upgraded regional facilities close to one of Greater Cambridge's most sustainable transport hubs, the Councils consider it necessary for the site to be designed and planned for in a cohesive and comprehensive way. The policy's masterplanning and design requirements have been set out to ensure that the various planning considerations and regionally important opportunities are not planned for in a piecemeal fashion.
Building heights	Concerns raised regarding the lack of exact building height thresholds within the policy wording.	Comments duly noted. Where feasible and practicable, the Councils have sought to integrate the recommendations of all evidence base documents, including the Heritage Impact Assessment, into the creation of site allocation policies. In some cases, this has required a balanced approach to policymaking to

		appropriately account for the various overlapping planning considerations. In the case of Land at Clifton Road, it was considered that a degree of flexibility in the approach to building heights was needed in order to allow masterplanning and decision making to balance the opportunities for jobs, homes and upgraded regional facilities close to one of Greater Cambridge's most sustainable transport hubs with the need to preserve the city's character and national policy requirements to make the most efficient use of land. During decision making, Policy S/C/LCR will be applied alongside the Local Plan's heritage safeguarding and design policies set out within the Great Places chapter, as well as any national planning policy and guidance that concern the historic environment. Further justification for the Councils' approach to the policy wording and supporting text can be found in the Site Allocations Topic Paper (2025) and Site Allocations Topic Paper (2026). Should they be considered necessary, the Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination process.
Site capacity testing	Representations suggesting that detailed capacity studies are needed to demonstrate how the retention of existing commercial uses can be delivered alongside the vision for the site without compromising Cambridge's character.	Noted. The policy notes the sustainable location of the site and supports the intensification of uses and quantum of development. This will need to be carefully balanced against on-site, local and strategic constraints through a future planning application process. The Built Form section of the policy provides appropriate and clear

		wording on how this should be considered through a future masterplan.
Changes to the policy's wording, the supporting text and figures	Comments suggesting changes to the policy wording or figures.	Noted. Should they be considered necessary, the Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination process.

Policy S/C/SMS: Garages at St Matthews Street and Norfolk Street

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/SMS: Garages at St Matthews Street and Norfolk Street	1	1	0	0	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcomes the changes made to policy wording.	Noted.

Policy S/C/HTR: 137-143 Histon Road

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/HTR: 137-143 Histon Road	2	2	0	1	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	CIP are in support of the policy.	Support noted.
Heritage	Historic England welcomes the changes to the policy.	Noted.

Policy S/C/HGH: Henry Giles House, 73-79 Chesterton Road

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/HGH: Henry Giles House, 73-79	2	2	2	0	1

Chesterton Road					

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcomes the changes made to the policy, minor wording modification proposed for a more detailed Heritage Impact Assessment.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination.
Capacity	CIP suggest that the capacity should be increased to 95 dwellings.	Noted, wording was added in point g of the policy to indicate the potential for an increase in capacity subject to further assessment. The rationale for the approximate capacity is set out in Appendix A of the Sites Topic Paper (2026).

Policy S/C/HRC: Horizon Resource Centre, 285 Coldham's Lane

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/HRC: Horizon Resource Centre, 285 Coldham's Lane	1	1	0	1	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	CIP support for the allocation with no modifications required.	Support noted.

Policy S/C/PDC: Cambridge Professional Development Centre, Foster Road

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/PDC: Cambridge Professional Development Centre, Foster Road	4	4	2	0	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Overdevelopment	Concerns raised for overdevelopment on the site, including about densities.	Noted. A HIA has been undertaken for this site and the recommendations included in the policy wording, including the impact of the building heights on the existing buildings and local character.
Heritage	Historic England have no further comments.	Noted.
Environmental concerns	Concerns raised about impact on water supplies, chalk aquifers and wildlife corridors.	Noted. The policy wording includes the need for a landscape buffer which would provide some protection for wildlife. This policy should be read alongside the Local Plan as a whole which will ensure that the environmental impacts are reduced from the development and the phasing of the development considers the availability of water supply.
Increase in capacity	Cambridgeshire County Council as the landowners have suggested an increase the capacity from 40 homes to 67 homes.	Noted. The approximate capacity has been calculated on the basis of the local character and impact on heritage assets. The rationale for the capacity is set out in Appendix A of the Sites Topic Paper.
Decrease in capacity	Concerns raised about the calculation of the capacity and impacts on ecology and proposes that the capacity should be reduced.	Noted. The site was assessed through the HELAA to understand impacts on ecology and was further assessed in the Sustainability Appraisal against the sustainability indicators, which include ecology and biodiversity impacts. The rationale for the capacity is set out in Appendix A of the Sites Topic Paper.

Policy S/C/PPS: Police Station, Parkside

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/PPS: Police Station, Parkside	2	2	2	0	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcome the changes made to the policy, minor wording modification proposed relating to requirement for a more detailed HIA.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Supportive of principles	Supportive of principles of allocation, requirements and boundary.	Noted.
Minor wording modifications	The landowner the Police and Crime Commissioner for Cambridgeshire suggests 50 homes is not a maximum, that co-living could be appropriate onsite and minor clarifications.	Noted. The rationale for the capacity is set out in Appendix A of the Sites Topic Paper. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.

Policy S/C/NCA: North Cambridge Academy, 108 Arbury Road

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/NCA: North Cambridge Academy, 108 Arbury Road	5	5	3	1	3

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Cambridgeshire County Council as the landowner support for the policy with no amendments.	Support noted.
Heritage	Historic England welcomes the preparation of a HIA and the changes made to policy wording.	Noted.
Loss of playing fields	The loss of play space should be replaced with equivalent or better provision.	Noted. The Local Plan should be read as a whole. Policy BG/PO provides policy guidance.
Density	Concerns raised about density of the site is lower than other live schemes, and the number of storeys in this location in the context of Arbury Court which is a lot higher.	Noted, a HIA has been prepared to develop suggested mitigations for the impact on character and heritage assets in this location, and this building height has been assessed as appropriate in this location.

Need for swimming pool	Concerns raised about lack of swimming pools in Cambridge, and suggest this could be an alternative to proposed tennis courts onsite.	Noted, the provision for swimming pools in Cambridge is being reviewed with proposals for new swimming pools as set out in the Swimming Pool Delivery Strategy.
School capacity	Concerns raised about loss of capacity at Secondary School level due to the change of use of the site.	Noted. The Councils' have been working alongside Cambridgeshire County Council to understand the demand for school places and future trends. This has informed the Infrastructure Delivery Plan which sets out requirements for new school provision.

Policy S/C/ER: 1-99 Ekin Road and 1-8 Ekin Walk

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/ER: 1-99 Ekin Road and 1-8 Ekin Walk	2	2	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcomes the preparation of a HIA and the changes made to policy wording.	Noted.
Policy requirements	CIP as the landowner have suggested some amendments to policy wording and	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in

	site boundary to reflect their ownership and vision for the site.	the examination, should the opportunity arise, noting that the site recently gained planning approval.

Policy S/C/DR: 2-28 Davy Road and Garage Blocks

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/DR: 2-28 Davy Road and Garage Blocks	2	2	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcomes the preparation of a HIA.	Noted.
Capacity	Capacity should be increased to 77 homes.	Noted. The figure does not differ significantly from the approximate capacity in the plan. The rationale for the approximate capacity is set out in Appendix A of the Sites Topic Paper (2026).
Tree removal	Amend policy part a to allow for justified tree removals through an Arboricultural Impact Assessment.	Noted, justification for removal of specific trees would need to be made at the planning application stage.

Policy S/C/HPC: 1-78 Hanover Court, 1-49 Princess Court and Garage at Newtown Garages

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/HPC: 1-78 Hanover Court, 1-49 Princess Court and Garage at Newtown Garages	2	2	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcomes the changes to the policy and welcome preparation of the HIA.	Noted.
Modifications for requirements	Suggested modifications to relating to trees, removal of a desk based archaeological assessment and issues around the management of the substation.	Noted. The policy wording is written in a way that requirements already fulfilled by a planning application on a site still remain, to ensure that any future applications adhere to the same standards. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.

Tree removal	Amend policy part a to allow for justified tree removals through an Arboricultural Impact Assessment.	Noted. Noted, justification for removal of specific trees would need to be made at the planning application stage.

Policy S/C/GER: Former Garage Block, East Road

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/GER: Former Garage Block, East Road	1	1	0	0	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcomes the changes to the policy and welcome preparation of the HIA.	Noted.

Policy S/C/SH: 1-33 Stanton House, Christchurch Street

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/SH: 1-33 Stanton House, Christchurch Street	2	2	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcomes the changes to the policy wording and the preparation of a HIA.	Noted.
Capacity	CIP as the landowner suggest that the capacity should be 32 homes not 34 making a difference of 4 units.	Noted. The capacity has been calculated on the basis of the local character and impact on heritage assets. The rationale for the capacity is set out in Appendix A of the Sites Topic Paper.

Policy S/C/MRG: Milton Road Garages

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/MRG: Milton Road Garages	3	3	1	1	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Policy wording	Site owner supports allocation of the site, but seeks correction to a number of policy points, and to add flexibility to the proposed uses.	Noted. The policy is clear that the quantum of development set out are approximate. This, alongside the mix of uses, will need to be carefully considered through a future planning application process, where development proposals will need balance the site's sustainable location against on-site and adjacent site constraints. This is consistent with the design related policies in the Great Places chapter of the Local Plan. In relation to the comment regarding overlooking and daylight and sunlight impacts and hectarage of the site area, the Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Odour	Anglian Water agrees with the supporting text that the policy must be considered in conjunction with Policy AMC/NEC and the	Support noted.

	need to ensure proposals are compatible with the location.	
Heritage	Historic England welcome reference to local context, contextually appropriate materials and skyline.	Noted.

Policy S/C/SCL: Land South of Coldham's Lane, Cambridge

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/SCL: Land South of Coldham's Lane, Cambridge	2	2	2	0	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England considers that the strategic views from Lime Kiln Road (E) and also from Worts Causeway (J) are also likely to be affected. Therefore, these should also be referenced in the policy.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise. The HIA has been reviewed to assess which viewpoints are likely to be affected.
Contamination	Concerns raised about public health in relation to contamination.	Noted. Point g of the policy sets out that contamination issues need mitigation. The Local Plan should be read as

		a whole. Policy WS/HS: Pollution, health and safety ensures that development manages impacts on environmental health, including pollution and contamination.

Policy S/C/BRN: Land at Barnwell Road and Newmarket Road

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/BRN: Land at Barnwell Road and Newmarket Road	1	3	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcomes the preparation of the HIA.	Noted.
Re-provision of sports provision	Sport England notes that the policy requires re-provision of the bowls club; and re-provision of the Multi-Use Games Area, policy should specify it should be of an equivalent or better quality.	Noted. That would be consistent with Policy WS/CF: Community, sports, and leisure facilities. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.

Building heights	CIP request removal of references to 2 or 3 storeys in part 3 as taller heights have been agreed for our Barnwell Road development, which is higher than surrounding areas.	Noted. This is a recommendation from the HIA and has therefore been added into policy as a mitigation to minimise impacts on local character. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Tree removal	Modify wording to allow tree removal if required for the development.	Noted. Noted, justification for removal of specific trees would need to be made at the planning application stage.

Policy S/C/TRP: Travis Perkins, Devonshire Road

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/TRP: Travis Perkins, Devonshire Road	1	1	0	0	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcome the preparation of a HIA.	Noted.

Policy S/C/OPK: Parcel Com4, Orchard Park

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/OPK: Parcel Com4, Orchard Park	2	2	0	0	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Uses	Support subject to minor revisions to be more accurate and flexible.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Loss of play space	Sport England recommends that the policy is modified to explicitly acknowledge the loss of playing field and identify how that loss will be appropriately addressed through replacement or other mitigation, informed by the identified needs within the Playing Pitch Strategy.	Noted. Parcel Com4 has consistently been identified as a development parcel since orchard park was allocated. Its relationship with the adjoining openspace was addressed at the planning application stage when consent was granted in 2024 for an apart hotel.

Policy S/C/BFS: Brookfields

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/BFS: Brookfields	1	1	0	0	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcomes criterion 1a, 1b and 1c.	Noted.

Policy S/C/SRW: Station Road West

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/SRW: Station Road West	4	4	1	1	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Support for active travel amendments.	Support noted.
Heritage	Historic England welcomes the changes to the policy wording and preparation of a HIA.	Noted.
Capacity, boundary and uses	Concern that the policy sets a fixed quantum of development based on a previous planning permission, which could unduly constrain the development opportunity. It also doesn't reflect potential range of uses. Building heights, and reference to not having negative impact on viewpoint E are also overly prescriptive.	Noted. The approximate capacity reflects the planning permission for the site granted in 2024, which addressed issues including parking reprovision. The references to heights and views respond to evidence accompanying the local plan.
Site boundary	Land within the site allocation boundary is needed for the delivery of EWR. Boundary should also be amended to remove railway track area.	Noted. A modification to the policies map would be supported if the inspector considers necessary for soundness.

Policy S/C/BJH: Betjeman House, Hills Road (Botanic House)

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/BJH: Betjeman House, Hills	2	2	1	0	1

Road (Botanic House)					

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcomes the changes to the policy wording and preparation of a HIA.	Noted.
Contributions to Emergency Services	Requirement for developer funded contributions towards police and fire and rescue infrastructure/ facilities should be referenced in the policy.	Noted. Potential requirement for developer contributions for emergency services is addressed by Policy I/ID. It is not necessary to reference this general requirement in site allocation policies.

Policy S/C/OPM: Old Press/Mill Lane

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/OPM: Old Press/Mill Lane	4	4	4	0	4

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Capacity	Object to change in capacity and exclusions for Class E uses	Noted. The capacity was changed to reflect the permissions that have been built out.
Relevance to policy	Removal of points 1b, 1c, 1d and 1e as not relevant to the policy.	Noted. This is an error in web version of the plan, the pdf version is correct. Part b references the potential for archaeological remains on the site which must be addressed at the planning application stage, part c that proposals should take reasonable opportunities to introduce active frontages at ground floor level, and part d the need for site specific Flood Risk Assessment.
Heritage	Historic England considers that the wording is amended for heritage assets onsite as a factual correction.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.

Policy S/C/NMD: New Museums, Downing Street

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/NMD: New Museums, Downing Street	2	2	0	1	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	The University as the landowner supports the helpful changes to the policy wording and the allocation in full.	Support noted.
Heritage	Historic England welcomes the changes made to policy wording.	Noted.

Policy Areas in Cambridge Urban Area

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy Areas in Cambridge Urban Area	0	0	0	0	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
No responses		

Policy S/PA/CC: City Centre

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/PA/CC: City Centre	2	2	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcomes criterion 1c and 1d.	Support noted.
Market	Cambridge Market should be 7 days a week and provide a traditional market and fresh local produce.	Noted. This is outside the remit of the Local Plan.

Policy S/C/AMC: Cambridge Areas of Major Change

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/C/AMC:	5	5	3	1	3

Cambridge Areas of Major Change					

Theme of Representations	**Summary of Main Issues Raised in Representations**	**Councils' Response to Representations**
Support	Support for Policy S/C/AMC from Anglian Water as it secures necessary infrastructure for Areas of Major Change. Historic England welcomes criterion 4.	Support noted.
Approach to delivery	Policy S/C/AMC imposes overly prescriptive and unjustified requirements for implementation plans, masterplans and phasing strategies. A more proportionate approach is needed to delivery. Imposes unnecessary and duplicative requirements that could undermine the delivery and viability of development within Cambridge's Areas of Major Change.	As stated in the local plan these are key locations which require a comprehensive approach to development and renewal through an implementation plan, over-arching framework or equivalent masterplan to guide their transformation in a joined-up manner.

Policy S/AMC/NEC: North East Cambridge Area of Major Change

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/AMC/NEC: North East Cambridge Area of Major Change	27	34	22	6	20

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for policy	Support for change of approach to AMC.	Support noted
Concerns with policy	Objection to the change from site allocation to policy framework, loss of housing and requirement for other strategic sites to compensate for reduced housing delivery during the plan period. Concern policy too long, complex and prescriptive, creating barriers to delivery and flexibility; policy requirements are onerous for smaller scale developments.	The change to an Area of Major Change is in recognition that Cambridge Waste Water Treatment Works (CWWTW) is unlikely to come forward for redevelopment over the plan period. Odour from the CWWTW is a significant constraint to residential provision on land surrounding the CWWTW. A policy framework is therefore considered sufficient to coordinate further proposals that come forward across the NEC area.
Housing trajectory	Housing trajectory counting homes at NEC is not effective; overstatement of supply will	The housing provision within NEC includes that already consented as well as the current planning application for Cambridge Business Park, where both respective

	expose villages to speculative development at appeal.	developers have indicated their intention to build out the housing.
Waste Water Treatment Works (WWTW)	AW supports policy principles and confirms intention to invest in WWTW. Support for retaining WWTW in situ. Fails to evidence potential for WWTW consolidation and elimination of odours to enable housing. Misleading to refer to preferred vision based on relocating WWTW when it is undeliverable, focus on optimisation with WWTW in situ. Misapplies M&W Policy 16 by applying an exclusion zone, need for plan-led co-funded programme of odour reduction at source.	The Councils maintain their long-term ambition to see the Cambridge Waste Water Treatment Plant (CWWTP) relocated to realise comprehensive redeveloped of the NEC area but recognise this may not be possible within the current plan period. Anglian Water are responsible for identifying how future wastewater treatment needs can be met at the CWWTW. Further work is being undertaken through the DWMP to identify appropriate, deliverable options to expand the capacity of the site to meet plan needs - this may involve consolidation of operations, however to be determined through the DWMP process, and any measures must be capable of being funded and delivered. The policy has been prepared on the basis of the evidence available at the present time, therefore the odour zone associated with the CWWTW would be a relevant consideration when determining the acceptability of a planning application at NEC. The odour zone may be subject to subsequent review dependent on the outcome of the DWMP process.
Employment	Support for supporting innovation and removal of upper limit on commercial floorspace. Support provision of affordable workspace but comment on the need to take account of viability, market demand, existing occupier requirements and delivery	Support is noted. The Councils consider the policy as drafted is robust.

	mechanisms. Minor edits proposed to improve clarity.	
Transport	Support for the updated transport position statement, reviewed in light of WWTW remaining in situ.	Support noted
Transport impacts	Concerns with the fixed trip budget, the lack of active travel links to the north and east, displaced parking in Milton. Concern the evidence does not address impact on SRN, or assess and mitigate cumulative impacts on rural routes.	Application of the trip budget, alongside the package of transport mitigation measure, are intended to manage the cumulative impacts arising from planned growth across NEC on the local and strategic road network. The policy requires monitoring to ensure these are effective.
Fen Road	Concerns with excessive HGV movements and need for alternative access.	Noted. Fen Road, and access to Fen Road, sits outside of the NEC policy area.
Rail infrastructure	Reflect operational railway and infrastructure requirements; land is identified for new railway infrastructure and a Maintenance Delivery Unit (MDU).	The safeguarding order for East West Rail is identified on the map accompanying the NEC Area of Change and aligns with the safeguarded aggregates railhead and rail sidings.
Public Rights Of Way	Protect and enhance connections to the wider PROW, ensure no severance or unsafe interfaces, accommodate widest practicable range of users.	The Infrastructure Delivery Plan includes details of the transport mitigation measures for NEC including securing connection to PROWs along the Cam River and new greenways.
Infrastructure	NEC is dependent on significant infrastructure interventions and funding that are unresolved, lack of secondary school provision, require developer funding to mitigate and manage impacts on Blue Light Partners service capacity.	The level of residential development now anticipated in Nort East Cambridge over the plan period does not warrant provision of significant on-site social infrastructure. The needs of new residential use are best meet through improvements to facilities in neighbouring areas, utilising the significant improvements in public transport accessibility and active travel routes that are to be secured.
Green infrastructure	Milton Country Park cannot support additional use.	The level of residential development now anticpated across NEC over the plan period is unlikely to place significant demands on Milton Country Park.

Heritage	Important to protect historic assets and their and the City's setting. Concern about building heights and protecting views from north-east and east.	Development capacities, including building heights, have been informed by a detailed landscape character and visual impact assessment and a heritage impact assessment.
Historic England	Historic England welcomes the allocation of the site and appreciate that the site has reduced to exclude parts of WWTW. The HIA prepared for this site should be published. Concerns raised about there being no reference to strategic views/setting of city and potential impacts heights on heritage assets etc despite the specific references to height increases.	Noted. The HIA has been published.
Landscape	Evidence relies on mature riverside vegetation screening views, but recognises willows are regularly pollarded but lacks assessment once pollarded.	The Landscape Character and Visual Impact Assessment notes that views into NEC are partly screened and filtered by mature trees and lower shrub species growing on the north side of the River Cam. However, the study notes that the hotel and Cambridge North Station, along with the consented office buildings reduce the effects of views further into the site as viewed from the east side of the River Cam.
Flood risk	Policy should refer to the need to adopt a sequential approach, prioritising the location of more vulnerable development outside areas at risk of fluvial and surface water flooding, and require FRA.	The developable area is totally within the Environment Agency's Flood Zone 1, and the area is at the lowest risk of fluvial flooding. However, there is a risk of pluvial flooding, and Exception Test was undertaken. It was deemed that the flood risk was able to be mitigated against, but individual proposals should be accompanied by a site-specific flood risk assessment. A cross-reference to Policy CC/FM(5) could therefore be helpfully included.

Policy S/AMC/AS: Abbey Stadium Area of Major Change

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/AMC/AS: Abbey Stadium Area of Major Change	4	4	1	2	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Sport England support the requirement that the stadium should meet standards of the Football Association.	Support noted.
Transport impacts	Comments made in relation to transport impacts and single access to the site.	Noted. At the Regulation 18 stage, the policy was updated to reflect the need for transport mitigation and congestion management.
Heritage	Historic England suggested minor wording modification relating to heritage requirements to reflect best practice.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Cambridge United Football Club	Cambridge United Football made representations asking for a larger stadium to increase capacity and improve match day. Plan should acknowledge future potential relocation of the club.	Noted. The Area of Major Change is designed to support the use of the stadium in a way that manages impacts on local residents and all users.

S/AMC/BC: Beehive Centre Area of Major Change

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
S/AMC/BC: Beehive Centre Area of Major Change	8	8	5	1	4

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Network Rail supports the strategic objectives and delivery of the Cambridge East Station, particularly the proposed eastern entrance. Historic England welcome the changes to the policy wording.	Support noted.
East West Rail (EWR)	EWR Co has identified that a small area of land within the Beehive Centre site is required for access to the railway to facilitate construction and operation of EWR, and this is included in the EWR safeguarded area.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Retain retail	Retail uses are needed in this location and are well used.	A mix of uses is proposed in this location to diversify the offer and increase amount of floorspace and create more jobs and support the wider development of the Cambridge Economy. Planning permission for redevelopment of the

	Concern proposals do not respond to local needs.	site was granted by the Secretary of State in December 2025. The Local Plan is supported by retail needs evidence, and considers retail provision for the city.
Car parking	Concerns about being overly restrictive about car parking.	In this accessible city location the level of carparking must respond to the mix of public transport and active travel opportunities available, to support sustainable development.
Uses	The policy fails to reflect physical constraints on connectivity and does not adequately acknowledge the Secretary of State's December 2025 permission for comprehensive redevelopment of the Beehive Centre.	This policy sets out the Councils' vision for this site, and sets an appropriate policy framework for the consideration of future proposals.

S/AMC/EB: East Barnwell Area of Major Change

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
S/AMC/EB: East Barnwell Area of Major Change	1	1	0	1	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Sport England	Sport England notes that planning permission 23/04687/FUL has been granted for redevelopment of the site. This should be referenced in policy wording.	Noted.

S/AMC/FBG: Fitzroy/Burleigh Street/Grafton Area of Major Change

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
S/AMC/FBG: Fitzroy/Burleigh Street/Grafton Area of Major Change	2	2	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcomes changes made to policy wording.	Noted.
Policy is overly prescriptive	The policy is overly prescriptive and should give greater support should be given to intensification, taller buildings and flexibility of town centre uses to maximise the regeneration potential of the Grafton Area and help address viability pressures arising	It is important the policy provides clear guidance for this part of the city undergoing significant change, and secures opportunities for enhancements to the public realm.

	from cumulative policy requirements to ensure that development in the area is deliverable and able to contribute to the vision of the Local Plan. The policy should reflect the permission at the Grafton Centre.	

S/AMC/SCL: South of Coldham's Lane Area of Major Change

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
S/AMC/SCL: South of Coldham's Lane Area of Major Change	4	5	2	1	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Network Rail strongly supports the strategic objectives and delivery of East West Rail. East West Rail Company supports the allocation and safeguarding of Cambridge East Station within the Area of Major Change.	Support noted.

	Historic England welcome the changes made to policy wording.	
Proposed Cambridge East Station	Policy should recognise that the proposed station at Cambridge East is a step change in public transport connectivity to the site and wider East Cambridge. The policy should be amended to reflect uncertainty around station location.	The policy recognises the opportunities provided by a Cambridge East Railway station, and the need for comprehensive masterplanning.
Area 4	Area 4 Cambridge East Station, 2.e is ineffective as there is no demonstration of either sustainable movement or public transport accessibility, either within the plan area or external to the plan area needed to provide connectivity to it.	This is a policy area indicating the potential land uses and key issues relating to the site, the development of a strategy to manage sustainable movement and public transport will be iterated with any future planning applications or masterplans.
Water management	Anglian Water have raised concerns about surface water risk management and provision of SUDs.	Noted. The Local Plan should be read as a whole. Policy CC/IM sets out how water should be managed in development utilising SUDs.

Policy S/PRIA: Public Realm Improvement Areas (PRIA) in Cambridge

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/PRIA: Public Realm Improvement Areas (PRIA) in Cambridge	3	3	2	0	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcomes the general aims of the policy and the changes made to the policy.	Noted.
Sustainable Drainage Systems (SuDS)	The public realm improvement areas should also offer the opportunity to achieve betterment in terms of surface water risk management, through provision of sustainable drainage systems (SuDS). This should be made explicit in the policy wording.	The Local Plan should be read as a whole. Policy CC/IM sets out how water should be managed in development utilising SUDs.
Approach to Public Realm Improvement Areas (PRIA)	Critical of the requirement for a Framework Document and modifications suggested to make a more practical and flexible policy.	A Framework Document is designed to support collaboration between landowners and stakeholders to deliver the outcomes of the PRIA.

Policy S/PRIA/CRP: Cambridge Retail Park

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/PRIA/CRP: Cambridge Retail Park	3	3	2	0	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcomes the changes to the policy wording.	Noted.
Overarching development and environmental strategy framework	Critical of rigid requirement for an Overarching development and environmental strategy framework, and instead asks for a steering document. Concerns raised about generic asks in the policy which undermines having a clear strategy and direction for the site. There are some asks that are not in the developers gift.	The policy area reflects the vision for the site to overcome challenges around the railway line dividing the site up and explore opportunities to connect both sides of the retail park. The wording is in some places more qualitative because of the nature of the allocation as a policy area for improving the public realm, as opposed to a direction for all uses on the site and a quantum of development.
Retail use	Supportive of retail use as it is.	Noted. The use of Cambridge Retail Park as a retail park is starting to see some changes in use and a diversification to include other uses, this supports a more effective use of land and also a more positive experience for people using the space. Leisure and community uses alongside retail are encouraged and the site could benefit from a reconfiguration to provide additional floorspace for more businesses.
Car usage	Critical of potential for discouraging car use at a location where cars are necessary to transport shopping.	Noted. Car parking is one of many types of transport mode promoted on this site to support a proposed range of uses to make efficient use of space to create a more positive experience for people in the public realm. Proposals must also respond to the sites context, and the availability of active and public transport to access the site.

Policy S/PRIA/EG: Eastern Gate

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/PRIA/EG: Eastern Gate	28	28	2	15	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Impact on community	Support for the policy in the Plan on the grounds that a nearby omission site that scored Red in the HELAA and has been refused for planning permission five times remains unallocated.	Noted. St Matthews Centre, Sturton Street, was identified in previous HELAA assessments but not allocated in either the Draft Local Plan or Proposed Submission Local Plan.
Northern boundary	The policy cannot be achieved with the current northern boundary as the improvements to the public realm should consider the whole surrounding area and should be extended as far as the River Cam.	Noted. The boundary of the policy area was amended in the Proposed Submission to reflect the boundary identified as opportunity for improvement within The Under Pass Project as put forward in representations received at the draft Local Plan stage. The boundary considers the appropriate distance to improve the public realm, amenities and landscape but does not prevent other improvements happening outside of the PRIA.
Heritage	Historic England suggests that the policy should include more reference to the historic environment and nearby heritage assets either for mitigation or enhancement.	Noted. The policy includes reference to nearby heritage assets including Scheduled Ancient Monument. The Councils are open to modifications being recommended

		by the Inspector at the appropriate point in the examination, should the opportunity arise.

Policy S/PRIA/HRRS: Hills Road and Regent Street Corridor

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/PRIA/HRRS: Hills Road and Regent Street Corridor	3	3	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Allocations	Include reference to the Site of 82-90 Hills Road as one of the allocated sites able to deliver the identified improvements within the corridor.	This site is not an allocation in the Proposed Submission Local Plan.
Active travel	Could larger pavements and the reduction of street clutter include an increased provision of benches for the public? Could alterative options for cycling routes between Hills Road / the station / the leisure centre be found?	Noted. These specific interventions could be examples of appropriate measures that align with the PRIA vision, however further modelling is required to be undertaken to understand feasibility and this would be completed during the development management process.

Heritage	Historic England welcome changes made to policy.	Noted.

Policy S/PRIA/MC: Mitcham's Corner

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/PRIA/MC: Mitcham's Corner	5	5	4	0	4

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Vehicle movements	Delete paras 4a and 4b, as smooth flow of traffic should be maintained until more sustainable options are implemented. Do not make this junction harder to get around by car.	The policy reflects the need to manage transport in this area and improved the user experience, particularly for active travel.
Active travel	Policy should be strengthened to place active travel at the heart of the vision for Mitcham's Corner. Development should be required to prioritise walking, wheeling and cycling over private car use and demonstrate how it will contribute to modal shift, reduced congestion and improved air quality.	The policy wording emphasises the need for a focus on the pedestrian experience and not that of vehicles.

Supplementary guidance	Part 4 bars any major planning application until the planning authority has approved an unidentified "development framework document". The policy does not say what this document is, who prepares it or by when. It should also say that, until it is adopted, applications will be determined on their merits.	A Development Framework Document is designed to support collaboration between landowners and stakeholders to deliver the outcomes of the PRIA.
Heritage	Historic England welcome changes made to policy.	Noted.

Policy S/PRIA/MR: Mill Road

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/PRIA/MR: Mill Road	7	8	3	2	3

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
General support	General support for improvement of the public realm.	Support noted.
Connectivity	Bus Gate on the Mill Road bridge should be removed and plans to further change the nature and use of the Mill Road deferred until a more sustainable transport network has been implemented.	Noted, the PRIA establishes the vision for the area and what the principles are for improving the public realm and what issues need to be considered. As the policy wording states, development proposals will deliver a series of coordinated streetscape and public realm improvements.

		Further modelling and assessment are needed to specific the detail of projects that would achieve this.
Connectivity	The area covered by the policy should be extended eastward to cover Brookfields and Burnside, thereby reaching the major active travel routes of the Tins Path and the Snakey Path, and allowing the area to be planned holistically.	The PRIA establishes the vision for the area and what the principles are for improving the public realm and what issues need to be considered, and focuses on the core Mill Road area.
Walking	Residential function of Mill Road is not referenced They are serviced by very narrow pavements and volumes of traffic that are increasing. Policy should explicitly seek wider, unobstructed pavements and safer cycling along the road, not only at junctions. It should specify the standards that should be attained by pavement improvements, for example by deferring to the Cambridgeshire Active Travel Toolkit.	Noted, the policy seeks measures to help improve the public realm for all users.
Building heights	Restricting building height (for new builds or refurbishments) is necessary to maintain the distinctiveness of Mill Road, but it is not referenced.	A Heritage Impact Assessment has been developed to support this site and the relevant recommendations have been included in the policy wording.
Heritage	Historic England consider policy should more explicitly reference relevant heritage assets.	Noted, the Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.

Policy S/PRIA/OPML: Old Press/Mill Lane

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/PRIA/OPML: Old Press/Mill Lane	3	3	3	0	3

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England consider criteria should be expanded to reflect highly sensitive location in terms of heritage.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Public realm	Object to strands b) and c) which do not relate to public realm improvements. We also object to Strand d) as a public space should be one of a range of possible approaches explored not a specific requirement. Strand g) should be re-worded to make public realm enhancement and improved accessibility an aspiration not a requirement as it is not entirely within the gift of the site developer.	The policy provides appropriate guidance for development proposals in this important area. The re-use of buildings contributes to the legibility of a place which is part of the experience of a place which contributes to a good public realm.
Demolition	Explicitly Safeguard the Mill Pond Mill/Warehouse Building. Clarify that the creation of public open space and public realm improvements “must be achieved	The Local Plan should be read a whole, there are policies on the protection of designate and undesignated heritage assets.

	through the retention, integration, and repurposing of existing historic structures", explicitly ruling out the demolition of the Mill Pond warehouse/mill building for open space provision.	

Consultation Statement

Summary of Representations and Councils' response - Edge of Cambridge



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan Regulation 22 Consultation Statement (November 2026)

GREATER CAMBRIDGE
SHARED PLANNING

Edge of Cambridge

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Edge of Cambridge	3	3	2	0	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Mapping error	Figure 52 Map of proposed allocations and areas of major change on the edge of Cambridge does not identify site S/AMC/NEC (North East Cambridge Area of Major Change).	Noted. North East Cambridge Area of Major Change has been moved to the Cambridge Urban Area.
Cumulative impacts	The cumulative impact of development needs to be considered in terms of effects on rural communities, infrastructure provision and development needs.	Noted. The cumulative impact of development, including the timely provision of supporting infrastructure has been addressed in the Greater Cambridge Infrastructure Delivery Plan. Noting these requirements as well as more broad policies relating to other development needs across the Local Plan, this will be addressed through subsequent planning applications.
Infrastructure	Each of the draft site allocations should make clear reference to the IDP either in	Noted. Where relevant, particularly for the strategic allocations, the site specific items from the Greater

	policy or in supporting paragraphs or linked to relevant policies within the Local Plan.	Cambridge Infrastructure Delivery Plan have been set out within the supporting text to the policy.
Health provision	It is essential that the ICB and wider NHS partners have the flexibility to decide the most appropriate form of healthcare infrastructure mitigation at the point the sites come forward.	Noted. Engagement with service providers is noted in Policy I/ID: Infrastructure and delivery.

Policy S/CE: Cambridge East

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/CE: Cambridge East	38	39	18	4	14

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	General support for the principles of the policy including the biodiversity and greening aspects and for the proposal of a 50 metre Swimming Pool.	Supported noted.
Site capacity	Capacity should be treated as a minimum; allow flexibility for higher housing growth and accelerated delivery where infrastructure constraints can be alleviated	Noted. The capacity for the site has been subject to sensitivity testing and is a robust figure to include in the plan. It is stated as an approximate figure to allow

		flexibility for when issues are explored in greater detail at the planning application stage.
Land uses	Policy overly prescriptive, allow flexibility for masterplanning to determine most appropriate mix of uses	Noted. The proposed mixed uses development co-locates employment and residential uses with community and cultural infrastructure to
Swimming pool	Recommendations for suggested inclusion of a 50 metre swimming pool at least 2 metres deep, to enable aquatic sports such as waterpolo.	Noted. The need for sports infrastructure is identified in the Swimming Pool Delivery Strategy.
Heritage	Broad support for the policy and HIA, with minor amendments suggested to reflect the HIA recommendations and for clarity of interpretation.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Green belt corridor	The boundaries and extent of development should be determined through the masterplanning process, and the Green Belt corridor land does not fulfil the purposes of the Green Belt as set out in the NPPF. The policy should therefore focus on maintaining or enhancing the corridor's strategic function rather than prescribing fixed boundaries or requiring additional widening elsewhere if the alignment evolves through the masterplanning process.	Noted. The proposed site boundary is designed to protect the Green Belt, to maintain the green connections to Coldham's Common and protect the separation with Teversham and other nearby settlements. The supporting text to the policy recognises the need for a masterplan-led approach to determining the Green Belt boundary and extent of development in a way that is in conformity with national policy. Ahead of such a masterplanning exercise it would not be justified to alter the boundaries in this location. The supporting text is clear that any change to Green Belt boundaries at this location should maintain or enhance function of the Green Belt, and that if the masterplan

		resulted in development encroaching on the current Green Belt corridor, this may result in a requirement for additional widening of the corridor elsewhere in order to maintain that function.
Green infrastructure	Need connections to GI outside the area, including to Wicken Fen Vision. Cambridge East AAP included a country park	Noted. The Local Plan should be read as a whole, there are policies under Biodiversity and Green Spaces which require major residential development to provide accessible greenspace, play space and food growing spaces. The GI Strategy identifies the areas in need of further green infrastructure, and this includes reference to Wicken Fen Vision.
Transport impacts	Support for additional detail on mitigation measures, updated IDP and interim GCTS. Allow flexibility noting planning application will be informed by site specific transport strategy. Concern the evidence does not address potential impacts on SRN. Concern regarding bus permeability.	Noted. The Councils' will continue to work with National Highways and the Highways Authority to engage on the wider transport strategy.
Contributions to Emergency Services	Requirement for developer funded contributions towards police and fire and rescue infrastructure/ facilities should be referenced in the policy.	Noted. Potential requirement for developer contributions for emergency services is addressed by Policy I/ID. It is not necessary to reference this general requirement in site allocation policies.
Rail	Concern relating to the environmental impacts of routing more diesel rail freight along Newmarket line. Concern that prematurely fixing the station location and delegating design to rail industry bodies	Noted. Some of the matters referenced are matters for the East West Rail project rather than the local plan. The airport site is capable of being developed.

	ahead of masterplanning is contrary to NPPF principles.	
Water	Support requirement for early engagement with AW, but more is needed on low-sustainable water management, and to require a foul drainage strategy.	Noted. Policy S/CE should be read alongside Policy CC/WE and Policy CC/IW which sets out further requirements for water efficiency and management of water to ensure efficient supply and demand of water. The development at Cambridge East is also scheduled to commence in 2032 when the water infrastructure is in place to provide water for the new development.
Lifespan	Objection to placebook and masterplanning requirements which fail to understand how the site will be planned and delivered. Include viability provisions.	Noted. This approach is standard across all of the strategic sites to ensure there is a clear design led approach.
Infrastructure	Would welcome addition of a commitment to consult neighbouring local authorities on infrastructure provision. Minor amendments sought to support coordinated approach to delivery of healthcare infrastructure.	Noted. The Councils' will continue to engage with local stakeholders to deliver healthcare infrastructure.
Sports infrastructure	Cambridge East should allocate land for the re-location of the Cambridge United Stadium.	Noted. The policy does not prohibit that coming forward. Any mitigations and management of additional traffic and people would need to be considered in the master planning process.
Co-Operation	Commitment to consult West Suffolk Council at the master planning and planning application stages.	Noted. The request for continued co-operation and engagement is welcomed.
Specialist accommodation	Concerns raised about that references to specific facilities and a fixed requirement for	Noted. This requirement is consistent across all of the strategic sites. Development proposals should have

	10% specialist housing were overly prescriptive at this stage and should instead be guided by up-to-date evidence of need, market demand and placemaking considerations over the long-term build-out of the site.	regard to the Local Plan evidence base which considers the needs of a wide range of groups, and the relevant Supported Housing Strategy, which the Councils are required to prepare to meet the Supported Housing (Regulatory Oversight) Act 2023. The policy applies to a wide range of specialist housing which could fall under use classes C2 or C3, and also that most other forms of specialist supported accommodation (other than housing for older people) are likely to be considered as affordable housing. Therefore, the approach is considered to be appropriate and reasonable.
Viability	In the absence of any substantive change in circumstance that would justify a departure from the AAP approach, Hill consider it appropriate that the relevant viability provisions are carried forward into the Regulation 19 policy.	Noted. The Cambridge East Area Action Plan was adopted in 2008. The approach to viability onsite is consistent with the approach to other strategic sites included within the Plan.
Cambridge Growth Company	There should flexibility in the capacity noting the potential for accelerated delivery. The policy wording should greater reflect the opportunities that the new East West rail station offers.	Noted. The capacity for the site has been subject to sensitivity testing and is a robust figure to include in the plan. It is stated as an approximate figure to allow flexibility for when issues are explored in greater detail at the planning application stage. The policy wording provides positive and appropriate support for integrating the opportunity provided by Cambridge East station.
Masterplanning	The policy requirements for masterplanning donotalign with the intentions of the landowners. It is entirely inappropriate to	Noted. It is not the intention of the policy to require the agreement of a masterplan ahead of the submission of any planning application. Rather, masterplanning should

	produce a masterplan that will be agreed with the Council, ahead of any planning application, and for that masterplan to guide future applications.	be understood as an ongoing process encompassing visioning, placemaking, spatial planning, community engagement and participation, alongside technical design development. It would therefore be entirely appropriate to initiate a masterplanning process to explore the capacity and potential of Cambridge East, establish a shared vision for its future and understand its role as a new district within Cambridge. Such an approach should involve a wide range of stakeholders and, crucially, both local and wider communities. This is consistent with the approach taken for Cambridge Southern Fringe and with good practice in the planning and delivery of major developments that have a significant role in shaping places. This approach is entirely consistent with accepted good practice. It provides an opportunity to demonstrate a genuine commitment to proactive planning, meaningful engagement and the long-term stewardship and custodianship of what will become a significant new district for Cambridge.

Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital)

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital)	26	110	102	4	33

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Phasing of development	Ambition for continued growth of the Campus is supported, however, the policy should clearly distinguish between Phase 1 (developed and operational), Phases 3 and 4 (undeveloped).	Noted. The policy sets out that the campus should be planned and delivered comprehensively. Distinguishing the quantum of development for separate phases of development does not support this objective. Additionally, the policy is considered to be sufficiently flexible to enable matters of detail to be addressed at the planning application stage.
Quantum of development	The policy, whilst trying to establish the broad parameters of the development of the campus, should not be overly prescriptive in terms of use or quantum of development. If	Noted. The policy is considered to be sufficiently flexible to enable matters of detail to be addressed at the planning application stage.

	a level of prescription is to remain, then this must not lead to additional constraints on healthcare development.	
Quantum of development	Change to quantum and uses required to 650,000 net square metres for additional biomedical, biotechnology and life sciences research and development, related commercial uses, medical research, higher education, training and retention of health related skills and talent. Distinguishing between different uses within part 9c of the policy would make it clearer and easier to apply.	Noted. The policy approach seeks to provide sufficient flexibility without being overly prescriptive. A subsequent masterplanning process, as required by the policy, and subsequent reserved matters applications would define the appropriate quantum of development for specific land uses and individual development plots.
Estimated need for Campus growth	The estimated demands of the Campus to deliver clinical care, clinical education and clinical research have not been reassessed to appropriately allocate land for development in the Green Belt.	Noted. The forecast growth of the campus and the redevelopment of existing parcels of land have been carefully considered during the preparation of the policy and through extensive engagement with the landowners and other relevant campus stakeholders. Based on the latest evidence, the quantum of development is considered to be robust and deliverable, whilst the case for releasing land from the Green Belt for the 'Phase 4' land, has been adequately justified by the councils.
Support for expansion of the Campus	Support for the expansion of the Campus for cluster companies in the tech sector and life sciences. The Campus will continue to evolve as a globally significant centre anchored by three leading NHS teaching	Support noted.

	hospitals (Addenbrooke's, the Rosie and Royal Papworth).	
Land uses	There is an imperative to make efficient use of the land (reflecting Chapter 11 of the 2024 NPPF). Development must optimise developable land within the Campus.	Noted. This is consistent with the policy approach.
Housing provision	It is recommended that 1,300 homes be allowed to give greater flexibility on the type of housing that is likely to be delivered on the Campus.	Noted. The policy outlines approximately 1,000 new homes for the site. This is based on the latest evidence regarding land that will be available for this use during the plan period. The policy is therefore considered to be robust and deliverable. However, the policy is worded flexibly for this to be refined through future planning applications.
Green Belt release	The Submission and associated evidence base does not justify the exceptional circumstances for the land to be released from the Green Belt. The level of harm should be Very High, not High.	Noted. The councils are of the view that the evidence set out to support the plan is considered to be robust, proportionate and consistent with national planning policy in terms of demonstrating exceptional circumstances to amend the Green Belt.
Green Belt release	GCDC requests a minor amendment to the Green Belt boundary to remove the land that would be required for the delivery of a new junction that would be essential to enable delivery of a viable site access to development land on the Biomedical Campus.	Noted. The boundary is based on evidence considered during the plan making process. At this stage, there is no alternative scheme for this junction presented to justify an alternative Green Belt boundary.
Place book	There is a lack of clarity on what is intended for the site wide Place book. There should	Noted. Whilst this is explained in paragraph 3.2.28 and 3.2.29 of the plan, the Councils are open to modifications

	be clear wording either in site specific policies, or elsewhere in the plan, to provide a clear definition and set out the strategic principles and outcomes rather than being an overly fixed detailed control document.	being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Masterplan requirement	The mechanism for agreeing the masterplan is somewhat subjective. The use of the word 'input' does not do justice to the need for effective joint working across landowners and occupiers. CUH suggest amending the wording such that the masterplan should be "co-produced by all existing landowners and with input from major occupiers". A design-led approach must be set out to optimise developable land and align with the Spatial Framework and/or agreed Masterplan ahead of any strategically significant applications coming forward.	Noted. The policy seeks to ensure that the preparation of the masterplan and transport mitigation plan is undertaken collaboratively between the landowners and other relevant stakeholders. The councils are of the view that this is clearly expressed in the policy wording and paragraph 3.2.33 of the Supporting Information. The councils agree that a design led approach is required, as set out in the policy.
Building heights	Need for clarity of building heights in the policy wording. As it stands, it does not seem sound to not specify heights of new buildings coming forward in phases 3 and 4, particularly around the existing residential development.	Noted. The plan does not set specific development heights but notes that building design, including heights, scale and massing, need to respond to local sensitivities including neighbouring communities and local/strategic views. This is set out in 16(d) of the policy.

Operational needs of the Campus	CUH are supportive of this policy and consider that the operational needs of the existing hospital should be an absolute priority. However, following discussions with other landowners it has been agreed that the wording should be amended to avoid 'unacceptable impacts' to ensure consistency with the NPPF.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Landowner engagement	Support that a range of matters need to be addressed before Phases 3 and 4 are brought forward. There is desire for landowners to work collaboratively to co-develop the masterplan.	Support noted.
Landowner engagement	There is no joined up approach by the different landowners and communication with local residents is sporadic and often not offered at all.	Noted. The policy requires a collaborative approach to the growth of the existing and expanded campus and for community engagement through the planning application/masterplan process, set out in a Community Engagement Strategy.
Strategic approach to nature connectivity	The allocation should be revised to reflect the strategic approach to delivering the priorities of the Cambridge Nature Network and Local Nature Recovery Strategy.	Noted. The site-specific policy is broadly consistent with these plans/strategies. Additionally, Policy BG/BG: Biodiversity and geodiversity sets out that development proposals must deliver measures which align with those identified in the Cambridgeshire and Peterborough Local Nature Recovery Strategy and therefore it is not repeated in this policy.
Green infrastructure	Green infrastructure adjacent to the campus is important to provide significant	Noted, this is consistent with the policy approach.

	landscape buffering and public open space for users.	
Green infrastructure	References to a specific pocket park should be removed to avoid implying greater importance than other green infrastructure.	Noted. The policy does not identify that this green asset is of greater importance than others but identify this asset to ensure a comprehensive and joined up approach is taken to proposals relating to the SEA and Landscape Improvement Area.
Wildlife and biodiversity	The release of Green Belt land will further increase pressures on threatened species including farmland birds. Policy must stress the need to enhance biodiversity and secure longer-term protection for farmland wildlife.	Noted. The policy and wider plan requires a range of biodiversity protection and mitigation measures, including for farmland birds in this area.
Biodiversity requirements	Amendments are suggested for consistency with Policy BG/EO, which identifies on-site provision as the preferred approach.	Noted. The development plan should be read as a whole and therefore the councils do not believe it is necessary to repeat other policies of the plan.
Landscape Improvement Area	It needs to be made clearer what the LIA covers that is separate from the SEA to prevent confusion.	Noted. This is set out in section 19 of the policy.
Landscape Improvement Area	The reference to LVIA and a Heritage Impact Assessment is unnecessary. Amendments are proposed to allow the scope and level of detail of future submissions to be determined having regard to the stage of development and the applicant's requirements.	Noted. The councils have undertaken a range of evidence studies in order to support the Local Plan and this has been reflected in the relevant policies. The plan, read as a whole, provides a criteria based approach for tall and/or bulkier buildings and how these need to respond to site specific considerations. Therefore, the councils believe that this policy and the wider Local Plan provide sufficient

		flexibility for these matters to be considered and tested at the planning application stage.
Strategic Enhancement Area	It needs to be made clearer what the SEA covers. The list of considerations listed in part c. of the policy is too prescriptive. It is also not clear how the Campus will contribute towards the SEA.	Noted. The policy sets a clear vision for the SEA and section 18 sets out further policy criteria for the design and implementation of the SEA. These criteria are site specific to the Campus and will achieve good ecological outcomes alongside a significant quantum of growth.
Strategic Enhancement Area	Support for the identification of the SEA and appropriate delivery of landscape, ecological and other enhancement objectives.	Support noted.
Magog Down and countryside approaches	CUH support the aspirations of this policy but consider that there is a need to recognise that any development on the CBC site will be visible from surrounding areas such as Magog Down and wider countryside approaches.	Noted. The policy notes this and, in combination with Policy GP/ST: Skyline and tall buildings, sets out a clear and robust approach for how development will need to address local sensitives.
Magog Down and views	The enhancement of views will not always be possible or appropriate in every circumstance. The policy should require development to retain key views and seek enhancement where this can be achieved through a design-led approach.	Noted. The policy notes this and, in combination with Policy GP/ST: Skyline and tall buildings, sets out a clear and robust approach for how development will need to address local sensitives.
Heritage assets	Historic England welcomes the preparation of the Heritage Impact Assessment. It is recommended that the Nine Wells Monument listed structure and the	Noted. It is not considered necessary for the SEA to be expanded to include local heritage assets. The policy is clear on the role and purpose of the SEA to support the expansion of the Campus, whilst the heritage related

	scheduled monument are brought into the SEA to enable positive enhancement of heritage assets.	policies in the Great Places chapter provide sufficient policy measures for the protection and enhancement of heritage assets more generally.
Heritage assets	To ensure that the policy is effective and not overly prescriptive, amendments are proposed to avoid requiring enhancement in every circumstance for the setting of designated locally listed heritage assets including the Listed Monument at Nine Wells and Scheduled Monument west of White Hill Farm.	Noted. Policy GP/ND: Non-Designated Heritage Assets outlines that development proposals need to consider non-designated assets and their setting. The site allocation policy identifies site specific assets which will need to be taken into account through future planning applications. It is therefore appropriate for the policy to be consistent with other parts of the plan.
Sustainable retrofit	There are circumstances where demolition may deliver benefits that outweigh carbon savings. By necessity, the hospital will need to provide operational buildings, therefore, policy should be amended to reflect this and align with policy CC/CE.	Noted. Future applications of this nature will need to be considered against all relevant policies of the plan, including Policy CC/CE: Supporting a circular economy and sustainable resource use.
Location of helipad	A temporary location is required, ahead of a permanent on campus helideck as part of the renewal of Addenbrooke's Hospital. This could be within the SEA or LIA and the policy should be amended to accommodate delivery.	Noted. The policy does not preclude a development proposal of this nature coming forward in these locations and these would need to be considered at the planning application stage on their own merits.
Anti-social behaviour and community safety	Need to consider safety, access and prevention of anti-social behaviour that will greatly impact on existing and future residents, particularly in the public spaces	Noted. This is addressed in the policy at part 20(b) and wider policies in the Greater Places chapter.

	between buildings that are not monitored or managed by landowners appropriately.	
Community uses and amenities	Could development provide more amenities for convenience shopping. The nearest store is within the hospital, or you have to get a bus or drive to a superstore.	Noted. The policy broadly supports this type of use within the campus, as set out in section 10.
Ancillary and supporting uses	The policy should distinguish between ancillary and supporting uses such as small-scale retail and leisure (supporting uses) and facilities related to the operation of clinical and research and development uses (ancillary).	Noted. As set out in the policy, the development of the campus requires a comprehensive approach and for this to be agreed through a Place Book and masterplan. It is important that new services and facilities are well distributed across the campus to ensure people visiting, working and living on the campus have safe and convenient access to them. It is therefore not necessary or supportive of the wider policy approach, for these to be distinguished between the different phases of development and/or land uses.
Access from Red Cross and Greenlands	The transition point from Red Cross and Greenlands has historically generated anti-social behaviour and danger from parking vehicles. A five-bar gate will mitigate issues whilst still allowing pedestrian access.	Noted. As set out in the policy, a transport strategy is required to support the on-going development of the campus. This would need to consider existing campus access issues and involve community input.
Active travel and connectivity	The policy should secure a safeguarded land and infrastructure delivery for a coherent and connected countryside-access network around the Campus for equestrian use, contributing to active travel and the wider Public Rights of Way.	Noted. Both the main campus area, SEA and Landscape Improvement Area require improved connectivity and linkages to the wider movement network. This will need to form part of the preparation for both the site wide masterplan and transport strategy for the campus.

Pedestrian and cycle improvements	There may be some opportunities for small scale improvements for pedestrian and cycle movements east to west, but the ambition to realise a public transport and active travel link through the site is not deliverable in the near term, with delivery most likely outside of this plan period. Wording should be amended to identify this as a longer-term aspiration.	Noted. The complexity of achieving this is noted in the supporting information at paragraph 3.2.40. Nevertheless, this longer term aspiration should still form part of the masterplan for the campus to ensure it is safeguarded/not prejudiced by short/medium term development.
Transport and connectivity	There is no vehicular access from Babraham Road and connection off Granhams Road does not appear to be a road access, therefore, traffic will continue to increase and cause congestion.	Noted. Part 22 (d) (iv) of the policy sets out that the new southern access road is multi-modal in order to relieve congestion on surrounding roads.
Transport and connectivity	The proposal to realign Granham's Road to provide a southern access is flawed as it does not provide mechanisms to stop unauthorised drivers, therefore contributing to traffic levels. A robust and effective system is required to enforce the prohibition of driving with only entry from public transport, blue lights vehicles and blue badge holders.	Noted. The requirement for an ANPR system is set out in the policy, whilst part 31(e) of the policy requires enforceable mechanisms to be funded and delivered as part of the infrastructure delivery plan.
Transport mitigation	A co-developed (all key landowners and major occupiers) strategic and local transport mitigation plan will be co-developed must be prepared by the	Noted. The policy requires a coordinated approach to the growth of the Campus and section 22(c)(i) sets out that in relation to transport, this needs to be agreed by the Local Planning Authority and the Local Highways Authority.

	applicants for Phases 3 or 4 for agreement with the Local Highways Authority and Local Planning Authority.	
Transport infrastructure	The transport baseline assumptions and reliance on unconsented infrastructure are flawed. Clause 22c should be replaced with a requirement for flexible, deliverable contributions towards verified sustainable transport and highway network mitigation along established corridors.	Noted. The transport evidence prepared to support the Local Plan as well as the CBC prepared CBC Transport Strategy identify that in order for the campus to grow and expand, CSET is required as part of a package of transport measures. Therefore, it is appropriate to identify this in the policy.
Cambridge South East Transport	The policy should make clear that the Campus should contribute towards the delivery of CSET Phase 2, rather than implying that it is solely responsible for its delivery. CSET is a strategic transport scheme which will support a wider area and will necessarily be funded and delivered through a combination of sources.	Noted. The policy in part 22 (c) is clear that the campus must facilitate the CSET scheme, through a combination of direct delivery, enabling works and financial contributions. It does not state that the campus must deliver the scheme in full.
Trip budget	The evidence base is not sufficiently resolved to include an indicative trip budget for the Campus, so the figure should be removed from the policy.	Noted. The trip budget approach is considered to be sound and is therefore noted in the policy. However, the figure for the trip budget is within the supporting information as it may require further refinement during the plan period and therefore the councils consider it to be appropriate for it to be stated outside of the policy.
Trip budget	It is unclear whether it applies to further development and the proposed wording confirms that such development is to be	Noted. The trip budget applies to the whole campus, rather than specific phases.

	assessed on the basis of its own highway outcomes.	
Innovative water management	Anglian Water support requirements for innovative water management including sustainable drainage, water reuse and natural systems to address flood risk, foul drainage and sewage disposal.	Support noted.
Water demand and supply	Water demand for uses in large commercial buildings have not been addressed.	Noted. As set out in the Local Plan, policy CC/WE, BREEAM water credits are being applied to all non-residential development.
Sewage pumping station	Amendment should provide greater flexibility to allow for development that could preclude operation and maintenance of existing sewer pumping stations.	Noted. Sewage pumping stations are important infrastructure and therefore the councils consider it to be essential that development does not preclude the operation and maintenance of these stations.
Safeguarded land	The site area includes a safeguarded Waste Management Area for the Energy Innovation Centre that includes the construction of underground tunnels that should be considered in design of the Campus.	Noted. This is addressed through Policy I/SI: Safeguarding important infrastructure and therefore not repeated in this policy. Development affecting safeguarded areas should involve engagement with the relevant bodies/statutory undertakers/organisations.
Safeguarded land	EWR Co supports the principle of development and expansion of the Campus and has identified that small areas of land within the Campus are required to deliver its proposals in the area (including EWR safeguarded area).	Noted. The EWR safeguarded area is noted on the Local Plan Policies Map.

Contributions to Emergency Services	Requirement for developer funded contributions towards police and fire and rescue infrastructure/ facilities should be referenced in the policy.	Noted. Potential requirement for developer contributions for emergency services is addressed by Policy I/ID. It is not necessary to reference this general requirement in site allocation policies.
Adverse impacts and operational needs	The policy should refer to mitigation of unacceptable adverse impacts such as noise, transport, lighting and access from ground-floor, rather than implying that any adverse impact on surrounding communities would be unacceptable.	Noted. The policy notes that the operational needs of the NHS and institutional facilities are essential elements of the campus but that adverse impacts from these facilities should be addressed. Whilst this can relate to noise and other sources of pollution, it can also include other matters, such as anti-social behaviour. Therefore, the policy is worded appropriately to cover a wide range of possible issues.
Infrastructure delivery	Developers must be required to contribute financially to hospital provision.	Noted. This type of developer contribution would be captured through a legal agreement and/or CIL contribution and could apply across the Greater Cambridge area.
Infrastructure delivery	Contributions to placemaking improvements from major proposals should be delivered through financial contributions or through works delivered as part of the development itself.	Noted. This is broadly consistent with the approach for both the policy and wider Local Plan and would be secured through a legal agreement.
Infrastructure delivery	Anglian Water supports the IDP and approach that enables early engagement on infrastructure delivery, phasing and network connections.	Support noted.
Infrastructure delivery plan	The infrastructure delivery plan is premature and too prescriptive at this	Noted. The councils are required to prepare an Infrastructure Delivery Plan to support the Local Plan and

	stage. Requirements should be tailored to development phasing and viability, avoiding formulaic requirements and should be determined through the masterplan and infrastructure planning process.	it is considered to be robust and proportionate for the purposes of plan making.
Infrastructure delivery strategy	An agreed Infrastructure Delivery Strategy, funded and delivered through enforceable mechanisms, is necessary for the policy to be effective. This should be agreed and also clearly demonstrate that the necessary infrastructure is capable of being funded for delivery.	Noted. This is consistent with the broad requirements set out in the policy, as set out in the Resources section.
Phasing of delivery	As mitigation and enhancement requirements will evolve alongside development proposals, the timing of delivery should be responsive to development impacts, evidence of need, land availability and practical delivery considerations. The policy should therefore avoid implying a fixed sequence of delivery between the identified areas.	Noted. The Local Plan has been based on a wide range of evidence studies and extensive engagement with the landowners of the Campus. It is considered to be robust and propionate for plan making. Nevertheless, future Local Plan reviews will need to consider delivery rates and the provision of site wide and strategic infrastructure to ensure the policy remains robust and effective.
Delivery of other policies in the Plan	It is recommended to amend wording to make clear where requirements from other policies relate to the Campus (particularly requirements from policies WS/IO (Employment and Skills Plan) and J/AW (Affordable workspace).	Noted. The development plan should be read as a whole and therefore policies from across the plan will potentially apply to development proposals across the campus, depending on the nature of the scheme.

Map inconsistencies	The colours on the map in Figure 54 do not match the colours in the legend.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.

Policy S/ED: Eddington

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
S/ED	7	7	6	1	6

Theme of Representations	**Summary of Main Issues Raised in Representations**	**Councils' Response to Representations**
Support	Support for the policies masterplanning requirements and the allowance for early engagement between developers and infrastructure partners.	Support noted.
Active travel	The allocation presents an opportunity to deliver bridleway connections and equestrian upgrades. It is requested that infrastructure is safeguarded through Phase 2 masterplanning, delivery and proportionate developer contributions.	Comments duly noted. The Local Plan's wider requirements for enhancements to the active travel network, including equestrian routes, are set out in Policy I/ST, whilst developer contribution requirements are set out in Policy I/ID. During decision making, Policy S/ED will be applied alongside all other relevant requirements of the Development Plan, as well as any national planning policy and guidance. Therefore, the suggested changes to Policy S/ED are not considered necessary.
Existing planning history	Modifications requested to ensure the policy is consistent with existing planning permissions for the site and does not introduce any new requirements.	Comments duly noted. The preparation of Policy S/EC has been prepared in recognition of the consented development for Phase 1; at the time of the policy's finalisation for the Proposed Submission Local Plan, planning permission had not been granted for future phases of Eddington. Nevertheless, the policy has been prepared to ensure that site-wide development, including

		any future development or redevelopment within the allocation area, reflects the needs and character of the area across the plan period whilst recognising the existing planning history. Further justification for the Councils' approach to the policy wording and supporting text can be found in the Site Allocations Topic Paper (2025) and Site Allocations Topic Paper (2026). At time of writing the phase 2 application has been approved subject to a Section 106 agreement being prepared. Should they be considered necessary, the Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination process.
Building heights	Concerns about the references to taller than five residential storeys in criterion 5a. Reference to height should either be in line with the recommendations of the HIA or omitted from the policy wording.	Comments duly noted. Where feasible and practicable, the Councils have sought to integrate the recommendations of all evidence base documents, including the Heritage Impact Assessment, into the creation of site allocation policies. In some cases, this has required a balanced approach to policymaking to appropriately account for the various overlapping planning considerations. In the case of Eddington, it was considered that a degree of flexibility in the approach to building heights was needed in order to allow masterplanning and decision making to balance the opportunities for jobs, homes and facilities close to one of Greater Cambridge's most notable innovation clusters with the need to preserve the city's character and national policy requirements to make the most efficient use of land.

		During decision making, Policy S/ED will be applied alongside the Local Plan's heritage safeguarding and design policies set out within the Great Places chapter, as well as any national planning policy and guidance that concern the historic environment. Further justification for the Councils' approach to the policy wording and supporting text can be found in the Site Allocations Topic Paper (2025) and Site Allocations Topic Paper (2026). Should they be considered necessary, the Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination process.
Healthcare facility provision	Minor amendments to policy requirements for healthcare facilities suggested to support the delivery of the most suitable form of healthcare infrastructure.	Comments duly noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Developer contributions	Requirements for developer funded contributions towards emergency services infrastructure / facilities should be clearly referenced in the policy.	Comments duly noted. Potential requirement for developer contributions for emergency services is addressed by Policy I/ID; thus, it is not considered necessary to reference this in the site allocation policies as all relevant requirements in the Development Plan will guide decision making.

Policy S/WC: West Cambridge

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
S/WC	4	4	4	0	4

Theme of Representations	Summary of Main Issues Raised in Representation	Councils' Response to Representations
High-quality design across the site	It is important for high-quality design to be achieved across the site, not just the south and west borders.	Comments duly noted. Site-specific design requirements have been included where there is a particular consideration that the Councils feel is important for future development to explicitly account for (such as West Cambridge's boundaries with the neighbouring Green Belt). However, during decision making, Policy S/WC will be applied alongside all other relevant requirements of the Development Plan, as well as any national planning policy and design guidance. The Local Plan's wider requirements for high-quality design are set out in the Great Places chapter, so no further changes to S/WC are considered necessary secure site-wide high-quality design.
Clarifying high-quality public transport	There is a reference to the "high-quality public transport corridor (HQPT) – the term seems undefined.	Comments duly noted. The Councils are open to modifications being recommended by the Inspector, including clarifying additional terms in the Local Plan's glossary, at the appropriate point in the examination, should the opportunity arise.

Existing planning history	Modifications requested to ensure the policy is consistent with existing planning permissions for the site and does not introduce any new requirements.	Comments duly noted. The preparation of Policy S/WC has been prepared in recognition of the consented development on the site. Nevertheless, the policy has been prepared to ensure that site-wide development, including any future development or redevelopment within the allocation area, reflects the needs and character of the area across the plan period whilst recognising the existing planning history. Further justification for the Councils' approach to the policy wording and supporting text can be found in the Site Allocations Topic Paper (2025) and Site Allocations Topic Paper (2026).
Site name	The site name should be changed to Cambridge West for consistency.	Noted. The site is an historic allocation that was previously identified as "West Cambridge" in the adopted Cambridge Local Plan (2018). The Councils have carried this name forward for consistency with historic policy documents, so no further changes are considered necessary.
Historic environment	The policy and supporting wording should be corrected to recognise the Grade II* listed Schlumberger Gould Research Centre (not Grade II), and it should make reference to the two Conservation Areas: West Cambridge and Conduit Head Road.	Comments duly noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Developer contributions	Requirements for developer funded contributions towards emergency services infrastructure / facilities should be clearly referenced in the policy.	Comments duly noted. Potential requirement for developer contributions for emergency services is addressed by Policy I/ID; thus, it is not considered necessary to reference this in the site allocation policies

		as all relevant requirements in the Development Plan will guide decision making.

Policy S/HHR: Land between Huntingdon Road and Histon Road

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/HHR: Land between Huntingdon Road and Histon Road	5	5	4	0	4

Theme of Representations	Summary of Main Issues Raised in Representation	Councils' Response to Representations
Governance	Without a committed framework for a Community Governance Review, the plan lacks effectiveness, leaving future residents without clear local representation and existing communities vulnerable to overstretched local services.	Noted. A Community Governance Review process is outside of the plan making process and relevant planning legislation as it falls under the Local Government and Public Involvement in Health Act 2007, which is a matter for the relevant Local Authority, not the Local Planning Authority.

Retail	The policy should be more flexible and remove reference to specific quantum of floorspace	Noted. The policy sets an approximate floorspace figure to provide sufficient flexibility. Any future planning applications seeking to amend the existing planning consents for the site in relation to this matter, will need to be justified in accordance with the relevant and adopted policies of the development plan.
Movement	Wording within Part 12 of the policy is unnecessary duplication and can be incorporated into Part 11 of the policy.	Noted. The proposed modification set out in the representation achieves the same outcomes as the proposed policy wording.
Lifespan	Amendments to some of the policy requirements would reduce duplication with the Validation Checklist for outline or major planning applications and align the policy wording with permitted development.	Noted. The elements are listed to provide clarity on the expectations for the site, but it is noted a number are required by other policies. Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, if considered necessary for soundness.
Contributions to Emergency Services	Requirement for developer funded contributions towards police and fire and rescue infrastructure/ facilities should be referenced in the policy.	Noted. Potential requirement for developer contributions for emergency services is addressed by Policy I/ID. It is not necessary to reference this general requirement in site allocation policies.
Heritage	Historic England have highlighted that the site adjoins the Howes Place Conservation Area (designated 2024).	Noted. This is reflected in the policy wording.
Support	We welcome the changes made to the policy wording.	Support noted.

Policy S/EOC/NWO: Land north of Worts' Causeway

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/EOC/NWO: Land north of Worts' Causeway	2	2	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England have highlighted that there are no designated heritage assets within the site. The Grade II listed Milestone lies just to the east of the site.	Noted. This is reflected in the policy wording.
Support	We welcome the changes made to the policy wording.	Support noted.
Connectivity	The BHS welcomes recognition of the bridleway network and Worts' Causeway green link, including space for horse riders, but seeks protection for the western/peripheral bridleway and wider connections. The Plan should not	Noted. Any new and/or enhanced connections in this wider area will form part of the Cambridge Biomedical Campus Strategic Enhancement Area and Landscape Improvement Area. This is addressed in Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital).

	retrospectively alter existing permissions but should safeguard future connectivity and prevent development prejudicing it.	

Policy S/EOC/NWO: Land south of Worts' Causeway

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/EOC/NWO: Land north of Worts' Causeway	2	2	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England have highlighted that there are no designated heritage assets within the site. The Grade II listed Milestone lies just to the east of the site.	Noted. This is reflected in the policy wording.
Support	We welcome the changes made to the policy wording.	Support noted.
Connectivity	The BHS welcomes recognition of the bridleway network and Worts' Causeway	Noted. Any new and/or enhanced connections in this wider area will form part of the Cambridge Biomedical

	green link, including space for horse riders, but seeks protection for the western/peripheral bridleway and wider connections. The Plan should not retrospectively alter existing permissions but should safeguard future connectivity and prevent development prejudicing it.	Campus Strategic Enhancement Area and Landscape Improvement Area. This is addressed in Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital).

Policy S/EOC/BS: Bell School, Babraham Road

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/EOC/BS	1	1	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Restrictive requirement	Support for the allocation but objection to policy is based on a relationship with Bell School that no longer exists and includes factual inaccuracies regarding site operator. The policy should be amended to support student accommodation in accordance with	Noted. The site is adjacent to an existing educational facility. The Local Plan takes a long term approach for the site to meet existing or future accommodation needs of the school site.

	Policy H/SA without Bell-specific restrictions.	
Policy name	Amend the policy name to remove reference to Bell School.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.

Policy S/EOC/FRE: Fulbourn Road East

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/EOC/FRE: Fulbourn Road East	3	3	2	0	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Data centre	Proposed data centres need to be set out as a separate section in this plan so that people are aware.	Noted. Where applicable, sites allocated for data centres have been identified within the Local Plan.
Support	We welcome the changes made to the policy wording.	Support noted.

Heritage asset	Historic England have highlighted that the Fulbourn Hospital Conservation Area lies to the northeast of the site.	Noted. This is reflected in the policy wording.
Contributions to Emergency Services	Requirement for developer funded contributions towards police and fire and rescue infrastructure/ facilities should be referenced in the policy.	Noted. Potential requirement for developer contributions for emergency services is addressed by Policy I/ID. It is not necessary to reference this general requirement in site allocation policies.

Policy S/EOC/IDH: Ida Darwin Hospital

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/EOC/IDH: Ida Darwin Hospital	2	2	2	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England have highlighted that there does not appear to be an HIA for this site, but also note that planning permission has been granted for this site and construction is progressing. Welcome criterion 1c.	Noted.

Climate Change	The policy does not sufficiently address issues relating to climate change including carbon emission reduction and biodiversity enhancement.	Noted. The Local Plan should be read as a whole. There are separate development management policies for reducing carbon under policy CC/NZ and for biodiversity enhancement under BG/BG. It is not necessary that these are duplicated under each site allocation.

Policy S/AMC/FH: Fulbourn Hospital Area of Major Change

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/AMC/FH: Fulbourn Hospital Area of Major Change	2	2	2	0	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	General support for the allocation and the principles.	Noted.
Heritage	Historic England welcome amendments made to the policy. There is not a Heritage Impact Assessment for this site.	Noted. Heritage Impact Assessments have been prepared for policy areas as there is not an assessment of capacity for the site, and therefore no specific proposal to assess.

Clarifications and accuracy	Amendments are required for clarity and accuracy as some of the requirements in d and g are not relevant to the site, and e and f require further justification for inclusion.	Noted. E and F are appropriate requirements responding to the site context. The development brief referenced was prepared and agreed by Planning Committee when the Ida Darwin redevelopment was being planned, which incorporated exploration of developing some additional floorspace at the Fulbourn hospital site. This highlighted the importance of the southern parkland comprising the southern third of the site, and the cemetery to the north.

Consultation Statement

Summary of Representations and Councils' response - New Settlements



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan Regulation 22 Consultation Statement (November 2026)

GREATER CAMBRIDGE
SHARED PLANNING

New Settlements

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
New Settlements	5	5	5	0	4

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Policy requirements related to public transport	Policies will not ensure bus services operate daily, with long operating hours and high frequencies at peak times from first occupation, therefore they won't bring about the high-quality services required for bus travel to be a genuine option. A busway alone will not make bus travel viable. Amendments should be made which provide more specific requirements.	Noted. The phasing of transport infrastructure is set out in the movement section on each of the strategic sites and this sets out what is required to deliver the site. There are some suggestions of phasing, but the specific timescales will require additional consideration at the planning application stage.
Strategic Enhancement Areas	Add specific policy criteria on Strategic Enhancement Areas where they are not expressed in site policies, and clarify the policies map. Address inconsistencies and how they are shown on Spatial Framework Diagrams.	Noted. Each site with a strategic enhancement area has a specific section of the main site policy that sets out the appropriate uses fora Strategic Enhancement Area. With regards to any inconsistencies in the spatial frameworks, the Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Spatial Framework Diagrams	Spatial Framework plans should include the perimeter buffers. These would be better	Noted. The Spatial Frameworks are indicative. Where buffers are part of the suggested package of mitigations these have been shown on the spatial frameworks.

	controlled by inclusion within the site boundary.	Additional buffering may be designed in during the masterplanning and development management process.

Policy S/CBN Cambourne North

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/CBN Cambourne North	39	69	52	5	50

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Cambourne connections	Cambourne will be divided by the A428, which will result in dispersed land uses and people using private vehicles, generating traffic. Cambourne should be planned as one place, the two areas require a strategic masterplan and coordinated infrastructure delivery.	Noted. The policy and supporting Spatial Framework set out the necessary measures required to integrate the two elements of the town together. This includes active travel and public transport connections aligned with existing town and key areas of activity. This also applies to new connections across the proposed East West Rail corridor. Support for the broad approach is noted. However, given Cambourne is largely built out and Cambourne West is currently being implemented, the councils are of the view that the Spatial Framework set out in the policy is adequate for the purposes of integrated and coordinated growth at this stage.
Station connections	The purpose and deliverability of the 'direct link under the proposed station for both	Noted. Additional transport sensitivity modelling has been undertaken and provides further technical clarity in relation to the proposed link under the station. The

	active travel and public transport' requires clarification. Include the link on Figure 63.	principle of this connection is an important part of the transport strategy for the site.
East West Rail (EWR) severance	The allocation is compatible with the EWR project and the alignment of the EWR can be accommodated as part of the development. The DCO is expected to show crossings and mitigation that are required for EWR. At this time, it is simply too early to say exactly what will be necessary beyond this, to confirm costs and viability, and be clear who will fund and deliver them.	Noted. Given the scale of the proposal, the number and nature of the connectivity interventions have been considered and identified through the councils' evidence base studies. This is reflected in the policy and supporting spatial framework. The long term nature of the development will require the early and on-going consideration of costs, phasing and delivery mechanisms. This will need to be considered through the planning application process.
Transport modelling	The modelling does not reflect the existing baseline for vehicles travelling on local and strategic roads or the Cambourne North Addendum Transport Strategy Report. Further modelling and policy criteria on this issue is required.	Noted. The Cambourne North Transport Strategy & Modelling Report Addendum (July 2026) provides an overview of the strategic modelling which includes wider local plan growth as below. Additional transport sensitivity modelling has been undertaken and provides further technical clarity. The councils' are of the view that the transport evidence undertaken to support the allocation is robust and sound.
Cumulative traffic impacts	It does not address regionally significant leisure, recreation and events centre traffic generation outside of peak hours, including uses within the SEA or include cumulative modelling for Cambourne North and other proposed sites.	Noted. The CaPCAM 2046 Reference Case represents the region's expected future transport conditions, combining planned housing and employment growth within the CaPCAM model area to 2046, further development from Local Plan allocations across the Greater Cambridge area are also included within the reference case.
Modal filter	The evidence should have included the figure for 2046 DS3a with trip budget	Noted. The Cambourne North Transport Strategy & Modelling Report Addendum (July 2026) provides an

	without the modal filter / bus gate in place so that the Inspector could see the impact of doing nothing on Elsworth. Modal filters would displace traffic and restrict local access. It is not clear when the modal filter will be implemented.	overview of the strategic modelling which includes wider local plan growth as below. The councils' are of the view that the transport evidence undertaken to support the allocation is robust and sound.
Village by-pass	There is no by-pass proposed for local villages and development will result in rat-running. The existing roads are not suitable for any additional vehicle movements.	Noted. The transport strategy for Cambourne North has not identified a current need for a by-pass around the existing local villages. This is based on reasonable and agreed traffic volume forecasts and future mode shares. This evidence has also considered the existing capacity for adjacent roads such as the A1198, and outlines the types of measures required to mitigate the impacts of the development whilst not creating adverse impacts on highways safety and flow rates/delays. The policy notes that additional strategic highways mitigation measures may be needed beyond the plan period and this will be informed by up to date transport modelling. The development, similar to other strategic sites in the plan, will be subject to a Trip Budget, which is a tool that will be applied to monitor and manage trips into and out of the site during peak hours.
Traffic calming	Traffic calming measures are required, based on local engagement, delivered early in the development and based on up to date local evidence.	Noted. As set out in the Supporting Information to the policy, the precise form, location and scale of interventions will be informed by stakeholder input.
Construction traffic	Construction traffic will be a local impact for both the railway and wider development.	Noted. Both through the preparation of a Transport Assessment and application of Policy I/CM: Construction

		management, the impacts of construction traffic will need to be mitigated.
A1198	The A1198 is already an extremely difficult to navigate and at capacity road in peak periods and adding a further roundabout will have impacts on capacity, traffic flow, road safety and journey times.	Noted. The transport strategy for Cambourne North has considered the existing capacity for adjacent roads such as the A1198, and outlines the types of measures required to mitigate the impacts of the development whilst not creating adverse impacts on highways safety and flow rates/delays. The policy notes that additional strategic highways mitigation measures may be needed beyond the plan period and this will be informed by up to date transport modelling. The development, similar to other strategic sites in the plan, will be subject to a Trip Budget, which is a tool that will be applied to monitor and manage trips into and out of the site during peak hours.
Support subject to transport package	The Council supports the new settlement allocation at Cambourne North and Cambourne, noting that the transport evidence produced to date suggests that development here can be mitigated in transport terms.	Noted. Support for the allocation and transport evidence is noted.
Trip budget	The trip budget is not effective and unenforceable and there is clear evidence for how the trip budget has significantly increased or arrived at. There should be one trip budget for one road corridor (i.e. the A428).	Noted. The Cambourne North Transport Strategy & Modelling Report Addendum (July 2026) (Page 60 –70 – First Principles Assessment and Initial Trip Budget) demonstrates how existing travel patterns could respond to incremental interventions at Cambourne North and with incremental policy shifts at varying levels of ambition. This shows that c.4,000 peak hour two-way vehicle trips could

		reasonably be achieved based on the number of dwellings, jobs, and schools set out in the Regulation 19 spatial framework if delivered in line with walkable neighbourhood principles. This level of trip generation has been discussed and agreed with CCC as a reasonable initial trip budget for Cambourne North with potential for further refinement as the delivery programmes of key public transport interventions (CtoC and EWR) increase in certainty and as wider transport policies are defined. An initial trip budget at this level will provide some headroom should these delivery programmes not come forward as expected.
Strategic Road Network	Concerns about insufficient, inadequate and limited evidence regarding the potential impacts on the A428, its associated junctions and other related infrastructure needed to support the development.	Noted. The Cambourne North Transport Strategy & Modelling Report Addendum (July 2026) demonstrates that the proposed allocation at Cambourne North is supported by a credible and deliverable transport strategy. The assessment is proportionate to the plan-making stage and does not seek to predetermine the detailed design solutions that will be progressed through future planning applications.
Cross boundary trips	There is no clear representation of the expected flows on our sensitive routes within Central Bedfordshire or more rural routes towards Potton and Sandy. The IDP does not make any reference to the potential for cross boundary mitigation to be considered as plans emerge, and the policy wording of S/CBN as proposed does not	Noted. Further engagement with EWR, National Highways and Cambridgeshire County Council and adjoining LAs will continue to take place to Local Plan examination. Further detailed assessment will also be required at the planning application stage to consider appropriate growth and mitigation at the time of application.

	offer a commitment to delivering further, cross boundary infrastructure if identified. Neighbouring authorities should be added to the list of consultees under section 39 of the policy.	
Cambourne to Cambridge	Flexibility needs to be maintained to ensure effective delivery when details are finalised of an extension of the CtoC public transport corridor through the remainder of Cambourne and Cambourne North, and beyond to Papworth Everard.	Noted. The policy and spatial framework recognise that flexibility is required in relation to the exact alignment of the Cambourne to Cambridge extension into Cambourne North. However, the Transport Strategy demonstrates that the extension of the scheme is required to deliver the development and achieve the required mode share and trip budget.
Buses	Additional bus services are required to minimise car travel.	Noted. This is identified in the Transport Strategy evidence supporting the policy and will form part of the package of transport measures required to bring forward the development.
Mobility hub	This is entirely undefined. Its purpose seems to be to enable a computer model to show sufficient reduction in car usage to fit within an arbitrary “trip budget” rather than serving any identified community need. It’s location will not facilitate journeys by public transport.	Noted. The Transport Strategy identifies that a Mobility Hub can range in its scale and function and that this is not currently defined in this instance. This will need to form part of the detailed transport work that will inform future planning applications/masterplan for the site. At this stage, the policy is establishing the concept of a mobility hub in this location in order to ensure the town and railway station can be accessed by residents in and around Papworth Everard by sustainable modes.
Car parking	Mixed views on either restricting the size of the station car park and parking prohibitions nearby in order to limit the number of vehicles seeking to access it or whether the policy is unreasonably hostile to vehicular access and parking provision is undersized.	Noted. The design of the railway station car park will be subject to a separate consenting process via a Development Consent Order, submitted by East West Rail Co. Nevertheless, the Transport Strategy for Cambourne North sets out a robust and achievable package of measures to ensure that both the development and station can be delivered without having

		significant adverse impacts on the local and strategic road network. Large car parking facilities at the station would not support the vision outlined in the policy or the transport strategy, and would likely lead to highways significant impacts.
EV impacts	As more people switch to EVs, public transport solutions will not be economically viable or sustainable and therefore, multi-modal transport interchanges should be designed to accommodate rather than prevent private vehicles interchanging with other modes.	Noted. Given the long term nature of the development, transport matters will need to be kept under consideration as part of future Local Plan reviews and up to date monitoring. This would include close engagement with the Transport Authority and other key stakeholders.
Wimpole connections	The Wimpole Estate is poorly connected to the site and the policy should include improved local bus connections and high quality and safe active travel connections to the south.	Noted. The Transport Strategy notes the importance of local bus connections as part of a package of measures required to support the development. The exact routing of these bus connections will need to be considered at the planning application stage.
Northern approach	The spatial strategy relies on East West Rail and the C2C busway for sustainable transit, yet both systems completely bypass the Cambridge North employment hub. This induced car dependency will collapse Vehicular Trip Budgets along the A428 and A14 corridors, breaching NPPF sustainable transport mandates	Noted. North East Cambridge is an important employment destination, as set out in the plan. However, there are also other significant employment areas across the Greater Cambridge area, including central Cambridge and the Biomedical Campus. The spatial strategy of the plan continues to place homes close to jobs, including within Cambridge, to the north of the city providing homes at Darwin Green, Northstowe and Waterbeach New Town close to North East Cambridge as well as other sites. Transport modelling for the overall plan demonstrates that the plan is sound in transport terms, with appropriate monitor and manage requirements identified.
Agricultural land	Development and the SEA will erode prime arable land.	Noted. As part of preparing the development strategy for the Local Plan, the councils have had to consider a

		number of trade-offs. In this instance, the opportunities presented by the proposed Cambourne Station and link to the Cambourne to Cambridge transport scheme were significant factors in determining an appropriate location for growth. Within the SEA, there will continue to be opportunities for farming and the farming practices and management approaches undertaken by the RSBP at Hope Farm are specifically noted within the policy.
Ecology and Green Infrastructure	Pleased to see that there has been significant changes to the policy wording under the Nature section arising from workshops since the draft local plan stage.	Support noted.
Ecology and designated natural assets	Concerned that the development and its green infrastructure proposals could still result in material harm to the nationally important local Barbastelle bat population as well as significant adverse impacts to nature sites within and adjacent to the allocation, and to some nature sites well beyond the site boundary. Buffer zones to ecological assets need to be larger.	Noted. Through the further work on the Green and Blue Infrastructure Strategy, the councils have refined the policy further to address previous comments regarding Barbastelle bats and ecological features such as SSSIs and Ancient Woodland. This has involved collaboration with local and statutory stakeholders. The policy sets out a clear approach to avoidance and mitigation including buffer zones, woodland creation, establishing the requirement for dark corridors as well as recreational pressure management plans. The buffer zones exceed national standards and are based on best practice and stakeholder input. The policy and spatial framework set out the need for ecological corridors over the A428 and railway. The proposed forest will require detailed design and stakeholder engagement at the planning application

		stage. The policy sets out a clear vision for the SEA and the mosaic of uses that it should contain, including managing known surface water flooding issues around Elsworth.
Biodiversity net gain	On-site 10% BNG is mathematically unviable without destroying existing high-value farmland habitats and wildlife corridors. This also need to be monitored.	Noted. The Green and Blue Infrastructure Strategy identifies that the site is currently made up of fragmented ecological pockets and habitats. It, and the policy, set out clear requirements on how to achieve biodiversity net gain that is consistent with the Local Plan's requirements. Biodiversity monitoring is addressed in Policy BG/BG: Biodiversity and geodiversity and therefore not repeated in this policy.
Strategic ecological connectivity	There must be collaboration and joined up design between the Cambourne North masterplan, Strategic Enhancement Area (S/SEA/CBN), and neighbouring schemes and allocations, such as East West Rail, Cambourne (S/CB) and Bourn Airfield (S/BA), to ensure coherent ecological connectivity is achieved;	Noted. The councils' also believe this is required and therefore this is a requirement set out in the Context and Nature parts of the policy and also shown on the Spatial Framework.
RSPB Hope Farm	Welcomes the additional policy wording supporting the continued success of the RSPB Hope Farm demonstration farm in the context of this allocation.	Support noted.
Recreational pressure	Imperative that development acknowledges the cross-boundary recreational impact that it may have, particularly on sensitive assets and landscapes such as Overhall Grove SSSI and the Greensand Ridge that does not have a strategic visitor gateway in the	Noted. The Habitats Regulations Assessment, prepared as part of the wider Local Plan, has considered recreational pressure that would be generated by the growth set out in the plan. The Biodiversity and Green Spaces policies, in combination with the site specific policies, outline how recreational pressure needs to be addressed at the planning application stage.

	eastern most section to absorb and control recreational pressures.	
Biodiversity Enhancement, Implementation and Management Plan	Biodiversity Enhancement, Implementation and Management Plan should not be for the applicant to consider all aspects of the SEA area.	Noted. Given the local and strategic importance of the SEA area, a comprehensive Biodiversity, Enhancement, Implementation and Management Plan (BEIMP) will be required. As set out in the policy, it will need to be informed by stakeholder engagement. Given the varied landownership within the SEA, it may not be appropriate for the applicant(s) to deliver and/or manage all aspects of the SEA, however the BEIMP will need to, in part, clearly identify roles and responsibilities to ensure the SEA achieves the policy objectives, which the councils believe cannot be achieved in a piecemeal or fragmented way.
Green space	Need to ensure green space allocation within the footprint buffers the farm from built development immediately adjacent to its boundaries.	Noted. The detailed design of a future masterplan and the siting of buildings, open space and other supporting infrastructure will need to be carefully considered at the planning application stage especially where they are adjacent to existing sensitive uses.
In-combination effects	Induced car dependency increases NOx emissions, failing Habitats Regulations in-combination tests by impacting protected habitats (Devil's Dyke Special Area of Conservation (SAC)) and the Eversden and Wimpole Woods SAC.	Noted. The councils have and are continuing to consider air pollution impacts on designated sites in collaboration with Natural England.
Existing vegetation	Must retain existing trees, hedges and verges.	Noted. This is a policy requirement in the Nature section of the policy as well as covered by other policies in the plan, in particular those in the Biodiversity and Green Spaces chapter.
Heritage	Must protect heritage assets including Conservation Areas. The changes made to the policy wording and to paragraphs 3.3.16, 17 and 25 are welcomes but the	Noted. This is a policy requirement set out in the Local Plan.

	policy should 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. This criterion should also state that development should be excluded from a buffer area immediately surrounding these assets as shown in the framework plan.	The conversion/restoration of existing heritage assets are addressed in Policy GP/HA: Designated Heritage Assets and therefore does not need to be repeated in this policy. A conservation management plan may be required in specific instances but it is more appropriate to explore and agree this at the planning application stage, as a masterplan for the site and a more detailed understanding of the future uses of these assets and their setting, is known. Whilst it is shown on the indicative spatial framework, the extent of the buffer area will also need to be considered and agreed at the planning application stage. The policy identifies the need for further heritage assessments to be undertaken at the application stage, and these will inform the extent of the buffer area and any uses/facilities (e.g. signage) that may be appropriate within it.
Archaeology	14 d Areas of known archaeological sensitivity should be referenced in the policy using the recommended wording from the HIA. The policy should state that a desk-based assessment should be undertaken to inform the masterplanning process	Noted. Matters relating to archaeology are addressed in part 14c of the policy, noting that non-designated archaeology may be of national significance. The currently known areas of high archaeological potential are also identified on the spatial framework, noting that the policy requires further extensive archaeological investigation to be undertaken. Read in combination with Policy GP/AR: Archaeology, the council are of the view that the matter raised in the representation has been adequately addressed. Part 14d of the policy identifies that a desk-based assessment and appropriate field evaluation of archaeological investigation is required
Flooding	No provision for flooding in Elsworth. Enlarge the SEA, or designate additional	Noted. Part 40 of the policy identifies that surface water flooding requires consideration and further assessment at

	wetland and attenuation land within itand require a catchment level drainage strategy. The use of the term sub-catchment in the policy is not clear as this is not defined.	the planning application stage. This includes a consideration of the wider sub-catchment, a term that has been used to ensure that development addresses both on-site and wider impacts where necessary. Other policies in the plan address flooding considerations, which in combination, set out a clear and robust approach to managing flooding. Through further technical studies at the planning application stage, additional flood mitigation measures beyond the site and SEA may be required but this would need to be demonstrated.
Water provision	There is no water to serve further development. Granting planning consent for 13,000 homes in the absence of a verified, legally compliant water supply scheme violates statutory environmental duties and would render any permission liable to being quashed by the High Court.	Noted. The plan sets out clear trigger points for the development in relation to the provision of water infrastructure. Wider infrastructure projects across the region are subject to a separate consenting process which is currently underway. The plan also sets high standards in relation to water usage.
Housing delivery and water supply	Part 44. of Policy S/CBN needs to be removed. It is too prescriptive and indeed not justified because it is not possible to say at the moment that first occupations “are likely” to have to be restricted.	Noted. As set out in the plan, future planned growth is contingent on water supply, which will be achieved through a number of measures including new infrastructure. Until such time, it is unlikely that there is sufficient headroom for additional development to come forward beyond the sites identified in the adopted Local Plans (2018). This would need to be considered further at the planning application stage, based on up-to-date data. The plan sets out clear trigger points for the development in relation to the provision of water infrastructure. Wider infrastructure projects across the region are subject to a separate consenting process which is currently underway.

		The plan also sets high standards in relation to water usage.
Water infrastructure engagement and provision	Supports Cambourne North's strategic growth role and masterplanning requirement, which enables early infrastructure engagement. It welcomes provision for sewage treatment facilities, green and blue infrastructure, surface water management and foul drainage strategy.	Support noted.
Water management	The policy should better align with the Grange Farm policy by requiring innovative low-sustainable water management, including greywater recycling, rainwater harvesting and SuDS, informed by an Integrated Water Management Plan and Water Cycle Strategy. It also notes wastewater capacity improvements at Uttons Drove WRC may need phasing before occupation.	Noted. Given the scale and nature of the development and known surface water flooding issues, the policy requirements are considered to be appropriate. Paragraph 3.3.10 of the Supporting Information note the capacity issues at Uttons Drove WRC.
Energy	The policy does not mention grid capacity, and the NPPF states that LPAs are required to consider this and connections.	Noted. This is addressed in Policy I/EI: Energy infrastructure masterplanning and therefore it is not considered necessary to repeat the policy here.
Environmental impacts	Development will result in light and sound pollution and railway vibrations for the surrounding villages.	Noted. Whilst this matter is broadly addressed in Policy WS/HS: Pollution, health and safety, the policy outlines that light pollution is a key consideration in this location and establishes a number of policy requirements to address this issue. Vibrations from the proposed railway will need to be addressed as part of the Development Consent Order process for this specific project.

Other impacts	The development will be visible from the village.	Noted. Through the Landscape Visual Appraisal, Heritage Impact Assessment and Green and Blue Infrastructure Strategy, the development has sought to minimise visual impacts as much as possible, particularly from sensitive locations. Through the policy requirements of the SEA, it is envisioned that appropriate mitigation measures will be introduced to minimise impacts further. This would need to form part of the wider masterplanning process at the planning application stage.
Crime	Development will result in crime in this area.	Noted. The policies set out in the Great Places chapter seek to address matters of crime through good design of both buildings and open spaces.
Properties within the site	Our property is within the development area and there is no planned mitigation. There needs to be a clear plan of how the existing homes can be incorporated into the development and associated infrastructure.	Noted. The masterplanning process, which will accompany a planning application, will need to consider existing properties within the site area. It is expected that site promoters would engage with affected residents as part of this process.
Housing delivery	The Plan relies on homes that cannot be delivered unless external infrastructure arrives on time, and it does not demonstrate how delivery will be held back if these projects are delayed. Other options need to be presented in the plan if this is the case.	Noted. The policy is clear that specific infrastructure is required in order for development to come forward. This varies depending on the type of infrastructure, for example water supply, public transport, etc. However the policy contains clear trigger points and for additional assessments/studies to be undertaken to confirm that there is sufficient infrastructure capacity to support development.
Housing provision	A more flexible approach is needed to the provision of specialist accommodation. The policy approach will have an impact on viability and may not meet an identified need over time.	Noted. The supporting text to Policy H/SH is clear that development proposals should have regard to the Local Plan evidence base which considers the needs of a wide range of groups, and the relevant Supported Housing Strategy, which the Councils are required to prepare to meet the Supported Housing (Regulatory Oversight) Act

	Support for a range of housing types and tenures for people to live here at all stages of their life.	2023. The supporting text explains that the policy applies to a wide range of specialist housing which could fall under use classes C2 or C3, and also that most other forms of specialist supported accommodation (other than housing for older people) are likely to be considered as affordable housing. Therefore, the approach is considered to be appropriate and reasonable. Support for a range of housing types is noted.
Sustainability	The development should be an exemplar sustainable settlement based on high climate standards.	Noted. In combination with the Climate Change, Infrastructure and Great Places policies, the councils agree that the development should be an exemplar sustainable settlement.
Gypsy and Traveller provision	Do not understand why the siting of the Gypsy and Traveller pitches is being permitted outside of the site area defined within Policy S/CBN. The only other area in close proximity to the site is covered by Policy S/SEA/CBN and having a site within the SEA would be contrary to the purpose of the SEA.	Noted. The Policy provides flexibility for provision to be located within but on the edge of the development, or outside but in close proximity to the site. The policy is also clear on what is considered to be acceptable uses within the SEA, which does not include housing of any types or tenures.
Employment	People may live in this development but will travel to Cambridge for work. The policy should reintroduce minimum employment land targets to prevent a commuter-town model and protect employment floorspace.	Noted. Given the future public transport connectivity serving the site, there is a reasonable prospect that people living at Cambourne North will work in Cambridge. However, the policy sets a clear ambition for Cambourne to capitalise on this public transport investment and for new employment opportunities to be developed within the site. The employment provision set out in the policy is based on evidence and is considered to be robust and deliverable.

		The timing of new employment opportunities will need to be considered as part of the phasing plan for the development and informed by the trip budget and other infrastructure provision. Policy J/PB: Protecting existing business space protects existing business sites from development where planning permission is required.
Employment quantum	Generally welcome the wording in 3.3.7 of the Supporting information and consider that it is essential that it is retained in relation to additional employment floorspace beyond the quantum set out in the policy.	Support noted.
Services and facilities corridor impacts	A single corridor study is needed to understand the amenity, health and other community needs across multiple sites in combination, rather than a site by site approach.	Noted. Local Plans are required to understand the infrastructure needs generated by growth and as such, an Infrastructure Delivery Plan has been prepared. This is plan wide rather than corridor specific as infrastructure typically has a wider catchment area.
Provision of services and facilities	Due to the trigger point approach in the plan, early residents may not have services and facilities available to them, putting pressure on existing nearby settlements. Developers must follow through on their legal commitments to deliver new facilities.	Noted. The timing of services and facilities to support new residents will need to be carefully considered at the planning application stage and linked to the phasing plan. This will vary depending on the type of infrastructure and the plan outlines that temporary provision may be required until a sufficient level of population has been achieved to deliver permanent facilities. Based on the viability assessment undertaken as part of the Local Plan, the development is considered to be

		viable. The provision of new and/or enhanced services and facilities will be secured through legal agreements and/or CIL contributions.
Cambourne High Street	The plan should ensure the protection of Cambourne High Street as the town's primary centre.	Noted. The policy outlines the importance of connections with the existing Cambourne High Street. It also sets out a number of requirements to ensure that the development is well supported by new and enhanced facilities and open spaces from the initial phases of development and that these should complement rather than compete with the existing Cambourne High Street.
Health	Local planning authorities cannot compel the NHS/ICB (Integrated Care Board) to fund or staff GP practices. Reserving land without guaranteed operational funding leaves service delivery unverified. There is no capacity at Primary or regional care levels. Primary Care and Addenbrooke's do not have the capacity for additional growth.	Noted. The councils continue to work closely with healthcare providers to ensure the adequate and timely provision of health provision at both a local and wider level.
Health Hub	Amend the term Health Hub to 'New healthcare infrastructure provision as confirmed through' engagement with local and regional health stakeholders.	Noted. Regarding the suggested amendment to the policy wording, the Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Design and facilities	Plans on how to develop retail facilities around the station look promising compared to the development of retail so far in Cambourne.	Support noted.
Papworth Design Guide	Any development abutting Papworth Everard must be compliant with the Papworth Design Guide.	Noted. This would be applicable if development is within the design guide area.

Station design	EWR Co's baseline station option will help to unlock significant sustainable development at Cambourne North. The enhanced station option would build on this, helping to maximise the opportunity presented by EWR. This is only possible subject to third party funding and therefore support this element of the policy.	Support noted. The policy is clear that the station design should be informed by the principles identified in the spatial framework, Rail Integration Study and Station Enhancement Study and that an enhanced station option should be funded by third parties. Therefore no policy amendment is considered necessary.
Built form	Policy section 21 is vital to ensure the aims at the outset of Policy S/CBN and Policy S/SEA/CBN are met, especially regarding the villages of Elsworth, Knapwell and Papworth Everard.	Support noted.
Density	Paragraph 3.3.8 of the Proposed Submission Local Plan needs to be changed where it refers to "densities of 60-70 dph or higher could be achieved in and around the Town Centre and Station Quarter" to accord with part 17 of the policy which states that "Focusing high-density development (circa. 90 dwellings per hectare) at the Station Quarter and Town Centre quarter as well as at neighbourhood centres".	Noted. Part 17 of the policy applies also applies to neighbourhood centres, which are not referenced in paragraph 3.3.8. Meanwhile, paragraph 3.3.8 is clear that higher densities could be achieved around the town centre and station area and therefore no amendment is considered necessary.
Strategic Enhancement Area	Buffer zone should be larger, defined on the Policies Map and not contain development, like county parks, sports facilities or travelling sites. It should remain as countryside including farming and include local communities in its planning.	Noted. Through the councils evidence base studies, the SEA has been identified to include a mosaic of uses that are suitable within this context, including open farming countryside. The boundary of the SEA has been informed by existing features (i.e. hedgerows, watercourses, settlement boundaries), maintaining a suitable distance between the

		development and existing settlements as well as the necessary mitigation measures required to support the development. The policy is clear on what uses are acceptable within the SEA, some of which include sports and recreation facilities, where they are appropriate and support the overall vision and intention of the SEA. The policy contains requirements limiting artificial lighting and establishing dark corridors. The SEA is defined on the policies map and the councils consider it to have sufficient protection from further inappropriate uses. Nevertheless, additional designations may be applied to areas within the SEA once delivered, for example, wildlife sites and/or protected open space. It is not reasonable to introduce these designations at this early stage as they have not been identified. The policy sets a clear vision and a number of requirements in relation to the SEA and Cambourne Forest. The location and nature of the forest will be subject to further consideration at the planning application stage and should involve a range of stakeholders.
Visual and physical separation	Visual and physical separation between the villages and Cambourne North is very important. Taken together with the lack of depth, the topography creates doubt as to the effectiveness of the landscape buffer as presently envisaged to meet its purposes and thus to provide mitigation of adverse impacts on the villages.	Noted. Through the Landscape Visual Appraisal, Heritage Impact Assessment and Green and Blue Infrastructure Strategy, the development has sought to minimise visual impacts as much as possible, particularly from sensitive locations. Through the policy requirements of the SEA, it is envisioned that appropriate mitigation measures will be introduced to minimise impacts further. This would need

		to form part of the wider masterplanning process at the planning application stage.
SEA delivery	The expectations on delivery of the SEA are also not clear and therefore not effective. As is it not required, or certainly not all required, to mitigate the impacts of the development, it cannot be for the Cambourne North developers to wholly deliver the SEA.	Noted. The delivery of the SEA will require a multi-stakeholder and collaborative approach, given the size of the SEA, landownership and existing designations within it. The policy is clear on the vision and purpose of the SEA and what is required in terms of its delivery and on-going management.
Elsworth and SEA	Welcome the changes that have been made to the development area to minimise the visual impact on Elsworth and having a separate Policy S/SEA/CBN to prevent the amalgamation of Elsworth within North Cambourne. We also welcome the aim of maintaining a rural landscape as separation.	Support noted.
Site boundary	Insufficient evidence to draw a hard line to limit the extent of built development in this area. Seek flexibility in how the limits to future development are determined in order to allow the potential of the area to be optimised for the purposes of delivering highly sustainable development. The current proposed line of the Site Allocation is not justified on the basis of the evidence base provided by the GCSP.	Noted. The red line boundary of the site and its associated SEA have been informed by series of evidence base studies. The councils are required to identify a red line boundary for the allocations in the plan to show on the Policies Map. Therefore a flexible approach is neither necessary or possible.
Future development	Could additional promoted sites come forward for development in the future, adversely impacting on the existing villages.	Noted. The Local Plan identifies sites to meet its housing and employment needs to 2045. It also contains a number of policies to guide windfall development to the most appropriate locations. This policy is clear on the role and purpose of the SEA.

Masterplan	Supports criterion 2, which sets out that a site-wide masterplan will be prepared by the landowners/promoters in conjunction with the Council and in consultation with the local community and stakeholders including EWR Co.	Support noted.
Spatial Framework	It is welcome that the Spatial Framework is now expressly “Indicative” and the masterplan required by the policy “should be broadly aligned with the indicative Spatial Framework” in the Proposed Submission Local Plan.	Support noted.
Spatial Framework presentation	It is not clear or shows the wider context.	Noted. The councils consider the spatial framework to be appropriate in terms of its geographic extent and presentation.
Spatial Framework level of detail	The inclusion of narrow, specific alignments of crossings and connections indicates a degree of specificity and detail that is not supported by the evidence at this stage and therefore needs to be changed. There may be other ways to deliver the same outcomes.	Noted. The spatial framework is supported by the councils evidence but is also labelled as indicative, noting that the exact form, alignment and nature of the key moves it identifies is subject to refinement through the planning application process.
Place Book	The requirement for a Place book in addition to a masterplan and design codes has not been justified or consistent with the NPPF.	Noted. The requirement for a Place Book is to bring together a number of plans that would necessary to support a planning application of this scale, including a masterplan, design code and details around community engagement and long term stewardship. This is not considered to be unduly onerous on the applicant(s) or inconsistent with the NPPF.
Forest and cycle ways	Widening of the ‘forest area’ and cycle ways is an improvement from the previous plan.	Support noted.

Rights of way	Early identification and protection of existing PROWs, including their legal status and lawful users, together with new and circular connections addressing network gaps and linking Cambourne North with existing Cambourne, Bourn Airfield and the wider countryside.	Noted. This is identified in the policy and supporting information.
Inconsistent approach	Throughout Policy S/CBN and Policy S/SEA/CBN we wish to highlight the inconsistent approach taken in drafting the policies, as it is often not clear who is expected to be consulted with, as the masterplan, assessments/ strategies, applications etc are being developed and brought forward.	Noted. The policy sets out the councils' position on the necessary stakeholders that should be engaged with through future studies and planning applications. This will vary depending on the nature of the study. Part 47 of the policy requires an Engagement Strategy to be prepared to outline how local people and other stakeholders will be involved in the development as it comes forward. The policy sets out the necessary trigger points and how this will need to be aligned to a phasing plan for the development. This will vary depending on the type and nature of the proposal.
Name of forest	The woodland creation should be referred to as the Elsworth Forest.	Comment regarding the name of the woodland/forest is noted.
Community engagement	It is essential that local communities are included in the design and delivery of the site and SEA. The policy should be clearer on which communities should be engaged through the delivery stages and how S106/CIL funds should be spent, especially given likely changes to local governance.	Noted. Part 36 (b) of the policy requires a Biodiversity Enhancement, Implementation and Management Plan to be prepared in conjunction with key local and statutory stakeholders. Additionally part 47 of the policy requires an Engagement Strategy to be prepared to outline how local people and other stakeholders will be involved in the wider development as it comes forward.

	Parishes have no direct interaction with the DCO process and wider stakeholders and little influence and look to SCDC to represent our interests and therefore we welcome and wish to continue to have dialogue with SCDC in the future.	The Councils do not consider it to be a soundness issue to reference specific villages/parishes throughout the policy wording. The policy already makes reference to surrounding settlements. This should include children and young people. Continued engagement between SCDC and local parishes is noted and welcomed.
Clarification	Paragraph 3.3.9 is unclear from the text whether the section relates to the plan period only, or a longer period.	Noted. Paragraph 3.3.9 applies to the full build out of the development.
Consultation procedures	The consultation on the plan must be fair and accessible and was restricted to digital means which is procedurally flawed.	Noted. The Proposed Submission Regulation 19 consultation took place for 8 weeks and consisted of a range of both in-person and online events. Documents were made available in public locations and information about the consultation was shared with parish/town councils and ward members. This is consistent with the councils' Statement of Community Involvement and is set out in more detail in the councils Regulation 22 Consultation Statement.
Community benefits and mitigation	Where there are likely impacts on residents the developers must provide appropriate compensation to residents through either S106 or a CIL.	Noted. Adverse impacts generated by the development will need to be mitigated as far as practically possible either through the delivery of mitigation measures and/or funding through legal agreements/CIL payments. This will be considered in more detail at the planning application stage.
Housing trajectory	North Cambourne is a mega-allocation reliant on multi-decade transport infrastructure (in the case of North Cambourne also multi-decade water and grid infrastructure) with unviable lead times pushing the bulk of the housing delivery	Noted. The councils' have set out a clear vision for Cambourne North, rather than only considering development to the end of the plan period. The policy is clear that development will need to be supported by the timely provision of infrastructure and, as a result, a proportion of the development will deliver beyond the plan

	beyond the end of the plan period and having negligible impact on short-medium term housing needs.	period. This approach is consistent with other new settlements from the adopted Local Plans including Northstowe and Waterbeach New Town. Based on the councils' evidence, it is not feasible to deliver strategic new sites like Cambourne North within a single plan period.
Alternative sites	S/CBN will effectively block other smaller developments which would have otherwise been brought forward to provide housing in the short-medium term.	Noted. Greater Cambridge's housing needs have been assessed in accordance with national planning policy and guidance. The Local Plan identifies a supply of specific, developable sites for the plan period, including an appropriate level of additional "headroom" supply to deliver flexibility. Evidence accompanying the Plan demonstrates that the sites are be 'deliverable' or 'developable' in terms of the definitions set out in national planning policy and guidance.
Phasing	The first draft of this Policy in Lifespan had a requirement for 'an approved phasing plan that must be submitted alongside the first planning application for the site'. This was very clear and enabled the surrounding villages to have some understanding of the impact of the development on them, particularly regarding the SEA and to traffic impact. This has now been removed totally, and this expectation should be restored to the Policy.	Noted. This policy requirement is now set out in part 47 of the policy.
Infrastructure delivery	There is little consideration of alternatives and the key justification for the site selection seems to be primarily the co-	Noted. The Proposed Submission Development Strategy Topic Paper explains how the plan-making process, including Sustainability Appraisal, has considered the

	location with EWR and CtoC, both of which are likely to suffer the multi-year delays and budget overruns common across UK infrastructure projects. This will mean either the houses are built before the new transport infrastructure - increasing load on the already overloaded A1198, A428 and surrounding road networks - or that the houses are significantly delayed.	merits of alternative strategies and site allocation options. It is considered that the development strategy set out in the local plan provides an appropriate strategy, which has taken into account the reasonable alternatives, and is based on proportionate evidence. The policy sets out requirements in relation to the phasing of development and the delivery of necessary infrastructure provision. Based on the councils' housing trajectory, the development is currently anticipated to be completed beyond the plan period around the 2070s, however this will be monitored through annual monitoring reports and future plan reviews. Noted regarding infrastructure led development. This is consistent with the approach set out in the policy.
Contributions to Emergency Services	Requirement for developer funded contributions towards police and fire and rescue infrastructure/ facilities should be referenced in the policy.	Noted. Potential requirement for developer contributions for emergency services is addressed by Policy I/ID. It is not necessary to reference this general requirement in site allocation policies.
Development viability	The viability analysis of the plan is not fit for purpose given the long term nature and complexity of the development and therefore the policy requires greater flexibility.	Noted. Policy requirements in the Proposed Submission Local Plan have been informed by proportionate evidence of infrastructure assessed for regarding viability. The plan is accompanied by a Viability Assessment.
Stewardship	Concerned that there is no timescale for when the work related to the SEA needs to both commence and be completed, which reduces the effectiveness of the policy. It is not clear what 'at the outset' means.	Noted. The policy requires a Stewardship Plan to be prepared by the developer as part of the planning application process. The appropriate trigger point for infrastructure provision, including the SEA, will need to be confirmed through the planning application process.

Support	Welcome and support Cambourne North being included as an integral part of the spatial strategy of the Local Plan.	Support noted.
Strategy options	Building closer to job hubs and existing public / active transport networks on the edge of Cambridge would reduce car dependency more effectively than building on similar green field sites, with similar loss of rural landscape and environmental impact that are also dependent on completely new - and highly uncertain - public transport infrastructure.	Noted. Justifications for location-specific exceptional circumstances have been identified for the release of Green Belt land at Cambridge Biomedical Campus and at the Babraham Research Campus. However, outside of these location-specific circumstances, exceptional circumstances that justify further Green Belt release to meet general development needs have not been identified through the plan-making process. As such, changes in national Green Belt policy have not altered the Councils' position regarding the Local Plan's preferred development strategy, which is founded upon considerable evidence and technical assessment work.
Excessive ambiguity	The plan has not been written in clear, and easy to understand language.	Noted. The plan is considered to be sound and appropriate for the purposes of plan making.
Omission sites	The Local Plan should maintain a diverse portfolio of deliverable sites, including Crow's Nest Farm or other sites within the SEA area, to support short-term housing delivery and provide resilience within the housing trajectory.	Noted. The councils have considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. The strategy for allocating sites is therefore considered to be sound. It has been demonstrated that the Local Plan will deliver a robust 5 year housing land supply and a supply of homes to meet the identified housing need for the plan period. Additional allocations for housing are not required. The SEA has been informed by a range of evidence base studies and is considered appropriate to both mitigate the

		impacts of development as well as prevent the coalescence of settlements.
Reasonable alternatives	The Plan does not adequately support future development opportunities that may emerge as the railway progresses through detailed design, consent and delivery. Land West of Cambourne is uniquely positioned to support the Plan's objectives through station-led growth, integrating homes, jobs, community facilities, renewable energy generation and strategic green infrastructure and is a logical and sustainable growth opportunity related to the proposed new station. The Sustainability Appraisal should more clearly demonstrate that all reasonable alternatives have been assessed, including scenarios where EWR design refinements reduce or reconfigure current constraints relating to access, mitigation, drainage and severance.	Noted. As part of the preparation of the Cambourne North allocation, the councils considered other areas to the east, south and west of Cambourne for longer term strategic scale growth. Set out in the options appraisal, alternative spatial options were considered and discounted.

Policy S/CB Cambourne

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/CB Cambourne	9	9	7	2	7

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Context	Cambourne Town Council supports the principle of growth at Cambourne North, subject to the development being delivered as a fully integrated extension of Cambourne rather than a separate settlement. Infrastructure first and strong connectivity required.	Support noted.
Cambourne connections	Cambourne and Cambourne North should be considered and planned as a single settlement rather than as separate communities. The future success of the scheme depends upon the creation of one coherent town, rather than distinct neighbourhoods centred around different facilities and destinations. The two areas require a strategic masterplan and coordinated infrastructure delivery.	Support for the broad approach is noted. However, given Cambourne is largely built out and Cambourne West is currently being implemented, the councils are of the view that the Spatial Framework set out in the policy is adequate for the purposes of integrated and coordinated growth at this stage.
East West Rail (EWR)	EWR Co supports the requirement in criterion 62 that other new or enhanced connections must not conflict with, or prejudice the delivery of EWR proposals.	Support noted.
Context	Historic England advise policy should also reference the two nearby Registered Parks and Gardens, Bourn Hall (Grade II) and Longstowe Hall (Grade II*).	Noted. Regarding the suggested amendment to the policy wording, the Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Employment	Employment land should be protected and delivered alongside new homes, and at an early stage in the development.	Noted. The timing of new employment opportunities will need to be considered as part of the phasing plan for the

		development and informed by the trip budget and other infrastructure provision. Policy J/PB: Protecting existing business space protects existing business sites from development where planning permission is required.
Housing provision	Support for a range of housing types and tenures for people to live here at all stages of their life and the development should be an exemplar sustainable settlement based on high climate standards.	Support for a range of housing types is noted. In combination with the Climate Change, Infrastructure and Great Places policies, the councils agree that the development should be an exemplar sustainable settlement.
Heath	Clarify references to healthcare provision in line with the Integrated Care Boards strategic direction.	Noted. Regarding the suggested amendment to the policy wording, the Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise. The councils continue to work closely with healthcare providers to ensure the adequate and timely provision of health provision at both a local and wider level.
Contributions to Emergency Services	Requirement for developer funded contributions towards police and fire and rescue infrastructure/ facilities should be referenced in the policy.	Noted. Potential requirement for developer contributions for emergency services is addressed by Policy I/ID. It is not necessary to reference this general requirement in site allocation policies.
Infrastructure	The development requires an infrastructure first approach.	Noted. This is consistent with the approach set out in the policy.
Movement	Cambourne will stop western expansion of Cambridge. The plan should make explicit reference to the recently approved Cambourne to Cambridge guided busway to emphasise the existence of an approved solution that deals with the question of	Noted. The Cambourne to Cambridge project is referenced throughout the plan, including within this policy.

	public transport access from Cambourne to Cambridge.	
Movement	Policy should more clearly secure a comprehensive and connected countryside-access network.	Noted. This is broadly addressed in the Movement section of the policy as well as Policy I/ST, which addresses the provision of new and protection and enhancement of existing Public Rights of Way and other routes suitable for walking, wheeling, cycle and equestrians.
A428 connectivity	Connections over the A428 must be landscape-led green bridges or covered deck structures.	Noted. The policy and supporting Spatial Framework set out the necessary measures required to integrate the two elements of the town together. This includes active travel and public transport connections aligned with existing town and key areas of activity. This also applies to new connections across the proposed East West Rail corridor.
Stewardship	Confirm the long-term management and maintenance of the SEA. It should be multi-functional.	Noted. The policy requires a Stewardship Plan to be prepared by the developer as part of the planning application process. The appropriate trigger point for infrastructure provision, including the SEA, will need to be confirmed through the planning application process. The policy notes that the SEA will be multi-functional and sets this out throughout the policy.
Village identity	The development must protect village identity.	Noted. Through the Landscape Visual Appraisal, Heritage Impact Assessment and Green and Blue Infrastructure Strategy, the development has sought to minimise visual impacts as much as possible, particularly from sensitive locations. Through the policy requirements of the SEA, it is envisioned that appropriate mitigation measures will be introduced to minimise impacts further. This would need to form part of the wider masterplanning process at the planning application stage.

Spatial Framework and omission site	Figure 67 is ambiguous at the western side of the site where the site allocation adjoins the A1198 and the A428. The red line boundary includes a straight line whereas the actual allocation is kinked and shows incorrect information regarding a wildlife corridor and the EWR safeguarding order. Should include Caxton Gibbet area for development.	Noted. The Spatial Framework is an indicative plan, as clearly labelled within the plan. Nevertheless, the Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise. The wildlife corridor shown on the Spatial Framework forms part of the vegetation alongside the A428 in this location. The A428 upgrade project is currently under-construction and therefore the spatial framework has been prepared based on the existing layout. This may be updated following future plan reviews. The comments regarding the EWR safeguarding extents are a matter for EWR. The councils have considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. The strategy for allocating sites is therefore considered to be sound. It has been demonstrated that the Local Plan will deliver a robust 5 year housing land supply and a supply of homes to meet the identified housing need for the plan period. Additional allocations for housing are not required.
Community engagement	Youth engagement and priorities should shape the development.	Noted. Part 47 of the policy requires an Engagement Strategy to be prepared to outline how local people and other stakeholders will be involved in the wider development as it comes forward. This should include children and young people.

S/GF Land adjacent to A11 and A1307, Grange Farm

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
S/GF Land adjacent to A11 and A1307, Grange Farm	342	351	331	1	334

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Location of development appropriate alternatives	The proposed location is inappropriate and should be relocated to previously identified sites such as North East Cambridge (relocating the Waste Water Treatment Plant), smaller brownfield sites elsewhere or close to existing railway stations (former Six Mile Bottom station) and places with better connections and infrastructure. The Plan has not demonstrated that Grange Farm is the most appropriate strategy compared with alternatives.	Noted. The Councils have considered a range of development strategy options and how development needs can be most sustainably met. Strategy options were first consulted on at the First Conversations consultation (Issues & Options) from January-February 2020. The options included sites on the edge of Cambridge and developments in villages, as set out in the Proposed Submission Development Strategy Topic Paper and Appendices. Evidence also determined that new settlements located on public transport corridors can be the most sustainable locations for development. The Councils maintain their long-term ambition to see the Cambridge Waste Water Treatment Plant (CWWTP) relocated to realise comprehensive redeveloped of the NEC area but recognise this may not be possible within the current plan period due to the lack of funding. In order for sites to be allocated for development in a Local Plan,

		national planning policy requires, in part, for sites to be available for development and achievable (financially viable). Given the CWWTP is operational, Anglia Water have committed to upgrading the facility and there is no funding to relocate it, allocating North East Cambridge for residential development would mean the Local Plan is inconsistent with national planning policy and therefore unsound.
Objection to size of development	The size of the development that is disproportionate to the rural setting and risks the area becoming a commuter settlement from London and would overwhelm local infrastructure and services.	Noted. The site capacity was refined to approximately 4,500 homes for the Proposed Submission Local Plan, a reduction from 6,000 to minimise the impact of the development. The size of the development meets the housing demand and has been assessed and evidenced through the HELAA, Proposed Submission Sustainability Appraisal and Development Strategy Topic Paper. 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 of people to allow for infrastructure to be delivered on-site including schools, healthcare and transport that will ensure the development is self-sustaining in terms of services and facilities.
Scale of development and impact on nearby settlements	The scale of development will have significant detrimental impacts on Great and Little Abington, Hildersham and Linton, eroding the villages rural identities and character with loss of physical separation of existing settlements, loss of community cohesion overshadowed by the proposed development. Development in the area will cause joining of nearby villages that already	Noted. Part 7 and Part 13c of the policy sets out that development will maintain the distinction from neighbouring villages including both local character and physical separation. The indicative spatial framework sets out mitigation measures required to minimise impacts on these surrounding nearby settlements. The Strategic Enhancement Area is also proposed to contribute to creating a buffer.

	have new development such as Hinxton and Great Chesterford.	The Defined Development Extents (DDE's) in South Cambridgeshire have been reviewed throughout the plan-making process to ensure that the countryside is protected from gradual encroachment on the edge of villages and to prevent incremental development in unsustainable locations. The screening and green buffer in appropriate locations along the boundary of the development will also contribute to maintaining these defined edges.
Housing and Employment Land Availability Assessment (HELAA)	The site was initially proposed a few years ago and was rejected as it was not a suitable location. There are procedural concerns for compliance with the HELAA which scores the site "red" on both suitability and landscape.	Noted. The initial HELAA assessment of the Grange Farm proposal reflects the initial site boundary submission from the site promoter in 2021. 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 at that time have been withdrawn and superseded and more information on this process can be found in the Proposed Submission Consultation Statement Appendix 7: Responses to Representations – Site Allocations. The site scored an overall Red for suitability in 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 for suitability in the HELAA. Officers have considered the impacts on landscape amongst the other impacts this development would generate. Site specific evidence and engagement with key stakeholders has identified how impacts can be mitigated as much as possible and this will be refined

		through future studies and assessments at the planning application stage. This includes requirements for a Landscape Visual Impact Assessment, Historic Landscape Characterisation Study and Landscape Character Assessment to be prepared by the applicant.
Identification of the site	There was no transparency of the process of the site selection of Grange Farm or proposer comparison of reasonable alternatives or densification of other proposed sites. The housing requirement attributed to this site should instead be met through more sustainable and deliverable locations such as Cambridge East (Marshall Airport), Northstowe, Cambourne and Eddington.	Noted. All potential sites have been considered and assessed by the HELAA and those identified as potentially suitable for development were assessed as reasonable alternatives in the Sustainability Appraisal at each stage of plan-making. The development strategy has identified this site as a suitable location for development with the policy included in the draft Local Plan stage at Regulation 18. Documents including Topic Papers, the HELAA and the Sustainability Appraisal have been published for each stage of plan-making. These set out the process, selection and assessment of sites.
Cumulative impact of local development	Grange Farm should be tested for cumulative impact alongside Kingsway Solar Farm, development at the Wellcome Trust and other employment sites.	Noted. The Councils have engaged with statutory consultees to assess the policies and site allocations within the Local Plan to ensure the impacts of the development are managed and mitigated. A new community at Grange Farm provides an opportunity to deliver new homes near to existing employment sites, contributing to a sustainable location for growth and realising the potential of the campuses nearby that require suitable housing to support the local economy and the intensification of this nationally important life science cluster. The Government, Combined Authority and local partners have made clear the ambition for continued economic growth in the area.

National policy and soundness	The proposal is not consistent with national policy and principles of sustainable development and has not been demonstrated to be justified, effective or sound.	Noted. The Greater Cambridge Local Plan has been prepared under the legacy system (2012 regulations) and is therefore being assessed at Examination for compliance with the 2024 NPPF. Grange Farm provides a sound approach, justified by an appropriate and proportionate evidence base and is considered to meet the requirements of the NPPF against which it is tested.
Reduced scale of development	Some support for limited growth and a lower number of homes, up to 500, but development not supported at the proposed scale of development. A few small pockets of extra houses on the edge of villages is more acceptable.	Noted. To be feasible and viable, it has been identified through the councils evidence that a minimum of 4,200 units is required at a new settlement to generate a critical mass of people large enough to support the infrastructure needed for a sustainable settlement. This new settlement 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 in the local area. The Development Strategy Topic Paper sets out rationale behind the selection of settlements located on public transport corridors.
Design, layout and Masterplan	The indicative spatial framework is not detailed enough and the policy lacks a robust Masterplan. Too many critical issues are deferred to future studies, surveys, assessments, masterplans or planning applications.	Noted. 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 is an indicative visual representation of what is set out in the text of policy. For the purposes of plan making, a masterplan is not required at this stage. This is a matter for a future planning application process, which will be informed by a number of studies, additional site specific evidence and stakeholder engagement. The evidence prepared to inform the policy is considered to be proportional and sound.

		The policy wording specifies that this development must Masterplan-led and this Masterplan must be agreed with the Councils' ahead of any planning application approval. Furthermore, a site 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.
Site boundaries and buffers	The policy and indicative spatial framework do not provide descriptions of widths or distances of development from existing settlements. The policy requires a sensitive, low-intensity adjoining built edge with measurable design-code standards.	Noted. The spatial framework has been drafted to set out mitigation measures required to minimise impacts on the surrounding settlements. 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 contribute to maintaining these edges. The nature and width of buffer zones and other mitigation measures such as screening, is a matter for a future planning application process, which will be informed by a number of studies, additional site specific evidence and stakeholder engagement. As set out in the policy, a site-wide Design Code must be submitted alongside the Masterplan to contribute to a high quality settlement.
Housing density	The densities proposed are too high and will mean mostly apartment blocks. All houses should be low density and a maximum of 2-3 storeys, with substantial sized gardens, landscaping and planting included – homes with nature at the forefront.	Noted. Paragraph 13c sets out how development will deliver buildings that respond to the surrounding content including scale, density and massing. The indicative average densities set out in the policy identify the areas where higher density are appropriate with the lowest topographical points of the site providing higher-density development. The policy also sets out the objective to

		deliver Grange Farm through a design-led approach with nature and community at the heart of development. Other policies in the Great Places chapter of the Local Plan will also need to be considered during the preparation of a site wide masterplan, including Policy GP/PP: People and place responsive design and Policy GP/HD: Housing density.
Transport congestion and traffic volume	The A1307, A11, A505 and Fourwentways are already congested with future traffic volumes from development and associated employment uses (and commuting to Cambridge or London) worsening the problem and creating further significant bottlenecks at Fourwentways. Junctions are also likely to be severely affected by the developments in S/AMC/WGC at Hinxton and will need to be significantly improved.	Noted. The policy is supported by the Infrastructure Delivery Plan that identifies the transport infrastructure required to deliver the strategy, including public transport connections to the new settlement at Grange Farm. Funding for the new connection will be from a number of different sources, including developer contributions. Through a package of transport measures, the planning application stage will need to explore options to deliver transport mitigations for the site that will align with the indicative trip budget that has been identified, which will ensure that impacts on the wider transport network are minimised. This trip budget has been refined by the preparation of the Transport Analysis and Evidence (June 2026) and the development of options to prioritise active travel and public transport to reduce the number of vehicles using the wider network during peak hours. The wider Greater Cambridge Transport Strategy will also seek to manage wider transport issues, considering development and growth across the wider area.
Impact from increased traffic	The A1307 is a high casualty route and operating at or near capacity, particularly at peak hours – reflecting current commuting	Noted. The Councils have identified a range of priority transport measures set out to mitigate the transport impacts of growth brought forward by the emerging Local

	patterns. Any new development will contribute to accidents or rat-running through nearby villages including Linton, Hildersham and Balsham, and will cause delay to emergency-services using this route. Stronger controls are needed on displaced traffic with need for a dedicated bus lane for emergency vehicles and a new park and ride between Horseheath and Linton to cut down through traffic.	Plan, ensuring sustainable growth across Greater Cambridge throughout the plan period. This is considered to be proportionate and robust for the purposes of plan making. Through the planning application process, relevant stakeholders including Cambridgeshire County Council, Cambridge and Peterborough Combined Authority, the Greater Cambridge Partnership and National Highways will need to be engaged to identify the potential impact of demand in the area arising from the development on the transport network and the timely provision of the necessary mitigation measures. The Transport Analysis and Evidence (June 2026) published for the Proposed Submission consultation sets out an indicative framework for delivering a vision-led development that supports the transport user hierarchy and reduces car dependency. It defines and explores measures that support low-car living building on mode share and internalisation proposals.
Cambridge South East Transport (CSET)	Reliance on an unfunded or unapproved CSET extension (Phase 2 scheme) is unrealistic and unviable. CSET needs robust costings, clarity on who is delivering it and the design of infrastructure needs to be explicit e.g., flyovers, underpasses, additional roundabouts. Phase 2 is unlikely to be completed before dwellings are occupied, nor will it prevent high levels of car use. The plan needs to take account for when CSET is not a suitable solution.	Noted. The long term nature of the development will require the early and on-going consideration of costs, phasing and delivery mechanisms. This will need to be considered through the planning application process. Delivery of the CSET scheme will enable improved transport connectivity in this area and will reduce the impact of growth on the existing transport network. The delivery of infrastructure has been informed the phasing of the development at Grange Farm, with notional phasing set out in the evidence base. It identifies Phase 1 for delivery of 500 units and includes early site access, active travel including potential for an underpass and bus

		route enhancements. Phase 2 proposes that for the CSET extension and overbridge delivery, 500-1500 units can be delivered. Phase 3 and 4 are for the Fourwentways capacity improvements, enabling delivery of the remaining units at Grange Farm. This will require further consideration and agreement, through a legal agreement, at the planning application stage.
Transport assessments	Transport impacts have not been fully assessed, as a comprehensive Transport Assessment has not been completed. Further work including transport and junction modelling, agreement of a site-wide trip budget and strategic and local transport mitigation should be undertaken. The transport strategy depends on an ambitious trip budget and does not identify interventions that make it credible.	Noted. The site promoter has been developing further transport evidence in consultation with National Highways and the local Highways Authority and the Councils. This evidence base includes Transport Analysis and Evidence and Transport modelling of the Fourwentways roundabout for 2,250 dwellings and 5,000 dwellings. Transport modelling was also undertaken for the A1307 access roundabout. Part 24 of the policy states that the site must demonstrate how the quantum and mix of development can be delivered within the agreed trip budget. This must be evidenced and agreed with the Local Highways Authority prior to submission of the outline planning permission. Paragraph 3.3.64 of the supporting text provides an indicative trip budget of 1,114 and sets out the need for an effective site-wide Travel Plan with active travel prioritised as an appropriate measure to achieve this trip budget.
Transport infrastructure	The plan should be accompanied by a finalised Infrastructure Delivery Plan and finalised Greater Cambridge Transport Strategy.	Noted. The Local Plan is supported by the Infrastructure Delivery Plan which sets out the infrastructure needs to support the growth identified in the plan. It is a live document that is updated on a regular basis to ensure it is up to date and reflects identified infrastructure needs and planned projects. The policy requirements for the site

		have been informed by a proportionate evidence base, including the IDP and is aligned with the Greater Cambridge Transport Strategy (GCTS), which was published by the Cambridgeshire & Peterborough Combined Authority for their Transport Committee on Wednesday 4 November 2026.
Cross-boundary strategic planning	The transport assumptions used in assessing Grange Farm extend beyond the site, creating potential strategic implications. What substantive engagement has taken place with relevant bodies and how have discussions influenced deliverability of Grange Farm.	Noted. The councils have engaged with transport authorities and neighbouring authorities during preparation of the local plan.
Site access and movement	The indicative spatial framework does not identify adequate access points at Grange Farm. There are only two access points for cars on the already overburdened A1307. It requires a highways plan for movement of HGV's external of the immediate area of Grange Farm and CSET development.	Noted. The spatial framework is indicative in nature and does not confirm exact locations of access points in and out of the site. This will be determined through a comprehensive masterplan and secured through legal agreements. Part 23c vii of the policy requires appropriate site access arrangements and the evidence base proposes a four-arm roundabout on the A1307 to accommodate existing and future traffic flows and movement and to act as a traffic calming feature.
Active travel and connectivity	The area needs better walking and cycling links that provide practical access to amenities and services all year round. Active travel and the PROW/countryside-access network should be planned with horse riders considered from early stages of planning.	Noted. Part 23a i and 23c iii prioritises walking, wheeling, cycling and public transport improvements and requires financial contribution towards wider walking and cycling infrastructure in the area. This will include Public Right of Ways.

Public transport	Weak public transport exists that is already at capacity and cannot be relied on or added to by any development.	Noted. The phasing of transport infrastructure is set out in the movement section of the policy, setting out what is required to deliver the site. The evidence base prioritises active travel and public transport from the earliest stages of masterplanning and identifies the opportunity for a frequency uplift of existing bus services on the A1307 corridor.
Construction impacts on roads and existing settlements	The development and construction traffic will make congestion worse, causing long-term disruption, with no clear entry and egress from construction vehicles. Industrial impacts, heavy goods vehicles and construction vehicles will create noise pollution and dust. How will small rural villages will absorb an influx of construction workers during the building phase.	Noted. Both through the preparation of a Transport Assessment and application of Policy I/CM: Construction management, the impacts of construction traffic will need to be identified and mitigated.
Pollution from occupation of development	Light and noise pollution from the proposed development will have impact on surrounding settlements, existing habitats and will result in the loss of dark skies.	Noted. Mitigation through buffers will reduce the impact of noise and light pollution. In terms of air pollution, an air pollution assessment will be required, and the prioritisation of active travel and public transport will reduce impacts on air quality. Policy WS/HS: Pollution, health and safety will also apply to all development. This policy will require assessments to mitigate against the impacts of development and its construction.
Car ownership	Car ownership at the development are unrealistic and the transport modelling underestimates the modal shift.	Noted. The Transport Analysis and Evidence (June 2026) sets out an indicative framework for delivering a vision-led development that supports the transport user hierarchy and reduces car dependency. It defines and explores measures that support low-car living building on mode share and internalisation proposals.
Water supply	The proposed water infrastructure is insufficient in supplying water for 4,500	Noted. The plan sets out clear trigger points for the development in relation to the provision of water

	homes. Nothing can be progressed until all water projects have been soundly developed and approved and can demonstrate they can be delivered in time to support the whole of Greater Cambridge, let alone Grange Farm.	infrastructure. Wider infrastructure projects across the region are subject to a separate consenting process which is currently underway. Other policies in the plan also set high standards in relation to water usage in order to deliver sustainable development. The Local Plan was informed by evidence exploring water supply availability, and the policy requires appropriate phasing to respond to the availability of strategic water supply interventions. The Managing Water, Carbon and Finite Resource (June 2026) evidence also explores measures around the integrated water resource management opportunities at Grange Farm.
Water phasing and delivery	Questions as to whether water transfer networks from Grafham Water or the Fens Reservoir can be delivered in time to provide for proposed development. Water capacity should be demonstrated before any development proceeds. Hydrological requirements must be coordinated with drainage, landscape and masterplanning.	Noted. The policy identifies that conditions are likely to be necessary to limit first occupations of new dwellings until after the Grafham Transfer water supply intervention becomes operational or where alternative headroom is secured, in consultation with Cambridge Water and the Environment Agency, where the LPA is satisfied that there is scope for earlier development. The policy requires the Integrated Water Management Plan and Water Cycle Strategy and other strategies listed in Part 27 to inform design of the new settlement, allowing incorporation of innovative and sustainable water management.
Impact on chalk aquifer and chalk streams	The chalk aquifer connected by rare chalk streams, including the River Granta will be severely impacted by development and will have dire consequences on water pollution and pressure on the aquifer through continued over-abstraction. The position	Noted. 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 wastewater will be managed to mitigate impacts on the chalk stream and aquifers. The policy requires a foul drainage strategy and site-specific

	over the chalk aquifer will also risk groundwater contamination.	Flood Risk Assessment to be prepared by the applicant in line with the Climate and Sustainability Innovation Delivery Plan. The Managing Water, Carbon and Finite Resource (June 2026) evidence states that the landowners are committed to ensuring any water discharged to ground or surface water will only be released once it meets stringent regulator-approved quality standards, thereby safeguarding the River Granta and its sensitive chalk stream ecology.
Water evidence base	The policy lacks independent hydrological modelling, groundwater monitoring, a guaranteed water supply, a robust wastewater strategy and enforceable environmental protections. The new NPPF introduces new water supply, drainage and water policies that the current evidence base may not address.	Noted. The site promoter has engaged independently with Environment Agency, Anglian Water and Cambridge Water to understand how impacts can be reduced as set out in the Managing Water, Carbon and Finite Resource (June 2026) evidence. 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 preparation of evidence through to the planning application submission, in consultation with the Environment Agency and Anglian Water.
Wastewater capacity	There is an absence of a clear waste water, drainage or sewage strategy with treatment, provision and surface-water runoff / flooding risk not adequately resolved. The location of treatment works will impact on existing residents with capacity not demonstrated adequately in the policy.	Noted. The Managing Water, Carbon and Finite Resource (June 2026) evidence base sets out the approach to water supply, sustainable drainage, groundwater discharge and recharge, water recycling and wastewater. The policy sets out that the development should be informed by an Integrated Water Management Plan and Water Cycle Strategy that will form part of the planning application.

		The Councils have engaged with Anglian Water throughout the plan making process, and agreed a statement of common ground that addressed wastewater provision.
Impact on ground water and contamination	Construction and long-term occupation could reduce groundwater recharge. There is also potential contamination from road run-off, sewage and urban development could affect water quality.	Noted. The Managing Water, Carbon and Finite Resource (June 2026) evidence identifies that in addition to the curtailment of an existing borehole, groundwater in the aquifer can be supplemented through a groundwater discharge permit. Work is ongoing with the Environment Agency to consider groundwater discharge with regard to other forms of treated wastewater.
Risk of flooding	Grange Farm creates a serious risk of flooding to surrounding settlements from surface water run-off. The elevated development and extensive impermeable surfaces will increase surface water and possible downstream flooding. Environmentally tested onsite wastewater and Sustainable Drainage Systems (SuDS) should be approved before the Plan is agreed.	Noted. Part 28 of the policy addresses the requirement for a Site-Specific Flood Risk Assessment to be carried out with other elements of the policy considering incorporation of water management including sustainable drainage systems through an Integrated Water Management Plan and Water Cycle Strategy. Other policies in the plan address flooding considerations, which in combination, set out a clear and robust approach to managing flooding. Through further technical studies at the planning application stage, additional flood mitigation measures beyond the site and SEA may be required but this would need to be demonstrated.
Landscape views	The development is elevated and would be highly visible from nearby settlements and further out to locations such as Ely. This will cause significant harm to views and alter existing important views, tranquillity and the historic landscape character of the surrounding countryside with intrusion on the existing skyline with high-density or multi-storey buildings that should be limited.	Noted. A Landscape Strategy (2026) has been prepared to build on previous landscape and visual baseline analysis from draft Local Plan stage. The Strategy establishes a robust landscape framework that informed the policy. Part 12c requires the preparation of a Landscape Visual Impact Assessment that integrates the SEA and wider landscape context and Part 12e of the policy requires the undertaking of a Historic Landscape Characterisation and Landscape Character Assessment

	A revised Landscape Visual Impact Assessment is required.	to set out the impacts on landscape character, long range and local views and the identification of necessary mitigation measures. The indicative average densities set out in the policy identify the areas where higher density are appropriate with the lowest topographical points of the site providing higher-density development.
Landscape buffers	Question as to whether the landscape buffers will adequately screen the settlement with mitigation insufficient in addressing this issue. It is not clearly defined as to how building on a hill will be appropriately mitigated. Confirmation is required that this is compliant with Appendix H: Skyline and tall building guidance.	Noted. The spatial framework is indicative. Where buffers are part of the suggested package of mitigations these have been shown on the spatial framework to indicate this intention. Part 21b of the policy sets out the requirement to create a clearly defined green buffer that preserves existing viewpoints and strengthens the existing treeline along the edge of the site. Additional buffering may be designed in during the masterplanning and development management process. Additionally, other Local Plan policies will apply at the planning application stage, including, where relevant, Policy GP/HD: Housing density and Policy GP/ST: Skyline and tall buildings including Appendix H.
Loss of agricultural land	The loss of best and most versatile productive agricultural land and farmlands is not acceptable and jeopardises food security.	Noted. As part of preparing the development strategy for the Local Plan, the Councils have had to consider a number of trade-offs. In this instance, the opportunities presented by the proposed location of the site close to established employment sites and the CSET public transport corridor were significant factors in determining an appropriate location for growth. Within the SEA, there will continue to be opportunities for farming as set out in the policy.

Impact on historic environment and heritage assets	The heritage constraints have not been fully assessed or protected and there is concern for compliance with heritage legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Development would harm historic and archaeological assets including listed buildings and conservation areas. Proposal would cause irreversible loss of the area's historic character. There should be greater separation between development and heritage assets.	Noted. The policy is supported by a Heritage Impact Assessment (HIA). This document identifies 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 at the masterplan stage. GCSP have also been continually engaging with Historic England and the Cambridgeshire County Council Historic Environment (archaeology) team to work through and agree any mitigation measures for the impact of the development on these assets and their setting.
Archaeology and Roman Road Scheduled Monument	Impact on the Roman Road Scheduled Monument and other significant archaeological potential and nationally significant remains. Development capacity should not be fixed until archaeological constraints are understood with investigation completed before allocating the site.	Noted. Matters relating to archaeology are addressed throughout the policy, noting that non-designated archaeology may be of national significance. The currently known areas of high archaeological potential are also identified on the spatial framework, noting that the policy requires further extensive archaeological investigation to be undertaken. The policy should be read in combination with Policy GP/AR: Archaeology. Part 12d of the policy identifies that an archaeological Desk Based Assessment and appropriate field evaluation of archaeological investigation is required. 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 Heritage Impact Assessment (HIA). The policy is clear that engagement with statutory consultees and further archaeological evidence is needed at the planning

		application stage to inform the site wide masterplan and any necessary mitigation measures.
Bronze Age barrows	Grange Farm forms part of a wider prehistoric landscape including the Bronze Age barrows that is a Scheduled Monument. Housing quantum should not be fixed until the archaeological constraints and their implications are properly established.	Noted. 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 on these assets and their setting.
Site of Special Scientific Interest (SSSI)	The development will have significant impact on the Roman Road SSSI from access and recreational pressures. There is potential for recreational disturbance to protected sites and nature sites beyond the site boundary. Policy must ensure that appropriate measures are implemented to minimise recreational disturbance and pressures on ecology at the SSSI along the Worstead Roman Road which is a Public Right of Way and a European Long Distance Route and at other nearby SSSIs and nature sites within easy travel distance.	Noted. Grange Farm has been assessed in the Habitat Regulation Assessment and mitigation measures identified in this document have been incorporated in the policy wording, as well as suggested mitigations from engagement with Natural England. The SEA is designed to manage recreational pressure on sensitive ecology and habitats including the SSSI. It sets out to prevent direct access onto the SSSI with grasslands used as a buffer to the Roman Road Public Right of Way. Policy also sets out to ensure that appropriate measures are implemented to minimise recreation disturbance with a Recreational Pressure Assessment required. An ecological survey and monitoring is also required for specific sensitive locations outside of the site's red line boundary that may be impacted by the development.
Strategic Enhancement Area	The SEA and proposed green infrastructure are too limited and will not be enough to offset recreation pressures.	Noted. The Strategic Enhancement Area for the site sets out a clear requirement for it to, in part, minimise as much as possible the impact of development on the landscape. The SEA will be predominately used for agricultural purposes, green infrastructure (including for informal recreational uses) and the provision of new habitat and habitat restoration. The Strategic Enhancement Area will contribute to retaining a clear green buffer between

		settlements and minimise recreational pressures on other areas.
Biodiversity measures	Biodiversity measures and mitigation would not compensate for the loss of existing habitats, countryside and greenfield land.	Noted. The policy identifies a number of measures to maintain biodiversity value and development proposals will also need to be considered against the relevant policies set out in the Biodiversity and Green Spaces chapter of the Local Plan. To inform the design, a Biodiversity Implementation and Management Plan providing appropriate mitigation and enhancement must be prepared. The Preliminary Ecological Appraisal (2026) makes design recommendations to minimise ecological impacts and includes a baseline Biodiversity Net Gain (BNG) calculation for different scenarios on the site to understand potential layout and access arrangements.
Habitats and ecology	Grange Farm will have impacts on existing habitats, ecology and local ecosystems. Policy should enhance ecological links beyond the site boundary, responding to strategic priorities for this area from the Cambridge Nature Network and Local Nature Recovery Strategy.	Noted. Through the preparation of the Local Plan, the councils have engaged with Natural England and other relevant stakeholders on this matter. Under the Nature section of the policy, it sets out a clear requirement for further studies to be undertaken to minimise the impacts of development on the SSSI and local ecology. Furthermore, ecological survey and monitoring is required in the policy for specific sensitive locations outside of the site's red line boundary that may be impacted by the development in order to minimise impacts on local habitat and ecological networks.
Sustainability	Sustainable building practices should be implemented from design, construction through to future operation and maintenance to reduce environmental impact. Development should implement key sustainability practices including passive design, low-carbon, renewable energy,	Noted. This is consistent with the policies set out in the Climate Change chapter of the Local Plan and therefore are not repeated in this policy.

	water conservation, green roofs and living walls.	
Evidence base	Evidence base is incomplete, outdated or overly dependent on future studies. The evidence does not adequately demonstrate that this strategic allocation is justified, effective, positively prepared or consistent with national policy. The published material does not appear to demonstrate how these landscape constraints, responses and differing development forms have informed the proposed capacity of approximately 4,500 homes.	Noted. The Councils' are of the view that the evidence undertaken to support the allocation is robust, sound and proportionate for the purposes of plan making. The evidence includes undertaking landscape assessments, heritage baseline assessments, preliminary ecological assessments and transport assessments as well as placemaking studies to demonstrate how development can be delivered sustainably in this location. Through the preparation of the Local Plan, stakeholder engagement has been undertaken by the councils to inform the allocation and identified mitigation measures. This includes statutory consultees such as Historic England, Natural England, the Highways Authority and National Highways in order to form a clear vision for the site and establish a robust policy approach to manage the sensitive heritage context, SSSIs and impacts on the road network through subsequent planning applications.
Capacity of existing infrastructure and services	Existing schools, GP surgeries, hospitals (including nearby Addenbrooke's Hospital), community facilities and local services are already at capacity and inadequate to support any residents from the size of development at Grange Farm. Can emergency services, policing and other public services cope with additional pressure.	Noted. The Infrastructure Delivery Plan has identified the infrastructure and services required for the Local Plan and for individual strategic sites. Discussions with the education authority have confirmed the need for both primary and secondary provision at Grange Farm. At this point, it is forecasted that Grange Farm will provide enough school places to serve the development in full. The education and healthcare infrastructure projects identified in the IDP will also mitigate the additional demand on these services arising from wider 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 and this engagement in relation to the Greater Cambridge Local Plan has been on-going and informed both the IDP as well as the infrastructure related policies.
Existing services in surrounding settlements	Great and Little Abington services and amenities including school, pub, shop, post office and village institute will be overwhelmed by new development. The new town must be self-contained and priority must be given to building schools, a health centre, shops and a community centre.	Noted. Grange Farm is designed to mitigate impact on surrounding village facilities through the provision of its own infrastructure aligned to the phasing of the development including healthcare facilities and schools.
Provision of services and amenities	Proposed shops, leisure facilities and other amenities are insufficient or poorly defined. The additional provision of education (primary and secondary school places) is not sufficient to rely upon.	Noted. The timing of services and facilities to support new residents will need to be carefully considered at the planning application stage and linked to the phasing plan. This will vary depending on the type of infrastructure and the plan outlines that temporary provision may be required until a sufficient level of population has been achieved to deliver permanent facilities. Based on the viability assessment undertaken as part of the Local Plan, the development is considered to be viable. The provision of new and/or enhanced services and facilities will be secured through legal agreements and/or CIL contributions.

Phasing of development and delivery of services	Concern that housing would be built before any required infrastructure or services are delivered. Essential infrastructure should be funded, secured and operational before homes are occupied and should be made clearer in the policy. Experience elsewhere is of infrastructure arriving late on major developments and requires enforceable phasing.	Noted. The timing of services and facilities to support new residents will need to be carefully considered at the planning application stage and linked to the phasing plan. This will vary depending on the type of infrastructure and the plan outlines that temporary provision may be required until a sufficient level of population has been achieved to deliver permanent facilities. Based on the viability assessment undertaken as part of the Local Plan, the development is considered to be viable. The provision of new and/or enhanced services and facilities will be secured through legal agreements and/or CIL contributions.
Control of delivery	Provision of some infrastructure outside Councils or the developer's control so cannot and should not be relied upon. If any development is to be considered, the plan must legally bind the delivery of critical infrastructure delivery prior to first occupation, rather than rely on speculative or unfunded future schemes. Will these requirements be resolved and in time to deliver the housing trajectory.	Noted. The timing infrastructure availability, explored in a number of evidence documents but in particular the Infrastructure Delivery Plan, has informed the development trajectory. Delivery of services and facilities to support new residents will need to be carefully considered at the planning application stage and linked to the phasing plan. This will be secured through legal agreements and/or CIL contributions.
Employment provision	The reasoning behind employment provision at Grange Farm is not clear. The assumption that people living in the new town will work locally but there is no guarantee of this.	Noted. The site is in close proximity to a number of established and expanding employment campuses such as the Wellcome Genome Campus and Babraham Research Campus. It will also be well connected to Cambridge and the Cambridge Biomedical Campus via CSET Phase 2. It will therefore be well connected to several employment sites by both active travel and public transport.

		Additionally, 35,000 sqm of employment floorspace has been identified to create an appropriate mix of uses and employment opportunities within the site.
Value of land and homes	New development will devalue the existing homes in the areas surrounding Grange Farm, requiring compensation paid to residents once legal challenges are made.	Noted. The purpose of the Local Plan is to meet the housing and employment needs of the area and to identify suitable and deliverable sites that will meet these needs. National planning policy provides a series of tests for soundness and legal compliance that a local plan must satisfy in order to be adopted; the Councils are of the view that the plan passes these tests. The allocations within the Plan establish the principle of development and will guide future planning applications. Through the policies of the plan, the councils are of the view that new development can be positively integrated into the area and benefit both existing and future residents. With the exception of development undertaken through Permitted Development Rights, all development will need to be determined following the submission of a planning application. National Planning Practice Guidance Paragraph 008 of the Determining a Planning Application is clear that, 'in general [the courts] have taken the view that planning is concerned with land use in the public interest, so that the protection of purely private interests such as the impact of a development on the value of a neighbouring property or loss of private rights to light could not be material considerations.'
Provision for Gypsy and Traveller and Travelling Showpeople	It is not an appropriate location for provision of Gypsy and Traveller plots.	Noted. The Councils' are required by national planning policy to meet the housing needs of all members of the community, including Gypsy and Traveller

		accommodation. The approach to meeting the identified needs of travellers is covered within Appendix 11 of the Strategy Topic Paper (August 2026). Appendix 11 includes a review of all existing and proposed strategic sites in terms of their ability to include a traveller site(s). Specific requirements for traveller sites, including the number of sites / pitches, are set out in each of the allocation policies that are required to provide traveller sites. Additionally, some of this need will also be met on the existing strategic sites in other parts of Greater Cambridge.
National Gas Transmission Pipeline	The Site boundary is located within the 500m 'buffer zone' of a National Gas Transmission pipeline. This should be reflected in the policy wording.	Noted. The Councils are open to modifications being recommended by the Inspector to address points of clarity at the appropriate point in the examination, should the opportunity arise.
Deliverability	The site is not deliverable with cumulative reliance on uncertainty with unfunded transport and water measures.	Noted. It is demonstrated that 2,550 units are deliverable at Grange Farm within the plan period, as set out in the Proposed Submission Housing Delivery Study Addendum. The development is phased from 2034 to ensure that the delivery of sufficient water and transport infrastructure is in place prior to development commencing, as well as based on standard assumptions for delivery timescales of a site of this size. This will be considered in further detail through a phasing plan as part of a future planning application.
Viability	Funding and long-term viability concerns including lack of clarity with "indicative" costs. Assessments and a proper Masterplan should identify the full infrastructure requirements, costs, funding	Noted. The Local Plan has been informed by a proportionate and robust evidence base including a plan wide Viability Assessment. This identified that development of the site is viable including when factoring in infrastructure costs.

	and long-term viability before a site is selected.	
Feasibility	Feasibility should not be treated as synonymous with deliverability, and a succession of unresolved assumptions should not collectively be treated as evidence of delivery.	Noted. A range of evidence has been prepared to accompany the plan which demonstrates that sites proposed are available, suitable and deliverable.
Indicative elements of the policy	The policy requires definite environmental and water solutions, enforceable boundaries and height limits, infrastructure requirements and transparent costings with the removal of vague terms, and indicative strategies as set out in the policy.	Noted. The policy wording has been prepared to be site specific to ensure that the vision for Grange Farm is realised through a comprehensive approach to masterplanning and delivery. In order to achieve this, the policy requires a number of evidence studies, strategies and plans to be prepared during the life cycle of the development by the site promoters/applicants. The indicative nature of the spatial framework is to reflect the planning process in which the exact form, alignment and nature of the key moves it identifies is subject to refinement through the application process. The Local Plan has been informed by a proportionate and robust evidence base including a plan wide Viability Assessment. This identified that development of the site is viable including when factoring in infrastructure costs.
Preparation of the policy	The proposal has been rushed and is poorly justified. Grange Farm was introduced late as a “panic planning” replacement for another site.	Noted. The rationale for allocating the site in the plan is set out in the Proposed Submission Development Strategy Topic Paper which explains how the plan-making process, including Sustainability Appraisal, has considered the merits of alternative strategies and site allocation options. It is considered that the development strategy set out in the local plan provides an appropriate strategy, which has taken into account the reasonable alternatives, and is based on proportionate evidence.

		The Councils maintain their long-term ambition to see the Cambridge Waste Water Treatment Plant (CWWTP) relocated to realise comprehensive redeveloped of the NEC area but recognise this may not be possible within the current plan period due to the lack of funding. In order for sites to be allocated for development in a Local Plan, national planning policy requires, in part, for sites to be available for development and achievable (financially viable). Given the CWWTP is operational, Anglia Water have committed to upgrading the facility and there is no funding to relocate it, allocating North East Cambridge for residential development would mean the Local Plan is inconsistent with national planning policy and therefore unsound.
Changes since draft Local Plan stage	There is a lack of clarity of what the policy proposed at draft Local Plan stage and what it is now that it has been adjusted. It is also unclear how consultation responses materially influenced the subsequent assessment or amendments.	Noted. This information is set out in the appendix to the Consultation Statement and in the Topic Paper.
Commenting on the Plan	SCDC requires all submissions to be summarised into 100 words using OpusConsult or a Word form. Legitimate comments from the public are restricted and inhibits input from the public.	Noted. The consultation platform asks respondents to submit a full text submission and/or attachment. Once submitted, the respondent is required to summarise the submission into 100 words or less. This allows Officers and the Examination Inspector to understand the key issues arising in the full submission and this approach is consistent with National Planning Policy Guidance. Officers and the Inspector review each and every submission including full text, attachments and summary to ensure comments from the public and stakeholders are considered during the preparation of the Local Plan.

Errors and inconsistencies	Need to correct inconsistencies including number of primary schools, reference to Oakington Brook, highway authority wording in paragraph 23(c)(iv), the Sustainability Appraisal landscape description and the S/CBN reference.	Noted. Part 10f of the policy identifies that development will generate the need for three primary schools. Regarding the other comments, the Councils are open to modifications being recommended by the Inspector to address points of clarity at the appropriate point in the examination, should the opportunity arise.
Mapping inaccuracies	Figures in the Plan incorrectly show Little Abington where Granta Park is located.	Noted. The Councils are open to modifications being recommended by the Inspector to address points of clarity at the appropriate point in the examination, should the opportunity arise.

Policy S/NST Northstowe New Town

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/NST Northstowe New Town	11	20	9	4	5

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Objection to more growth in the area	Challenge the government's narrative that we need more people in this area; we need to rebalance the economy nationally.	Noted. This matter cannot be dealt with through the policies within the local plan. The councils are required to prepare a Local Plan that addresses our identified housing and employment needs.

Additional policy requirements will delay delivery	Given the site's existing planning permissions and advanced stage of delivery the policy should support and facilitate this acceleration and not add complexity, constraints or uncertainty which could delay delivery; this includes through additional policy requirements.	Noted. The policy is sound as it seeks to ensure the local needs, as evidenced in the up to date evidence base, are addressed.
General support for the policy	Homes England support the policy and are committed to delivery alongside key stakeholders. Vistry Group support the allocation, Phase 3B will support the ongoing vitality of the new town as a whole.	Support noted.
Support for S/SEA/NST	Support for the SEA to maintain green separation with existing settlements and the protection and conservation of heritage assets.	Noted.
Uses	Objection that the requirement to provide specialist accommodation does not secure supported housing for working age disabled adults. Comment that the policy should be more flexible on the number of units to be provided.	Noted. The supporting text to Policy H/SH is clear that development proposals should have regard to the Local Plan evidence base which considers the needs of a wide range of groups, and the relevant Supported Housing Strategy, which the Councils are required to prepare to meet the Supported Housing (Regulatory Oversight) Act 2023. The supporting text explains that the policy applies to a wide range of specialist housing which could fall under use classes C2 or C3, and also that most other forms of specialist supported accommodation (other than housing for older people) are likely to be considered as affordable housing. Therefore, the approach is considered to be appropriate and reasonable.
Uses	Objects to the requirement for provision of 24 Gypsy and Traveller pitches. This was not previously identified as a requirement	Noted. The approach to meeting the identified needs of travellers is covered within Appendix 11 of the Strategy Topic Paper (August 2026). Appendix 11 includes a

	and consequently not been included within outline planning permission.	review of all existing and proposed strategic sites in terms of their ability to include a traveller site(s). Specific requirements for traveller sites, including the number of sites / pitches, are set out in each of the allocation policies that are required to provide traveller sites. Additionally, 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.
Uses	Comment that the Policy should clarify that G&T provision should be made within the Northstowe DDE. Comment that pitches should be located outside but in close proximity to the site.	Noted. The Policy provides flexibility for provision to be located within but on the edge of the development, or outside but in close proximity to the site.
Uses	Should include requirement for financial contributions to increase the capacity of local police, fire & rescue and ambulance facilities.	Noted. Potential requirement for developer contributions for emergency services is addressed by Policy I/ID. It is not necessary to reference this general requirement in site allocation policies.
Uses	There is already an approved Town Centre Strategy for Northstowe, and a Retail Needs Assessment is not required by any of the outline consents and should not be introduced at this stage. This policy should be updated to state: “Retail and other Town Centre and Local Centre uses, to be provided in accordance with an up-to-date Retail Needs Assessment or agreed Town Centre Strategy”.	Noted. The requirement of this element of the policy would only be applied through the consideration of relevant future planning applications. The policy wording does not seek to retrospectively require this to be undertaken on already permitted development.
Landscape features	Part 22 is inconsistent with the equivalent policy for Waterbeach, policy S/WNT part 17, which is based on retaining and	Noted. The policy criteria set out under the Nature part of the policy makes note of retaining and enhancing existing vegetation across various parts of the site. Therefore, the

	enhancing existing landscape features. Policy S/NST should be updated to match the wording used in S/WNT, with regards to retaining and enhancing landscape features.	policy achieves the same objectives as the comments made in the representation. It is not considered a soundness issue for the policy wording to be different between different site allocations.
Context	Comment the plan should be clear that no development will be allowed in the green separation between Northstowe and Oakington and Westwick.	Noted. The Policy is clear that the green separation must avoid the merging of Northstowe with surrounding communities, and this includes maintaining areas of countryside and landscaping, and only allowing open land uses.
Context	Inconsistency of approach to strategic landscaping with the equivalent policy for Waterbeach, which is based on retaining and enhancing existing landscape features.	Noted. The policies are site specific.
Movement	BHS supports the policy in principle but seeks further protection and enhancement of countryside access for equestrians.	Noted. Policy I/ST addresses the provision of new and protection and enhancement of existing Public Rights of Way and other routes suitable for walking, wheeling, cycle and equestrians. The Plan must be read as a whole, it is not necessary to cross-refer or duplicate requirements in other policies.
Highways	Part 27 makes reference to capacity improvements to the A14 corridor. All highways improvements delivered as part of the development of Northstowe, including those affecting the A14 corridor, are intended to mitigate the impacts of the Northstowe development alone. Other planning applications and site allocations should not rely on any increases in capacity and must demonstrate themselves through their own transport assessment how any	Noted. As set out in the relevant allocations and Infrastructure policies of the plan, development proposals are required to undertake a Transport Assessment and mitigate their impacts on the highways network.

	capacity constraints on the A14 would be mitigated as part of their proposals.	
Open space	Should clarify how strategic sports hubs are intended to function within areas that are designated as protected open space.	Noted. This is addressed in Policy BG/PO as it is a plan wide rather than site specific matter.
Resources	Comment the policy should be clear on the location, form and timing of flood mitigation measures, and requiring that they demonstrably reduce flood risk in Oakington and Westwick.	Noted. Policy CC/FM addresses the management of flood risk including the requirement for Flood Risk Assessments. The Plan must be read as a whole, it is not necessary to cross-refer or duplicate requirements in other policies.
Recycling	Part 32 could represent an additional requirement for Northstowe, as it seems to require a dedicated recycling facility, which does not reflect the material recycling processes that already occurs. The reuse of site-won materials currently takes place as part of construction and earthworks activities across Northstowe, and is managed through Construction Environmental Management Plans, Waste Management Plans and Material Management Plans (MMPs) registered in accordance with CL:AIRE principles, and secured through Reserved Matters Applications.	Noted. The application of this policy requirement may not be currently necessary given existing approved plans, agreed as part of the planning permissions for the site. Nevertheless, this may be required for future development.
Roads and parking	Part 35(i) should be updated to remove the inclusion of unadopted roads and parking enforcement being covered by Management and Maintenance Strategies, as these subjects will be covered by Section 106 stewardship requirements.	Noted. The issue of unadopted roads and parking enforcement are key considerations for large scale strategic sites like Northstowe. Therefore the policy outlines a requirement for future applications to address this.

Spatial Framework	Spatial Framework incorrectly designates the location of Parcel C2 as Open Space and Green Infrastructure.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
SEA	Unable to locate the SEA policy for this site.	Noted. The SEA policy requirements for Northstowe are set out in Policy S/NST Northstowe New Town.

Policy S/WNT Waterbeach New Town

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/WNT Waterbeach New Town	15	18	15	3	14

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
General support	Support the development. Homes England has committed considerable funding to accelerate the Waterbeach New Town development. This includes over £23m to relocate the railway station, in addition to providing a £61 million loan	Support noted.
Policy approach	Policy should be amended to outline the existing planning permissions for the site and be consistent with them as they are currently being implemented.	Noted. The Councils consider the policy as drafted is appropriately consistent with the existing permissions for the site. Nevertheless, the policy seeks to address up to date identified housing needs. This is consistent with the approach outlined by the adopted development plan and

	There are a number of discrepancies between the SFD, the SPD and the Parameters defined within the respective Outline planning permissions for Waterbeach new town west and east, which arguably render the SFD unsound, on the basis of not being effective, or at the very least may give rise to confusion as to how this is to be applied or achieved in practical terms.	consistent with the conditions attached to the planning permissions. The policy and plan is clear that the spatial framework is indicative. In this instance, the site has planning permissions and the indicative spatial framework is broadly consistent with these permissions. Whilst the Waterbeach New Town SPD will be a material planning consideration, it not a development plan document and therefore the policy and indicative spatial framework seek to embed the necessary policy requirements into this policy to ensure the site is delivered in accordance with the councils aspirations and existing permissions.
Quantum	There is inconsistency between the quantum of development identified in the Local Plan and what is permitted and how these are expressed. The policy requires clarification.	Noted. The policy expresses the quantum of development as appropriate, providing sufficient flexibility for this to be tested and agreed through the planning application process.
Uses	Objects to the requirement for provision of 24 Gypsy and Traveller pitches. This was not previously identified as a requirement and consequently not been included within either of the outline planning permissions.	Noted. The approach to meeting the identified needs of travellers is covered within Appendix 11 of the Strategy Topic Paper (August 2026). Appendix 11 includes a review of all existing and proposed strategic sites in terms of their ability to include a traveller site(s). Specific requirements for traveller sites, including the number of sites / pitches, are set out in each of the allocation policies that are required to provide traveller sites. Additionally, 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.

Uses	The entire 1,050-unit specialist requirement is expressed as Class C2. C2 is residential institutions and cannot deliver supported living, which falls within Class C3(b) or is sui generis. This is inconsistent with Policy S/NST(6)(a)(iv) and supporting paragraph 9.53, both of which recognise C3.	Noted. The supporting text to Policy H/SH is clear that development proposals should have regard to the Local Plan evidence base which considers the needs of a wide range of groups, and the relevant Supported Housing Strategy, which the Councils are required to prepare to meet the Supported Housing (Regulatory Oversight) Act 2023. The supporting text explains that the policy applies to a wide range of specialist housing which could fall under use classes C2 or C3, and also that most other forms of specialist supported accommodation (other than housing for older people) are likely to be considered as affordable housing. Therefore, the approach is considered to be appropriate and reasonable.
Uses	Remove reference to avoidance of vulnerable development east of Bannold Drove, as this has been addressed through provisions in the outline consent.	Noted. In accordance with Policy CC/FM it is appropriate to seek to ensure flood risk of a known vulnerable property is minimised.
Uses	Should include requirement for financial contributions to increase the capacity of local police, fire & rescue and ambulance facilities.	Noted. Potential requirement for developer contributions for emergency services is addressed by Policy I/ID. It is not necessary to reference this general requirement in site allocation policies.
Strategic Enhancement Area (SEA)	It is agreed that the primary role of the SEA for Waterbeach will be to safeguard the setting of Denny Abbey, whilst recognising the multifunctional functions that areas of this designation may also play in parallel.	Support noted.
Nature	Wildlife Trust supports the stronger inclusion of the Strategic Enhancement Area with policy for its explicit enhancement to include natural greenspace.	Support noted.
Vegetation	Policy Part 17 - A minor addition to this section has been suggested to reflect the	Noted. As set out in the Biodiversity and green spaces policies, there may be specific circumstances where the

	fact that not all features on the site can be retained or make a positive contribution. Recent practical experience of seeking to maintain plantation trees on site is a good example of where maintaining older, lower-quality stock is not successful, and new planting is preferable.	loss of existing trees may be appropriate. This would need to be considered against the requirements of the policies.
Movement	Changes to the Plan in relation to transport related mitigation since the Regulation 18 stage are supported. Provision of more detail in the Infrastructure Delivery Plan (IDP) is supported as is the publication of the interim Greater Cambridge Transport Strategy GCTS. The next iteration of the plan should be accompanied by finalised IDP and finalised GCTS.	Support noted.
Movement	Require a comprehensive countryside access strategy which ensures the two landownership parcels are planned, phased and delivered as one connected countryside-access network. Address connectivity barriers.	Noted. The supporting text is clear that the local planning authority expects the relevant landowners / developers to work collaboratively to support the continued comprehensive and coordinated approach to delivery.
Movement	National Trust supports the requirements of 22c which seeks financial contributions/ to enable improvement options for the cycle crossing at and connection to Bottisham Lock.	Support noted.
Movement	Relocating Waterbeach station will reduce the availability of sustainable travel options to current village residents, thereby making the plan ineffective.	Noted. The relocation of Waterbeach Station is being progressed by the Greater Cambridge Partnership and is subject to its own planning processes outside of the Local Plan.

Movement	The Plan assesses transport impact only on the strategic network. It should require assessment of cumulative impact on rural through routes including the B1047, and identify mitigation of severance, speed and safety as an infrastructure requirement securable by obligation.	Noted. The transport evidence has modelled traffic impacts arising from the development strategy in a proportionate way. Mitigation measures, focused on improving accessibility by non-car modes and including vehicular trip budgets have been identified within the strategic site allocation policies and included within the Infrastructure Delivery Plan. In combination these measures will minimise the number of vehicle trips arising from new development and thereby limit the impact on the local or strategic highway network within Cambridgeshire.
Transport mitigation	Part 23 - Refers to an 'agreed master plan' and the need for a 'transport mitigation plan'. It is not clear if either of these things exist at present. The Waterbeach SPD provides an overarching form of master plan – is this what is being referred to? With regard to transport, the OPP establishes a bespoke 'monitor and manage' based mechanism for transport mitigation. It is not clear whether this is still aligned with the 'strategic and local transport mitigation plan' referred to in the emerging Policy. If the policy is signalling something new/different in relation to a master plan and transport mitigation plan, it should be clear in what circumstances these are required and how they differ to that which is already in place and guiding delivery. It should only apply in circumstances where the mitigation approach is not already settled. Otherwise, it is unclear how and when an applicant should respond to this Policy requirement.	Noted. The site benefits from two agreed masterplans and the existing permissions outline a package of transport measures that are needed to support the build out of the site. Any relevant amendments to these permissions may require the transport package to be reconsidered and the policy outlines the councils' expectations on this matter. Part 23(e) maintains the requirement for a monitoring and management process to be implemented, which is consistent with the outline planning permissions for the site.

Corrections	Policy Part 10d - Runway Park is not a historic feature – it is a linear area of grass, alongside the former runway that is proposed for amenity, as a green corridor: it is a feature of the proposals coming forward, not an asset to be protected. Part 10g – Reference to 'village' does not make sense Part 22a - This is related to design on site, so (i) should refer to 'town', not 'village'. Policy Part 26 - A minor correction is suggested to reflect that not all development is subject to design code requirements and that Reserved Matters Approvals (RMAs) are the primary determinant of delivery.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Lifespan	The Waterbeach wastewater strategy is unjustified, remove the default requirement for a 5km pipeline transfer to Cambridge.	Noted. Anglian Water are responsible for identifying how future wastewater treatment needs can be met. The policy has been prepared on the basis of the evidence available at the present time.
Delivery ahead of required infrastructure	Concern about accelerating delivery prior to essential long-term water supply, build-out is progressing ahead of critical transport and civic infrastructure, and funding to complete projects is not guaranteed.	Noted. This policy should be read alongside the Local Plan as a whole which will ensure that the delivery of necessary infrastructure, including water supply, alongside the build-out of development as required, and the phasing of the development considers the availability of water supply.
Spatial Framework	Remove uncertainty over the status of the SFD by removing inconsistencies within policy wording. It should be indicative only.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.

	The spatial framework is inconsistent with the permitted developments and should be amended accordingly.	Some comments of support for the spatial framework revisions are noted.

Policy S/BA Bourn Airfield New Village

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/BA Bourn Airfield New Village	10	10	8	1	6

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
General support	General support for the policy.	Support noted.
Policy approach	Policy should be amended to be consistent with the outline permission that is currently being implemented and support the delivery of a new community at Bourn Airfield by including some flexibility to adapt to changing circumstances over the plan period.	Noted. The Councils consider the policy as drafted is robust and provides sufficient flexibility in order for the development to address future development needs.
Uses	EWR Co supports the continued allocation of Bourn Airfield. The proposed EWR route would pass through the site via a mined	Noted.

	tunnel. EWR Co highlights the need for any development above or near the tunnel to be suitable for such a location.	
Uses	Should include requirement for financial contributions to increase the capacity of local police, fire & rescue and ambulance facilities.	Noted. Potential requirement for developer contributions for emergency services is addressed by Policy I/ID. It is not necessary to reference this general requirement in site allocation policies.
Nature and dark corridors	The policy wording is not sufficiently strong in terms of providing mitigation such as continuous dark corridors for bats through and along the edge of the development. Suggested policy amendments to ensure dark corridors are provided and coordinated as part of wider development proposals in this area.	Noted. The Policy requires a Sensitive Lighting Strategy and bat surveys to determine the individual and cumulative impacts of development to identify and implement necessary mitigation measures. Nevertheless, the Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise to improve the policy wording.
Movement	Policy should more clearly secure a comprehensive and connected countryside-access network.	Noted. Policy I/ST addresses the provision of new and protection and enhancement of existing Public Rights of Way and other routes suitable for walking, wheeling, cycle and equestrians. The Plan must be read as a whole, it is not necessary to cross-refer or duplicate requirements in other policies.
Movement	Fails to provide adequate sustainable and active travel measures. Should address journeys to their end destination.	Noted. Policy I/ST addresses the provision of new and protection and enhancement of existing Public Rights of Way and other routes suitable for walking, wheeling, cycle and equestrians. The Plan must be read as a whole, it is not necessary to cross-refer or duplicate requirements in other policies.
Heritage	We welcome the changes made to the policy wording on heritage assets in this area.	Support noted.

Spatial framework	Spatial framework should identify designated heritage assets.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.

Consultation Statement

Summary of Representations and Councils' response - The Rural Southern Cluster



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan Regulation 22 Consultation Statement (November 2026)

GREATER CAMBRIDGE
SHARED PLANNING

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
The Rural Southern Cluster	6	6	5	0	3

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Landscape impacts	The Southern cluster is an area with extensive landscape impact and the major business parks are primarily parts of historic parklands associated with Listed Country houses. The parkland settings of those national assets should be appropriately recognised in accordance with 1990 Planning Act and Section 16 of the NPPF.	Noted. Heritage assets have been recognised in the evidence informing the local plan and within local plan policies.
Cumulative impacts of development	Concerns raised about the cumulative impacts of multiple large scale developments	Noted. Evidence supporting the local plan has considered impacts of development and appropriate mitigation measures. The Sustainability Appraisal has assessed the

	on road, water supply, local character and infrastructure.	reasonable alternatives and assessed the scenarios for different growth scenarios to understand the cumulative impacts of the plan. Each policy and site has been assessed individually and together in combination with wider impacts. In terms of water, the housing trajectory and delivery of homes is phased based on the availability of water and delivery of water infrastructure. The Infrastructure Delivery Plan looks at all of the allocations in the Plan and sets out what is required in terms of infrastructure to ensure new development has sufficient infrastructure to support a sustainable settlement.
Omission site	Upwards adjustments to housing targets should be accompanied by further allocations. Policy S/RSC/MF unsound insofar as it excludes other comparable sites.	Noted. The councils have considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. The strategy for allocating sites is therefore considered to be sound. It has been demonstrated that the Local Plan will deliver a robust 5 year housing land supply and a supply of homes to meet the identified housing need for the plan period. Additional allocations for housing are not required.
Cross boundary issues	Uttlesford supports the identified substantial growth associated with the Cambridge and Southern Cluster knowledge economy and	Noted. The Councils' will continue to engage with Uttlesford on these issues.

	innovation corridor. The Plan should encourage greater recognition that the innovation corridor extends beyond the Greater Cambridge boundary and includes Chesterford Research Park within Uttlesford.	

Policy S/RSC/WGC: Wellcome Genome Campus - Expansion Land, Hinxton

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RSC/WGC: Wellcome Genome Campus - Expansion Land, Hinxton	5	5	5	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcome some of the changes but further modifications needed to description of local heritage assets.	Noted. A Heritage Impact Assessment has been prepared for this site and the recommendations have been included in the policy wording. The Councils are open to

	Revisions to the Spatial Framework are needed to reflect these changes.	modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Overly prescriptive requirements	Minor modifications are required for clarity to make the policy requirements more effective and less prescriptive so that the policy sets more of a framework for development more generally and not just focusing on development management requirements.	Noted. The policy has been prepared and reviewed to set out appropriate uses and the policy S/WGC has been informed by the extant planning permission but also by requirements that will need to be met if that planning application is not fully implemented or if a new planning application comes in.
Conflicts with National Planning Policy Framework (NPPF)	Accesses and allocated employment and mixed-use development are contrary to NPPF Section 16 and Footnote 7, and statutory duty under the 1990 Act.	Noted. This Local Plan is a legacy plan and will be assessed under 2024 NPPF.
Infrastructure	Concerns raised about the proposed infrastructure being proportionate to the scale of the development and it is unclear in places what these requirements are and whether there is funding secured.	Noted. The requirements for infrastructure delivery at set out in the Infrastructure Delivery Plan. This indicates what infrastructure is required for the Wellcome Genome Campus. This includes energy infrastructure upgrades and new health infrastructure as secure in S106. The Infrastructure Delivery Plan and the Greater Cambridge Transport Strategy propose improvements to the wider network which will benefit the campus.
Local character and landscape	Concern raised about mitigation measures for management of impacts on landscape.	Noted. The Policy and Spatial Framework sets out mitigations for managing impacts on landscape, including the delivery of new open spaces, retention of woodland features and agricultural areas.

Viability	The challenges around infrastructure investment layer into a multitude of onerous and costly policy obligations across the Plan, the cumulative impact of which in any specific location (especially where the transport infrastructure deficit is considerable) is not tested, or is masked by a broad, whole plan viability assessment.	Noted. The Viability Assessment sets out the typologies tested for science parks and commercial development, and how these are affected by different policy requirements. These typologies have been demonstrated as viable.
Contributions to Emergency Services	Requirement for developer funded contributions towards police and fire and rescue infrastructure/ facilities should be referenced in the policy.	Noted. Potential requirement for developer contributions for emergency services is addressed by Policy I/ID. It is not necessary to reference this general requirement in site allocation policies.

Policy S/RSC/BRC: Babraham Research Campus

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RSC/BRC: Babraham Research Campus	8	8	6	1	4

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Support for the nature elements of this policy including the Strategic Enhancement Zone with specific nature objectives and the protection and enhancement of the River Granta and its wider corridor. General support for the allocation from the site promoters.	Support noted.
Heritage	Historic England have suggested modification to reference to Babraham Hall's listing status.	Noted. A minor modification can be made to correct the listed building grade of the referenced building.
Public Rights Of Way (PROW)	The masterplan should take into account PROWs and connections to the Campus and CSET.	Noted. Public Rights of Way will need to be appropriately protected. It is not necessary to duplicate this in this policy. Connections to CSET will be refined through the transport assessment required with the submission of a planning application.
Impact on landscape	Concerns raised on inconsistency of management of landscape impacts, in comparison to Granta Park. Concerns raised about the Strategic Enhancement Area and this being used for residential / commercial putting additional pressure on the Green Belt and heritage assets. The impact of the development on heritage assets has not been assessed.	Noted. A number of mitigation measures have been set out in the policy wording to manage the impacts on landscape including enhancing the corridor of the Rover Granta, delivery of green infrastructure measures and integrating with the wider green and blue infrastructure network. The Strategic Enhancement area is defined as an area for biodiversity and greening enhancement to manage the

		impacts of the development on the Green Belt. This is specified in the policy wording. The use of this land for residential and commercial development would be in conflict with the proposed intention for the function and purpose of the SEA. A Heritage Impact Assessment has been completed for this site and the recommendations included within the policy wording to manage impacts on heritage assets.
Transport mitigations	The CSET contribution requirements should be replaced with contributions to A1307 bus priority measures as this is a much more effective transport mitigation.	Noted. The policy sets out a financial contribution to strategic public transport and active travel schemes and highways mitigation, it is not ring fenced specifically to CSET. However, CSET has been assessed as the core piece of public transport infrastructure required in this location to serve the Campus. The financial contributions will be allocated to key pieces of transport infrastructure serving the Campus.
Contributions to Emergency Services	Requirement for developer funded contributions towards police and fire and rescue infrastructure/ facilities should be referenced in the policy.	Noted. Potential requirement for developer contributions for emergency services is addressed by Policy I/ID. It is not necessary to reference this general requirement in site allocation policies.
Strategic Enhancement Area	Suggested modifications to include drainage, habitat compensation, sustainable and green space in the strategic enhancement area.	Noted. The proposed uses in the SEA are set out in the policy to enhance biodiversity and create a buffer to manage impacts on the Green Belt.
Site boundary and Spatial Framework	Amend the site boundary title and amend the spatial framework to align with	Noted. The Councils are open to exploring modifications at the appropriate point in the examination, should the

	proposed planning application. Show the CSET route correctly on the map.	opportunity arise to ensure the technical correctness of the framework diagram if these go beyond minor modifications.
Minor points of clarity	Minor points suggested for clarity of requirements including open space, refining the protection of heritage assets and landscape assets.	Noted. The Councils are open to modifications being recommended by the Inspector to address points of clarity at the appropriate point in the examination, should the opportunity arise.
National Gas Transmission Pipeline	The Site boundary is located within the 500m 'buffer zone' of a National Gas Transmission pipeline. This should be reflected in the policy wording.	Noted. The Councils are open to modifications being recommended by the Inspector to address points of clarity at the appropriate point in the examination, should the opportunity arise.

Policy S/RSC/MF: Land at Maarnford Farm, Hunts Road, Duxford

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RSC/MF: Land at Maarnford Farm, Hunts Road, Duxford	5	5	2	0	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	General support for the site allocation.	Support noted.
Active travel connections	Whittlesford Parkway is not within walking or cycling distance and there is not public transport. Concerns were raised around safety issues.	Noted. The site is adjacent to the DDE and benefits from being in proximity to existing and proposed transport connections, as identified in the Infrastructure Delivery Plan and the Greater Cambridge Transport Strategy. Furthermore, a Transport Assessment will be required to assess the impact of the development on the local road network and road safety to ensure any mitigations are delivered as part of the planning application.
Congestion	Concerns raised around congestion and road safety, particularly around the station, A1301, A505, during events and with HGV traffic.	Noted. A Transport Assessment would be required to mitigate impacts arising from the proposed development. This would assess and mitigate issues with congestion and road safety at a scheme level. The Greater Cambridge Transport Strategy identifies improvements to the A505 and South corridor package, including completion of the Melbourn and Sawston Greenways, Cambridge South West Travel Hub and Foxton Station, A505 corridor improvements, Whittlesford Parkway station upgrades, higher capacity trains between Cambridge and London terminus stations on both key routes in the medium term.

Water supply	Development will create additional demand on water supply.	Noted. The Local Plan has been informed by evidence considering water supply availability, and the allocation can be accommodated.
Omission site	Policy S/RSC/MF unsound insofar as it excludes Site 40509 adjoining Sawston, a higher-order Rural Centre. Do not object to S/RSC/MF but considers the Council has not demonstrated a consistent comparative approach to site selection.	Noted. The councils have considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. The strategy for allocating sites is therefore considered to be sound. It has been demonstrated that the Local Plan will deliver a robust 5 year housing land supply and a supply of homes to meet the identified housing need for the plan period. Additional allocations for housing are not required.
Site boundary amendment	Site promoter has submitted a more up to date red line boundary that should be reflected in the allocation.	Noted. The minor map amendment sought is not entirely clear from the representors submission. Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination should it be necessary for soundness.
Building heights	Concerns raised about restrictive nature of the reference to the two commercial storeys and this should instead be replaced by a clear maximum building height requirement.	Noted. The HIA sets out recommendations to mitigate impacts on heritage and landscape in this location and these recommendations have been included in the policy wording.

Policy S/RSC/SBR: Land South of Babraham Road, Sawston

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RSC/SBR: Land South of Babraham Road, Sawston	3	3	3	0	3

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Contributions to Emergency Services	Requirement for developer funded contributions towards police and fire and rescue infrastructure/ facilities should be referenced in the policy.	Noted. Potential requirement for developer contributions for emergency services is addressed by Policy I/ID. It is not necessary to reference this general requirement in site allocation policies.

Allocation of additional site	Policy S/RSC/SBR unsound insofar as it allocates approximately 280 homes at Sawston while excluding the substantially smaller Site 40509 immediately to the east of H/1C. BRC should not be removed or the site area reduced. It is instead requested modification is to retain S/RSC/SBR as proposed and additionally allocate the reduced Site 40509, Land to the south of Babraham Road and east of H/1:C, Sawston, for approximately 24 dwellings.	Noted. The councils have considered the suitability of alternative development strategies and sites to accommodate development needs as part of the plan preparation process. The Proposed Submission Local Plan provides an appropriate strategy and allocations for meeting identified development needs, and is sound. Further allocations are therefore not required in order to make the plan sound.

Policy S/RSC/FSS: Former Spicers Site, Sawston Business Park, Sawston

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RSC/FSS: Former Spicers Site, Sawston Business Park, Sawston	11	11	6	0	3

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcomes the changes made to the policy in relation to protection of the Scheduled Monument, no further changes required.	Noted.
Contributions to Emergency Services	Requirement for developer funded contributions fire and rescue infrastructure/ facilities should be referenced in the policy.	Noted. Potential requirement for developer contributions for emergency services is addressed by Policy I/ID. It is not necessary to reference this general requirement in site allocation policies.
Environmental recreation	The policy should explicitly require the protection and enhancement of the site's lake, woodland and biodiversity assets, together with appropriate public recreational access.	Noted. The Local Plan includes policies to protect and enhance biodiversity and manage habitat, and creation and protect open and green space.
Active travel connections	Cycle routes down Whittlesford Road need further upgrades and improved active travel connections between Whittlesford Little Shelford and Whittlesford Parkway Station, and A1307 Stapleford. There should be amenity space provision for non-cyclists as well.	Noted. The Greater Cambridge Transport Strategy (2026) looks at mitigations required for the wider Great Cambridge network and this includes measures to improve congestion around the A505 and the network around Whittlesford Parkway. The Infrastructure Delivery Plan (2026) also sets out specific essential pieces of infrastructure which includes active travel improvements along the A505 to connect Wellcome Genome Campus to Whittlesford Parkway station.

		For any major planning applications a Transport Assessment will be required, which will look at road safety and mitigation measures to minimise the impacts of the new development in the existing network.
Oversupply of research floorspace	Concerns raised about oversupply of research floorspace in this area which places an additional demand on local services.	Noted. The strategy in the Local Plan is to support the continued growth of the Greater Cambridge Economy to provide a sufficient and flexible employment land supply. This existing employment site provides opportunities to contribute to meeting the future needs of the area.
Non-developable area	The lapsed planning permission was approved with development within the non-developable area indicated on the map intended to protect the Scheduled Monument. The map should reflect the consented lapsed permission, the green line is making the site undeliverable.	Noted. This change was proposed by Historic England to protect the Scheduled Monument and its setting. The HIA has subsequently been reviewed to identify what a suitable review of this boundary would look like. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
National Gas Transmission Pipeline	The Site boundary is located within the 500m 'buffer zone' of a National Gas Transmission pipeline. This should be reflected in the policy wording.	Noted. The Councils are open to modifications being recommended by the Inspector to address points of clarity at the appropriate point in the examination, should the opportunity arise.

Policy S/RSC/CC: Comfort Café, Fourwentways

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RSC/CC: Comfort Café, Fourwentways	1	1	1	0	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	General support for the allocation.	Support noted.
Density	The building height should be in line with the treeline and therefore the capacity should be reduced to 2,000 square metres.	Noted. The policy has been informed by the preparation of an HIA which sets out development should be at a sympathetic height and lower than the surrounding treescape at around 3 commercial storeys.

Policy Areas in the Rest of Rural Area

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy

Policy Areas in the Rest of Rural Area	1	1	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Cumulative impacts	Concerns raised about impact on local character and infrastructure with additional measure from housing and employment and the loss of farmland and wildlife to development.	Noted. The Local Plan has considered environmental, social and economic impacts to inform the plan and identify appropriate mitigation measures.

Policy S/PA/LN: South of A1307, Linton

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/PA/LN: South of A1307, Linton	0	0	0	0	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
No representations		

Policy S/AMC/WHD: Whittlesford Parkway Station Area, Whittlesford Bridge Area of Major Change

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/AMC/WHD: Whittlesford Parkway Station Area, Whittlesford Bridge Area of Major Change	13	13	9	2	7

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Support for the allocation and vision for the transport hub and amendments to include step free access and general connectivity.	Support noted.
Engagement	Network Rail are supportive of the allocation and encourage early engagement by the Councils with Network rail.	Support noted. The request for continued co-operation and engagement is welcomed.
Access to the station	Access to the station should be improved with connectivity internally with lifts to the platform, and improved cycle and public transport connections considering the increase in passengers to the station.	Noted. The policy sets requirements regarding improved functionality and access.
Delivery	There needs to be a clearer strategy, certainty and commitment to invest in their infrastructure delivery. There is a lack of an effective delivery mechanism. There is a lack of commitment to the timing and funding of these improvement.	Noted. The Infrastructure Delivery Plan sets out the costings for key infrastructure to deliver key pieces of infrastructure and suggests relevant funding sources. Whittlesford Parkway improvements are also identified the Combined Authority's Greate Cambridge Transport Strategy.
Engagement	Landowners would welcome engagement with other landowners to bring forward a comprehensive scheme.	Noted.
Access	An agricultural access through the centre of the policy area must be maintained.	Noted. The detailed matter of accesses to adjoining land is not addressed in the policy. The Councils are open to modifications being recommended by the Inspector at the

		appropriate point in the examination, if it was considered necessary for soundness.
Transport impacts	Concerns raised about impact on local congestion and transport particularly on the A505 from the increased use of the station.	Noted. Development within an area of major change does not have a specific quantum of development and therefore it cannot be included in the transport modelling. The Greater Cambridge Transport Strategy (2026) looks at mitigations required for the wider Great Cambridge network and this includes measures to improve congestion around the A505 and the network around Whittlesford Parkway. The Infrastructure Delivery Plan (2026) also sets out specific essential pieces of infrastructure which includes active travel improvements along the A505 to connect Wellcome Genome Campus to Whittlesford Parkway station. For any major planning applications a Transport Assessment will be required, which will look at road safety and mitigation measures to minimise the impacts of the new development in the existing network.
Omission site	Promotion HELAA Site ID 200765 to promote a more comprehensive development that aligns with Policy S/AMC/WHD and the Councils' ambitions.	Noted. The councils have considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. The strategy for allocating sites is therefore considered to be sound. Some sites proposed for development by developers/landowners have been rejected as part of this process.

Principle of residential development	The policy should set out that residential development is encouraged in this location. Particularly in relation to the changes to the NPPF (2026).	Noted. Point E of the policy supports complementary uses including residential development.

Policy S/AMC/GP: Granta Park Area of Major Change

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/AMC/GP: Granta Park Area of Major Change	4	4	3	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Clarity	Minor wording changes suggested for clarity.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Heritage	Historic England have suggested minor modifications to amend reference to heritage assets, the need for a heritage	Noted, reference to other heritage assets could be made if the inspector considers necessary for soundness.

	impact assessment and that the building heights should be lower than the surrounding treescape.	
Transport impacts	Cumulative impacts of all of the proposed development should be assessed together to mitigate impacts on congestion on the local road network, specifically the A505 and around Whittlesford Parkway Railway Station.	Noted. The area of change would guide future proposals should they come forward within the exciting site. The Greater Cambridge Transport Strategy (2026) looks at mitigations required for the wider Great Cambridge network and this includes measures to improve congestion around the A505 and the network around Whittlesford Parkway. The Infrastructure Delivery Plan (2026) also sets out specific essential pieces of infrastructure which includes active travel improvements along the A505 to improve connections to Whittlesford Parkway station. For any major planning applications, a Transport Assessment will be required, which will look at road safety and mitigation measures to minimise the impacts of the new development in the existing network.
Building heights and local character	Concern raised about impacts on heritage assets and ensuring the building heights remain consistent in the local area. There is discrepancy in the approach to Granta Park.	Noted. Point 1c of the policy sets out how building heights, massing and materials can be managed in a way that can minimise the impacts In terms of Granta Park, recent development would not have been assessed against this version of the Greater

		Cambridge Local Plan, and therefore it could not take into account the recommendations.

Policy S/AMC/WGC: Wellcome Genome Campus, Hinxton Area of Major Change

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/AMC/WGC: Wellcome Genome Campus, Hinxton Area of Major Change	3	3	2	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Support for the creation of the major change.	Support noted.
Clarifications	Amendments are sought by the site promoter to improve clarity and provide greater flexibility for campus operations, redevelopment and the proportionate delivery of supporting infrastructure.	Noted. The Councils' consider the overall approach to the policy is sound, including seeking a masterplan for the site and to ensure uses are appropriate to the campus.

Heritage	Historic England welcome the proposed policy wording although recommend changes to criterion i) of the policy to more accurately reflect the heritage assets within the Area.	The request to add reference to other grade II buildings on the site is noted, the Councils are open to modifications being recommended by the Inspector if considered necessary for soundness.
Transport impacts	Concerns raised about impact of additional development on the A505 and Whittlesford Parkway Railway Station.	Noted. As existing commitments the campus expansion has been considered in the transport evidence, and the policy provides a framework for consideration of any future proposals within the campus. The Greater Cambridge Transport Strategy (2026) looks at mitigations required for the wider Great Cambridge network and this includes measures to improve congestion around the A505 and the network around Whittlesford Parkway. The Infrastructure Delivery Plan (2026) also sets out specific essential pieces of infrastructure which includes active travel improvements along the A505 to connect Wellcome Genome Campus to Whittlesford Parkway station.

Policy S/AMC/IWM: Imperial War Museum, Duxford (inc. AvTech 1) Area of Major Change

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/AMC/IWM: Imperial War Museum, Duxford (inc. AvTech 1) Area of Major Change	8	9	7	0	5

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	General support for the allocation and proposed approach. Support from Imperial War Museums.	Support noted.
Scope of the Masterplan	The policy should recognise there is already a masterplan in place and that it is development within the site rather than comprehensive redevelopment.	Noted. The policy focuses on master planning in order to ensure a cohesive approach to development when individual proposals come forward.

	Amendments suggested to wording around masterplan to increase flexibility and not create dependency between different parcels of land.	
Development	Historic England suggest that the potential uses for the land in the west end of the site should be set out in the policy and/or supporting text.	Noted. The policy sets an appropriate framework for considering the suitability of future uses.
Transport impacts	The effect of this development on the road network - particularly the A505 - and Whittlesford Parkway railway station must be assessed together with all the major development plans in the local area. Masterplan should establish clear principles for transport mitigation. Plan does not address potential impact of expanded development at Duxford on the A505 and Junction 10 of the M11. Need measures to minimise impacts on the A505 and Junction 10 of the M11, including junction improvements, better public transport connections, extended cycle routes and safe pedestrian crossings.	Noted. The policy identifies the Museum site as an area of major change, it does not allocate a specific quantity of development. For any major planning applications, a Transport Assessment will be required, which will look at road safety and mitigation measures to minimise the impacts of the new development in the existing network. The Greater Cambridge Transport Strategy (2026) looks at mitigations required for the wider Great Cambridge network and this includes measures to improve congestion around the A505 and the network around Whittlesford Parkway. The Infrastructure Delivery Plan (2026) also sets out specific essential pieces of infrastructure which includes active travel improvements along the A505 to connect Babraham site and Wellcome Genome Campus to Whittlesford Parkway station.

Consultation Statement

Summary of Representations and Councils' response - Rest of Rural Area



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan Regulation 22 Consultation Statement (November 2026)

GREATER CAMBRIDGE
SHARED PLANNING

Rest of the Rural Area

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RRA Rest of Rural Area	12	18	17	1	15

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Support for not allocating specific sites promoted through the Call for Sites, as these are not considered to reasonable alternatives.	Support noted.
Omission sites	A number of sites not allocated and promoted through the Call for Sites process have made a representation to be allocated under the Rest of Rural Area, and to challenge the methodology. This includes allocation of additional employment land for B2 and B8 uses.	Noted. The councils have considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. The strategy for allocating sites is therefore considered to be sound. It has been demonstrated that the Local Plan will deliver a robust 5 year housing land supply and a supply of homes to meet the identified housing need for the plan period. Additional allocations for housing are not required. Appropriate

		allocations have also been identified to meet employment needs.

Policy S/RRA/SHF: Land north of A3107, Bar Hill (Slate Hall Farm)

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RRA/SHF: Land north of A3107, Bar Hill (Slate Hall Farm)	26	26	20	3	17

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Support for the site allocation as an appropriate location for location for logistics and lorry parking. Support from Huntingdonshire District Council for the policy.	Support noted.
Environmental concerns	Concerns raised about the loss of trees, impact on pollution in Oakington Brook, noise and light pollution, flood mitigation, and wider environmental impacts.	Noted. The site assessments informing the plan consider that the site is capable of being developed with appropriate mitigation. The Local Plan should be read as a whole, including policies addressing these matters.
Loss of agricultural land	Concerns raised about loss of land to logistics from food production.	Noted. The HELAA assesses every site that was promoted during the Call for Sites. The previous use of the site is considered and weighed up in the decision to allocate the site. The location being close to sufficient road infrastructure with space for lorry parking means this is a sufficient site to meet the

Landscape impacts	Concerns raised about site, disproportionate scale, landscape, building height and public amenity harm, including the Bridleway (Oakington & Westwick).	Noted. This site was assessed under the HELAA and Sustainability Appraisal as to its suitability for allocation and impact on landscape. The site was selected responding to identified needs having considered reasonable alternatives and the plan identifies appropriate mitigation measures. A HIA was prepared to understand the landscape and heritage impacts. This set out that new development should not exceed prevailing building heights. Scaling down towards the edges of development would also be appropriate to soften the impacts on the rural areas on the eastern and northern edges. Mass should also be organised to avoid a 'block' effect. This recommendation has been reflected in the policy wording as a mitigation measure.
Flooding and drainage	The flood mitigation plan is not sufficient to mitigate excess surface water from overwhelming Oakington Brook.	Noted. A SFRA has been prepared for this site by the Councils' as part of the Local Plan Evidence base. As part of the planning application, additional site specific floor risk assessments will need to be prepared in line with part 23 of the policy which is specific about the approach to water management onsite.
Contributions to Emergency Services	Requirement for developer funded contributions towards police and fire and rescue infrastructure/ facilities should be referenced in the policy.	Noted. Potential requirement for developer contributions for emergency services is addressed by Policy I/ID. It is not necessary to reference this general requirement in site allocation policies.

Transport impacts	Objections raised to the scale of development in this location and subsequent impacts on the road network. Concerns also raised about cumulative impacts due to pressure from number of proposed B2 and B8 sites in this corridor on the A14.	Noted. Transport impacts and access have been assessed though the HELAA, and the Greater Cambridge Transport evidence base. The policy requires a masterplan and Transport Strategy, and the validation checklist will require a transport assessment.

Transport evidence	National Highways supports the Greater Cambridge Local Plan's sustainable growth ambitions but considers the evidence insufficient to demonstrate that impacts on the Strategic Road Network have been fully assessed. Concerns relate to strategic transport modelling, trip budget assumptions, cumulative impacts, mitigation requirements, infrastructure funding, and deliverability. Cambridgeshire Council requires the development of a joint Transport Assessment and mitigation strategy with the other sites located adjacent to it to help understand, then mitigate the combined impact of transport going forward. This should include the cumulative impact of the four proposed logistics sites along the A14 in this location.	Noted. Transport impacts and access have been assessed though the HELAA, and the Greater Cambridge Transport evidence base. The policy requires a masterplan and Transport Strategy, and the validation checklist will require a transport assessment. The policy wording has been amended at the Regulation 19 stage to be more specific about the requirements for transport assessments and what this should consider ahead of the preparation of a planning application.

Heritage	Historic England and the Site Promoter have indicated that the policy should be clear if Slate Hall Farm is a non-designated heritage assessment. Historic England welcome wording changes to the policy.	Noted. The Heritage Impact Assessment has been revised to reflect the conclusion from the assessment of the planning application that it is not a designated heritage asset in response to comments made by Historic England to assess if it is a non-designated heritage assessment or not. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Non-residential omission sites	A number of sites promoted through the Call for Sites process and not allocated have made a representation to be allocated as a logistics site, and to challenge the methodology. This includes other logistics sites proposed in the A14 corridor. For example, Tritax Park Queens' Cambridge (Land North of A14, J25, Bar Hill) as an alternative or addition to Slate Hall Farm (noting separate representations have been made on the need for an increased supply of employment land). This site has less of an impact on the Green Belt and has better access arrangement and more straightforward promotion arrangements and landownership which will secure its quicker delivery.	Noted. Greater Cambridge's identified employment land needs have been informed by evidence set out in Appendix 6 in accordance with national planning policy and guidance.

Residential uses in Bar Hill	There is a missed opportunity to allocate housing land for development at Bar Hill to provide homes in close proximity to major centre of employment, therein helping to manage more effective patterns of development sustainability.	Noted. Alternative sites have been considered during the plan making process. The plan provides a sound development strategy.
Uses	The strategic location, size and context of the S/SHF site allocation make it the most suitable and sustainable site for strategic B2/B8 uses in Greater Cambridge. However, it is considered by the Site Promoter that it is also appropriate for this to accommodate an element of E(g)(iii) (Light Industrial) use within the site allocation. The E(g)(iii) uses onsite should be restricted to individual units of no more than 30,000sqm.	Noted. The site has been assessed as being an appropriate location for B2 and B8. This is not specified as a breakdown between B2 and B8 to allow flexibility for multiple uses to be brought forward, there is a danger of overspecifying and preventing the site from coming forward. This has been indicated in Appendix 6 of the Development Strategy meet the need for the additional 289,000 square metres of industrial and warehousing and distribution floorspace, evidence base. This is a preferred locations for industrial and local distribution and warehousing companies and therefore is needed for B2 and B8 uses to meet the identified need. Furthermore, the evidence recommends that we identify two locations to ensure occupier choice and competitiveness, and therefore the use class has been restricted to B2 and B8 to fulfil this requirement.
Documents to support planning permission	The policy should be more specific about what reserved matters and detailed planning applications are required to submit.	Noted. The site should take a masterplan led approach which should be agreed by the Council prior to any approval of planning applications as set out in point one of the policy. Generally, this would achieved ahead of an outline or hybrid planning application, but this will be

		determined through the development management process at the discretion of the case officer.
Small and medium scale commercial uses	The supporting information to the policy, refers to "…small and medium scale commercial uses…" when referring to a flexible range. This conflicts with policy, is inappropriate and overly prescriptive in relation to the type and size of units, given the employment need and demand and site suitability for a range including larger units on a strategic site allocation. Huntingdon District Council suggests that unit sizes should include a flexible range of appropriate units that can support a wide range of businesses and that can be adapted to accommodate changing business requirements.	Noted. Both the A14 sites have been identified as needing small and medium scale commercial uses to meet the identified need for B2 and B8 floorspace. The logistics and warehousing need meet with allocations is intended to meet the identified need.
Supply of B2 floorspace	There is no minimum B2 quantum set out in policy. The LPA's own evidence shows industrial requirements six times higher than available space but the policies cannot meet demand. B2 land keeps being lost to housing, offices and labs.	Noted. The identified need in Greater Cambridge is 289,000 sqm for industrial and warehousing and distribution floorspace (B2/B8 use classes). The identified need is for B2 and B8 combined, it is not individually assessed, therefore the policy specifies B2 and B8 floorspace together. The site has been assessed as being an appropriate location for B2 and B8. The rationale for this is set out in Appendix 6 of the Development Strategy Topic Paper where it sets out the purpose of combining these requirements was to enable the creation of a mix of

		B2/B8 development including manufacturing, general industrial and distribution.
Land ownership	Landowners of smaller parcels of land within the site raised concerns about potential development impacts on their land parcels and continued use of their land.	Noted. The spatial framework is indicative and shows a suggested developable area for the site. The plan should be read as a whole. Other land uses within the site allocation are protected under policy J/PB which protects existing businesses, and this is reinforced by part 22b of the policy.
Public rights of way	Protect and enhance the existing public right of way and access for equestrians.	Noted. Policy I/ST Sustainable transport and connectivity requirements would apply to rights of way provision in addition to the requirements of part 20 of this policy.
Inconsistency with national decarbonisation and rail freight policy	Reassess the spatial freight strategy. Commission a multi-modal freight study to direct strategic logistics needs to rail-served corridors, brownfield regeneration sites, or locations with direct, unconstrained access to the strategic road network that avoid local roads and villages.	Noted. Policy S/ID sets out how freight should be managed and requirements for not impacting on road networks and ensuring there is sufficient lorry parking for new industrial and distribution centres.

Policy S/RRA/ML: The Moor, Moor Lane, Melbourn

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RRA/ML: The Moor, Moor Lane, Melbourn	4	4	4	1	3

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Connectivity	The site is not well located to Meldreth Railway Station and would generate traffic.	Noted. As part of the Councils' assessment of the site, the site's accessibility and traffic impacts have been considered by the Highways Authority and considered to be suitable. Other Local Plan policies, such as Policy I/ST: Sustainable transport and connectivity, set out the relevant criteria to be addressed through a future planning application.
Context	Dispute the description of the setting of the development. Its concerns regarding the proposed housing density and lack of adequate village spaciousness remain unchanged and unaddressed.	Noted. The policy sets an approximate capacity for the site and this would be tested and confirmed through a future planning application. This would need to address the other relevant policies of the Local Plan, including those within the Great Places chapter.

Flooding	The site in the Local Plan is unsound due to incomplete consideration of the flood risks.	Noted. The assessment of the site through the SFRA has confirmed that a very small element of the site is constrained by Flood Zone 2 and 3 land (c. 1.6%). This is addressed in part 1(d) of the policy and will need to be addressed through a future planning application.
Omission site	Policy S/RRA/ML unsound insofar as it allocates 20 dwellings, while excluding Site 40509 adjoining Sawston, a higher-order Rural Centre. Do not object to S/RRA/ML but considers the Council has not demonstrated a consistent comparative approach to site selection.	Noted. The councils have considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. The strategy for allocating sites is therefore considered to be sound. It has been demonstrated that the Local Plan will deliver a robust 5 year housing land supply and a supply of homes to meet the identified housing need for the plan period. Additional allocations for housing are not required.
Support	On behalf of the landowner, Sworders can confirm that the site is suitable, available and deliverable for residential development, with an outline planning application due to be submitted on the site in October 2026.	Support noted.

Policy S/RRA/H: Land at Highfields (Phase 2), Caldecote

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RRA/H: Land at Highfields (Phase 2), Caldecote	2	2	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Omission site	Policy S/RRA/H is unsound insofar as it allocates approximately 65 homes at Highfields, Caldecote, while excluding Site 40509 adjoining Sawston, a Rural Centre. Do not object to this policy but considers the Council has not demonstrated a consistent comparative approach to site selection.	Noted. The councils have considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. The strategy for allocating sites is therefore considered to be sound. It has been demonstrated that the Local Plan will deliver a robust 5 year housing land supply and a supply of homes to meet the identified housing need for the plan period. Additional allocations for housing are not required.
East West Rail (EWR)	Since its comments on the Regulation 18 consultation, EWR Co has refined its proposals in this area and no longer	Noted.

	requires land within this allocation site to deliver EWR.	

Policy S/RRA/SCS: Land to the South of Cambridge Services, A14

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RRA/SCS: Land to the South of Cambridge Services, A14	9	9	8	1	7

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Support for the allocation and recognising need for overnight lorry parking in this location.	Support noted.
Contributions to Emergency Services	Requirement for developer funded contributions towards police and fire and rescue infrastructure/ facilities should be referenced in the policy.	Noted. Potential requirement for developer contributions for emergency services is addressed by Policy I/ID. It is not necessary to reference this general requirement in site allocation policies.

Heritage	Historic England welcomes the preparation of a HIA, but to support the planning application additional assessments will be required.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Transport	The impacts on the strategic road network have not been fully addressed. Continued engagement with National Highways is needed on Transport evidence base.	Noted. It is the intention of the Councils' to continue to engage with National Highways on this issue and the transport section of the policy has been revised to reflect the need for further transport mitigations to manage impacts locally.
Policy requirements	Site promoters suggested minor amendments to reflect the accurate size of the site and revised site boundary.	Noted. Whilst the councils do not agree with all suggested amendments, the Councils would be open to considering some amendments for accuracy. Further detail is needed on why the minor amendments to the site boundary are necessary, which can be explored with the site promoters. It is acknowledged that drainage ponds are no longer present.
Landscape buffers	The site promoter suggest the imposed 25m landscape buffer is used only on the most sensitive locations, 20m and then 5m in increasingly less sensitive impacts.	Noted. This is not considered to be a sufficient buffer to manage the landscape impacts. Furthermore, the HIA has set out that mitigation should include measures to manage building heights and mass. Maintaining a buffer allows for the management of the impacts on the landscape and nearby heritage assets.
Lorry parking	Jaynic, acting for the landowners, set out that lorry parking provision is essential onsite. The Draft Local Plan makes an allowance for an additional 150 lorry	Noted.

	parking spaces which if provided would bring the total at the Services to 282 (132 existing plus 150 additional). This would be sufficient to accommodate the 242 spaces derived above in relation to forecast growth and would be equivalent to approximately 86% utilisation.	
Water infrastructure	Correct the reference to the Fens Reservoir Pipeline.	Noted. This can be addressed through a minor modification.
Density	The policy should set out height controls to ensure that the density is appropriate for the location.	Noted. The HIA sets out recommendations to mitigate impacts on heritage and landscape in this location and these recommendations have been included in the policy wording.
Alternative sites	Allocation not compared with alternative locations, and does not compare favourably with those alternatives.	Noted. The site was compared to other logistics sites for allocation and this is set out in Appendix 6 of the Development Strategy Topic Paper. This document completes a second sift of sites following the initial sift in the Greater Cambridge Industrial and Warehousing Sector Study (Iceni Projects, 2025).

Policy S/RRA/BBP: Land at Buckingway Business Park, Swavesey

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RRA/BBP: Land at Buckingway Business Park, Swavesey	3	3	2	1	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Supported with no changes required.	Support noted.
Water infrastructure	Correct reference to the Fens Reservoir Pipeline.	Noted. This naming issue can be addressed through a minor modification.
Uses	Support the allocation but other sites should be allocated for housing in Swavesey.	The development strategy in the local plan delivers an appropriate strategy to meet identified housing needs.

Policy S/RRA/SNR: Land to the North of St Neots Road, Dry Drayton

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RRA/SNR: Land to the North of St Neots Road, Dry Drayton	2	2	1	1	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
East West Rail (EWR)	EWR Co supports the requirements of draft Policy S/RRA/SNR. Land required for EWR is within the EWR safeguarded area and Policy I/SI will apply where development is proposed on land required for EWR.	Support noted.
Support	Broad support for the allocation of land north of St Neots Road, Dry Drayton for employment uses and agrees development should not prejudice the Cambourne to Cambridge Busway or East West Rail.	Support noted.

Employment provision	Objects to limiting uses to Class E employment uses only, arguing that B2 (industrial) and B8 (storage and distribution) should be permitted and that there are, in principle, no adverse noise impacts.	Noted. The plan identifies a number of other allocations for B2 and B8 development. As noted in the relevant allocations, the Councils' are seeking these sites to provide smaller scale units to address a local need. Additionally, B2 and B8 uses may have adverse impacts on nearby residential amenity beyond just noise impacts. Whilst the Councils' are of the view that this site is suitable for employment uses, there are more appropriate sites identified for B2 and B8 uses in the plan to meet identified needs.
Policy requirements	Seeks greater policy flexibility regarding transport infrastructure, landscaping requirements, and the use of a Noise Impact Assessment.	Noted. The policy criteria has been informed by the relevant evidence base studies and technical officers. This will ensure that future development can provide effective mitigation measures to minimise any adverse impacts. Reference in the policy to the Cambourne to Cambridge HQPT corridor and East West Rail are also addressed by Policy I/SI: Safeguarding important infrastructure. Should these transport projects not be required or delivered in the future, the justification to not apply this policy requirement will need to be confirmed by the relevant transport body/organisation at the planning application stage.

Policy S/RRA/OHD: Old Highways Depot, Twenty Pence Lane, Cottenham

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RRA/OHD: Old Highways Depot, Twenty Pence Lane, Cottenham	1	1	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Omission site	Alongside this allocation, the plan should provide for additional housing in Cottenham, including the promoted site, which is near the allocated site.	Noted. The councils have considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. The strategy for allocating sites is therefore considered to be sound. It has been demonstrated that the Local Plan will deliver a robust 5 year housing land supply and a supply of homes to meet the identified housing need for the plan period. Additional allocations for housing are not required.

Policy S/RRA/NW: Norman Way, Over

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RRA/NW: Norman Way, Over	1	1	0	1	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Supported with no changes required.	Support noted.

Policy S/RRA/CRH: Land Adjacent to Cambridge Road (A10) and Mill Lane, Hauxton

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RRA/CRH: Land Adjacent to Cambridge Road (A10) and Mill Lane, Hauxton	2	2	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage	Historic England welcomes changes to policy wording, however landscaped open space diagram from the HIA should be included in the policy.	Noted. The wording of the policy reflects the suggestions in the HIA. The format of the local plan has not included Indicative Spatial Frameworks for small allocations, but the Councils are open to a modifications being recommended by the Inspector if considered necessary for soundness.
Flood Risk	Policy wording should refer to need for an FRA and sequential approach to the site layout.	Noted. There is no need to duplicate national requirements, except where there is a particular reason to.

Policy S/RRA/CH: Compass House, Chivers Way, Histon and Impington

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RRA/CH: Compass House, Chivers Way, Histon and Impington	2	2	1	1	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Parking	Future travel plan and parking strategies can not rely on parking in nearby residential areas.	Noted. The policy requires a Parking Strategy to be prepared as part of the redevelopment of the site. This would need to be agreed with the Highways Authority.
Heritage	Historic England welcome the changes made to the policy wording. The plan should be clear about the status of the potential NDHA and whether it meets the criteria of a NDHA.	Noted. Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.

Policy S/RRA/CR: Land to the west of Cambridge Road, Melbourn

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RRA/CR: Land to the west of Cambridge Road, Melbourn	3	3	3	0	3

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Uses and integration	Continue to support employment uses, particularly science and technology development, but considers that requiring integration with the existing Science Park could create a ransom issue and hinder delivery of the proposal.	Noted. Given the consented, and unimplemented, development at Melbourn Science Park, it is unlikely that commercial development of this nature will be needed, in this location, during the Plan period. Integrating the site with surrounding areas including Melbourn Science Park will ensure the site facilitates good active travel connections.
Transport	Likely to be traffic impacts and supports sustainable transport measures, including public shuttle-buses and cycle facilities.	Noted. The policy, in combination with the transport policies of the plan, set out the requirements in relation to

	Requests clearer wording on active travel connections, specifying pedestrian and cycle links rather than the broader term "active travel'.	this issue, including local connections to existing transport measures and other key areas within the village. Active travel connections are defined in the plan as everyday journeys made by walking, wheeling or cycling.
Design	It seeks high-quality design creating an attractive eastern gateway to Melbourn, rather than simply screening development.	Noted. The policy requires the site to create an enhanced entrance into the village from the east.
Support	Supports the allocation of the site for around 125 dwellings.	Support noted.
Policy requirements	The requirement for a "masterplan-led approach" ambiguous and potentially onerous for a site of this scale, seeking confirmation that a concept plan submitted at an application stage would suffice.	Noted. The Councils consider it is appropriate for a masterplan to be prepared as part of a planning application process. The level of detail set out should be discussed and agreed with the local planning authority as part of pre-application discussions.
Omission site	Policy S/RRA/ML unsound insofar as it allocates 125 dwellings, while excluding Site 40509 adjoining Sawston, a higher-order Rural Centre. The Green Belt assessment also requires review, as the site's limited contributions to its purposes seem overstated. Do not object to S/RRA/ML but considers the Council has not demonstrated a consistent comparative approach to site selection.	Noted. The councils have considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. The strategy for allocating sites is therefore considered to be sound. It has been demonstrated that the Local Plan will deliver a robust 5 year housing land supply and a supply of homes to meet the identified housing need for the plan period. Additional allocations for housing are not required.

Policy S/AMC/PH: Papworth Hospital, Papworth Everard Area of Major Change

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/AMC/PH: Papworth Hospital, Papworth Everard Area of Major Change	1	1	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Proposed use	Restricting the uses onsite to healthcare uses when this is not a viable use and brownfield land should be prioritised for homes.	Noted. The policy appropriately seeks to maintain the vitality of the village following departure of its major employer.

Policy S/AMC/FD: Fen Drayton Former Land Settlement Association Estate Area of Major Change

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/AMC/FD: Fen Drayton Former Land Settlement Association Estate Area of Major Change	2	2	1	1	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Support for the amended allocation boundary.	Support noted.
Extension of boundary	Boundary of policy area should be extended to include promoted site to deliver more housing.	Noted. The extent of the policy area is reflective of the Land Settlement to promote the delivery of homes in a sustainable way.

Policy S/AMC/HIS: Mixed Use Development in Histon & Impington Station Area of Major Change

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/RRA/CH: Compass House, Chivers Way, Histon and Impington	1	1	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Transport and parking management	Transport and parking mitigations must be contained within the site boundary. The local highway network cannot absorb more displaced vehicles.	Noted. Any major planning application will be required to undertake a transport assessment to mitigate impacts on the local road network and manage identify appropriate transport mitigations.

Policy S/AMC/GT: Optimisation of Gypsy and Traveller sites

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy S/AMC/GT: Optimisation of Gypsy and Traveller sites	7	7	3	0	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Sites the policy relates to	The policy only refers to two locations – Smithy Fen and Chesterton Fen, but then also acknowledges that sites of 0.5 hectares or more are suitable. Smithy Fen and Chesterton Fen should not be the only sites identified. Strategic sites should be included, with information on the number of pitches / plots required.	Noted. The policy is designed to apply to all Gypsy and Traveller Sites, but it also references a number of specific sites.
Smithy Fen	Authorised land is approx. 10 acres, therefore 48-56 pitches based on optimum	Noted. The purpose of optimising Gypsy and Traveller sites is to safeguard Gypsy and Traveller sites for use by

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	of 12 pitches per hectare referred to. Already in excess of 50 pitches on this land, so little room for intensification. Need to resolve the lawful development issues on this site. Figure 104 does not take account of existing injunctions. These areas should be specifically excluded from the red line boundary, or considered through a process that is open to public scrutiny. The site does not comply with NPPF and H/GT in that its located within Flood Zone 3, is detached from Cottenham, areas of the site have no mains drainage or electricity, and Cottenham is a Minor Rural Centre so may not be a sustainable location.	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.
Chesterton Fen	East West Rail (EWR) Company has identified a small area of land within this site that is required for railway infrastructure works, and which is included within the safeguarded land for EWR. Any proposals on this site should not prejudice the delivery of EWR.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
New sites	The Local Plan sets out that no new land was offered, however, residents of Moor Drove are seeking to expand and other sites will be looking to expand to accommodate families. No record of these sites being approached.	Noted. There were no sites promoted for the use of Gypsy and Traveller Sites through the Call for Sites process. However, as set out in Appendix 11 of the Development Strategy Topic Paper (2026), the Councils have considered all potential sources of supply for meeting the accommodation needs of travellers. The Accommodation Needs Assessment of Gypsies, Travellers and Travelling Showpeople (ANA, September 2024) identifies, as a result of the discussions undertaken through the household survey, a number of sites where additional pitches could potentially be provided through intensification or expansion of private authorised sites. Appendix 10 therefore considers whether each of the sites identified through the ANA have the potential for expansion or intensification.
Optimisation and densification	The policy should clarify how many plots / pitches are allowed on each site, and where the plots / pitches will be located. Before any additional pitches are approved, need to demonstrate that there is a genuine need and also show how existing site is coping with current capacity. The sites are already growing rapidly.	Noted. The policy sets out what the optimal density per hectare is for the delivery of pitches. The evidence base Greater Cambridge Accommodation Needs Assessment of Gypsies, Travellers, Travelling Showpeople, Bargee Travellers, and other caravan and houseboat dwellers (2024) sets out the identified need for gypsies, travellers, travelling showpeople and bargee travellers.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Landscape mitigation	Needs stronger emphasis on landscape mitigation and responding to local character. Currently refers to improving the appearance and quality of the environment and minimising visual intrusion, but the policy does not explicitly require landscaping to respond positively to local landscape character. Should require landscaping measures that mitigate adverse landscape and visual effects whilst reflecting and respecting local landscape character.	Noted. This policy should be read alongside the Plan as a whole which includes policies on the management of landscape impacts and on design, in the Great Places chapter.
Flood zones	Policy should clarify that any proposals for new pitches must not be located within Flood Zone 3, to ensure consistency with national policy.	Noted. This is set out in the supporting text.
Sub-letting	Policy should explicitly state that sub-letting is a breach of planning conditions, as without this it is too easy for sites to quietly intensify.	Noted. This is not within the remit of the Local Plan.

Consultation Statement

Summary of Representations and Councils' response - Climate change



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan Regulation 22 Consultation Statement (November 2026)

GREATER CAMBRIDGE
SHARED PLANNING

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Climate Change	7	7	5	1	5

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Support for the Climate Change chapter.	Support Noted.
Plan does not respond to climate change	Development does not consider the impact on the environment. Reduce the size of the development to protect the local area and the global environment.	Noted. The Local Plan considers environmental, economic and social issues, and sets a policy framework which seeks to respond to the challenges of climate change.
Does not consider carbon impacts of growth	Assessments conflate a transport mode being lower-carbon per journey with the overall scale of growth it enables. East West Rail depends on approximately 70,000 new homes coming forward, generating massive embodied, land-use, and construction emissions.	Noted. The development strategy responds to the opportunities provided by a railway station at Cambourne.
Development should be conditional on delivery of water infrastructure	Plan should be explicit that housing growth into and beyond 2032 must be conditional on delivery of pipeline from Grafham Water,	Noted. Phasing conditions have been includes in strategic site policies which allocate new developments in the Local Plan to align with delivery of the pipeline connection to

	and into and beyond 2036 conditional on delivery of the Chatteris Reservoir.	Grafham Water. These measures have been agreed with Cambridge Water and the Environment Agency.
Do not support climate change policies	Oppose all of the "climate" policies and suggest that they should be removed from the plan because they are unsound.	Noted. Local planning authorities in England are legally required under Section 19(1A) of the Planning and Compulsory Purchase Act 2004 to include policies in their Local Plans that contribute to the mitigation of, and adaptation to, climate change.

Policy CC/SD: Sustainable development and the climate emergency

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy CC/SD: Sustainable development and the climate emergency	18	18	15	2	11

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	General support for the policy, the principle of securing information needed to guide decision making, and the policy's approach to proportionality.	Support noted.

Meeting climate objectives	Concerns that the Local Plan does not take account of how population growth will impact on the Councils' ability to meet its climate objectives, including sustainable water infrastructure management.	Noted. Policy CC/SD concerns the submission of a proportionate sustainability statement as part of a planning application. Matters related to the Local Plan's strategic approach to climate change mitigation and water infrastructure have been considered during the preparation of the wider Development Strategy, as well as the other policies contained within Climate Change chapter. The Local Plan is supported by substantive evidence that demonstrates further infrastructure needs do not represent a barrier to proposed growth, which is further supported by the agreements reached with external providers within the Statements of Common Ground.
Sustainability Statement requirements should go further.	Sustainability Statements contain more explicit requirements for areas not yet covered, including renewable energy and heating for new homes, and tree canopy cover.	Noted. During decision making, Policy CC/SD will be applied alongside all other relevant requirements of the Development Plan, as well as any national planning policy and guidance. This includes Policy CC/NZ, which includes policy standards for total energy use intensity and on-site renewables, and Policy BG/TC, which sets out the Local Plan's approach to tree canopy cover. It would be ineffective for the policy to repeat these requirements, but it should be noted that Policy CC/SD makes reference to the Sustainability Checklist that applicants should use to ensure that their planning applications meet planning validation requirements.

Sustainability Statement requirements are excessive.	Mandatory submission of Sustainability Statements is onerous and exceeds national information requirements – the content can be secured via a Design and Access Statement.	Noted. The NPPF is clear that plan making and decision making should actively contribute to the management and mitigation of the impacts of climate change. It is considered vital that developments demonstrate that they have responded effectively to climate change and the polices in the Local Plan. Sustainability Statements are an effective method of presenting and securing a majority of the information needed to demonstrate a proposal's compliance with other Development Plan requirements, as well as the NPPF. Moreover, the policy is clear that the information provided should be proportionate to the scale and nature of the proposal. As this approach has effectively been carried forward from both the Cambridge Local Plan (2018) and the South Cambridgeshire Local Plan (2018), the policy's requirements are considered sound.
Content of the Sustainability Statement.	The content of design requirements exceed national requirements and will likely need to change following adoption of forthcoming standards (e.g. the Future Homes Standard).	Noted. Policy CC/SD sets out Sustainability Statements as a validation requirement for planning applications. The policy is clear that the content of a Sustainability Statement should be proportionate to the scale and stage of development, with only high-level detail of what may be included in the Sustainability Statement being set out in the policy. The content of the Sustainability Statement will be guided by the Sustainability Checklist and the relevant requirements of the wider Development Plan. The Councils are aware of potentially forthcoming standards and have sought to build flexibility into policy

		wording to ensure that decision makers can respond to changes in national sustainability standards. Moreover, the Sustainability Checklist has not been included within the Local Plan, which will allow the Councils to update the Sustainability Checklist in response to changes in national standards.
Viability concerns	The policy risks undermining development viability, deliverability and the achievement of objectively assessed needs.	Noted. Policy requirements in the Proposed Submission Local Plan have also been informed by a Viability Assessment, which has factored the requirements of Policy CC/SD. The Councils' full evidence base, which includes technical feasibility, cost analysis and carbon budget analysis, has been published to evidence that the Councils' approach to technical climate change requirements (as set out in the other Local Plan policies) are viable and feasible.
Definition of "nature-based solutions"	The Local Plan does not clearly define the term "nature-based solution".	Noted. The International Union for Conservation of Nature (IUCN) define "nature-based solutions" as solutions address societal challenges through actions to protect, sustainably manage, and restore natural and modified ecosystems, benefiting people and nature at the same time. The term has been incorporated into the Local Plan following advice from the Environment Agency, who highlight that some of the best design solutions to climate

		change mitigation will deliver a range of complementary effects that benefit both human and natural systems.
Exclusion of householder applications	The policy's exclusion of householder development is not justified, particularly given the introduction of Policy CC/SR in the Proposed Submission Local Plan.	Noted. Householder applications were discounted as the Councils were of the view that it would be a disproportionate requirement for developments of this scale.

Policy CC/DC: Designing for a changing climate

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
CC/DC: Designing for a changing climate	21	12	14	7	14

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Strong support for the policy especially the cooling hierarchy and the role of building design, with reference to specific experience of people living in recently built homes that overheat. The role of green infrastructure in providing evaporative cooling is also supported.	Support noted
Support	Welcomes reference to integrated water management and nature based designs which align with sustainable water use and Anglian Water's Enabling Water Smart Communities approach.	Support noted

Support	It is noted that the wording of the policy has been expanded since Regulation 18 and that this is in line with best practice for sustainable design and as such the University of Cambridge continue to fully support the policy.	Support noted
Consideration of embodied carbon	New buildings have an enormous carbon footprint regardless of whether they're insulated, Passivhaus etc	Noted. Embodied carbon is considered as part of policy CC/NZ. The Plan must be read as a whole, it is not necessary to cross-refer or duplicate requirements in other policies.
Need for green infrastructure to be an integral part of design of new developments	Green infrastructure will not be effective in providing shading and cooling on land at the edges of sites. Policy should be amended to ensure that urban greening and tree canopy cover requirements are met within the built areas of sites and to make specific reference to SEA and Cambourne Forest being additional to and not instead of green infrastructure within neighbourhoods.	Noted. Other policies within the Plan seek to ensure that green infrastructure and high quality landscaping are integrated throughout new developments, notably policy BG/BG,BG/GI and GP/QP. The Plan must be read as a whole, it is not necessary to cross-refer or duplicate requirements in other policies.
Conflict between delivering cool roofs and rooftop solar heating/electricity generation	Concern is raised as to how any potential conflict between cool roofs and roof top solar heating/electricity generation would be managed.	Noted. Solar generation can be delivered alongside cool roofs, and indeed there is benefit to the efficiency of the solar generation where this approach is taken. A number of schemes across Greater Cambridge already take this approach and we already have established planning conditions in operation across the area to ensure that the design of cool/green roofs takes into account the needs of

		solar generation so that both systems can be successfully delivered alongside one another.
Policy is insufficiently flexible to respond to evolving climate change policy	Consider the policy insufficiently flexible to respond to evolving climate change policy, best practice and uncertain climate projections over the Plan period. The Local Plan should allow greater adaptability.	Noted. The policy takes a design based approach to responding to the challenges posed by our changing climate in line with NPPF policy DP3(2b). The policy also builds upon existing guidance available in the Greater Cambridge Sustainable Design and Construction SPD 2020, which has been applied to schemes across Greater Cambridge since its adoption. It is considered that there is sufficient flexibility in the policy that it can respond to any changes in approach and flexibility to changing approaches to modelling is built into the wording of the policy.
Wording is unclear	Object to Part 2 (a)(iii) which requires passive design measures to minimise internal heat generation, arguing that the wording is unclear and does not adequately define the expectations or standards applicants must meet.	Noted. Criteria 2 (a) (iii) clearly states that energy efficient design to minimise internal heat gains relates to building services. For example, in apartment blocks with communal systems for heating and domestic hot water, low temperature water distribution network would be the best choice to minimise internal heat gains. Where required, further guidance on the implementation of the policy can be provided in a technical note.
Wording is unclear	The policy includes ambiguous requirements related to albedo and internal heat generation without clear definitions or measurable standards, creating uncertainty over compliance.	Noted. The reference to albedo in relation to new development is a reference to the ability of materials to reflect rather than absorb heat. Put broadly, this is a reference to the role of cool materials in combatting the urban heat island effect, for example white-coloured surfaces have a high albedo and can be effective in

		minimising solar gain as they tend to be poor absorbers of solar radiation and good emitters. Where required, further guidance on the implementation of the policy can be provided in a technical note.
Need to recognise role of mechanical ventilation/cooling for some uses	R&D uses have specialist operational and technical requirements and as such criterion (d) of the policy is considered overly prescriptive and may overly constrain the appropriate design and operation of specialist R&D development where mechanical cooling and ventilation are often integral to research environments. Request that greater flexibility in the policy wording be introduced.	Noted. It is not considered that the policy is overly prescriptive as the approach outlined is already applied to developments across Greater Cambridge, including specialist R&D facilities and has not resulted in the technical needs of those facilities going unmet. Policy CC/DC is specifically focused on reducing overheating risk in new buildings and the thermal comfort of occupants through prioritising design-led approaches to reducing overheating risk. It is recognised that there will be situations where cooling will be required, and the policy does not prevent that from being utilised, instead looking to ensure that cooling loads are reduced as far as possible through design led approaches first. Where specific operational requirements of buildings require the use of specialist ventilation and cooling requirements, these can be accommodated as part of development proposals.
Overlap with other policies	While the policy requirements are reflective of and not inconsistent with national standards and guidance, it is considered that the policy largely replicates principles listed under policy CC/NZ and as such the policies should be combined.	Noted. The merging of policy CC/DC with CC/NZ is not considered appropriate. Policy CC/NZ specifically deals with climate change mitigation and the metrics required to deliver net zero carbon development, while policy CC/DC relates to climate change adaptation.

Sets requirements beyond Building Regulations	The policy exceeds requirements already addressed through other statutory consenting regimes and imposes unnecessary burdens on development.	Noted. The policy sets a design led approach to reducing the risk of overheating in all buildings, not just dwellings, This approach reflects NPPF (2024) paragraphs 161 and 162, but also is in line with NPPF (2026) policies CC1, CC3(d), DP1 and DP3(2b). The policy does not set any modelling requirements for new homes that go beyond those set out in Part O of the Building Regulations and associated modelling methodologies.
Policy lacks a maintenance mechanism for green infrastructure	The policy is not effective as it lacks a maintenance mechanism for green infrastructure intended as overheating mitigation.	Noted. Maintenance of green infrastructure, including that provided as part of climate change resilience is considered as part of policy BG/GI: Green Infrastructure. The Plan must be read as a whole, it is not necessary to cross-refer or duplicate requirements in other policies.
Policy duplicates other guidance	Policy should be deleted as it replicates guidance already contained within the Greater Cambridge Sustainable Design and Construction SPD resulting in conflict with paragraph 16 of the Framework.	The Greater Cambridge Sustainable Design and Construction SPD provides guidance to support the implementation of the 2018 Cambridge and South Cambridgeshire Local Plans. On adoption of the Greater Cambridge Local Plan, this SPD will fall away and as such the inclusion of policy CC/NZ is necessary to ensure that all development proposals take design led approaches to reduce climate risks, including overheating of buildings in line with policies CC1, CC3(d), DP1 and DP3(2b) of the 2026 Framework.

Policy CC/NZ: Net zero carbon new buildings

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
CC/NZ: Net zero carbon new buildings	32	33	23	6	23

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Support for the ambition for carbon neutral development and for the delivery of energy efficient development to address climate change.	Support noted.
Energy demand being met onsite	Concerns raised over the inflexible requirement for all energy demand to be met through onsite generation, particularly for energy intensive uses.	Noted. The modelling undertaken to support Policy CC/NZ demonstrates that the energy metrics and renewable energy balance are achievable for the majority of development types. For non-residential development, targets have been informed by the UK Net Zero Carbon Buildings Standard (UKNZCBS), which are underpinned by significant technical modelling and have been applied to a range of real-world pilot projects. There may be some exceptional circumstances in which full policy compliance may not be possible and these will need to be discussed

		early as part of pre-application discussions to agree a suitable fallback position. The Climate Change Topic Paper (2026), published alongside the Regulation 19 consultation, considers fallback positions in cases where it is not possible to meet the policy requirements in full.
Lack of evidence base	Concerns raised about not publishing underlying assumptions for this policy. Lack of evidence on how these requirements affect the delivery of site allocations as well as viability.	Noted. The Councils' full evidence base, which includes technical feasibility, cost analysis and viability and carbon budget analysis has been published at every stage of consultation on emerging policy CC/NZ. This evidence is summarised in the Climate Change Topic Papers, which have also been published at each stage of consultation. The councils are confident that the evidence base that has informed the preparation of the Plan is relevant, robust, up to date and proportionate.
Methodology	The proposed methodology goes beyond the scope of planning policy and what it can control and is therefore unenforceable. The effectiveness of this policy is questionable especially because no other authority has adopted a similar policy.	Noted. The NPPD 2026 does allow for local plans to set standards that go beyond Building Regulations, albeit policy CC/NZ does utilise different metrics than those suggested by the framework. It is also noted that the Planning and Energy Act, which enables local planning authorities to set policy requirements beyond those set out in Building Regulations, is no longer due to be repealed. 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 and 2026 Climate Change Topic Papers, 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 in terms of the metrics used. As of March 2026, the viability of similar energy-metric based policies to CC/NZ had be proven at examination across 16 different local planning authorities including local plans in Central Lincolnshire, Cornwall, Bath and North East Somerset, Royal Borough of Kensington and Chelsea, Greater Manchester Combined Authority, Uttlesford, and Winchester, and the Tendring Colchester Borders Garden Community DPD and Salt Cross Garden Village Area Action Plan. Indeed, in the Inspector's report for the Uttlesford Local Plan 2021-2041 Examination, the Inspector notes in paragraph 133 that "the use of the EUI metric is becoming more common nationally".
Criticism of modelling	The requirement for CIBSE TM54 modelling also duplicates existing energy assessments undertaken through BREEAM.	Noted. There is no requirement to meet BREEAM apart from using the water standards. Therefore, TM54 is not duplicating it as it is not required. TM54 modelling is considered best practice and one of the most accurate methodologies for assessing energy demand.
Gap in modelling requirements	The policy fails to recognise PHPP modelling as an approved alternative to TM54 modelling.	Noted. Criteria 1 of the policy specifically references the role of both PHPP and TM54 as being capable of providing energy performance calculations.
National Planning Policy Framework (NPPF) consistency	In light of PM13 of the NPPF (2026), any standards exceeding national requirements should be fully justified. The policy is clearly inconsistent with national policy as there is	Noted. The Plan is being assessed against the 2024 NPPF. 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

	no policy position (planning or otherwise) to confirm that all new developments must be self sufficient in terms of energy use.	demonstrates the reason for doing so and the viability of the proposed policies. As set out in the 2025 and 2026 Climate Change Topic Papers, 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. The councils are confident that the evidence base that has informed the preparation of the Plan is relevant, robust, up to date and proportionate.
Consistency with national standards	Exceeds building regulation and national standard by using Passivhaus and LETI net zero benchmarks. Both the WMS and new NPPF states that these standards should be expressed as a percentage of TER and calculated using a specified version of SAP. It is considered that the use of targets based on space heating and energy use in parts A and B of the policy, and the requirement for these to be achieved using CIBSE TM54 or Passivhaus Planning Package to not be consistent with national policy.	Noted. While the NPPF and associated WMS are 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 and 2026 Climate Change Topic Papers, 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. While the Plan is being assessed against the 2024 NPPF, it is noted that PM13 of the NPPF allows for local planning authorities to set standards that go beyond Building Regulations, noting that these should be expressed as a percentage of Target Emission Rate (TER) and calculated using SAP. Using such metrics would not fulfil our statutory duties set out in the Climate Change Act and Planning Act as SAP and the Future Homes Standard

		only consider regulated energy, whereas to achieve net zero carbon development, all energy consumption in new buildings must be considered. If Greater Cambridge were to use the metrics suggested in the NPPF, which is worded as a 'should' rather than 'must', 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. With regards the role of SAP, this is due to be replaced by the Home Energy Model (HEM). It is our understanding that HEM may be able to be used for demonstrating performance using energy based metrics in certain circumstances, and as such may be capable of being used to demonstrate compliance with the requirements of policy CC/NZ.
Offsetting	The request for offsetting contributions is unworkable as there is no clarity as to the cost of offsetting nor who will receive the payment and what it will be used for.	Noted. Further guidance on the approach to energy offsetting was provided in the Climate Change Topic Paper Addendum which accompanied the Regulation 19 consultation. This included consideration on the cost of offsetting. The modelling undertaken to support Policy CC/NZ demonstrates that the energy metrics and

		renewable energy balance are achievable for the majority of development types without the need for offsetting.
Viability	Policy requirements increase build costs and are limited by technical constraints. The viability assessment fails to demonstrate a clear and robust costed rationale which shows that there will not be an adverse impact on the viability and deliverability of development. The assessment recognises that meeting Net Zero carbon on new buildings will have a direct cost impact, it works on the assumption that the reduced energy use would enable the build cost increase to be reflected in sales values. This does not recognise that there is no market demand for this kind of product. The cumulative impact of viability has not been.	Noted. 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 and viability assessment. The requirements of the policy are both technically feasible and viable. The councils are confident that the evidence base that has informed the preparation of the Plan is relevant, robust, up to date and proportionate.
Implementation / post construction monitoring	It is not clear from the policy how in-use energy monitoring data will be used and what action could be taken should energy use exceed that set out in the policy.	Noted. Further detail on the approach to in-use energy monitoring data (assured energy performance) was provided in the Climate Change Topic Paper Addendum, which was published alongside the Regulation 19 consultation.
Feasibility	Concerns are raised regarding the capability, cost, supply chain and technical delivery implications of the ambitious net zero carbon policy requirements.	Noted. 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 and viability assessment. The requirements of the policy are both technically feasible and viable. Indeed, there is no evidence from other areas with similar adopted planning policies that such an approach will impact on delivery. In Cornwall and Bath and North East Somerset, the introduction of higher energy performance standards was followed by increases in housing planning applications, with no increase in refusal rates, indicating that these requirements have not acted as a barrier to development.
Future Homes Standard	The government is progressing the Future Homes Standard which is intended to deliver highly efficient low carbon homes through Building Regulations. This approach is contrary to that and it would be better to align to have a more consistency approach.	Noted. While representing a significant step forward in energy performance standards for new homes, it is important to note that the Future Homes Standard (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 FHS 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. The extensive evidence base that supports the policy demonstrates that the requirements of the policy are both technically feasible and viable.
Unregulated energy	Concerns raised about unregulated energy being beyond the developers control and therefore something that cannot be restricted through the planning process.	Noted. If legally binding national carbon budgets are to be met, it is imperative that both regulated and unregulated emissions are accounted for as part of new development. Software exists that is able to provide accurate predictions of total in-use energy such as CIBSE TM54, PHPP and, potentially, the emerging Home Energy Model, which will replace SAP. Policy CC/NZ, which is supported by significant evidence base including viability assessment, technical feasibility and carbon budget analysis, is necessary to ensure that Greater Cambridge can meet its statutory duties set out in the Climate Change Act and Planning Act.
Greater flexibility required in applying standards	Greater flexibility in applying the policy requirements is required to ensure that the policy does not compromise development, particularly in targets for Space Heating	Noted. The modelling undertaken to support Policy CC/NZ demonstrates that the energy metrics and renewable energy balance are achievable for the majority of development types. For non-residential development, targets have been informed by the UK Net Zero Carbon

	Demand and Energy Usage Intensity Targets.	Buildings Standard (UKNZCBS), which are underpinned by significant technical modelling and have been applied to a range of real-world pilot projects. There may be some exceptional circumstances in which full policy compliance may not be possible and these will need to be discussed early as part of pre-application discussions to agree a suitable fallback position. This approach was outlined as part of the Climate Change Topic Paper Addendum which was published alongside the Regulation 19 consultation.
Obstructing planning balance assessment	The policy requirement to maximise opportunities to generate on-site renewable energy where possible does not allow for the necessary planning balance with other planning consideration.	Noted however we do not consider that the requirements in policy CC/NZ will lead to an obstruction of the planning balance assessment. The plan is to be read as a whole.

Policy CC/WE: Water efficiency in new developments

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy CC/WE: Water efficiency in new developments	40	43	30	11	28

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Support for the policy which has strong water efficiency standards. Supported by Cambridge Water, Anglian Water, the Environment Agency, Uttlesford District Council, Huntingdonshire District Council.	Support noted.
Concern regarding water availability and infrastructure	There is nothing in the plan about developing new water facilities. Infrastructure must be delivered first. Concern regarding water availability to meet development needs.	Noted. 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.
Demonstrating adequate water supply	Policy should require proposals to demonstrate there is an adequate supply to serve their development.	Noted. Whilst wording to this effect was included in the policy at the Draft Plan stage, it was not included in the Proposed Submission Local Plan as it was not reasonable to ask every individual development proposal to demonstrate water supply availability.
Concern regarding water availability in early years of Plan	The plan's front-loaded growth trajectory lacks binding Grampian-style phasing to bridge the multi-year infrastructure deficit, the spatial strategy fails the NPPF soundness tests.	Noted. Phasing conditions have been included in strategic site policies which allocate new developments in the Local Plan to align with delivery of the pipeline connection to Grafham Water. These measures have been agreed with Cambridge Water and the Environment Agency.
Concern regarding water availability and future monitoring	Plan should reference the need for the Councils to work with statutory water undertakers to monitor regional water capacity and introduce phasing conditions where necessary.	Noted. The Councils are liaising with statutory water providers through the Cambridge Water Scarcity Group. If conditions were necessary in future they could requested through representation to the development management process.
Standards should not go beyond Building Regulations	Proposed standards go beyond current and proposed Building Regulations and there is no evidence as to why these are necessary or how viable these are. Policy should accord with Building Regulations.	Noted. 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.

		A Written Ministerial Statement of 19 December 2023 encouraged local partners to explore higher standards in Cambridge where it was inhibiting Local Plan adoption. The NPPF (2026) recognises that it may be appropriate to set standards beyond Building Regulations.
Add flexibility to the policy	Add flexibility where the requirement for residential developments of 100+ dwellings are to achieve 80 litres/person/day is demonstrated to be impracticable. Introduce a an "unless demonstrated not practicable" test similar to that in the non-domestic policy.	Noted. Introduction of a general caveat is not supported given the severity of water scarcity and the importance of the issue.
Standards should not require water recycling	Policy should not require water reuse systems to achieve 80 lppd until there is clarity as to the legal position and clear national standards and guidance for installation and ongoing stewardship. Drinking Water regulations do not support water recycling and the Eddington system could not be activated. Assumed costings underestimate the true costs of such provision. Assessment also does not consider maintenance costs.	A range of evidence informed the policy, including the Water Smart Communities project, and the Viability Assessment accompanying the Local Plan. Evidence has shown that community scale reuse is more cost effective and could be implemented in addition to water efficient fixtures and fittings. Whilst current regulations restrict water companies from supplying non-potable standard water, private systems are capable of being installed. As referenced in the government white paper ‘A new vision for water’ (January 2026), a review of water regulations to support water reuse is currently underway.

	The is no justification for different standards above and below 100 dwellings. Replace with a single, uniform requirement.	A range of evidence has informed the policy, including the Water Smart Communities project, and the Viability Assessment accompanying the Local Plan. Evidence has shown that community scale reuse is more cost effective and could be implemented in addition to water efficient fixtures and fittings. This has informed the approach taken in the policy for residential development above 100 new homes to achieve the more stringent requirement of 80 litres/person/day as the evidence suggests that it is at this point that community scale reuse becomes more viable.
Standards will impact on house sales	Fixtures and fittings policy will prevent house builders from offering products (bath, higher capacity washing machine and more powerful shower), reducing customer satisfaction and potentially leading to these fixtures being replaced post occupation.	The policy will require the most water efficient fixtures and fittings to meet the water efficiency levels, however this is fully justified by the pressures on water resource that Greater Cambridge is facing and the need to protect the environment. 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.
Policy change should be phased	Policy should deliver a more balanced, phased approach which aligns with the Water Ready report rather than pursuing higher specifications within compressed	Noted. The significance of the water scarcity issue in Greater Cambridge supports the approach proposed.

	timeframes that may undermine deliverability and affordability.	
Water meters	Part 3 of the policy which requires water metres suggests that the Council will use enforcement powers to monitor the policy.	The installation of measures allow occupiers to understand their water use and to identify where there are leakages. It is an appropriate response to water issues facing the area to require metering at individual property level, and is supported by water companies.
Future standards	Part 5 of the policy is not justified as future policy or legislation changes should be reviewed in future Local Plans.	Water policy is a fast-evolving area. It is reasonable to clarify that if a future standard is applied through national regulatory regimes exceeds the Local Plan standard that the new standard would be applied.
Data centres	Data centres: Closed-loop cooling systems rely on PFAS ("forever chemicals") to manage extreme server heat, raising environmental concerns. This must be rewritten carefully to operate to the highest environmental standards and prevent PFAS leaks, emissions, and water contamination.	System pollution control measures would be addressed by separate regulatory measures. The issue of water pollution is dealt with in policy CC/IW (Integrated water management, sustainable drainage and water quality). The Plan must be read as a whole, it is not necessary to cross-refer or duplicate requirements in other policies.
Non-residential standards overly onerous	Requirement for non-residential development to achieve full credits under Wat 02, Wat 03, and Wat 04, and one credit for category Wat 05 of BREEAM demands specialist design and technology. Wat 04 is difficult to control and adds considerable cost and complexity to developments. Policy needs greater flexibility.	The majority of these requirements are relatively easy to achieve such as providing water meters and sub meters (Wat 02) and leak detection systems and flow control devices (Wat 03) and are being regularly provided in current planning applications. Wat 04 applies to non-domestic water use. It is expected that developers must have some knowledge of the amount of water use expected for their discussions with Cambridge Water on

		securing a connection, particularly as Cambridge Water have a current non-household restriction for water use of a maximum of 20m3 per day per connection. Similarly Wat 05 relates to estimating the annual operational water consumption for the building which should not be overly onerous or costly.

Policy CC/IW: Integrated water management, sustainable drainage and water quality

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy CC/IW: Integrated water management, sustainable drainage and water quality	29	30	21	6	21

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	General support for policy, and for requirements around SUDs.	Support noted.
Concern about demonstration of wastewater capacity	Criterion 6(a) seeks to place responsibility on developers for demonstrating wastewater capacity, despite this being a statutory function of the water company. This places an unreasonable burden on developers. Sewerage undertakers cannot refuse connections due to capacity constraints and must address resulting infrastructure requirements.	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 prior to occupation. Anglian Water are currently working on their next DWMP28 which 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

	Point 6(a) conflates securing a water connection with demonstrating actual wastewater treatment capacity.	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. It is not unreasonable for developers to consider the impact of their proposals on wastewater capacity and infrastructure and to engage with Anglian Water and for all developments a connection will have to be secured. This is a current requirement for planning applications in Greater Cambridge to show a foul water connection as part of a utilities assessment. This requirement to demonstrate adequate infrastructure capacity exists or is capable of being secured is also a requirement of Policy I/ID: Infrastructure and delivery, of the Greater Cambridge Local Plan. As the supporting text specifies, where necessary phasing conditions will be applied to planning permissions to ensure that new developments are not occupied until the required capacity is in place in order to prevent detrimental impacts to the environment.
Support for demonstration of wastewater capacity	Retain Criterion 6(a) in Policy CC/IW as proposed, ensuring developers remain responsible for demonstrating that sufficient wastewater capacity exists before development is occupied.	Support for criterion 6a of the policy is noted.

Policy wording around demonstration of wastewater capacity	Strengthen wording of part 6(a) to refer to 'guaranteed sufficient hydraulic and environmental capacity for wastewater flows and treatment' and 'to the required standard'.	Noted. Anglian Water will consider both hydraulic and environmental capacity in their Drainage and Wastewater Management Plan and when considering applications for connection. New infrastructure will need to be a of a standard that will comply with licensing conditions controlled by the Environment Agency. It is considered that the existing wording covers both of these aspects, but a modification could be made if the inspector considered necessary for soundness.
Flexibility required for drainage standards	Requirements for zero discharge from rainfall events up to 5mm, mandatory permeable hard surfacing, compulsory green or brown roofs on all flat roofs exceed established guidance and fail to recognise site-specific constraints. Flexibility is required where technical or viability issues arise, supported by alternative biodiversity measures.	Noted. Introduction of a general caveat is not supported given the importance of integrated management and SuDS in managing water close to its source and reducing runoff which could cause flooding downstream. At the planning application stage, site specific constraints and also opportunities can be put forward.
Surface water drainage priority	Anglian Water request that after Part 3 insert: 'All surface and foul water flows must be separated. Under no circumstances will surface water be permitted to discharge into a separate foul sewer or to a combined sewer system via a new connection.'	Noted. The plan reflects the hierarchy set out in Standard 1 of the National Standards for Sustainable Drainage Systems.
Ensure Sustainable Drainage Systems	Ensure all above-ground SuDS features trap sediment and filter hydrocarbons/heavy	Noted. Part 4g of the policy requires that SuDS have been suitably designed to manage water quality to avoid the

(SuDs) prevent pollution	metals before water enters rivers, directly safeguarding chalk stream ecology.	risk of pollution and sediment entering groundwater and watercourses.
Design of SuDS	Related to 1(b), SuDS should be considered at an early stage as it may be necessary to collect data on seasonal groundwater levels to inform the assessment and design. It would be prudent to detail this in supporting information to ensure the policy is effective.	Noted. This is already referenced in National SuDS guidance.
Maintenance of SuDs	Policy requirements for on-going maintenance of SUDs should be strengthened and made more specific. While maintenance arrangements are referenced, there is no explicit requirement for ongoing monitoring or performance review to ensure systems continue to function as designed.	Noted. Part 4h of the policy requires that details of the future management, maintenance and adoption of the SuDS are provided, including who will be responsible, to ensure they will function effectively over the lifetime of the development. In terms of the specifics of individual schemes, ongoing management and monitoring will be prescribed and secured through planning conditions and/or obligations.
Wider benefits	Policy does not provide sufficient support or weight to development proposals that deliver local or strategic water infrastructure benefits.	Noted. The identification of suitable sites for allocation has followed a rigorous process considering the development strategy and through the HELAA. The representation deals with a specific situation where a development site is adjacent to a Water Recycling Centre and states that this is an opportunity, however no evidence is presented to demonstrate this need.

Cambridge Waste Water Treatment Plant	Residential component of Hartree and any other North East Cambridge capacity contingent on relocation of the treatment plant should be removed from the five-year supply calculation and from the housing trajectory for the plan period, unless the Councils can identify a funded delivery route, the funding partners, and a realistic timescale.	Noted. Residential developments in the housing trajectory are not dependent on the relocation of the Cambridge Waste Water Treatment works.
Cambridge Waste Water Treatment Plant	Plan should include a clear policy position on wastewater capacity as a constraint on the phasing of growth in the Cambridge. Catchment.	Noted. The Councils have worked closely with Anglian Water and other stakeholders through the water scarcity group. A Statement of Common Ground has been agreed on the issue, which agrees that the plan provides sufficient lead in time for its new strategic allocations allowing their separate statutory processes to address infrastructure needs.
Require water management across a wider area	Require water issues to be considered on an area wide basis covering water catchment and infrastructure catchment across the whole Cambourne urban area covering Cambourne North, Cambourne West, existing Cambourne and Bourn Airfield together.	Noted. The plan has been accompanied by an appropriate and proportionate evidence base, including a Strategic Flood Risk Assessment. At the planning application stage, requirements will be guided by national planning policy regarding the approach and contents of flood risk assessments, which include consideration of cumulative impacts.

Policy CC/FM: Managing flood risk

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy CC/FM: Managing flood risk	8	8	5	2	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	General support for policy approach. Anglian Water supports Policy CC/FM's approach to managing flood risk.	Support noted.
Update policy in line with National Planning Policy Framework (NPPF)	Update policy to reflect 2026 National Planning Policy Framework (NPPF) and latest guidance.	Noted. The 2026 NPPF was issued after the Proposed Submission Local Plan has been published. As a legacy plan, its soundness will be tested against the 2024 NPPF.
Update policy in line with Planning Policy Guidance (PPG)	Policy requires updating to take account of the latest guidance set out in the PPG that the sequential test no longer needs to be applied where a site specific FRA demonstrates that occupiers will remain safe from surface water flood risk for the	Noted. The policy correctly references passing the sequential and exception tests as set out in national planning guidance.

	lifetime of the development without increasing flood risk elsewhere.	
Policy requirements – change of use	Part 1 is not consistent with national policy because it universally applies the sequential test to "change of use" applications. Retain targeted restrictions specifically for changes of use in Flood Zones 3a/3b and areas of high surface water risk, matching the Environment Agency's recommendations.	Noted. The Local Plan directs to national planning guidance, which includes reference to how change of use proposals should be considered.
Policy requirements – floor levels	In part 1j the allowance should be changed to 600mm above the 1 in 100-year flood level (including an allowance for climate change), as this is the Environment Agency's current requirement.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise to reflect the latest guidance.
Addition to policy - catchment wide flood risk	Add a requirement that strategic allocations are supported by a catchment wide flood risk assessment covering the cumulative impact of all phases and adjoining allocations on downstream ordinary watercourses and the communities they pass through.	Noted. Flood Risk Assessment requirements are set by national planning policy and guidance.
Addition to policy - reduction in flood risk	Where downstream flooding already occurs, require a reduction in downstream flood risk rather than no worsening only.	Noted. Part 1c already requires that, 'The development does not lead to an increase in flooding elsewhere and, where, possible reduces overall flood risk'.

Addition to policy - flood mitigation and phasing	Require mitigation land (for example within a Strategic Enhancement Area or equivalent) to be identified and safeguarded at allocation stage, and attenuation to be delivered before the phase that generates the runoff.	Noted. Mitigation measures and phasing will be identified through the FRA process.
Strategic Flood Risk Assessment (SFRA) inaccuracy	In the 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.	Noted. The SFRA was produced following national guidance. Modelling inputs to the SFRA were agreed with the Environment Agency.

Policy CC/RE: Renewable energy projects and infrastructure

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy CC/RE: Renewable energy projects and infrastructure	15	11	5	2	5

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for the policy	Support for the policy's encouragement of renewable energy development and contributions to community benefit funds.	Support noted.
Retaining ecological enhancements and mitigation	CC/RE point 5 is not effective as ecological and biodiversity mitigation cannot 'out live' the related planning permission.	Noted. Biodiversity enhancements from development, including temporary forms of development, will be expected to be retained as appropriate, especially where any biodiversity enhancements support protected habitats sites or protected species. However, the Councils recognise that a practical approach will need to be taken on a case-by-case basis to ensure that such retention does not prevent any required decommissioning activity to occur. Should they be considered necessary by the Inspectorate, the Councils are open to modifications being recommended at the appropriate point in the examination.

Strengthening adverse impact mitigation requirements	The policy could be strengthened to put the onus on the developer to undertake an assessment of cumulative and cross-boundary impacts.	Noted. During decision making, Policy CC/RE will be applied alongside all other relevant requirements of the Development Plan, as well as any national planning policy and guidance – it would be ineffective for the policy to repeat these requirements. As such and given the Local Plan addresses the mitigation of environmental health issues and impacts on the built and natural environment in great depth, it is considered the policy is sound and further changes are not needed to address these issues.
Landscape Character Assessment	The policy wording CC/RE point 1a refers to tranquillity, but it is not clear how this relates to the findings of the Landscape Character Assessment.	Noted. Part (1)(a) of Policy CC/RE focuses on the need for proposals to be sensitive to the site's landscape character, which has been reviewed by the Councils' Greater Cambridge Landscape Sensitivity Assessment: Part 2 (Renewable Energy Development) ("the Assessment"). Appendix A of this document sets out the methodology for undertaking the assessment, which included consideration of a range of assessment criteria, including perceptual and aesthetic factors which includes a sense of tranquillity. However, the Councils also recognise that multiple factors can contribute to an area's landscape setting; the Assessment provides a preliminary analysis of each identified zone's sensitivity to particular scales of renewable energy development, which should be regarded by proposals but not considered to be an exhaustive appraisal of the potential landscape impacts. Instead, the supporting text highlights that applicants will likely need to undertake Landscape and Visual Impact Assessment work to determine the scale of impact, including on tranquillity, as well as appropriate mitigation. Therefore, as the policy and supporting text should be

		read as a whole, and given Policy CC/RE will be applied alongside other landscape character requirements set out in the Great Places chapter, it is considered that the policy is sound.
Synergies between agricultural activity and renewable energy infrastructure	Point 1(d) and Paragraph 4.48 inaccurately treats renewable development on agricultural land as an inherent negative trade-off requiring "significant sustainability benefits" to outweigh the loss, but this understates the potential of dual-use schemes.	Noted. The supporting text at paragraph 4.48 acknowledges that there are cases where agricultural uses are maintained.
Alternatives to heat networks	Policy CC/RE should provide flexibility where connection to a heat network would not be the most sustainable or effective energy solution.	Noted. The criteria does allow for flexibility should connection to district heating impact on the technical feasibility of projects, for example if this would impact on the energy aspirations for a proposal. The proposed Heat Network Zoning legislation would also include a requirement for certain types of development to connect to district heat networks where these fall within a designated heat network zone. Again, there would be some exemptions to this such as where it would not be cost effective to connect or better low carbon solutions exist. This approach is due to be confirmed through legislation. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination if the inspector considers they are necessary.

Wind Turbine Zones	Understand that the ratings are based on visual landscape considerations, however, as these areas are within the Landscape Connectivity Zone (LCZ), and some areas within the Core Sustenance Zone (CSZ) for Eversden and Wimpole Woods SAC barbastelle bats, and may be impacted by wind turbines, these ratings should be reviewed to avoid encouraging wind turbine applications in these areas.	Noted. The wind turbine zone maps are for informational purposes only to help with the application of Policy CC/RE's requirements relating to landscape character and sensitivity. The map key is clear that these maps relate to landscape sensitivity that reflect the results of the Greater Cambridge Landscape Sensitivity Assessment: Part 2 (Renewable Energy Development); they do not represent zones of in-principal support for different scales of wind development. Policy CC/RE is a criteria-based policy and sets out all the impacts that must be considered, which includes protected habitats and species (see part 1b). The supporting text to Policy CC/RE makes clear that an Ecological Impact Assessment should include an appraisal of potential impacts on protected species, including commuting and foraging bats. Moreover, during decision making, Policy CC/RE will be applied alongside the ecological safeguarding requirements of the Biodiversity and Green Spaces chapter, as well as any national planning policy and guidance that address protected species and ecological sites.
Changes to the policy's wording and supporting text	Comments suggesting changes to the introduction's wording, including closer alignment with the recognised mitigation hierarchy.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.

Policy CC/CE: Supporting a circular economy and sustainable resource use

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy CC/CE: Supporting a circular economy and sustainable resource use	15	15	12	2	11

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for the policy and approach	Support for the Plan's integration of circular economy principles, references to the CL:AIRE Definition of Waste Development Industry Code of Practice, and for Circular Economy Statement requirements.	Support noted.
Viability concerns	Requirement to reduce embodied carbon lacks clear parameters, creating uncertainty over implementation and viability.	Noted. Circular economy principles have become a more widely understood and acknowledged opportunity for the planning system to secure sustainable forms of development. The approach set out in the policy builds upon existing advice in relation to applications involving demolition. Further justification for Policy CC/CE's

		approach is set out in the Climate Change Topic Paper (2026) and the Climate Change Topic Paper (2025). Policy requirements in the Proposed Submission Local Plan have also been informed by a Viability Assessment, which has factored the requirements of Policy CC/CE.
Circular Economy Statement requirements are excessive	Mandatory submission of Circular Economy Statements for larger residential schemes is onerous and exceeds national information requirements.	Noted. National planning policy contains limited reference to circular economy principles, but it does make clear that plan making and decision making should actively contribute to the management and mitigation of the impacts of climate change. The Local Plan has been accompanied by substantive evidence, including a carbon budget analysis. This evidence sets out the role that managing embodied carbon in new development through material / structural reuse and repurposing will play in meeting statutory climate objectives, as conveyed by the Climate Change Act 2008. Circular Economy Statements will provide decision makers with key information on embodied carbon management, including sustainable material use / reuse, which will help to rationalise a particular approach to building retention / demolition in the context of statutory objectives. Further information on how the Circular Economy policy would be implemented is set out in the Addendum to the Climate Change Topic paper. Therefore, it is considered that the approach is sound.

Conflicts between building retention and other planning benefits	The policy imposes a stricter presumption against demolition than the NPPF generally requires. By allowing wider development benefits to be considered only exceptionally, it risks preventing sustainable redevelopment and creates an inappropriate hierarchy, rather than balancing economic, social and environmental objectives.	Policy CC/CE's circular economy requirements and policy positions are designed to ensure that good design decisions can be achieved whilst contributing to the reduction of whole life carbon in new developments across Greater Cambridge. It is the Councils' view that the policy does not prohibit sustainable redevelopment, rather that it requires developers to comprehensively consider and assess what can be retained and re-used on or off site in order to make more efficient use of existing building materials and, by extension, achieve sustainable redevelopment. The approach set out in the hierarchy builds upon existing advice in relation to applications involving demolition – wider economic, environmental and social benefits of development proposals will still be important considerations for planning decision making and can be used to justify that demolition would be the most appropriate pathway for a particular site's redevelopment.
Inconsistent development thresholds	Different thresholds for Whole Life Carbon Assessments (CC/NZ) and Circular Economy Statements weakens the Plan's effectiveness.	Noted. The thresholds for Policy CC/NZ have been prepared on the basis of recommendations made in the accompanying evidence by Bioregional, whereas the circular economy statement thresholds for Policy CC/CE have been established on the basis of other comparable examples that have been adopted, including the London Plan. The thresholds for the Circular Economy requirements were discussed and validated by

		Bioregional in the Addendum to the Climate Change Topic Paper. It is the Councils' view that the different thresholds rely on different foundations, but should alignment be considered necessary by the Inspectorate, the Councils are open to discussing modifications at the appropriate point in the examination.

Policy CC/CS: Supporting land-based carbon sequestration and carbon sinks

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy CC/CS: Supporting land-based carbon sequestration and carbon sinks	10	10	8	1	8

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for the policy	Support for the policy's recognition of peat soil as a critical carbon store and for the promoting the protection and enhancement of other carbon stores.	Support noted.
Increase flexibility through allowances for peat restoration plans	Some peat is in poor condition and emitting carbon - Peat Restoration Plans should be encouraged within the policy to allow developers the flexibility to build new homes whist protecting or enhancing valuable peat soils.	Noted. Support for proposals to enhance peat soils and protect its qualities, including for carbon sequestration, is included within criteria 6 of the policy.

More soil management is needed	The Plan fails to fully acknowledge the fundamental role of sustainable soil management. The Plan should introduce a more integrated approach recognising soils as a strategic and multifunctional natural resource and capital asset.	Noted. Whilst the Councils agree that comprehensive soil management is important, the Local Plan has sought to address the need for appropriate soil management across the different areas of development that are a consideration for the planning system. This includes requirements for the management of soils during construction (Policy I/CM), as well as CC/CS's requirements for the protection of peat soils; during decision making, Policy CC/CS will be applied alongside other relevant considerations in the Local Plan, as well as any national planning policy and DEFRA guidance or permitting standards that are relevant to the importing, disposal and use of soils during construction.
Changes to the policy's wording and the supporting text	Comments suggesting changes to the introduction's wording, including clarification on tree planting and Whole Lifecycle Carbon Assessments.	Noted. Tree planting is covered by policy BG/TC and Whole Life Carbon Assessments are required under Policy CC/NZ. The plan should be read as a whole and these requirements do not need to be duplicated here.
The necessity of CC/CS (7)	CC/CS (7) requires major developments to enhance carbon sequestration via green infrastructure or habitat creation; it is unclear why this is necessary given other policies relating to urban greening, open space, and biodiversity net gains.	Noted. The Councils have sought to ensure that the Local Plan recognises that, if designed and considered correctly, biodiversity and green infrastructure enhancements can deliver benefits for carbon sequestration, as well as habitat and foraging opportunities to for the wider ecological network. CC/CS (7) is intended to make this opportunity for in-tandem effects a clear consideration for decision making,

		introducing a consideration that sits alongside, rather than repeats, the requirements of Policy BG/BG.

Policy CC/SR: Sustainable retrofit

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy CC/SR: Sustainable retrofit	3	3	1	2	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for the policy	To support Climate Change, it is essential for the strategy for reaching Net Zero, reducing operational carbon, and conserving embodied carbon across Greater Cambridge to address retrofit. Given that existing buildings far outnumber new developments, establishing a supportive planning framework for sensitive adaptation is fully justified.	Support noted.
Concern about level of detail in the policy	The sustainable retrofit policy is not binding enough to be effective as a policy. Further evidence is required to properly justify and understand the viability implications.	Noted. The policy is designed for refurbishment schemes to have a set of qualitative principles to guide their approach to a whole buildings approach to reducing carbon. Previously, there would have only been an approach for new development and this policy is designed to be a catch all policy to be applied to all refurbishment. Refurbishment is very

		varied and complex, and it would be difficult to pin down specific policies for every typology. Therefore, this approach focuses on the energy hierarchy and principles to reduce whole life carbon to set out an approach to guide refurbishment schemes.

Consultation Statement

Summary of Representations and Councils' response - Biodiversity and green spaces



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan Regulation 22 Consultation Statement (November 2026)

GREATER CAMBRIDGE
SHARED PLANNING

Biodiversity and green spaces

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Biodiversity and green spaces	4	4	2	1	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	General support for the ambitions of the Biodiversity Chapter and the general approach taken to biodiversity policies in the Local Plan.	Support noted.
General comment	The Chamber of Commerce does not oppose ambitious environmental outcomes merely because they exceed minimum requirements. We support an approach focused on clear, measurable environmental outcomes combined with reasonable flexibility and innovation in how those outcomes are achieved.	Noted.

Monitoring	Polices in chapter lack functional mechanisms to monitor or enforce their ambitions.	Noted. An Implementation note will be produced to set out how the Operation and Maintenance Plan will be secured. A GI Operation and Management Plan outlines how the space will be managed over a 30-year period, and the funding and stewardship arrangement for implementing the management plan. The 30 year management plan requirement aligns with the Biodiversity Net Gain 30 year requirement for consistency. This should ensure that the greening measures implemented are secured for the lifespan of the development, which is generally considered to be at least 30 years. Pre-development, post-development and total net change calculation for BNG is covered by existing national legislation and guidance. The Local Plan does not seek to repeat national guidance or legislation; it provides locally specific planning policy reflecting the needs and opportunities of the area.
Open space at Harston	Should include the informal open space/nature reserve at Button End Wood (policy HAR 8) Harston	Noted. The Protected Open Space Evidence Report assesses which sites should be designated. This sets out our approach to designating green space.

Policy BG/BG: Biodiversity and geodiversity

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
BG/BG	51	54	44	5	39

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for the policy	Support for 20% Biodiversity BNG on major development and for the alignment with the LNRS in priority areas, particularly in the context of Cambridgeshire being one of the most nature depleted counties in England.	Support noted.
Effect of development on species and habitat	Objection to the plan due to the impacts of development on barbastelle bats (and other species) and the habitats which support them.	Noted. For proposals where development may affect biodiversity, Policy BG/BG already includes a requirement for applicants to provide survey information and a site assessment that is proportionate to the likely severity of the impacts. Point 8 of the policy requires specific mitigation and survey requirements for proposals coming forward on sites identified as, or suitable to, support Barbastelles bats (including within the Natural

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		England Impact Risk Zone for the Eversden and Wimpole Woods SAC).
Objections to 20% biodiversity net gain requirement	A universal 20% target could be unachievable on constrained urban sites, increase reliance on off-site BNG provision, and affect development viability and deliverability. A uniform policy fails to account for diverse land typologies.	Noted. National Planning Practice Guidance on BNG sets out that plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, 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.
Biodiversity Net Gain (BNG) targets- Green Infrastructure (GI) spatial areas	Policy should set local BNG targets above the national level for development within the GI spatial areas that will help to steer development away from them and/or raise higher credits to protect what remains.	Noted. Policy BG/GI requires major development located within an area identified for one of the strategic green infrastructure initiatives to demonstrate how the design of on-site green infrastructure has had regard to the relevant initiative's objectives. Setting higher BNG requirements for sites within areas identified by the strategic green infrastructure initiatives is not justified based on the evidence, analysis of local data and reasoned justification (as set out in the Biodiversity and Green Spaces Topic Paper).
Evidence of local need for BNG above 10%	No compelling evidence of local need presented by the Councils or how 20%	The Councils have provided robust justification (in the Biodiversity and Green Spaces Topic Paper) for the policy approach for 20% BNG for major development

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	BNG is likely to support the doubling nature ambition.	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. The councils are confident that the evidence base that has informed the preparation of the Plan is relevant, robust, up to date and proportionate. Reflecting our 'doubling nature' ambition, our policies seek a higher level of biodiversity gains from new development than the national requirement.
BNG above 10% as a material benefit in the planning balance	BNG delivered above the mandatory 10% should be recognised as a material benefit in the planning balance rather than required through a fixed policy target.	Noted. The Councils have provided robust justification (in the Biodiversity and Green Spaces Topic Paper) 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.
Not in alignment with Local Nature Recovery Strategy (LNRS)	The Policies Map should include the spatial GI areas and ensure they align to the APIB and ACB in the CP LNRS GIS mapping.	Noted. The fourteen area-specific and dispersed long term priority enhancements to Greater Cambridge's green infrastructure network are indicative and are not mapped to boundaries. The Strategic Initiatives have been identified in cognisance of the nature recovery

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		network ambitions developed at sub-regional and local level and there is some significant overlap with these. The CP LNRS has been developed and adopted since the identification of the Strategic Initiatives, and its nature focused opportunities are mapped at a more granular level. However, similar to the Strategic Initiatives, the CP LNRS has drawn on the Cambridge Nature Network, and Natural Cambridgeshire's other landscape-scale priority areas, such that the Councils' GI initiatives match well with the emerging LNRS, albeit they have a broader focus.
Habitat site protection should be strengthened	The detail of specific policy requirements should be strengthened, particularly with regard to off-site provision of BNG and the allowance in paragraph 9 for exceptionally permitted development.	Noted. The policy only allows for new development that would have a direct or indirect adverse effect on sites of biodiversity or geological importance in exceptional circumstances and, in such cases, proposals must demonstrate that the mitigation hierarchy has been implemented, and the intrinsic natural features of particular interest must be safeguarded and enhanced. The policy is in alignment with National Planning Policy and with Planning Practice Guidance.
Essential major infrastructure should be exempt from 20% BNG requirement	Object to a 20% BNG requirement to all major development as this may be unfeasible for essential infrastructure projects.	Noted. An exception is not considered necessary due to the ability for proposals to provide evidence as part of the planning application process to demonstrate that a

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		material consideration(s) exists to deviate from the policy.
Cumulative impact	BG/BG in conjunction with other policies, restrict opportunities for density uplift and achieving the housing numbers. Requiring additional land for BNG could reduce development capacity, affect housing delivery and conflict with the efficient use of land.	Noted. 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.
Viability and Deliverability	20% BNG requirement for major development has the potential to significantly increase development costs and render development unviable and undeliverable.	Noted. The Council has appropriately tested the viability of seeking 20% BNG on site, alongside other policy requirements and developer obligations.
On-site and off-site BNG delivery.	The requirement for on-site options to be exhausted does not allow for the necessary planning balance to be	Noted. The Councils preference is for BNG to be delivered on-site wherever possible, (rewarded through the Defra Statutory BNG metric) and in accordance with

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	assessed having regard to other planning considerations.	government guidance (the Biodiversity Gain Hierarchy (BGH)). 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:74001-20240214 Biodiversity Net Gain). Paragraphs 5.9 already explains the Councils' preference for BNG to be delivered on-site wherever possible, (rewarded through the Defra Statutory BNG metric) and in accordance with the BGH, which emphasises prioritising on-site measures before exploring off-site options. This approach aligns with national guidance and ensures developments make the most effective contributions to local biodiversity.
Importance of urban gardens	Policies overlook the importance of urban gardens for biodiversity.	Noted. Paragraph 5.8 considers private gardens' classification within the Statutory Biodiversity Metric (as low-value habitats post-development, (i.e. vegetated garden) and encourages opportunities for minor development to bring further net gains beyond the 10% required nationally. The Plan is committed to ensuring that Major development proposals contribute to the greening of Greater Cambridge by including urban greening - via the Urban Greening Factor (UGF) - as a fundamental element of site and building design, and by incorporating measures such as high-quality landscape

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		(including trees), green roofs, green walls and nature-based sustainable drainage through Policy BG/UGF. Pollinator corridors are a strategic green infrastructure initiative identified in policy BG/GI.
Negative green infrastructure impact of Cambourne to Cambridge Busway	Concern that busway through Coton Orchard will be built, prioritising land value and growth over green spaces.	Noted. The Cambourne to Cambridge 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 an Environmental Impact Assessment.
Monitoring and enforcement	The policy fails to specify how habitat enhancement measures will be monitored in practice, how frequently, by whom, or what enforcement action follows non-compliance.	Noted. Paragraph 5.15 sets out that to ensure the delivery of BNG measures, the Councils will secure off-site habitat creation and its long-term management (minimum 30 years), through planning obligations, or, where BNG is provided on land outside of the applicant's control, by obligations. A Habitat Management Monitoring Plan (HMMP) is required to support off-site land proposals and will be reviewed and agreed by the Local Planning Authority (LPA) as part of the legal agreement process. Enforcement action is outside of the scope of Local Plan policies. A breach of planning compliance can be reported to the Councils and are addressed through the Local Planning Authorities'

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		separate development management and enforcement function.
Cross-boundary ecological networks and habitats	The policy would benefit from recognising both direct and indirect impacts on biodiversity and habitats located within adjoining local authority areas.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Invasive species	The policy or supporting paragraphs also include a clear requirement for biosecurity measures to prevent the spread of invasive species.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Different requirements for different habitat sites	The policy wording needs to distinguish between the differing requirements of development affecting international, national and local wildlife sites.	Noted. This policy has been discussed with Natural England and no additional amendments to the supporting have been suggested. Paragraph 5.22 and 5.23 already sets out that European sites (SACs and SPAs) are protected by the Conservation of Habitats and Species Regulation 2017 as amended (the Habitats Regulations) and that the Habitats Regulations impose a strict negative test that permission can only be granted if it can be concluded that there will be no adverse effect on the site's conservation objectives. Derogations are only permitted where there are no alternative solutions, and there are imperative reasons of overriding public

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		interest and only then through provision of compensation.
Minor changes to the policy's wording and supporting text	Comments suggesting minor changes and factual changes to the policy's wording or the supporting text to correct factual errors.	Noted. The Councils will consider and identify any minor modifications necessary for clarity. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.

Policy BG/GI: Green infrastructure

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
BG/GI	28	32	18	4	16

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Support for the policy and its ambitions to protect and enhance green infrastructure.	Support noted.
Green Infrastructure Operation and Maintenance Plans-costs	Objection, highlighting that the production and implementation of GI Operation and Maintenance Plans over the lifetime of developments will clearly have associated costs. The Councils should ensure green infrastructure requirements are reflective of, and are not inconsistent, with national standards and guidance and adequately reflect and address viability concerns.	The Councils consider that GI can be incorporated into development as an integral part of a proposals overall design. As with BNG, on site GI requires ongoing management and maintenance to ensure it is retained and thrives over the longer-term.
GIS Mapping	In some areas the Local (Development) Plan is ahead of the LNRS in that it includes significant areas of land that should be protected because of their	Noted. 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 Cambridgeshire. The Councils

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	current role or future potential as habitats for nature restoration.	are aware that the County Wildlife Sites data shown on the CP LNRS mapping is designed to disappear at close up zoom levels (as this is the agreement with the data provider) and therefore makes a direct comparison of the GIS data layers for County Wildlife sites difficult.
Protection for Strategic Green Infrastructure Initiative areas	The policy as stated makes no attempt to protect the GI areas and steer development away from them, contrary to NPPF requirements.	Noted. Policy BG/BG point 9 already ensures that development proposals which have a direct or indirect adverse effect on sites of biodiversity or geological importance as identified on the Policies Map (or other sites which meet the published criteria for selection), will not be permitted. The fourteen area-specific and dispersed long-term priority enhancements to Greater Cambridge's green infrastructure network are indicative and are not mapped to boundaries. Policy BG/GI point 5 ensures that major development located within an area identified for one of the strategic green infrastructure initiatives must demonstrate how the design of on-site green infrastructure has had regard to the relevant initiative's objectives.
Alignment of development strategy and strategic green infrastructure initiatives	Comments that the 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.	Noted. The approach to green infrastructure delivery is set out in various Local Plan policies, including site-specific allocations that identify measures to support relevant green infrastructure initiatives, and Policy BG/EO, which requires provision of 7 52 hectares of

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	Strategic green infrastructure should be allocated.	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. The Plan must be read as a whole; it is not necessary to cross-refer or duplicate requirements in other policies.
Cambridge South East Transport Busway	Concern expressed on the negative green infrastructure impact of CSET. Objection policy BG/GI is not effective because major infrastructure progressed outside the Local Plan can bypass and undermine its priorities.	Noted. 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.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
PROWs and creating a green infrastructure network	The policy should more clearly recognise the relationship between GI, the PROW network and wider countryside access. The delivery, phasing and long-term management of relevant countryside-access routes, including cross-boundary routes, should be addressed alongside other green infrastructure delivery.	Noted. Policy BG/GI recognises the importance for connectivity between green infrastructure to deliver multifunctional benefits for all users of the wider green infrastructure network. Various site-specific allocations in the Local Plan include requirements related to the delivery of green infrastructure and effective countryside access. Policy I/ST also sets out that new active travel infrastructure should be high quality and designed in accordance with LTN 1/20 and Cambridgeshire's Active Travel Strategy, Design Guide and Toolkit (or successor documents) and highlights the rights of way network as an important asset and that Leisure routes should be improved in accordance with Cambridgeshire County Council Rights of Way Improvements Plan. 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 offsite contributions towards improved leisure routes which would include supporting Public Rights of Way Improvement Plans or providing leisure routes. The Plan must be read as a whole; it is not necessary to cross-refer or duplicate requirements in other policies.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Equestrian routes	The needs of horse riders should be considered at the earliest stage of planning and designing GI and development, including safe and appropriate access to, and connectivity within, the PROW and wider countryside-access network.	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. As equestrian needs relating to the PROW network have been addressed in other Local Plan policies, it is considered unnecessary for these matters to be repeated in the Biodiversity and Green Spaces chapter.
Green Infrastructure Plan and 'Green Infrastructure (GI) Statement – Clarification for requirements	Green Infrastructure Plan and Green Infrastructure Statement requirements are too vague – the policy should set out what these documents should include to make clear what these tools do that would not be achieved through other required submission documents.	Noted. Paragraph 5.40 already sets out that Green Infrastructure Statements should summarise how GI and open space provision has been considered as part of the outline planning stage. GI Plans should be evidence-based and demonstrate how the development meets the relevant GI standards at the detailed planning stage. Further detail is set out in the paragraphs 5.41 to 5.44. Also, guidance within the Greater Cambridge Green Infrastructure and Open Spaces Standards Framework Final Report (June 2026) (see Chapter 4) outlines the various requirements needed for GI Statements / GI Plans at various stages of the planning application process. Specifically, it sets out that a GI plan is a distinct

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		document (or dedicated section within a Design and Access Statement) attached to a qualifying planning application showing how a proposal incorporates a GI network strategically and meets all applicable GI standards through design, delivery, and long-term management.
Green Infrastructure Plan and Green Infrastructure (GI) Statement – Proportionality	The requirement for all major developments to submit a Green Infrastructure Plan and, at outline stage, a Green Infrastructure Statement should be amended so that these documents are only required where proportionate to the scale, nature and complexity of the development.	Noted. The Natural England Green Infrastructure Framework (NEGIF) recommends requiring a GI Statement / GI Plan to be submitted with every application for major development. This helps to ensure that GI is integrated into development from the outset and ensures its long-term management / maintenance. Requiring applicants to demonstrate that GI / open space standards have been met in one place makes GI provision easier to assess when determining planning applications.
Implementation and Monitoring	Amend paragraph 6 of BG/GI to align with BG/EO by applying a consistent 30-year management period for green infrastructure to provide a clear timeframe for securing funding, stewardship and ongoing maintenance.	Noted. An Implementation note will be produced to set out how the Operation and Maintenance Plan will be secured. A GI Operation and Management Plan outlines how the space will be managed over a 30-year period, and the funding and stewardship arrangement for implementing the management plan. The 30 year management plan requirement aligns with the Biodiversity Net Gain 30 year requirement for consistency. This should ensure that the greening measures implemented are secured for the

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		lifespan of the development, which is generally considered to be at least 30 years.
Conflicts with the National Planning Policy Framework (August, 2026)	A Green Infrastructure Plan is not identified within the application information requirements set out in Annex C of the NPPF (2026), so the requirement is unjustified.	Noted. The Greater Cambridge Local Plan has been prepared under the legacy system (2012 regulations) and is therefore being assessed at Examination for compliance with the 2024 NPPF.
Building with Nature Standard-for developments of 5,000sqm GIA or more	The encouragement for developments of 5,000sqm GIA or more to seek accreditation under the Building with Nature Standard requires greater clarity and justification.	Noted. The policy encourages development of 100 dwellings or more or 5,000 square metres or more of gross internal floorspace (GIA) to seek accreditation under the Building with Nature Standard with paragraph 5.44 explaining that achieving external accreditation via full Building with Nature accreditation demonstrates excellence in integrating green infrastructure into its design.
Green Infrastructure definition	The Green Infrastructure definition should include Public Rights of Way (PROWs), urban alleyways and footpaths, highways, waterways and railways.	Noted. The definition of Green Infrastructure set out in the Greater Cambridge Local Plan aligns with that the NPPF and Natural England's Green Infrastructure Standards. The specific list of GI elements within the definition are illustrative and are not limited to the specific features listed; also, the Greater Cambridge Green Infrastructure and Open Spaces Standards Framework Final Report June 2026 highlights further elements of a GI network,

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		including linear links and corridors (such as PRoWs and railway lines) and elements of the built environment (such as roadside verges).
Minor changes to the policy's wording and supporting text	Comments suggesting minor changes to the policy's wording or the supporting text to correct factual errors.	Noted. The Councils will consider and identify any minor modifications necessary for clarity. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.

Policy BG/UGF: Urban Greening Factor

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy BG/UGF: Urban Greening Factor	25	26	23	1	20

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Support for changes made to Local Plan, including from the Wildlife Trust. Generally supportive of principles of the Urban Greening Factor policy.	Support noted.
Ambition	The policy should be more ambitious, it is not clear what the requirements are minor development.	Noted. The requirements for meeting the UGF are for major development only. This has been assessed as the most feasible and deliverable approach.
Consistency	Consistency between policy wording and supporting text in relation to when the Urban Greening Factor applies in 5.47 states applies to all new development and policy wording says major development.	Noted. The Urban Greening Factor applies to all major development. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Viability	Concerns raised about viability, including the cumulative impact of the UGF policy and biodiversity net gain policy. The UGF was developed as a voluntary tool, it is not feasible or viable to meet the UGF.	Noted. UGF is included in external works allowance and build costs with the Viability Assessment (2026) reflecting the design quality expected of new development proposals. The Viability Assessment also tests the cumulative asks upon development of the draft GCLP policies. Accreditation is optional, so no additional cost included. High-quality green infrastructure may support sales values. The UGF is considered best practice for delivering greening and is used across the UK for greening proposed development.
Exemptions	Critical of allowing development outside of Cambridge delivering open space over 50% is exempt from the urban greening factor.	Noted. This recognises the greening value of open space, and also ensures that asks remain proportionate to the scale of development.
Deficiency in urban greening	The UGF policy should be applied to sites with depleted of greening such a brownfield sites.	Noted. The standard is applied on all major sites. There is an identified depletion in greening and biodiversity in Greater Cambridge and the use of urban greening factor addresses some of that depletion through enhancement of green infrastructure.
Rural / urban	National policy (NPPF Paragraph 159) refers to the UGF in the context of Green Belt release, and Natural England UGF User Guide (2023) recommends applying it to predominantly urban or suburban areas or targeting it at sites where urban greening	Noted. To support the policy, Greater Cambridge commissioned an evidence base - Greater Cambridge Green Infrastructure and Open Spaces Standards Framework Final Report (June 2026), and Natural England were consulted in the development of this evidence to ensure they agreed with the proposed

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	is a significant planning issue, such as brownfield redevelopment. As suggested by Natural England guidance, this is an urban tool not to be used in rural areas, and is wrongly being applied across the whole of Greater Cambridge.	approach. The proposal of new development, residential or non-residential at a major application scale brings with it some qualities of urban character by its nature. The UGF policy ensures there is some greening retained in these locations. Natural England have not objected to or suggested amendments to the policy on urban greening.
Enforcement	Concerns raised with implementation and enforceability of the policy, especially because it relies solely on an Operation and Maintenance Plan.	Noted. A GI Operation and Management Plan outlines how the space will be managed over a 30-year period, and the funding and stewardship arrangement for implementing the management plan. The 30 year management plan requirement aligns with the Biodiversity Net Gain 30 year requirement for consistency. This should ensure that the greening measures implemented are secured for the lifespan of the development, which is generally considered to be at least 30 years.
Duplication of standards	Biodiversity Net Gain requirements achieve the same outcomes as the urban green factor, and it should therefore be deleted. The relationship between UGF, Biodiversity Net Gain and open space requirements must also be clarified to avoid duplication, maintain viability and support housing delivery.	Noted. The Greater Cambridge Green Infrastructure and Open Spaces Standards Framework Final Report (June 2026) has tested a number of standards for greening and has looked at where these overlap or have competing ambitions and proposed a reduced list of standards that compliment one another. The proposed standards have been tailored to specific types of development and also consider where it is more appropriate to deliver something

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		on or offsite which reduces some duplication. The Tree Canopy Cover percentage proposed at the Regulation 18 stage has been removed due to likely interaction/overlap with both the Urban Greening Factor (UGF) and statutory Biodiversity Net Gain (BNG) requirements. The resulting standards are the UGF and BNG requirements which deliver greening for the purpose of ecology and habitat enhancement but also for wider co-benefits of greening like cooling and water management and the creation of better public realm and open spaces.

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

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
BG/TC	17	18	15	1	14

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for the policy	Support for the general principles of the policy or specific refinements that have been made over the course of the plan-making process.	Support noted.
Imprecise approach to tree cover	The policy does not set out the number of trees which will be lost due to the impact of housing development; nor does it set out how many trees are planned to be planted to fight the climate emergency.	Noted. The policy 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 supports the Councils' aim of delivering a net increase in tree canopy cover across the district.
Tree canopy cover measurement	It is not clear whether "tree canopy cover" refers solely to future tree canopy cover or whether it also includes other landscape or green infrastructure elements such as	Noted. The policy requirement for major development to provide 30% future tree canopy cover has already been amended to remove this requirement from the policy to be replaced with Biodiversity Net Gain and the Urban Greening Factor instead. The evidence for this is set out

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	hedgerows, scrub, structural planting, green walls or green roofs.	in the Greater Cambridge Green Infrastructure and Open Spaces Standards Framework Final Report (June 2026).
Viability considerations	It is not clear about the potential impact of the canopy cover measurement on housing density and viability, especially for affordable homes and infrastructure.	Noted. The policy requirement for major development to provide quantitative future tree canopy cover has been removed from the policy 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. This has been replaced with BNG and UGF requirements which have been considered in the Viability Assessment under Green Infrastructure.
Compliance and development control measures	A system of reporting, staffing and legal consequences should be in place. The safeguards for environmental protection are not sufficiently policed by the Councils.	Appropriate planning controls and obligations for newly introduced tree planting will be assessed on a case-by-case basis. Matters relating to compliance with planning permissions, planning conditions and tree protection legislation are addressed through the Councils' separate development management and enforcement functions.
Maintenance and care of tree planting	The policy lacks mention of the needs for monitoring of tree health and effectiveness. The policy should underline the importance of the management of trees, including the monitoring of irrigation and tree growth, in the early years of development.	Noted. Supporting text to the policy (5.68) sets out that proposals should also provide for the successful establishment, maintenance and long-term management of new trees to support canopy cover, resilience and future amenity value in accordance with BS 8545:2014 -

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		trees from nursery to independence in the landscape (or successor document).
Maintenance contributions	Maintenance of tree and hedgerow planting is already secured, where appropriate, by Landscape Management and Maintenance Plans, which can be secured via condition where appropriate. This is often monitored and secured via a management company, with no contributions required.	Noted. The policy ensures that appropriate measures are in place to secure the long-term maintenance of newly-planted trees in alignment with the NPPF. The policy already sets out that proposals that include the planting of trees and/or hedgerows must contribute to their long-term maintenance, which will be secured via planning conditions and/or obligations as appropriate.
Approach to replacement planting calculations	Part 2 of BG/TC defines "no net loss" by raw tree counts rather than mature canopy volume or value, allowing mature trees to be replaced by saplings. Suggestion that policy should require replacement calculations based on the mature canopy area and amenity value that the lost trees would have provided at maturity.	Noted. All applications for development where there are trees within or immediately adjacent to the site should demonstrate how the proposal evaluates, preserves, protects and enhances existing trees and hedgerows. Policy BG/TC sets out that where new trees are provided, planting must be an appropriate species for the condition of the site, support species diversity and incorporate long-lived trees. The text to the policy notes that for replacement trees to be allowed to reach their potential, it is essential that provision is made for strategic planting of large trees in locations that can be protected during future redevelopment of a site. Policy BG/TC (6) is also clear that tree or hedgerow planting

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		proposals must contribute to the long-term maintenance of new and existing natural features, which will be secured via planning conditions and/or obligations as appropriate.
Reinstate tree canopy cover quantitative target	Removing the quantitative 30% tree canopy target from earlier drafts leaves no reliable mechanism to guarantee canopy delivery, directly conflicting with the Cambridge Urban Forest Strategy. 30% canopy target should be reintroduced.	Noted. Informed by the Greater Cambridge GI and Open Spaces Standards Framework (2026, Chapter 2), an increase in tree canopy cover is enabled primarily via policies BG/BG and BG/UG, and in combination with Policy BG/TC 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 continues 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.
Arboricultural Impact Assessment	The policy should provide greater flexibility by requiring an Arboricultural Impact Assessment where appropriate and ensuring retained trees and hedgerows are integrated into the development design where possible.	Noted. The policy requirement for an Arboricultural Impact Assessment for development where there are trees on, or immediately adjacent to the development site ensures compliance with BS5837 2012 and demonstrates how existing trees will be preserved,

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		protected and enhanced. The Policy provides a sound approach to this issue.
Minimum buffer zones	The buffer zone around mature trees should be increased to 30 metres. The policy should clarify the applicable minimum buffer zones for ancient woodland and ancient or veteran trees.	Noted. Paragraph 5.68 already sets out that development proposals must provide adequate buffers and Root Protection Areas (RPAs) around woodland, trees and hedgerows by providing sufficient space to afford surrounding protection and allow for future growth and expansion (above and below ground). Development near ancient woodland, ancient trees and veteran trees must be in accordance with the most up to date joint Natural England and Forestry Commission Standing Advice. Paragraph 5.70 already includes explanation 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 and that precise buffer zones will be determined by Local Planning Authority tree officers through assessment and design proposals submitted as part of the development application
Clarifying the purpose of buffer zones	Clarification as to whether the 15-metre buffer represents a fixed minimum or a guideline that is subject to variation based	Noted. This requirement is set out inpolicy as a must and therefore is a fixed minimum requirement on the advice of GCSP's in-hosue ecologists.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	on site-specific circumstances would be beneficial.	
Pre-application clearance of trees	Schedule 14 of the Environment Act 2021 allows setting the baseline at pre-degradation value, neither this policy nor BG/BG references how such evidence will be captured or applied locally.	Noted. The pre-development biodiversity value of that habitat and any habitat degradation or deliberate destruction undertaken on a site is covered by existing national legislation and/or policy. The Local Plan does not seek to repeat national guidance or legislation; it provides locally specific planning guidance reflecting the needs and opportunities of the area.
Major development/ Large infrastructure	The policy must explicitly include tree management and the planting of micro-forests in relation to large infrastructure projects and large developments where trees will help control noise, groundwater and micro-climate.	Noted. Supporting text (5.65) sets out that development proposals should support greater treescape design diversity (such as informal orchards, micro-woods, informal tree planting, woodland pasture and Hedgerow trees) and consider how large, long-lived trees can be incorporated into the design of the proposed development. Supporting text to the policy (5.68) sets out that proposals should also provide for the successful establishment, maintenance and long-term management of new trees to support canopy cover, resilience and future amenity value in accordance with BS 8545:2014 - trees from nursery to independence in the landscape (or successor document).

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Tree design/architecture	The policy should include a definition of tree architectures that will be considered alongside building design and spatial arrangements and, should address the opportunities for tree planting to complete a development.	Noted. Setting a policy definition of "tree architecture" is outside of the scope of Local Plan Policy. However, the policy sets out that development proposals that would impact trees, either on site or adjacent to the site, should be made in accordance with the standards set out in BS5837: 2012 (Trees in relation to design, demolition and construction – Recommendations) and accompanied by an Arboricultural Impact Assessment and a tree protection plan and/or a Hedgerow Survey. The supporting text of the policy already notes that the layout of development should be planned so that new and existing trees are not only a significant feature of open spaces, but they are also incorporated into streets, gardens, parking courts and other publicly accessible areas.
Exceptions for tree removal	The policy 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.	Supporting text (paragraph 5.59) already recognises that, in some specific instances, felling of existing trees or hedgerows may be necessary to meet wider placemaking objectives and sets out (at paragraph 5.61) that trees, groups of trees and woodland will be assessed by the Councils in accordance with the amenity considerations and assessment methodology within Cambridge City Councils' Urban Forest Strategy 2026-2036 or successor document.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Duplication of requirements	Concern raised that Part 2 of Policy BG/TC introduces an additional requirement for replacement planting where trees or hedgerows are removed, despite existing legislation already requiring habitat losses to be appropriately compensated.	Noted. Informed by the Greater Cambridge GI and Open Spaces Standards Framework (2026, Chapter 2), an increase in tree canopy cover is enabled primarily via policies BG/BG and BG/UG, and in combination with Policy BG/TC 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.

Policy BG/RC: River corridors

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
BG/RC	15	15	10	3	10

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representation
Support	Support for the policy, the principle of controlling development in riparian buffer zones, pertains to water quality and the naming of specific types of development that may be allowed in riparian buffer zones.	Support noted.
Scope of the policy	The policy is unclear what is meant by development "along" river corridors as the policy's requirements apply to wider areas than immediately along the river. Policy BG/RC (1) needs to be clarified to include development which while not immediately along the river corridors is visible from them.	Noted, Point 1d of the policy sets out that development along rivers should protect and enhance views to and from the river. The plan should be read as a whole. These points relate to the river corridor only. The policies in the Great Places chapter manage impacts on heritage impacts and views.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representation
The policy focus	The policy would be strengthened by explicitly recognising river corridors as continuous ecological networks and requiring development to maintain and enhance wildlife movement, habitat connectivity and ecosystem function.	Noted. The Plan is committed to protecting and enhancing the character, biodiversity, visual amenity and historic significance of river corridors and connected locations through policy BG/RC. BG/RC already includes requirements for development along river corridors and their tributaries, and which are in an appropriate location for tourism and recreation associated with river corridors, to ensure that any development does not impact negatively on the other roles of a river. Supporting text to BG/RC (5.74) notes that different applications will have differing characteristics such that the roles, challenges and opportunities referred to in the policy need careful consideration and balancing.
Conflicts between river naturalisation and other planning objectives	The policy wording is too rigid, and it could conflict with conservation of heritage significance where this derives from built form. Greater definition is required regarding the meaning of 'other roles of the river' and how these should be balanced with naturalisation of the river.	Noted. Proposals are able to provide evidence as part of the planning application process to demonstrate that a material consideration(s) exists to deviate from the policy. The exceptions to the Riparian buffer are set out in policy. Furthermore, the Local Plan must be read as a whole, and there are separate policies that provide additional requirements for the protection of heritage assets.
Chalk streams	The policy makes no mention of protecting and restoring the area's chalk streams. The reduction of riparian buffers	Noted. However, the Councils are confident that the policies in the Proposed Submission Local Plan provide adequate coverage to manage future development proposals in Greater Cambridge. Policy CC/WE already

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representation
	contradicts the LNRS recommendations for 50m chalk stream buffers.	recognises the environmental issues caused by water abstracted from the chalk aquifer, it highlights how the level of abstraction is being reduced by the Environment Agency's changes to licenses to prevent any further environmental deterioration and allow for the regeneration of the local area's rare chalk streams. The Plan is committed to supporting the chalk stream network through the strategic green infrastructure initiative identified as priority 1. for enhancing strategic green infrastructure across Greater Cambridge in Policy BG/GI.
Non-motorised users	Alongside waterway access should not be limited in paragraph 1e to walking and cycling, but should specify non-motorised users.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Cross-boundary projects	In addition to the Cam Trail, there should be plans for linking this with projects proposed by the Great Ouse Rivers Trust. Longer distance trails with consistent standards of signage and surface should encourage additional usage.	Noted. The Great Ouse Valley is identified as a Priority Natural Landscape in the Cambridge and Peterborough Local Nature Recovery Strategy (LNRS). Policy BG/BG 4 already sets out that opportunities to deliver measures which align with those identified in the LNRS as part of any net gain provision should be prioritised. The councils will continue to work in partnership (including within their roles as supporting authorities) with Cambridgeshire and Peterborough Combined Authority, Cambridgeshire County Council and other stakeholders involved in the

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representation
		LNRS to ensure that the Councils take a proactive approach to the protection, enhancement and management of biodiversity identified in the LNRS.
Riparian buffer zones should be increased	Riparian buffer zones should be increased, with suggestions that the zones should either be doubled or set at the extent of flood plains plus 10m or more. The Councils' response justifies narrower buffers by citing historic development encroachment, but this does not provide a robust or logical evidence base for applying a narrower standard to new development.	Noted. Requirements within BG/RC establish riparian buffer zones which have been set according to the River/Ditch definitions within current BNG User Guidance. The policy takes a proportionate approach to managing the buffer zone from the river. Significant expansions to riparian buffer zones would not align with the BNG user guidance.
Buffer zones across a watercourse	Clarification needed 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.	Noted. Policy BG/RC already includes the definition for riparian zones, this being in accordance with the River/Ditch definitions set out under current BNG User Guidance (the riparian zone is a set area from the bank top of the watercourse. The bank top is where there is a break in slope between the river channel and the surrounding land). The policy provides sufficient flexibility to reflect site specific circumstances.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representation
The purpose of riparian buffer zones	The case for development in the riparian buffer zone must be incredibly strong; the position should be no development.	Noted. As set out in the supporting text, there are cases where development needs to be situated within or close to a watercourse in order to function, such as essential flood mitigation infrastructure, water-based sports functions, or the development of marinas. Whilst protecting the quality and integrity of Greater Cambridge's watercourses is essential to achieving sustainable growth, adopting a "no development" position within riparian buffer zones could create barriers and policy conflicts, which would impact the effectiveness of the Local Plan.
Grey belt	The Plan should also recognise the River Cam corridor through Horningsea, including Laney Meadow and Rivermeadow, as strongly contributing to Green Belt purposes and not grey belt.	Noted. The Councils have carefully considered the approach to Green Belt in this Plan following national planning policy and national practice guidance requirements, drawing on up to date policy-compliant evidence, and taking into account the local Cambridge Green Belt purposes.

Policy BG/PO: Protecting open spaces

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy BG/PO: Protecting open spaces	14	16	14	1	12

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support policy approach	Support, including for protecting existing open space; the principle of replacement mechanisms; protection for undesignated areas meeting the assessment criteria; and for land adjacent to Protected Village Amenity Areas and Local Green Spaces.	Support noted.
Ownership	No mention of how change of ownership impacts protected open space.	Noted. The designation applies to the land not the landowner.
Protection of non-designated sites	It is not appropriate for equivalent safeguards to extend to qualifying areas not identified on the Policies Map.	Noted. The Protected Open Space Evidence Report is clear that some qualifying sites have not been designated on the Policies Map, including semi natural open space outside the defined development extent and sites which fall within a policy allocation without a Defined Development Extent still being built-out. It is therefore important that all sites that meet the policy criteria are given equal protection.

Inadequate protection	Concern the current phrasing of clauses 1 and 2 appear inadequate to fulfil the policy's intention to protect open spaces, that the Policy should recognise the environmental and recreational value of a space is inherent to its location, that relocation effectively means destruction and should be avoided at all costs, and comment that the relocation provision should be restricted to open spaces solely designated for recreational value.	Noted. The policy seeks to protect all open spaces that meet the policy criteria (whether shown on the Policies Map or not). However, the supporting text to the policy outlines that in some cases the development of an open space may be appropriate if it has limited quality, or the development would lead to overall quality or quantity improvement; in such cases the applicant will be required to provide evidence to justify any loss and their replacement proposal. In some cases, sites of importance for their environmental value also have an additional layer of environmental protection.
Replacement to be operational before any loss	Objection to the requirement for replacement open space to be operational before there can be loss of existing open space.	Noted. The Policy seeks to ensure the local community retains access to open space of an equivalent or better standard in terms of quality, quantity and accessibility always.
Redevelopment on educational grounds	Sport England have concerns that criterion 3 which permits development on school grounds if it meets an educational need, potentially undermines national policy protections for playing fields, and the Playing Pitch Strategy highlights deficits in playing field provision.	Noted. Applicants for development within the grounds of educational establishments which will result in the loss of protected open space are required to submit supporting evidence to demonstrate there is a clear educational need which cannot be met elsewhere and to demonstrate no adverse impact on existing playing fields or formal sports provision on the site.

Site specific comments	Objection to designation of a site that fails to meet the 11 criteria to warrant designation as informal open space, and comments seeking amendment to a site boundary.	Noted. The Protected Open Space Evidence Report demonstrates how sites meet the policy criteria for designation.
Inconsistent with national policy	Concern paragraph 5 is not consistent with national policy regarding Local Green Space, applying a weaker “adverse impact” threshold.	Noted. Whilst the policy states development will not be permitted within or adjacent to Local Green Space if it would adversely impact on the character and particular local significance which make them valued by their local community, the supporting text is clear that this can prevent new development other than in exceptional circumstances, consistent with national policy for Green Belts.
Delivery of ancillary infrastructure	Clarification is sought on the delivery of ancillary infrastructure such as sports hub and car parking.	Noted. The supporting text at paragraph 5.78 is clear that proposals for development on open spaces that are ancillary to that open space use will be considered on a case-by-case basis, taking into consideration their location and context.

Policy BG/EO: Providing and enhancing open spaces

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy BG/EO: Providing and enhancing open spaces	23	24	19	2	18

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Support for the principles of the policy and place-making objectives, including from the Wildlife Trust.	Support noted.
Definitions	Concerns raise about clarity of definitions of accessible green space and food growing space. The term food growing space does not align with the 2026 NPPF, i.e. refer to food growing spaces as allotments.	Noted. The Greater Cambridge Green Infrastructure and Open Spaces Standards Framework Final Report (June 2026) sets out definitions of accessible green space and food growing space, based on what kinds of spaces would meet the requirement for those standards. This Local Plan will be assessed against the 2024 NPPF and does not therefore need to align with the definition. Food growing spaces, tend to be an umbrella term for food growing spaces, which could include an allotment.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Methodology	Separate playing field provision from the general open space standards. Policy fails to address previously identified deficits in open space in proposing new standards, and it is not clear on how it takes into account existing open spaces.	Noted. Provision of playing fields is excluded from accessible open space, as these are not always accessible. The Sports Strategy sets out requirements for sports provision on the strategic site allocations taking into account regional need and demand for sports pitch provision.
Effective use of Land	With the housing pressures at the moment, it is considered by some representators that the high accessible open space standards are not considered to be an effective use of land, in the context of needing to deliver more homes.	Noted. As the population increases and additional homes are built, open space provision becomes more and more important to ensure that all residents have somewhere to go and that recreational pressure is limited through dispersal across multiple sites. The Viability Assessment (2026) has taken this policy into account and demonstrated that it is deliverable, where it cannot be met onsite, offsite contributions will be collected.
Recreational Pressure	Concerns raised about assumptions about use of existing open spaces and use of offsite green space provision for extra visitors as it is not realistic. Concerns were also raised about publicly accessible SSSIs and recreational pressure.	Noted. Natural England have been closely involved in the development of the Greater Cambridge Green Infrastructure and Open Spaces Standards Framework Final Report (June 2026), and the use of higher Accessible Green Space standards, works to create more spaces as the population increases to ensure that these spaces are protected, particularly SSSIs. This approach utilises the hierarchy of open spaces to provide a range of open spaces serving different purposes as well.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Deliverability of the policy	Concerns raised about deliverability of the policy in practice, and how this policy is joined up with site allocations.	Noted. The Plan should be read as a whole, the requirements apply to all of the site allocations. The Greater Cambridge Green Infrastructure and Open Spaces Standards Framework Final Report (June 2026) tested these standards against planning applications in Greater Cambridge and some of these are on site allocations, this is set out in Appendix A and demonstrates that these standards can be met.
Rationale for Accessible Green Space requirements	Concerns raised that there is no clear justification for the 7ha of accessible greenspace and that the use of an accessible green space standard for commercial development is duplication of open space delivery for residential areas and that the policy should instead take a more flexible and site-specific approach.	Noted. The justification for the 7ha of accessible greenspace is set out in The Greater Cambridge Green Infrastructure and Open Spaces Standards Framework Final Report (June 2026). The setting of a quantity standard for accessible greenspace should ensure "no net loss" of existing green space – meaning that, as the population grows, additional green space must be provided so that the amount of green space available per person is maintained or improved over time. Appendix A of this report sets out how the existing level of provision (7 hectares per 1,000 population) was calculated across Greater Cambridge. Where this standard cannot be onsite, an offsite contribution will be required. The policy provides clear requirements for residential and commercial space.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Provisions for non-residential development	Concerns raised about deliverability and viability of non-residential accessible green space standards and this not being seen as an efficient use of land.	Noted. The Greater Cambridge Green Infrastructure and Open Spaces Standards Framework Final Report (June 2026) assessed different applications to understand how this standard could be delivered and it found sites were able to meet this standard (set out in Table A.3 of the appendix). The need for non-residential development to provide accessible green space takes pressure off accessible green space delivered for residential development, and in locations where the employment uses may be further from other amenities and services, it ensures that workers have sufficient amenity and open space access.
Implementation	Concerns raised around clarity for meeting these standards on outline and reserved matters applications.	Noted. Similarly to the Urban Greening Factor, if the development is proposed in multiple phases, the relevant standard will apply to the development as a whole rather than to individual phases. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Viability	Concerns raised about the impacts on viability of the proposed open space standards, specifically the cumulative impact of multiple policies.	Noted. The application of the open space standards are essential in meeting the health and wellbeing needs of residents. Additional enhancements for open space have been included in the IDP costs and the cumulative policy

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		requirements accounted for within the IDP for the different development typologies tested.
Food growing spaces	There is not a complete food growing study and it cannot be relied upon as sufficient evidence to set a quantified standard for food growing space delivery. Lack of clarity if the Food Growing Space provisions are separate to the overall Accessible Green Space Standards.	Noted. An Interim version of the Food Growing Study was published at the Regulation 19 stage, this report had completed an analysis about the proportion of food growing space needed to support population growth and this has informed the requirements set out in the Local Plan. This is supported by the Greater Cambridge Green Infrastructure and Open Spaces Standards Framework Final Report (June 2026) which tests additional food growing space standards. The Food Growing Standards focuses much more on how these should be delivered. The requirements for Food Growing and the delivery of allotments are separate to accessible green space standards because allotments tend to be for members only and therefore do not meet the definition of accessible green space.
Stewardship and funding	Concerns raised about 30 year management and the implications this has for charities and organisations taking over these spaces. The policy lacks sufficient detail and clarity about the funding mechanisms to deliver off-site greenspace and identified Green Infrastructure	Noted. The purpose of the GI Operation and Management Plan is to clearly set out the funding and management frameworks to ensure that these spaces can be managed effectively for this 30 year period, so that residents can benefit from the greening in the development for its lifespan. This is recommended as an approach by the Greater Cambridge Green Infrastructure and Open

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	Initiatives. There is potential for unfunded liabilities that will be inherited by stewardship charities.	Spaces Standards Framework Final Report (June 2026). The GI Operation and Management Plan includes details of responsibilities, maintenance tasks and standards, funding arrangements, and governance/stewardship models, ensuring that GI functions effectively throughout its lifetime. Operation and Management Plans are typically secured through planning conditions or Section 106 agreements at detailed stage. The identification of Green Infrastructure Initiatives is set out in the Green Infrastructure Strategy and focuses on strategic greening enhancement opportunities.
Sustainable Drainage Systems (SUDs)	Open space should not form part of a SUDs scheme.	Noted. The standards set out in this policy are about enhancing accessible open space standards, therefore SUDs if these were not accessible or were fenced off would not be included in the total land contributing to the accessible open space requirement.

Consultation Statement

Summary of Representations and Councils' response - Wellbeing and social inclusion



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan Regulation 22 Consultation Statement (November 2026)

GREATER CAMBRIDGE
SHARED PLANNING

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Chapter 6: Wellbeing and social inclusion	4	4	3	0	3

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Affordable rents	The proposed Local Plan will not achieve its “Wellbeing and social inclusion” strategic priority unless it requires a proportion of new homes to be at rents local people can afford	The plan sets appropriate requirements for the delivery of affordable homes. Specific comments on the requirements are addressed against policies in the homes chapter.
Active travel	Bullet point 4 under Para 6.5 does not adequately require the need for appropriate travel modes; it should also incorporate active travel; and it needs to apply to accessing facilities outside the development - not all facilities can be provided locally.	This bullet point describes the approach taken to the policies in this chapter of the local plan. It is referring to the delivery of facilities are part of wider developments, and is an appropriate statement.
Policy quality	The policies in these chapters are well intentioned but there are many areas where the policies are repetitious, which could be dealt with through a single well worded policy. Many policy areas are also highly	Policies address a range of use proposals and issues, and reflect the importance wellbeing and social inclusion issues have to the Councils and stakeholders as demonstrated through the plan preparation process.

	subjective and qualitative. Supporting text should be removed to aid overall clarity and brevity.	

Policy WS/HD: Creating healthy new developments

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy WS/HD: Creating Healthy Communities	8	8	5	2	4

Theme of Representations	**Summary of Main Issues Raised in Representations**	**Councils' Response to Representations**
Support for the policy	Nature and greenspace access is essential addressing the needs of new and existing landscape users including safe and convenient connectivity with existing Rights of Way, historic routes, settlements, new developments and countryside. Horse-riding routes should be required were possible and wheeling routes are essential.	Support noted.

	The delivery of developments that support good health and enable residents to lead healthy lifestyles is supported. Support for the emphasis on healthier communities through better planning through a standalone heath policy. Welcome requirements to deliver healthcare facilities and align with local strategies in major developments. Support using Health Impact Assessments, particularly for major developments, to consider health infrastructure and wider-determinants earlier in planning-process. The proposed development at Fen Ditton would strongly align with the aspirations of the policy, providing the opportunity to create a healthy and inclusive community supported by appropriate infrastructure for health, education and wellbeing.	
Engagement	Early engagement with the Integrated Care Board to discuss mitigation priorities and sustainable healthcare infrastructure delivery is stressed.	The request for early engagement is welcomed.

The contribution of equestrian yards to well-being	The policy is insufficiently justified or effective as it excludes the contribution that recreational facilities, in particular private equestrian yards, make to well-being through, for example, physical activity and interactions with horses and the countryside. It should be amended to reflect these opportunities and to recognise their requirements for a rural location.	The proposed policies provide an appropriate framework consider proposals for land-based businesses such as equestrian enterprises.
Repetition of other plan policies	The policy relists principles addressed in other policies. This wording should be deleted to avoid unnecessary repetition.	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. Including the policy requirements in an overarching policy prevents duplication and ensures consistency.
Increases to HIA housing thresholds	The HIA housing thresholds for full and rapid HIAs should be increased to 500 dwellings and 200-500 dwellings respectively.	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. They are effective in seeking appropriate information for appropriate scales of application, and it is considered appropriate that the Plan continues to require their application across Greater Cambridge.
Removal of HIA floorspace housing requirements	If the thresholds cannot be increased, the 5,000sqm requirement for full HIAs should be applied to non-residential developments	The Health Impact Assessment requirements and thresholds are appropriate and necessary to ensure that health issues are fully considered at the planning application stage.

	only. As it stands this may limit housing mixes on developments.	
Viability	The Aspinal Verdi report omits the cost implications of this policy which should be properly considered.	Viability assessment, prepared by suitably qualified and experienced consultants, identifies the cost of preparing and monitoring plans included in professional fees. The creation of schemes in which a healthy environment is integral are expected to be modest relative to scheme size.
Flexible application of healthy principles	To provide greater flexibility in its application to reflect local circumstances, the healthy principles should be applied "wherever possible" and "as appropriate". This would ensure the policy remains proportionate and adaptable across a range of site types and scales.	Delivery of health places is a key role for the local plan. Additional caveats would weaken the application of the policy, and are not necessary for soundness.
Policy references	Part 2 should be amended to include explicit reference to the relevant policies which expand upon the principles listed under Part 1 of WS/HD.	Policy references are considered appropriately clear.
Smaller housing sites	The plan is too reliant on strategic sites which can be difficult to bring forward at a sustained rate and risks the deliverability of the plan. To align with Government's commitment to the economic growth of Cambridge and to support the sustainability	Addressed in the Development Strategy section of the plan and evidence base. The development strategy represents and appropriate strategy for meeting development needs of Greater Cambridge.

	of settlements, additional smaller scale housing sites should be allocated.	

Policy WS/NC: Meeting the needs of new and growing communities

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy WS/NC: Meeting the needs of new and growing communities	28	30	21	2	19

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Onsite vs on-site	Parts 3 and 5 – scale of onsite provision should be clarified, and also be subject to feasibility. Appropriate wording should be included to reflect for circumstances where improvements or expansions to existing	Comments duly noted. The GC Community Infrastructure Study and GC Cultural Infrastructure Strategy (Stage 1 & 2) explain how provision, for each category should be provided, and how new developments should determine whether to provide these as new on-site provision, enhancement of existing facilities, shared use, an off-site contribution or a combined package.

	facilities within the immediate area would be more efficient than new onsite facilities.	
Assessments of need	Part 4 - Requirement for residential proposals of 200 or more dwellings to be informed by detailed assessments of needs, and strategies to address them, should be prepared by the Councils through their Infrastructure Delivery Plan rather than developers. It is unclear whether it is addressed by existing strategies or whether it is a separate requirement.	Comments duly noted. For all applicable proposals, Community and Cultural Plans will form part of the planning submission process, and these must demonstrate a robust, evidence-led and locally responsive approach for their provision and long-term viability. New indoor and outdoor sports provision should comply with and have regard to the needs identified in the Indoor Sports Facility Strategy, Playing Pitch Strategy and Outdoor Courts and Rinks Strategy and their successor documents.
Assessments of need	Part 4 - Requirement for groups of smaller sites to undertake a detailed assessment of community need should be removed.	Comments duly noted. Where groups of sites are coming forward over a similar timeframe it is an appropriate and reasonable approach to require consideration of the cumulative impact of proposals in order to secure the optimum outcome to addressing community needs.
Standards	Part 6 - Inclusion of the standard of 129 m2 of floorspace per 1,000 additional population towards the provision of indoor community facilities is currently not fully justified.	Comments duly noted. The GC Community Infrastructure Study supports the use of the 129 sqm per 1,000 residents as a reasonable baseline quantum for Greater Cambridge.
Justification for requirements	Part 7 - clarify that residential development may contribute to sports facilities where justified, proportionate, and appropriate to the scale and location of development.	Comments duly noted. Where residential development will generate demand for or have an impact on existing sports facilities, including ancillary uses such as changing facilities, they should contribute to these facilities,

		appropriate to the scale and location of the development. New indoor and outdoor sports provision should comply with and have regard to the needs identified in the Indoor Sports Facility Strategy, Playing Pitch Strategy and Outdoor Courts and Rinks Strategy and their successor documents.
Justification for requirements	Parts 6, 7 and 9 impose onerous and insufficiently justified requirements for community, cultural, sports and recreational facilities, without adequately considering existing provision or actual demand.	Comments duly noted. All the various evidence documents developed to support Policy WS/NC take account of existing provision and, based upon future population growth from new planned development in the Local Plan, and fully justify the requirements, new development should provide to create successful communities.
Policy contrary to legal tests	Policy as drafted would lead to Section 106 contributions being required for single dwelling proposals as the Councils' approach is tariff based with contributions being required whether or not there is a deficit of the relevant service in the local area.	Comments duly noted. New residential development should provide for the demand that it creates. While individual dwellings may themselves not lead to adverse impacts on social infrastructure, their aggregate would. It is therefore important that they contribute accordingly.
Timing of infrastructure delivery	Policy should place a stronger emphasis on the timely delivery of infrastructure, ensuring that community facilities are available when new residents and businesses begin to occupy development rather than being delivered significantly later.	Comments duly noted. Part 11 of Policy WS/NC requires the timely delivery of services and facilities, including the provision of key services and facilities in early phases of the development. Phasing will be established through planning obligations or conditions, and this may include requirements for the use of meanwhile or temporary uses

		to ensure local needs can be supported until permanent facilities are delivered.
Timing of infrastructure delivery	Replace the reference to delivery in “early phases” with a flexible, case-by-case approach linked to development phasing and viability.	Comments duly noted. The policy places an emphasis on the delivery of new social infrastructure in early phases of the development to avoid the creation of housing estates with no local facilities. While it is recognised that the development phasing of new social infrastructure may depend on viability, this can be off-set with the provision of meanwhile or temporary uses to ensure local needs can be supported until permanent facilities are delivered.
Flexibility	Policy should also place greater emphasis on flexibility and adaptability, and strengthen requirements for community engagement.	Comments duly noted. For all applicable proposals, Community and Cultural Plans will form part of the planning submission process, and these must demonstrate a robust, evidence-led and locally responsive approach for their provision and long-term viability.
Green Infrastructure standards	Plan should strengthen its requirements for green infrastructure by setting measurable standards for accessible green space, tree canopy cover and biodiversity delivery.	Comments duly noted. The provision for green infrastructure including accessible green space, tree canopy cover and biodiversity delivery are provided under Policies BG/BG: Biodiversity and geodiversity; BG/GI: Green infrastructure; BG/UGF: Urban Greening Factor; and Policy BG/EO: Providing and enhancing open spaces.
Education capacity	There is no evidence in the consultation documents that demonstrates there will be sufficient school places within Cambridge	Comments duly noted. The Councils have engaged with Cambridgeshire County Council, as the local education authority, when developing the Infrastructure Delivery Plan which accompanied the local plan.

	itself to avoid pupils being transported to surrounding villages.	
Education capacity	Education capacity policy should reference consideration of cross boundary impacts.	Comments duly noted. It is acknowledged that school placement impacts can cross district and county boundaries. Explicit reference to this point is not necessary for soundness.
Healthcare infrastructure	Healthcare providers should be given flexibility in determining the most suitable form of mitigation	Comments duly noted. Suitable alternatives to traditional forms of mitigation which are supported by the community they would serve would normally be supported.
Funding for community groups	Funding also needed to support community groups and equipment.	Comments duly noted. Contributions towards the provision of funding to support community development workers have already been secured on a number of developments in Greater Cambridge. This type of funding should continue under the new Local Plan.
Potential double counting	Potential for double counting between S106 and CIL requirements.	Comments duly noted. As part of the implementation of a CIL requirement, any additional S106 monies will avoid the risk of double counting.
Requirements from commercial development	Reference to “1.5% of Net Internal Area commercial space” should be removed, as the policy is not intended to apply community facility contributions to commercial development. In addition, “large employment developments” should be clearly defined and any requirement for on-site sports provision should apply only where justified.	Comments duly noted. The 1.5% of Net Internal Area commercial space contribution will be sought for cultural facilities. Cultural activities help develop and support successful communities as well as make the area a more attractive place to live and work. Large commercial spaces can also have a significant impact on local, publicly accessible sports facilities. Many employees may well want to use these as part of a healthy lifestyle. To mitigate this impact, large employers will be expected to

	Another comment states that the 1.5% should be applied as a maximum.	contribute towards public sports facilities unless they provide their own, on-site facilities for their employees. The 1.5% Net Internal Area requirement is only applicable to
Requirements from commercial development	Places disproportionate obligations on commercial development, lacks certainty over infrastructure requirements, and may affect viability and delivery. Criterion 2 sets an unreasonably low 5,000sqm threshold. Jobs and employment in general do not add significant burden to these matters in the same way residential proposals may do.	Comments duly noted. Large commercial spaces can have a significant impact on local, publicly accessible sports facilities. Many employees may well want to use these as part of a healthy lifestyle. To mitigate this impact, large employers will be expected to contribute towards public sports facilities unless they provide their own, on-site facilities for their employees.
Requirements from commercial development	Clarify that requirements should be proportionate to the number of net additional employees the development is reasonably expected to generate and include strategies that address identified needs relevant to the development proposal. It would also not be applied where it is demonstrated that to do so would render a commercial development unviable.	Comments duly noted. The cultural and sports requirements for large commercial spaces are necessary to ensure they contribute to the area's cultural well-being and have a positive impact on their local area. An active cultural environment helps attract and retain employees Many employees may also want to use local sports facilities as part of a healthy lifestyle. To mitigate this impact, large employers will be expected to contribute towards public sports facilities unless they provide their own, on-site facilities for their employees.
Lack of village allocations to deliver improvements	Local plan includes no allocations in villages including Fulbourn and Great Shelford, Hardwick, Great Abington, Sawston that could make financial	Comments duly noted. The Local Plan provides an appropriate development strategy having considered a range of alternatives. The plane includes a number of policies which support continued development of these

	contributions or provide land for new or additional services and facilities.	areas, and local communities also have the option of producing neighbourhood plans.
Give weight to community benefits offered by a scheme	Policy should give explicit support and substantial weight to developments that provide wider community benefits and strategic infrastructure serving existing as well as new residents. Give greater weight to schemes addressing infrastructure and community facilities beyond immediate needs.	Comments duly noted. The weight apportioned to proposals that deliver wider community benefits and strategic infrastructure serving existing as well as new residents would normally be a matter for the planning application process.

Policy WS/CF: Community, sports and leisure facilities

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy WS/CF: Community, sports and leisure facilities	9	9	7	2	7

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations

Support for the policy	Greater Cambridge Development Corporation & Cambridgeshire ACRE supports Policy WS/CF, particularly its focus on local need, accessibility, community use and protection of existing facilities.	Comments duly noted.
Policy conflict	Concerns about policy criteria 4-6 regarding playing fields. Criterion 5(a) should be amended to ensure it doesn't create broader exceptions than national policy, and it should clarify that school playing fields aren't surplus just because educational needs are redundant.	Comments duly noted. Additional supporting text will be added to clarify that the loss of playing fields will also need to satisfy any other relevant policy requirements.
Sports and leisure infrastructure	The plan fails to properly addresses the dire need for more indoor swimming facilities in Greater Cambridge. The plan fails to allocate land off Grantchester Rd. for new padel court provision. Harston village requires new recreational spaces and a relocated Medical Practice to allow it to expand.	Comments duly noted. Policy WS/NC: Meeting the needs of new and growing communities will require new development and large employment proposals to contribute to new indoor and outdoor sports provision. The policy is also informed by needs identified in the Indoor Sports Facility Strategy, Playing Pitch Strategy and Outdoor Courts and Rinks Strategy.

Recognition of privately provided recreational facilities	The Plan should adopt a more comprehensive approach to leisure provision and recognise privately provided facilities within its policy framework.	Comments duly noted. The policy is applicable to a wide range of leisure activities and does not distinguish between private and publicly provided facilities.
NHS estates	The policy requires greater clarity about the treatment of NHS facilities which may become surplus to requirements as part of an NHS estates strategy / reorganisation plan.	Comments duly noted. The issue is addressed by supporting text paragraph 6.54.

Policy WS/CH: Cultural and creative hubs

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy WS/CH: Cultural and creative hubs	1	1	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Protection of existing sites	Amend the policy to include protection of existing creative hubs, artists' collective studios, etc.	Comments duly noted. Cultural facilities, including creative hubs and artists' collective studios are protected under Policy WS/CF: Community, sports, and leisure facilities. Leisure facilities may include leisure arts and

		culture uses (Class F1 and sui generis), including concert halls, performance venues and theatres, cinemas, punting stations, museums and galleries. Spaces that allow cultural activities to happen on a permanent or transitory basis.

Policy WS/MU: Meanwhile uses

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy WS/MU: Meanwhile uses	1	1	0	1	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for the policy	The policy will assist in supporting appropriate interim uses during phased delivery.	Support noted.

Policy WS/IO: Creating inclusive employment and business opportunities through new developments

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy WS/IO: Creating inclusive employment and business opportunities through new developments	8	8	7	0	6

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Viability	The Local Plan Viability Assessment underestimates the likely time, complexity and resources required to prepare, implement and monitor Employment and Skills Plans, and the impact of in lieu payments. Impact on site viability.	The viability assessment, prepared by suitably qualified and experienced consultants, identifies that cost of preparing and monitoring plans included in professional fees; implementation costs are expected to be modest relative to scheme size.

Targets not evidence based/justified	There is no evidence to suggest that the 20% target for local residents during the construction phrase is appropriate. There is limited evidence demonstrating that the targets resulting from the occupation phase formula for supported employment places for local residents are realistic and deliverable across the range of employment-generating development likely to come forward during the plan period.	Noted. The councils are confident that the evidence base that has informed the preparation of the Plan is relevant, robust, up to date and proportionate.
Targets and wording too rigid	There are inflexible targets relating to Employment and Skills Plans, local labour targets and monitoring obligations. Policy lacks sufficient flexibility and consideration of site specific circumstances.	The policy applies an appropriate degree of flexibility to skills plan preparation and implementation, but it is also important that it creates clear and consistent policy objectives and requirements.
Targets and wording too rigid	The policy is not achievable as it does not allow for circumstances where insufficient capacity or capability exists in the local labour-force. This will automatically lead to a policy conflict, where a developer, through no fault of their own, not be able to secure local employment.	The policy applies an appropriate degree of flexibility to skills plan preparation and implementation, but it is also important that it creates clear and consistent policy objectives and requirements.
Relocation of existing companies	The policy fails to consider the practical implications for local employers and educational establishments. For example,	Local labour only relates to construction, and reflects evidence of the need to support growth in local construction skills.

	for those seeking to relocate in Greater Cambridge, their existing labour force may not comprise the occupation phase ratios being sought. It could have a perverse impact of discouraging investment or improved accommodation. The policy should therefore allow sufficient flexibility to reflect existing workforce characteristics and operational requirements.	
Threshold levels	The trigger should be jobs created rather than floorspace to allow for circumstances where existing employees/departments/ companies simply relocate elsewhere in Greater Cambridge. The 1,000 square metres threshold is too low and disproportionately burdens smaller commercial development. Further clarification is required on how the cumulative threshold would apply to extensive institutional estates, such as those operated by Cambridge University, where existing floorspace already	The policy applies an appropriate degree of flexibility to skills plan preparation and implementation to ensure site specific circumstances can be responded to, but it is also important to set clear thresholds and requirements. The Councils' evidence in the Jobs Topic Paper (2026) explores options regarding thresholds, why those selected are appropriate, and compares with a number of similar local plan policies that have been found sound elsewhere.

	substantially exceeds the threshold identified within the policy.	
Financial contributions	Financial contributions should not be sought where applicants can demonstrate that reasonable endeavours have been undertaken.	Financial contributions in lieu of onsite measures is an appropriate and fair response where on site measures have not been implemented, and have been found sound in a number of local plans, as referenced in the Councils' evidence in the Jobs Topic Paper (2026).
Timing of employment and skills plans	There may be circumstances where there is insufficient detail available to create an employment and skills plan at outline stage. Instead, it should be required via pre-commencement condition.	It is important that a commitment is made with a planning permission however it is expected that ESPs at outline stage can be varied if the nature of any development alters.
Level of employment and skills plans	Confirmation is sought that on phased developments, employment and skills plans can be secured flexibility at masterplan level, rather than requiring a single standalone plan for individual plots.	The policy provides sufficient flexibility to reflect site specific circumstances.
Definition of local residents	The term local residents should be clearly defined.	A definition is provided in the supporting text to the policy.
Enforceability	Concerns over the enforceability of the policy.	The policy sets out how skills plans will be secured and monitored.
Monitoring	Monitoring requirements should recognise labour market constraints and factors outside the applicant's control. If not, the policy has the potential to create uncertainty for applicants despite genuine	This is addressed in part 9 of the policy, which requires developers to use reasonable endeavours.

	efforts having been made to comply with its requirements.	

Policy WS/HS: Pollution, health and safety

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy WS/HS: Pollution, health and safety	15	17	14	2	13

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Agent of Change Principle	Anglian Water supports Policy WS/HS and the agent of change principle for managing sensitive development near water recycling centres and sewer pumping stations.	Comments duly noted.
Light pollution	Policy does not prevent the unnecessary light pollution which is being caused by internal lighting in newly constructed commercial premises.	Comments duly noted. Part 2 of the policy references consideration of internal lighting, therefore the issue is appropriately addressed.

Light pollution	Lighting policy is overly prescriptive and not justified, and should be amended so that lighting assessments are only required where appropriate, including for proposals involving large-scale lighting schemes.	Comments duly noted. It is a reasonable and justified approach to require major developments to consider the impact of their lighting.
Light pollution	Clarification is needed to paragraph 2 which refers to “sensitive residential premises”.	Comments duly noted. Reference to the consideration of lighting to sensitive residential uses is an appropriate approach.
Air Quality	Policy should require developments, particularly within and around Air Quality Management Areas, to contribute to improved air quality and reduced exposure to pollution and require measurable air quality improvements.	Comments duly noted. The policy requires development to be consistent with local air quality strategies.
Air Quality	Cambridge should align with the Oxford Local Plan model by enshrining a legally binding local target into policy—specifically a commitment to achieve 20 µg/m³ of NO_2 by 2030. Development applications must be rejected if local modelling suggests the operational phase of the site will breach this local target or delay its achievement. London Plan style air quality neutral / positive requirements should be required, with standardised building emissions benchmarks.	Comments duly noted. Oxford established its local target through its Air Quality Strategy. The policy requires development to be consistent with local air quality strategies, which include Greater Cambridge’s equivalent air quality strategy.

	It also lacks a clear requirement for Air Quality Assessments on all major developments, assessment of cumulative impacts, explicit consideration of PM2.5 exposure.	
Air Quality	Requirement for all major and minor planning applications (excluding householder developments) to submit an Air Quality Statement is also overly prescriptive and not justified. should be amended to be required only for planning applications where air quality is likely to be a significant issue. Define and clarify the exact scope and parameters of 'minimise' emissions.	Comments duly noted. 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.
Assessment requirements	Noise Impact Assessments and Air Quality Assessments requirements should be referenced within the Councils' validation requirements instead of being included in the policy.	Comments duly noted. It is important requirements are made clear in the local plan.
Cross boundary issues	Policy should reference that impacts could extend beyond local authority boundaries.	Comments duly noted. The policy does not restrict consideration to administrative boundaries, additional reference is not required.

Policy WS/PH: Public houses

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy WS/PH: Public houses	1	1	0	1	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for the policy	Policy WS/PH strongly supported for its robust protection of public houses across Greater Cambridge.	Comments duly noted.

Consultation Statement

Summary of Representations and Councils' response - Great places



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan Regulation 22 Consultation Statement (November 2026)

GREATER CAMBRIDGE
SHARED PLANNING

Great places

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Great Places	2	2	2	0	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Placemaking objectives	Support for the Plan's placemaking objectives, including high-quality design, landscape integration, accessibility and biodiversity.	Support noted.
Policy content	Policies in these chapters are well intentioned but there are many areas where the policies are repetitious or highly subjective and qualitative. Supporting text should also be removed.	Noted. However, the policies are considered to provide a cohesive and justified set of polices addressing different aspects of place making.

Policy GP/PP: People and place responsive design

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy GP/PP: People and place responsive design	10	11	4	4	4

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for the policy	Strong support for the policy's approach to securing high-quality design and its recognition of adapting to the climate emergency and nature integration to achieve this aim.	Support noted.
Repetition of policy wording	The policy repeats sections of Policy GP/QD and parts of climate policies. Policies could be drafted more clearly or consolidated with other policies to avoid ambiguity. A more effective approach would be to consolidate a single comprehensive	Noted. The policies are considered to have different focus, and warrant being separate policies rather than a combined approach. Policy GP/PP provides overarching requirements for design including responding to health, wellbeing and inclusive design in a local context. Policy GP/QD provides detail on built form and function with requirements for building design, massing, scale and

	design policy to establish a clear framework.	materials. Policy GP/QP provides requirements for the external spaces between buildings and green spaces known as the public realm including requirements for public art.
Policy application	Important that the policy is applied in a way that avoids a homogenised approach to design and instead allows proposals to respond appropriately to their local context, and that it is implemented proportionately.	Noted. Policy GP/PP provides an effective set of criteria and guidance to deliver great places, which will be applied, as relevant, on a case-by-case basis. This will ensure that the site context will inform good quality, responsive design.
Rights of Way and public access	Need to include reference to the County Rights of Way Improvement Plan to ensure network changes align with it. Policy should state that to ensure delivery and effectiveness of the public access network, including missing links and development-related infrastructure, there should be an agreed form of monitoring throughout the Plan period.	Noted. The rights of way network and connectivity are appropriately addressed in Policy I/ST: Sustainable transport and connectivity and therefore it is not necessary to repeat this in this policy.
Supporting principles	The supporting principles under paragraph 7.6 would benefit from the addition of the word "reflect" to strengthen the relationship between development and local landscape character.	Noted. ‘Protect and enhance landscape character’ is considered sufficiently clear.
Neighbourhood plans	The requirement for development proposals to encourage local groups to prepare neighbourhood Plans is not justified or appropriate, as the preparation of these	Noted. The Councils consider that encouraging local engagement on design issues is a reasonable policy aspiration that benefits both local groups and developers

	plans sits outside the control of applicants and developers.	in understanding the local context and character of an area and local aspirations.

Policy GP/QD: Achieving high quality development

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy GP/QD: Achieving high quality development	10	12	11	1	9

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for the policy	Support for the policy and amendments made that ensure that the layout and design of development incorporates functional needs, including access to utilities.	Support noted.
Proportionate application of the policy	The policy needs to be applied proportionately in the planning process and respond to specific local context.	Noted. Policy GP/QD will be applied where relevant on a case-by-case basis ensuring that the site context and constraints will inform good quality, responsive design.
Design considerations	Criteria from Regulation 18 related to creating safe, attractive streets and protecting amenity from impact of overshadowing and noise pollution should be reinstated.	Noted. This is addressed in the policy, specifically 2(d, e, f and k).

User hierarchy	The policy fails to prioritise walking, wheeling and cycling in conflict with the wellbeing and social inclusion policy WS/HD.	Noted. The Local Plan should be read as a whole, and policies, including Policy I/ST: Sustainable transport and connectivity, will also apply to relevant proposals. It is therefore not necessary to repeat policies.
Repetition of policy wording	The policy is not effective as it repeats sections of policy within GP/QP and GP/PP, GP/QS. Policies could be drafted more clearly/consolidated to avoid ambiguity. A more effective approach would be to consolidate a single comprehensive design policy to establish a clear framework.	Noted. The policies are considered to have different focus, and warrant being separate policies rather than a combined approach. Policy GP/PP provides overarching requirements for design including responding to health, wellbeing and inclusive design in a local context. Policy GP/QD provides detail on built form and function with requirements for building design, massing, scale and materials. Policy GP/QP provides requirements for the external spaces between buildings and green spaces known as the public realm including requirements for public art.
Hostile vehicle mitigation	Policy lacks guidance on the types of development to which it applies and appears to impose a blanket requirement. The policy should instead require such measures only “where appropriate” and provide further guidance on the measures and to maintain scheme deliverability.	Noted. Policy GP/QD identifies the need for development to demonstrate a comprehensive design approach that ensures safety and security such as Hostile Vehicle Mitigation. Development should seek to integrate furniture, landscaping and consider road layouts as part of the public realm, however, the policy will be applied where relevant, which will be considered on a case-by-case basis at the planning application stage.
Advertising, signage and street furniture	Section 3 of the policy has not had enough scrutiny on negative impacts on Cambridge.	Noted. The policy does not distinguish between temporary and permanent advertising, and therefore it would need to be applied to all relevant applications. It is not considered

	The policy should include requirements for temporary advertising.	necessary to identify specific types of advertising as part of the policy.

Policy GP/HD: Housing density

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy GP/HD: Housing density	7	8	7	0	5

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for the policy	Broadly support the overall principles of the policy	Support noted.
Flexibility	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. Higher densities may be both suitable and sustainable and should be assessed on their individual merits rather than constrained by surrounding built form.	Noted. Part 2 of the policy sets out where the Councils would support higher density development, including where sites are well located and benefit from high levels of accessibility.

Reduced parking provision	A clear definition of reduced parking provision is required in the policy to avoid under-provision in rural-fringe areas.	Noted. Part 2 of the policy requires all criteria (a to c) to apply in order for a reduction in car parking provision to be required. The use of the word 'and' at the end of criteria b makes this clear.
Parking provision for rural infill sites	The policy applies a single density standard without differentiating rural infill sites, where limited public transport increases car dependency. Small infill developments provide parking for only two cars per household, causing parking displacement. Amend paragraph 7.7 and adding criterion 1g to Policy GP/HD, permitting reduced density in small rural infill sites to accommodate additional parking.	Noted. This policy does not set residential parking standards but notes in 1(e) that considerations such as car and cycle parking must be suitably provided and managed. The Council does not have evidence to suggest that developments in rural areas for less than 10 houses require additional parking provision and therefore, lower housing densities should be required. Part 1(b) of the policy requires the density of new homes to positively respond to the prevailing character of the area.
Safeguarding and enhancing active travel routes	Higher density housing should be achieved without the loss of or surface conversion of existing green recreational routes. These should aim to link into Public Rights of Way for leisure uses.	Noted. The protection of active travel routes and Rights of Way are addressed in Policy I/ST: Sustainable transport and connectivity and therefore are not repeated in this policy.
Alignment with national planning policy	Strengthen the policy to recognise the role of existing and proposed railway stations in enabling sustainable, higher-density development, in line with the Written Ministerial Statement for EWR and the revised NPPF.	Noted. Part 2 of the policy already makes reference to higher density development within 1,200m of existing or proposed railway stations. Therefore the proposed modification to align with the NPPF 800m catchment would reduce this by 400m, which would not make efficient use of land in sustainable locations. Specifically noting 'efficient use of land arising from investment in rail

		infrastructure' is unnecessary given the policy already refers to proposed high-quality public transport provision, and narrowing the policy wording to focus specifically on rail investment would not account for other planned high quality public transport provision, such as the Cambridgeshire Guided Busway.
Allocation of additional site	Over-reliance of strategic sites in the plan and the housing requirement should be increased. Smaller scale housing sites (such as the allocation of land at Mingle Lane) should be included within the plan.	Noted. The Councils have considered the suitability of alternative development strategies and sites to accommodate development needs as part of the plan preparation process. The Proposed Submission Local Plan provides an appropriate strategy and allocations for meeting identified development needs, and is sound. Further allocations are therefore not required in order to make the plan sound.

Policy GP/ST: Skyline and tall buildings

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy GP/ST: Skyline and tall buildings	15	15	14	0	13

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Broad support for the policy	Support noted.
Clarification	In criterion 1b, recommend replacing the word 'quantify' with 'articulate'. Quantify gives the incorrect impression of a numerical scale.	Noted. The term 'quantify' is not intended to imply that all effects must be expressed numerically, but to encourage an assessment of the extent and degree of potential harm or benefit, using quantitative and qualitative evidence as appropriate.
Mandatory maximum heights	The policy should make the building height thresholds maximum limits to safeguard rural settings, landscape character and village gateways. Quantifiable standards are essential to prevent over-development.	Noted. The building height thresholds are intended to identify when the policy would need to be applied. The Councils' consider a broad brush approach to capping development at this height as overly restrictive and not aligned with paragraph 135 of the NPPF 2024.
Landscape mitigation	Landscape buffers are not effective mitigation measures.	Noted. The Councils' are of the view that landscape buffers, in combination with well designed and orientated built form, can be effective mitigation measures to minimise as much as possible, the visual impacts of new development. The policies set out within the Great Places chapter seek address this issue.
Enforce height guidelines	It lacks legal mechanisms to enforce updated height guidelines against legacy masterplans and major allocations, risking city-wide height inflation through precedent.	Noted. The Local Plan cannot retrospectively amend existing masterplans or approved development proposals. Where a material amendment is proposed to an existing consent, the policy may need to be applied depending on the scale and nature of the amendments.

Design quality	Introduce a mandatory refusal clause for sub-standard proposals.	Noted. The National Planning Policy Framework requires plans to be positively prepared. This policy, in combination with the other policies of the plan, set out the criteria and expectations for future development proposals.
Definitions	It would avoid confusion to highlight the explanation provided in H.13 within the policy, or to make it clear that any new building taller than the one it replaces does not automatically 'break the skyline'. It depends on the context in which it is viewed. "Significant change to the existing skyline" is vague and leaves room for subjective interpretation.	Noted. The policy and Appendix H should be read together. The supporting information to the policy identifies the role of Appendix H.
Overly restrictive	Policy should be amended to recognise that, in appropriate locations, taller buildings can make a positive contribution to sustainable development and economic growth, and that impacts should be balanced against benefits. The policy wording is negatively drafted and should be amended to recognise that change to the skyline is inevitable and the key objective should be about managing this change carefully and appropriately.	Noted. Part 1(a) of the policy states that proposals for tall buildings will be assessed on a site-by-sit basis to demonstrate that they are appropriate to their context. Appendix H also notes that taller buildings should be directed to appropriate locations. Therefore this matter is broadly already addressed in the plan. The councils are not of the view that the policy is negatively worded and both the policy and Appendix H set out the appropriate tests that are required to bring forward taller buildings in a careful and appropriate manner. This is to ensure that the special characteristics of the city are

		protected and that new additions to the skyline are positive introductions.
Cambridge East	The Skyline and Tall Buildings Strategy and its translation to this policy do not recognise the core proposition behind the site allocation and the significant change in circumstances that arise from the confirmation of the new Cambridge East station to the immediate south of the site. Instead height proposals for major sites should be subject to separate, detailed review.	Noted. Appendix D of the Skyline and Tall Buildings Strategy notes that the site has the 'Potential opportunity for carefully managed clusters of taller buildings to create a new distinct skyline feature in the central/southern part of the area of search, marking East Cambridge on the skyline and serving as a locally meaningful centre for the emerging neighbourhood.' Combined with Policy S/CE: Cambridge East and Policy GP/HD: Housing density, the Local Plan acknowledges that there is potential for taller buildings within this proposed allocation/close to emerging railway stations, subject to detailed testing as set out in the policy and Appendix H.
Evidence	Consider the evidence base to be fundamentally flawed in a number of respects and as a result it should not be cited in the policy or supporting text as a basis for undertaking site specific assessments in support of planning applications.	Noted. The policy and Appendix H apply to both Cambridge and the wider South Cambridgeshire District, providing a framework for assessing the effects of development on the city's skyline and the character of the wider area. Informed by the evidence base, including the Skyline Strategy, Appendix H identifies thresholds above which the policy criteria should be applied, together with the key qualities expected of taller buildings. In the Cambridge context, these criteria appropriately place emphasis on the impact of development on the character and quality of the established skyline, but do not preclude justified and considered change to it. Rather, the policy requires a consistent and rigorous assessment of the individual and cumulative effects of taller buildings on the

		skyline. Strategic views, including View K, should inform site-specific assessments, with proposals at Cambridge East considered in the context of the scale and density of development envisaged for the allocation, alongside their wider townscape, skyline and heritage impacts.
Historic villages	Particular sensitivity in design and massing should be shown at the edges of developments that are closest to villages; many of which (as with Teversham Conservation Area) have an historic core whose settings must be respected in design of new development.	Noted. Part 1(b) of the policy sets out how impacts on the historic environment including sensitive receptors such as backdrop and setting need to be assessed.
Planning balance	Part 1(e) requiring “no adverse impact” on neighbouring buildings and open space sets an unrealistic test.	Noted. Part 1(e) of the policy provides further detail on amenity and microclimate impacts including specific wording on ‘acceptable microclimatic conditions’ and ‘adequate daylight to habitable rooms’. The Local Plan should be considered in full during the determination of planning applications and therefore a planning balance will need to be applied where adverse impacts are identified.
Proportionality	The scope and detail of assessment required under criteria (a)–(e) should be proportionate to the extent to which a proposal exceeds the relevant local context height and tall building threshold, as well as higher standards of justification for taller buildings in or around the Historic Core.	Noted. The application of the policy and assessments noted in Appendix H would need to take a proportionate approach based on the nature and location of the development proposal. As noted in H.41, a robust evidence base will be required, whilst early discussions with the LPA through pre-application engagement is strongly encouraged where this is likely to be agreed.

		Appendix H already sets out a lower threshold for taller buildings in the city centre / Historic Core and the required level of assessment to justify taller development proposals.
Recent development	Part 1(b) of the policy should take a broader, more contextual approach that acknowledges modern additions.	Noted. This policy criteria is specifically in relation to this historic environment and therefore reference to modern additions to the skyline would not be relevant. Nevertheless, Part 1(c) of the policy specifically notes that the existing baseline as well as existing or emerging proposals are key considerations when planning for taller buildings.
Evidence	The policy needs to be based on evidence, which takes account of the cumulative impacts of recently approved developments.	Noted. The policy and Appendix H have been informed by the Skyline and Tall Buildings Strategy, which includes a Baseline Analysis and takes account of permitted developments at the time of its production.
Historic assets	The policy fails to consider heritage and statutory setting, especially in assessing context.	Noted. Part 1(b) of the policy sets out how impacts on the historic environment including sensitive receptors such as backdrop and setting need to be assessed.

Policy GP/QP: Establishing high quality landscape and public realm

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy GP/QP: Establishing high quality landscape and public realm	12	13	12	0	11

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Repetition of policy wording	The policy is not effective as it repeats sections of policy within GP/QP and GP/PP, GP/QD. Policies could be drafted more clearly/consolidated to avoid ambiguity. A more effective approach would be to consolidate a single comprehensive design policy to establish a clear framework.	Noted. The policies are considered to have different focus, and warrant being separate policies rather than a combined approach. Policy GP/PP provides overarching requirements for design including responding to health, wellbeing and inclusive design in a local context. Policy GP/QD provides detail on built form and function with requirements for building design, massing, scale and materials. Policy GP/QP provides requirements for the external spaces between buildings and green spaces known as the public realm including requirements for public art.

Financial mechanisms	The policy fails to establish a financial mechanism for long-term monitoring and enforcement.	Noted. Financial measures for appropriate maintenance would be secured via section 106, addressed by Policy I/ID: Infrastructure and delivery.
User hierarchy	The policy is ineffective as it fails to prioritise walking, wheeling and cycling in conflict with the wellbeing and social inclusion policy WS/HD. The policy should ensure that the places referred to must be reached by active travel.	Noted. The Local Plan should be read as a whole, and policies, including Policy I/ST: Sustainable transport and connectivity, will also apply to relevant proposals. It is therefore not necessary to repeat policies.
Equestrian connectivity and recreation	The policy does not adequately recognise equestrianism as a legitimate form of rural connectivity and recreation. Equestrian connectivity should be considered alongside other forms of active travel and recreation.	Noted. The Local Plan should be read as a whole, and policies, including Policy I/ST: Sustainable transport and connectivity, will also apply to relevant proposals. It is therefore not necessary to repeat policies.
Integrating blue and green infrastructure	Anglian Water supports integrating green and blue infrastructure, SuDS and nature-based design into high-quality public realm.	Support noted.
Provision of public art	The policy requirement should clearly allow exemptions where public art is not justified, as this is inappropriate to essential utilities infrastructure.	Noted. Paragraph 7.51 of the local plan supporting information describes circumstances where either may be exemptions where viability is a concern, or where public art does not meet NPPF tests.
Definition of public art	Public art is not well defined in the policy. Public art needs to be associated with heritage when new communities have no other means of linking with the origins and history of a new place.	Noted. Public art is described in paragraph 7.48 of the supporting information. Whilst public art may have heritage associations with the site or local area, this will depend on the context of the site and nature of the development proposal.

Flexibility of policy requirements	The policy should take into account individual site and local area circumstances. Introducing an inflexible and prescriptive constraint could undermine development capacity, density and viability.	Noted. The policy provides a set of reasonable and appropriate policy considerations that should be applied during the planning application process.
Inset on-street parking	Policy requirement for on-street parking to be inset goes beyond established guidance and creates unnecessary land take and excessive costs. Inset parking should be encouraged not mandatory.	Noted. Inset bays offer significant design advantages and is an appropriate policy requirement.
Integrating with local character	Add a further clause “D. Integrating with local character” to prevent negative impacts of temporary or permanent advertisement on the setting of the immediate area.	Noted. Advertising is addressed in Policy GP/QD: Achieving high quality development.
Horse rider routes and facilities	Policy should allow horse rider usage unless sound reasons for their exclusion.	Noted. The Local Plan should be read as a whole, and policies, including Policy I/ST: Sustainable transport and connectivity, will also apply to relevant proposals. It is therefore not necessary to repeat policies.

Policy GP/LC: Protection, conservation and enhancement of landscape character

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy GP/LC: Protection, conservation and enhancement of landscape character	17	17	14	0	11

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Landscape Character policy requirements	Policy should be strengthened so that development must respond directly to specific Landscape Character Types, requires landscape character evidence during pre-application and feasibility stages, explicitly references baseline landscape and skyline studies, and requires developers to identify compensatory landscape features for nearby environmental loss or degradation.	Noted. The aims and requirements of the policy are clear. The supporting text is also clear that applicants are encouraged to enter pre-application discussions to ensure landscape character is considered in the early stages in the design process. As such the additional wording is not considered to be necessary.

Landscape Character policy requirements	Policy inconsistent with national policy because it requires all development to protect, conserve and enhance local landscape character, whereas the NPPF (paragraph 187) distinguishes between protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside. Greater Cambridge has no defined valued landscapes.	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 (2024) 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.
Landscape Character policy requirements	Policy GP/LC as it is considered overly restrictive and lacks an appropriate level of discretion for decision-making. 'Must' should be replaced with 'should', or valued landscapes should be defined within the policy.	Noted. The Councils consider that the policy is appropriate. Whilst it is recognised that new development will inevitably have some impact on landscape character, the policy is aiming to protect, conserve and enhance the landscape character and features that are characteristic of where a proposed development would be located and avoid, reduce or mitigate impacts where possible and consider any opportunities to make improvements.
Landscape Character policy requirements	Policy requires that development must "protect and enhance the setting of Cambridge within the landscape by	Noted. Not all parts of the policy will be relevant to a particular development proposal as it will depend upon where it is located, as some criteria relate to the setting of

	strengthening the well-defined, vegetated edges of the city and by protecting and enhancing the green corridors which extend into the city and along the River Cam corridor." However, 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.	Cambridge and other parts relate to the setting of villages. Each application will be considered on its own merits.
Important Countryside Frontages policy requirements overly restrictive	Important Countryside Frontages policy overly restrictive, it should ensure development can be designed in such a manner that takes account of the ICF through appropriate master planning rather than implementing what could be perceived as a blanket approach to protect views for their own sake.	Noted. The Important Countryside Frontages (ICF) policy is a continuation of policy in the adopted South Cambridgeshire Local Plan (2018). It continues to protect specific areas where a strong countryside character penetrates or sweeps into a village or separates two parts of the built-up area. It is a strong policy protecting these areas, but only applies to specific areas that have been identified as fitting the criteria. An applicant would need to show that their development would not compromise the ICF purposes as set out in part 3 of the policy.
Landscape Character policy requirements	GP/LC 1 d only seeks to protect and enhance the River Cam corridor, but within the countryside there are other River corridors including other chalk streams such as the River Granta.	Noted. The River Cam corridor has been identified in the policy as being important for the setting of Cambridge, as the main city in Greater Cambridge. However, the policy does not identify all the features and characteristics that are important to landscape character as they are described in detail in the Landscape Character Assessment (LCA), which is referred to in part a of the policy.

Landscape Character policy requirements	Central Bedfordshire Council suggests that criterion 1(a) of the policy is amended to ensure that development proposals also consider indirect adverse effects upon landscape character outside the Greater Cambridge area.	Noted. The policy does not restrict the consideration of impacts to within district boundaries, but the councils would support a modification if the inspector considered it necessary for soundness.
Important Countryside Frontages in Gamlingay	Support the ICF proposed for Station Road, Gamlingay. However, we urge additional ICFs along Dutter End and Long Lane to preserve long-distance views towards Gamlingay Wood, and along Dennis Green and Heath Road to protect the open setting of Gamlingay Registered Park and Garden.	Noted. The built extent of Gamlingay does not extend as far as Long Lane, and there is no open road frontage to Dutter End to enable land with a strong countryside character to sweep into the built-up area or provide a significant connection between the street scene and surrounding rural area, therefore neither would meet the policy test for designation as Important Countryside Frontage.
Important Countryside Frontages in Horningsea	Important Countryside Frontages should be identified at Horningsea over Laney Meadow and Rivermeadow, and existing designations carried forward without reduction.	Noted. There is no gap in the built frontage to High Street to enable land with a strong countryside character to sweep into the built-up area or provide a significant connection between the street scene and surrounding rural area. Neither site meets the policy criteria for designation as Important Countryside Frontage.
Landscape character around Great Shelford and Stapleford	Landscape character definition 7B Gog Magog Chalk Hills is unsound since it omits most of the Magog hill itself including the recently acquired country park. Additional Important Countryside Frontages should be identified around Stapleford.	The Greater Cambridge Landscape Character Assessment (LCA) (2021) was carried out by landscape consultants and followed a rigorous methodology to identify landscape types and landscape character areas, which were discussed with statutory consultees. The LCA is considered a robust part of the Local Plan evidence base.

		A previous review of the two additional sites put forward in Stapleford found that neither met the criteria and so were not designated, as reported in Appendix E of the Protected Open Space Review (June 2026).
Requests to remove specific Important Countryside Frontages	Representations consider Important Countryside Frontages are not justified and should be removed at: • Land off Ditton Lane, Fen Ditton • Home End, Fulbourn • South of Station Road, Harston • South of Church Street, East of High Street, Guilden Morden • Boxworth End, Swavesey	Noted. A previous review of the sites at Land off Ditton Lane, Fen Ditton; Home End, Fulbourn; South of Station Road, Harston, and South of Church Street, East of High Street, Guilden Morden found that these sites continued to meet the criteria and so remain designated as Important Countryside Frontage, as reported in Appendix E of the Protected Open Space Review (June 2026). The site at Boxworth End, Swavesey provides a significant connection between the street scene and the surrounding rural area and provides an important rural break between two nearby but detached parts of the defined development extent. There is no evidence that this position has changed and the site continues to meet the policy criteria and should remain designated Important Countryside Frontage. The assessment is set out in Appendix D of the Protected Open Space Review (June 2026), noting the report erroneously scores the Important Rural Break criteria as Red when it should be Green. The Councils will produce an errata to correct the evidence report.
Impacts of East West Rail	The plan's spatial strategy relies on East West Rail (EWR) to unlock strategic growth	East West Rail (EWR) is the subject of a different consenting regime (a Development Consent Order) and

	at Cambourne, yet fails to assess EWR's severe landscape impacts between Cambourne and Harston. Policy should require EWR and associated development to demonstrate compatibility with landscape protection criteria.	will have to consider the impact on landscape character and visual impact as part of an Environmental Impact Assessment, which will need to be based on detailed landscape assessment. There does not need to be a specific reference to major strategic infrastructure in the policy as the policy applies to all developments.

Policy GP/HE: Historic environment

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy GP/HE: Historic environment	6	6	5	0	5

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Support for the Councils' strategic approach to the historic environment.	Support noted.
Heritage strategy	The Plan does not provide the positive strategy required by the NPPF as it does not recognise the international heritage significance of Cambridge.	Noted. The preservation and enhancement of Greater Cambridge's historic environment has been positioned as a central pillar of the Local Plan's wider development strategy. Policy GP/HE provides a strategic-level framework that outlines how the various heritage assets and systems that embody Greater Cambridge's wider historic environment will need to be mobilised to balance the growth of Greater Cambridge's world-renowned industries with the preservation of Greater Cambridge's historic character and its globally recognised landmarks. Given the support for the policy received from Historic England, it is considered that no further changes are needed.

Public realm improvements	The Local Plan should adopt a strategy to manage public realm improvements.	Noted. Securing high-quality design and high-quality public realm form part of the Local Plan's wider development strategy. The Local Plan sets out location-specific public realm improvement measures in the Sites Chapter, whilst general public realm improvement measures are set out in other policies in the Great Places chapter. Moreover, appropriate design standards and public realm improvements will vary from neighbourhood to neighbourhood, so these matters may be most effectively addressed through the adoption of Design Codes, which are supported by the Local Plan (e.g. Policy GP/PP) and national planning policy. Therefore, it is considered the approach is sound.
Cumulative heritage impact assessments	The Local Plan should require cumulative heritage impact assessments of development and visitor pressure and should include measures to monitor impacts.	Noted. The Local Plan's requirements for Heritage Impact Assessments align with national planning policy requirements and the guidance set out by Historic England.
Inconsistent with National Policy	Part 2(b) is inconsistent with NPPF and heritage legislation. Use more proportionate wording that allows for balanced planning judgement.	Comments duly noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.

Inconsistent with National Policy	Clarify assessments reference, which should either be referred to as Heritage Impact Assessments or Heritage Statements.	Comments duly noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Conservation areas	The Plan should highlight the importance of existing conservation areas.	The strategic importance of Greater Cambridge's existing conservation areas is set out in Policy GP/HE, which recognises the conservation area appraisals that have informed their designation. Additionally, more specific development management requirements for conservation areas have been set out in Policy GP/HA. Therefore, it is considered the approach is sound.

Policy GP/HA: Designated heritage assets

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
GP/HA: Designated Heritage Assets	8	8	7	0	7

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Policy GP/HA(1)'s compliance with National Policy	Criterion a) needs to be reworded as harm can be outweighed by public benefits.	Noted. The policy seeks to provide a consistent approach with national planning policy. Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the inspector consider them necessary for soundness.
Tone of Policy GP/HA(1)	Historic England advise Policy GP/HA(1) should be amended to make it clear that harm should be avoided in the first instance.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Enabling development	Historic England advise that Policy GP/HA(5) and paragraphs in the supporting	Noted. The Councils have sought to prepare Policy GP/HA in line with national policy, notably Paragraph 221 of the NPPF (December 2024). However, should

	text on enabling development should be deleted.	modifications be considered appropriate during examination, the Councils are open to modifications being recommended by the Inspector.
Inconsistent with NPPF (August 2026)	The policy is inconsistent with NPPF (2026) and should be deleted (given the presence of the new national decision-making policies) or reworded to require that assets should be conserved as appropriate to their heritage significance.	Noted. The Greater Cambridge Local Plan has been prepared under the legacy system (2012 regulations) and is therefore being assessed at Examination for compliance with the 2024 NPPF.
Policy should be merged with Policy GP/HE	Policy should be merged with Policy GP/HE	Noted. The Councils do not agree as both policies serve different functions. Policy GP/HE provides a strategic-level framework for the historic environment as an active contributor to the wider development strategy, where Policy GP/HA focusses on specific requirements relating to designated heritage assets. Therefore, the Councils feel it is appropriate for the Local Plan to include the two separate policies.
Heritage at Risk Register	While addressing the national Heritage at Risk Register, the mechanism relies on Historic England data that excludes Grade II listed buildings outside London. Requests establishing a local Greater Cambridge Grade II Buildings at Risk Register.	Noted. The Councils maintain a local Listed Buildings at Risk register, which is available on the Greater Cambridge Shared Planning website. The Councils are open to modifications being recommended by the Inspector, such as references to this local register, at the appropriate point in the examination, should the opportunity arise.

		It is still important for the policy to refer to Historic England's Heritage at Risk Register as it provides details of the condition of various at-risk assets in Greater Cambridge; reference to Historic England's register was supported by Historic England at previous stages in plan making.

Policy GP/ND: Non-designated heritage assets

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy GP/ND: Non-designated heritage assets	2	2	0	1	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Policy supported	Policy is strongly supported	Support noted.
Non-designated designed landscapes	Non-designated designed landscapes must be equally represented in policy alongside buildings.	Noted. Across the Plan, there are various policy requirements that seek to protect and preserve Greater Cambridge's landscape character, most notably Policy GP/LC. All relevant Development Plan policies and national policy requirements regarding landscape character preservation will be applied during the determination of a planning application. Therefore, it is considered that the matter has been appropriately addressed by other proposed policy requirements and does not need to be repeated here.

Policy GP/CC: Adapting heritage assets to climate change

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy GP/CC: Adapting heritage assets to climate change	1	1	0	1	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Support the policy, and specifically the reference to BS EN 16883	Support noted.

Policy GP/AR: Archaeology

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy GP/AR: Archaeology	1	1	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Scheduled Monument Consent	Welcome changes made to the policy wording since draft plan stage, however, Paragraph 7.91 can be deleted as it duplicates wording in Paragraph 7.92.	Support noted. The repetitious sentence can be removed through a minor modification.

Policy GP/SF: Shopfronts

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy GP/SF: Shopfronts	1	1	0	1	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Heritage value	Strong support for the policy as well-designed historic shopfronts are vital to the character, heritage and visual amenity of Cambridge's historic core, market towns, and village conservation areas.	Support noted.

Consultation Statement

Summary of Representations and Councils' response - Jobs



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan Regulation 22 Consultation Statement (November 2026)

GREATER CAMBRIDGE
SHARED PLANNING

Jobs

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Chapter 8: Jobs	2	2	2	0	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Policy wording	The wording of the section should be rewritten to distinguish need from demand. The jobs policies should support all aspects of education infrastructure not just university faculty development.	The Local Plan has identified and responded to economic needs to meet the requirements of National Planning Practice Guidance. Policies elsewhere in the plan, such as WS/NC and WS/CF seek to address education infrastructure needs.
Collaboration	Dependent on what is meant by "employment" proposal", the requirement to demonstrate how a development will develop ideas through collaboration may well be an unreasonable requirement.	Evidence, including Greater Cambridge Growth Sectors Study: Life science and ICT locational, land and accommodation needs (Iceni Projects Ltd 2024), suggests interaction and collaboration space is a locational priority for start-up and scale-up businesses in knowledge-based sectors.
Affordable workspace	The proposed introduction of a financial levy on new development of employment facilities contradicts the plan's objective of encouraging and supporting the nationally important knowledge-based cluster.	Noted, however the Councils consider there is a robust case for requiring affordable workspace form qualifying proposals.

	Loose usage of the word "affordable" weakens the policy. An affordable workspace definition should be provided.	
Cultural infrastructure	The Cultural Infrastructure Strategy (Interim), its analysis and conclusions are questionable. It asserts, rather than demonstrates, gross benefits but does not give sufficient consideration to associated costs (dis-benefits).	The councils are confident that the evidence base that has informed the preparation of the Plan is relevant, robust, up to date and proportionate.
Market interventions	The complexity of market interventions should be recognised in the Plan and there should be consideration as to whether the councils have the expertise and resources to formulate and implement them. Wherever policies are proposed to give subsidies to specific activities the costs and risks should be considered so that net benefits are identified.	The polices identified in the local plan are supported by a robust and proportionate evidence base, meeting the requirements of national planning policy.
Site types and locations	It is good to use brownfield sites and spread employment around Cambridge where there is a workforce or the city is looking to grow sectors. Concentrating development on larger sites, such as those proposed on the A14, would mean workers travelling further and adding to road traffic.	The proposed allocation of sites in the Local Plan has been guided by the Development Strategy principle to locate development to enable our national and global economic employment sectors to flourish – provide employment space of the right type in the right location to meet sector needs. Evidence in Greater Cambridge Warehouse and Industrial Space Needs (March 2025)

	These do not add high value jobs but support jobs in other areas such as Fenland, Huntingdon and Peterborough.	indicates that there is a need for logistics and industrial space in Greater Cambridge and that a key locational priority for the logistics sector is proximity to the Strategic Road Network.
Hi-tech manufacturing space	There is a need for hi-tech manufacturing space which does not obviously appear in the plan.	The need for different types of industrial space was identified in Evidence in Greater Cambridge Warehouse and Industrial Space Needs (March 2025). Responding to this evidence, a range of industrial space is proposed for allocation in the Local Plan including space which will be suitable for mid-tech and advanced manufacturing.
Evidence base	References to supporting documents need to provide more detail of the evidence on which the policy formulation has relied.	Details of the evidence that has supported the development of the Jobs policies can been found in the Jobs Topic Papers which were prepared for each stage of the Plan making process.

Policy J/NE: New employment development proposals

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy J/NE: New employment development proposals	16	16	8	5	5

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
General support	Support for the policy.	Support noted.
Warehousing and distribution	West Suffolk District Council support reference to circumstances where the provision of large-scale warehousing and distribution may be permitted, and support the need for future cross boundary consideration of this issue.	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. 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 2027.
Warehousing and distribution	Support part 8 which restricts large scale distribution centres preserves land for high value R&D and local manufacturing sectors serving the sub-regional economy; protects sensitive countryside and historic village settings from visual intrusion and prevents unwanted freight traffic.	Support noted.

Warehousing and distribution	General support for policy part 8, but it should be made clear it applies to proposals beyond those planned for in the local plan, it should clarify how need should be identified, and rather than the policy specifically referring to meeting national or regional need, it should simply refer to proposals meeting unmet needs for employment floorspace generally.	The policy specifically addresses large scale warehousing and distribution facilities providing for national or regional needs. It must be read as part of the plan as a whole including other parts of policy J/NE, and would apply to allocations for warehousing and logistics. It does not need to repeat national planning policy regarding the approach to unmet needs.
Warehousing and distribution	The policy should more positively support sites which would meet an unmet regional need. Part 8 should be deleted or alternatively, amended so its restrictions apply only to non-allocated sites. The unit size does not determine whether occupiers serve local, regional or national markets, while Greater Cambridge has significant latent demand and historic undersupply of larger units.	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. The policy specifically addresses large scale warehousing and distribution facilities providing for national or regional needs. It must be read as part of the plan as a whole including other parts of policy J/NE, and would apply to allocations for warehousing and logistics.

Established Employment Areas in the Countryside	Support Cambridge Research Park's continued designation and endorse the distinction excluding Established Employment Areas from "Expansion of existing businesses in the countryside", recognising their strategic role.	Support noted.
Established Employment Areas in the Countryside	Support for the designation of the Eternit and Cambridge Research Park site as an Established Employment Area.	Support noted.
Established Employment Areas in the Countryside	Whilst the TTP Melbourn Campus should be included within the Defined Development Extent, it is most important that the policy reflects the text in the Consultation Statement that accompanies the Local Plan that J/NE has sufficient flexibility to allow for development within Established Employment Areas on the edge of towns and villages to be assessed having regard to the category and scale of the village, rather than simply "reflects their location".	Part 5 of the policy appropriately requires consideration of site context.
Suitable alternative existing buildings or	Parts 4a and 4b should refer to suitable, available and viable alternative existing	The policy proposes a reasonable approach to the exploration of alternatives.

sites in towns and villages	buildings or sites, rather than just referring to ‘suitable’.	
Parking	The policy fails to ensure that parking provisions for new employment sites are realistically aligned with actual workforce travel patterns. Calculations for employee parking cannot rely on generic, one-size-fits-all models or generalized assumptions about sustainable transport. Instead, any employment proposal must mandate site-specific travel surveys and empirical local data.	The issue is appropriately addressed by Policy I/CV: Cycle and vehicle parking, which establishes the issues that will need to be considered when identifying parking provision.
Equestrian developments	Policy should explicitly recognise specialist rural and land-based businesses, including equestrian and equine enterprises.	The proposed policies provide an appropriate framework consider proposals for land-based businesses such as equestrian enterprises.
Restrictive conditions/obligations	Recommend incorporating a provision from the South Cambridgeshire Local Plan 2018 into Policy J/NE to enable removal of restrictive planning conditions and planning obligations, particularly for established high-tech and R&D sites like Cambridge Research Park, to encourage investment and expansion in line with the NPPF 2024.	References to the planning policy changes that were made in the 2018 Local Plans regarding the selective management approach to the economy are not considered necessary for soundness.
Employment land monitoring	Maintaining a flexible supply of employment land is strongly supported. The Plan should commit to maintaining and annually	Policy S/MO: Monitoring provides a monitoring framework and actions if policies prove not to be effective. It includes

	monitoring a rolling five-year supply of quality, deliverable employment land assessed by type, quality, scale, location and timing. Persistent shortages should trigger a mechanism for corrective intervention and, where necessary, early review.	appropriate measures to monitor employment land supply.
Landscape impacts	To ensure consistency and robustness across the Local Plan, consideration should be given to incorporating landscape mitigation requirements within Policies J/NE, J/RE, J/VA, H/DC and H/GT where development may affect the Green Belt or wider countryside.	The issue is appropriately addressed elsewhere in the Plan.

Policy J/RE: Supporting the rural economy

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy J/RE: Supporting the rural economy	5	5	4	0	4

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Needs of land based businesses	The policy is unsound because it does not provide a route for new rural employment development on greenfield sites and, as such, fails to recognise the operational land requirements for the activities of land-based businesses, particularly equestrian enterprises. Settlement proximity and public transport requirements are also inappropriate where access to suitable land is the primary locational need. The approach conflicts with NPPF paragraphs 88 and 89, which support all types of rural business, including well-designed new buildings and locations beyond settlements where operational requirements justify them.	The proposed policy provides an appropriate framework consider proposals for land-based businesses such as equestrian enterprises in combination with H/DC: Dwellings in the countryside.
Employment development in Harston	Harston needs to identify space for light industrial development to create additional rural jobs. These should be close to existing employment sites, for example, through modest extensions.	Part 3 of Policy J/NE allows new employment development in accessible locations within the Defined Development Extents of villages in South Cambridgeshire where they are of a scale and character that reflect their location and the settlement in which they are located.
The food producing system	Policy gives insufficient importance to agriculture as a food producing system.	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, consistent with national planning policy.
Strategic/national rural enterprises	While supportive of rural diversification, the policy does not recognise rural enterprises with strategic regional or national roles. A more positive approach is required for such proposals where impacts are acceptable.	Part 7 of Policy J/NE allows the expansion of existing businesses in the countryside subject to a number of appropriate criteria, providing an appropriate policy approach for Greater Cambridge.
Landscape impacts	To ensure consistency and robustness across the Local Plan, consideration should be given to incorporating landscape mitigation requirements within Policies J/NE, J/RE, J/VA, H/DC and H/GT where development may affect the Green Belt or wider countryside.	The issue is appropriately addressed elsewhere in the Plan, which should be read as a whole.

Policy J/AL: Protecting the best agricultural land

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy J/AL: Protecting the best agricultural land	7	7	3	3	3

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Protecting agricultural land	Protecting Best and Most Versatile (BMV) agricultural land is essential for food security, soil health, carbon sequestration, and rural economic resilience. Policy needs to be robustly applied.	Support noted.
Protecting agricultural land	Policy gives insufficient importance to agriculture as a food producing system.	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, consistent with national planning policy. The policy provides a sound approach.
Policy is overly restrictive	Policy takes an overly restrictive approach and fails to recognise reversible rural uses, including equestrian activities. Policy is inconsistent with NPPF paragraph 187, which requires the economic and other benefits of BMV land to be recognised.	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.
Policy is overly restrictive	The policy should allow for a balanced and proportionate assessment rather than	National Planning Policy has consistently required local planning authorities to take into account the economic

	operating as an absolute constraint. 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.	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.

Policy J/PB: Protecting existing business space

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy J/PB: Protecting existing business space	3	4	2	1	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for policy	Support the protection of existing business space. Protects low to mid skilled jobs. Maintaining employment space across villages and urban edges supports an	Support noted.

	inclusive local economy and reduces out-commuting and traffic congestion.	
Should protect existing businesses	Important that established lawful businesses are protected from unreasonable constraints arising from sensitive development subsequently introduced nearby.	The agent of change principle is addressed in Policy WS/HS: Pollution, health and safety.
Overly restricts change at Coldham's Lane Business Park	Could constrain comprehensive masterplanning around the proposed Cambridge East station, particularly the Area of Major Change (S/AMC/SCL), by protecting Coldham's Lane Business Park for its existing industrial use. Add a clause relating to changes in accessibility arising from existing or proposed strategic transport infrastructure have materially altered the strategic context.	The policy identifies industrial sites in Cambridge due the importance of maintaining an available supply of this type of building within the city. This site is correctly recognised due to the role it provides and sets appropriate policy requirements in relation to proposals for alternative uses.
Maintaining supply of employment land	Plan should include commitment to maintaining and annually monitoring a rolling five-year supply of quality, deliverable employment land.	Policy S/MO: Monitoring provides a monitoring framework and actions if policies prove not to be effective. It includes appropriate measures to monitor employment land supply.

Policy J/AW: Affordable workspace and creative industries

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy J/AW: Affordable workspace and creative industries	26	37	36	1	35

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Subsidising cultural and creative industries is not justified	Subsidising cultural and creative industries is not justified by the evidence. The requirement that they be allocated scarce science/innovation park development land, thereby increasing the costs incurred by other occupiers and potentially complicating management of the overall site.	Local creative workspace studies, stakeholder engagement and a studio needs survey, as described in the Greater Cambridge Affordable Workspace Study (Iceni Projects Ltd, 2026), identify an unmet need, insecure provision and limited ability to pay for cultural and creative industries, establishing a need for affordable workspace. However, this supports targeted intervention, not an automatic requirement to accommodate cultural and creative uses specifically on every science/innovation park. Affordable workspace needs are also identified for a

		broader range of occupiers including SMEs, start-ups and scale-ups, industrial and maker businesses and innovation-led firms. Chapter 10 of the Affordable Workspace Study links affordable provision to local need, placemaking and an agreed management plan, and supports pooled contributions for specialist facilities.
Policy justification	Policy is not justified in the Cambridge context. Lack of evidence of market failure.	Chapters 2–5 of the Greater Cambridge Affordable Workspace Study (2026) provide Cambridge-specific evidence of affordability pressures, shortages of suitable grow-on space, displacement and barriers affecting smaller occupiers. The Study finds that market mechanisms alone are insufficient to deliver genuinely accessible workspace for some occupiers, while traditional leased office and industrial models are generally less effective in delivering affordability outcomes without discounted or managed provision. This provides evidence for targeted planning intervention.
Policy justification	Relies heavily on London comparators despite market differences. In London similar affordable workspace policies have been found to be unworkable, despite the London Plan recognising that Boroughs should tailor such policies to meet the specific circumstances of their areas.	London policies provide examples of mechanisms, and are not interpreted as proof that identical requirements will work in Cambridge. Chapter 10 of the Greater Cambridge Affordable Workspace Study (2026) already differentiates local conditions and delivery models, and recognises the need for flexibility in some circumstances.

	Oxfords policy applies a more flexible approach.	
Policy needs greater flexibility	Support the principle, but should include greater flexibility.	The Greater Cambridge Affordable Workspace Study (2026) recognises the need for flexibility in some circumstances, which is reflected in the local plan policy.
Exempt certain uses	Exempt development proposals delivered primarily for educational, research or institutional purposes where affordable workspace would not be operationally appropriate. Recognise established innovation campuses (such as Babraham Research Campus) which already deliver affordable incubator, start-up and scale-up space through an integrated business model. Agree bespoke approach for strategic allocations, science parks, and major research, healthcare or innovation campuses, to include consolidation within dedicated innovation, incubation or accelerator space, or alternative mechanisms. Remove the requirement for affordable workspace for B2/B8 uses, as provision would be operationally unsuitable.	Operational constraints are recognised. The study recommends payments in lieu where exclusive occupation or specialist requirements make shared on-site provision inappropriate, rather than blanket exemptions. Innovation campuses such as Babraham's integrated incubator and growth-space model will be recognised at the application stage. For B2/B8, the study proposes a higher threshold and normally a financial contribution towards suitable workshop or light industrial provision elsewhere.

Policy requirements	Policy sets onerous requirements which are insufficiently evidenced, regarding percentage requirements, and could impact on delivery. Alternatives not adequately assessed.	The recommended 10% of net internal area responds to identified local affordability and grow-on needs and draws on wider policy practice. It is subject to viability and differentiated delivery arrangements. The Local Plan viability assessment has also been used to inform the policy.
In perpetuity requirement	Policy should apply for a fixed time period rather than in perpetuity. Long term effects have not been modelled. Lacks national policy basis.	The recommendation seeks to retain affordability in perpetuity to avoid losing benefits after initial occupation. The absence of a nationally prescribed affordable workspace standard does not itself establish that perpetuity is unnecessary or inappropriate.
Size threshold	Development size threshold not justified and should be increased.	The Greater Cambridge Affordable Workspace Study (2026) recommends triggers of 1,000 sqm net additional gross internal area for office/R&D and 2,500 sqm for B2/B8, focusing obligations on larger developments and recognising industrial constraints.
In lieu payments	In lieu payments for delivery off site not justified.	The Greater Cambridge Affordable Workspace Study (2026) notes on-site delivery to be preferable, but in-lieu payments may provide better outcomes in some cases, particularly where operational or site constraints or site location, make on-site provision less appropriate.
In lieu payments	Clearer provision for offsite contribution	The Greater Cambridge Affordable Workspace Study (Iceni Projects Ltd, 2026) recognises that off-site contributions may provide a better outcome in some

	should be added into the policy to ensure that the best quality affordable workspace is provided in the best location.	circumstances, although on-site provision remains preferable where practicable to integrate affordable workspace within new development and provide access to key locations.
List of providers	Approved list of providers not yet published.	A list of providers will be developed to support implementation of the policy.
Review	Incorporate review mechanisms so requirements can adapt to changing market conditions over the Plan period.	Chapter 10 of the Greater Cambridge Affordable Workspace Study (2026) recognises delivery risk and proposes flexible phasing for large or complex schemes.
Viability concerns	Policy needs a viability review mechanism. Viability testing also needs to consider impact of the proposed Community Infrastructure Levy. Undertake further viability testing using realistic market assumptions, and to demonstrate developments can absorb cumulative policy impact. Appraisal does not sufficiently test different development typologies. Will discourage brownfield development.	The impact of the policy on viability has been assessed in the Local Plan Viability Assessment, which included assessment of different typologies and land value areas, as well as sensitivity testing of different build costs and rent levels. The Local Plan Viability Assessment provides a cumulative assessment of the relevant policy requirements placed upon different forms of building to ensure all policy requirements are capable of being met alongside planning obligations such as CIL and S106. The Viability Assessment concludes that most forms of commercial development can deliver upon the policy requirements of the draft Local Plan, including making provision for affordable workspace, and remain viable.
On-site delivery	Important to recognise that in many instances it will not be operationally	On-site provision would not be applied to require unsuitable subdivision or compromise security or specialist facilities. Chapter 10 of the Greater Cambridge

	appropriate or practical to deliver affordable workspace on-site. Policy should allow bespoke, campus-wide delivery models that respond to operational requirements and maximise economic and innovation benefits.	Affordable Workspace Study (2026) also recommends an evidenced payment-in-lieu route for these circumstances and where a specifically identified managed facility would deliver a better outcome, and this has been reflected in the local plan policy.
Impact on delivery	Concerned that the policy will adversely impact the supply or uptake of employment provision as many developers and/or prospective tenants are likely to be deterred by the associated costs, complexities and liabilities.	The objective is to support smaller businesses without undermining delivery of employment space. The Greater Cambridge Affordable Workspace Study (2026) recommends viability flexibility, alternative delivery and adaptable phasing for complex schemes, which is reflected in the policy.

Policy J/EP: Supporting a range of facilities in employment parks

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy J/EP: Supporting a range of facilities in employment parks	4	4	1	2	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	General support for the policy.	Support noted.
Nature of facilities	Amend Clause 1(c) to allow the facilities to serve local communities where appropriate provided they do not attract significant levels of unmanaged external visitor traffic or unacceptably impact nearby centres.	This element of the policy is important in order that facilities do not undermine village centres. It is a sound element of the policy.
Nature of facilities	Align list of activities in the policy with para 8.47 of the supporting text which includes additional activities such as 'changing and childcare facilities, or reframe the policy to clarify it is not a closed list.	The policy in its current form does not provide a closed list, and does not require modification.

Policy J/MS: Markets and street trading

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy J/MS: Markets and street trading	1	1	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Recognise historic markets	Paragraph 11.6 of the Jobs Topic Paper (2026) states that “The first paragraph of the supporting information has been amended to acknowledge the historic legacy of Cambridge’s traditional market.” This change has not been implemented.	Comments duly noted. This phrase was not used in the Proposed Submission Plan, but the importance of markets is appropriately recognised.

Policy J/RC: Retail and other complementary town centre uses

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy J/RC: Retail and other complementary town centre uses	2	3	3	0	3

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Policy on loss of retail	Policy would impose unnecessary and disproportionate restrictions on the loss or reconfiguration of retail uses. 500sqm threshold for impact assessments should be replaced by the national default of 2,500sqm.	Comments duly noted. Our Retail evidence recommends as an appropriate 500sqm threshold based on exploration of local issues.
Policy on loss of retail	The supporting text refers to certain restrictions that the Council might put in place to reduce the permitted development rights of a scheme in main town centres. Text should be removed, to deliver greater flexibility.	Comments duly noted. The current policy wording provides sufficient flexibility to provide for a wide range of retail and other town centre uses in both new and emerging main town centres. These should ensure that these town centres provide for their new and growing communities. Policy S/PA/CC: Cambridge City Centre will also ensure it remains the primary focus for developments attracting many people and for meeting retail, leisure, cultural and other needs appropriate to its role as a multi-functional regional centre.
Policy on loss of retail	Delete policy part 5. A policy position for a 12-month marketing period will bring delay and would lead to greater periods of vacancy which will act against the vitality and viability of retail area. Policy inconsistent with the introduction of Use Class E.	Comments duly noted. This policy element is an established method of testing viability. It will allow for a fair assessment of a retail unit’s viability. The period of marketing can also take place while the retail unit is occupied.

Beehive Centre	Remove the Beehive Centre from the designated Retail Centre network and better reflect its planned future role.	Noted. The recent planning application proposes a Local Centre at the Beehive Centre. It is therefore retained to allow for a new Local Centre to come forward on this site which may also form part of an extended Cambridge Retail Park development, adjacent to the site.

Policy J/SA: Cambridge City's Primary Shopping Area

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy J/SA: Cambridge City's Primary Shopping Area	0	0	0	0	0

Policy J/VA: Visitor accommodation, attractions and facilities

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy J/VA: Visitor accommodation,	5	5	4	0	4

attractions and facilities					

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Insufficient evidence	The policy lacks a comprehensive tourism strategy, day-visitor forecasts, or carrying-capacity evaluations for central Cambridge. Further work should be carried out and the policy criteria altered to protect town centre liveability and residential amenity. Unmanaged tourism and day-visitor traffic exacerbate city centre congestion, degrading the public realm, community well-being, and overall liveability necessary to attract global innovation talent.	The representation raises a range of measures which go beyond the local plan and measure that can be applied when considering planning applications. 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.
Flexibility in conversions	Future demand is uncertain and may change over the plan period. The requirement to demonstrate both a lack of economic viability and 12 months' marketing is overly restrictive, limiting the ability of sites to respond to changing market conditions and delaying alternative beneficial uses such as housing and student accommodation. A more flexible	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 appropriate.

	approach would be more proportionate, justified and consistent with national policy.	
Housing need	The changing supply/demand dynamics of the overnight short stay accommodation market in Cambridge specifically are not recognised and therefore the plan still favours and protects the use of land and buildings for this use whereas the more pressing demand in Cambridge is for dwellings for Cambridge residents and for student accommodation.	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 appropriate.
Social housing allocations	To remove the commercial bias and incentive to build short term accommodation rather than much needed dwellings for residents of Cambridge, the Social Housing allocations applied to housing development should be applied also to hotels and aparthotels (except perhaps hostel accommodation linked to the two Universities)	Where proposals for visitor accommodation 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.
IWM Duxford	The policy's focus on small-scale additional facilities does not reflect the scale of development envisaged by IWM Duxford's Area of Major Change designation. Clarification is needed to ensure Policy J/VA aligns with and does not inadvertently	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.

	constrain development supported by the site's AMC designation.	
Landscape impacts	To ensure consistency and robustness across the Local Plan, consideration should be given to incorporating landscape mitigation requirements within Policies J/NE, J/RE, J/VA, H/DC and H/GT where development may affect the Green Belt or wider countryside.	The issue is appropriately addressed elsewhere in the Plan.

Policy J/FD: Faculty development and specialist / language schools

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy J/FD: Faculty development and specialist / language schools	0	0	0	0	0

Consultation Statement

Summary of Representations and Councils' response - Homes



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan Regulation 22 Consultation Statement (November 2026)

GREATER CAMBRIDGE
SHARED PLANNING

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Homes	6	6	4	2	4

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Housing objectives	Support for the housing objectives included in the Local Plan.	Support noted.
Development strategy	Keep farmland for farming, stop ignoring the character of villages, stop re-designating Green Belt / Grey Belt land for development, protect Important Countryside Frontages from being lost to development, and protect land with ecological value from development. Develop derelict brownfield sites that already have existing services instead.	Noted. These are general comments about the development strategy and delivery of housing. The value of agricultural land has been recognised and considered during consideration of the development strategy, but some development on agricultural land is necessary in order to meet identified development needs. Previous development land has also been prioritised, with a range of previously developed sites allocated, but greenfield sites are also needed in order to meet development needs. Important Countryside Frontages continue to be recognised in the Greater Cambridge Local Plan. Impact on biodiversity has been appropriately considered when identifying sites and identifying development management policies.
Affordable housing contributions from developments for	Welcome changes made to Policy H/AH relating to circumstances where affordable housing contributions will be sought from developments for student accommodation.	Support noted.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
student accommodation		
Student accommodation for part-time students	Welcome changes made to Policy H/SA relating to circumstances in which accommodation can be provided for part-time students.	Support noted.
Houses in Multiple Occupation	Welcomes changes made to Policy H/MO relating to recognition for individual circumstances and management arrangements.	Support noted.
Short stay accommodation	The Local Plan is not doing enough to protect existing dwellings from conversion to short stay accommodation. Affordable housing contributions should be sought from all overnight accommodation developments. Residential areas should be designated as being solely for residential uses to protect dwelling stock.	Noted. Some short term let activities do not constitute a change of use. Where a change of use does occur the requirements of Policy J/VA would apply, and provide a sound policy position. The supporting information for Policy 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.

Policy H/AH: Affordable housing

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy H/AH: Affordable housing	32	35	24	4	18

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Delivery of affordable housing	Support for: • objective of maximising affordable housing delivery, • requirement for 40% affordable housing, • ability to deliver shared ownership homes or other affordable homes providing a route to homeownership, • preference for shared ownership homes (within the affordable homes providing a route to homeownership tenure), • requiring integration, proportional phasing, and treatment of a subdivided site as a whole, • approach to affordable housing contributions from student accommodation and co-living developments, and	Support noted.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	• approach to calculating financial contributions.	
Percentage of affordable housing required	Requirement for 40% affordable housing is overly rigid and not sufficiently responsive to site-specific viability considerations. More flexible or tiered approach would better reflect varying site circumstances and costs, and support SME housebuilders. The Councils' assessment of affordable housing need identifies that it would be necessary to deliver over 60% of all homes in the form of affordable housing to meet demand and that delivery of affordable housing delivery has lagged behind the actual level of need.	Noted. The Councils housing evidence supports seeking 40% affordable housing in new housing developments. This balances the need for affordable housing alongside infrastructure provision and other policy requirements needed to deliver sustainable growth. 40% represents a minimum requirement and, where appropriate and viable, development proposals would be encouraged to deliver a greater portion of affordable homes as part of their overall tenure mix.
Thresholds	Local Plan does not explain tenure changes between 10-14 and 15+ units.	Noted. The supporting text already explains why there are different tenure mixes for developments of 10-14 dwellings and 15 or more dwellings.
Affordable housing tenure mix	Support for affordable housing tenure mix, as it aligns with the NPPF and its emphasis on locally evidenced affordable housing needs.	Support noted.
Alternative affordable housing tenure mix	Local Plan should require a higher minimum percentage of social rented homes. Local Plan should require a minimum of 20% social rent (up to 60% of market rent) and 20% affordable rent (up to	Noted. 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, whilst also prioritising the need to deliver social and affordable rented homes. The proportions of different tenures of affordable homes recognises that affordable homes that provide a

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	80% of market rent), and this revised split should be tested for viability. Tenure mix needs to allow for other forms of intermediate housing (e.g. discount market housing), in accordance with Government policy. There is also no reference to how the policy applies to key worker accommodation, whether key worker accommodation is considered to be affordable housing, and who counts as a key worker.	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. Affordable housing is defined in the glossary of the NPPF 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. Affordable homes delivered will be available to anyone that meets the relevant eligibility criteria for the specific affordable housing tenure being provided.
Accommodation for NHS staff	Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services.	Noted. The Housing Needs of Specific Groups study (August 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. This assessment therefore already includes the consideration of NHS workers where they fall within the income levels and sources of need. Affordable homes delivered will be available to NHS workers where they meet the relevant eligibility criteria for the specific affordable housing tenure being provided.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Specialist housing with care	The policy needs to clarify how specialist housing with care is treated.	Noted. The policy requires all major developments for housing to provide at least 40% of the new homes as affordable housing, and the policy sets out that this requirement applies to all residential developments of self-contained dwellings irrespective of their use class. Therefore any specialist housing developments that include self-contained dwellings will be required to provide affordable housing either on-site, off-site or via a financial contribution.
Social and affordable rented homes	Policy should be clear that rents for affordable and social rented homes should be capped at Local Housing Allowance.	Noted. This is outside of the remit of the Local Plan, but setting affordable rents is covered by the Greater Cambridge Housing Strategy 2024-2029. The Greater Cambridge Housing Strategy is a material consideration in any planning decisions.
Flexibility	Additional flexibility needed to enable developments to respond to a variety of circumstances, including site specific or local constraints, financial circumstances (e.g. inflation and market volatility) or viability conclusions. Need flexibility to enable developments to depart from the specified tenure mix, where it is evidenced and justified. Policy should include cascade and review mechanisms. Also additional flexibility needed to allow off-site provision where justified.	Noted. The policy is consistent with the NPPF 2024, and further exemptions and / or flexibility within the policy are 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.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	Inconsistent with national policy (NPPF 2024 paragraph 66 and NPPF 2026 Policy HO8) that recognises that location plays a role in determining the appropriate tenure mix.	
Viability	Need stronger viability safeguards, so that reductions in affordable housing are exceptional, independently evidenced, and transparent. Assessments to be publicly accessible, and not hidden due to commercial confidentiality. Viability should be re-assessed annually for long term projects, with the costs of the independent reviews borne by the developer. Viability considerations should better reflect paragraph 59 of the NPPF.	Noted. The supporting text already explains that viability will be considered as set out in national planning policy and guidance, and in accordance with Policy I/ID. Policy I/ID sets out that where a viability assessment is submitted, this assessment will be subject to independent review for which the applicant will bear the cost.
Viability Assessment of the Local Plan	Concerns relating to the costs for BNG, energy efficiency standards and land fill tax used in the Viability Assessment, and that it does not include costs associated with the Building Safety Levy. Including revised costs for these is likely to add £2,000 to the cost of a dwelling, and therefore will impact on the viability of delivering all plan requirements, including affordable housing.	Noted. Policy requirements in the Local Plan have 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. 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. The Building Safety Levy only comes into effect in November 2026. As a compulsory national tax,

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	Application of a blanket 40% affordable housing requirement in combination with a blanket CIL of £60/sqm, without consideration of site size, location or typology, is flawed. Viability Assessment does not provide a realistic outcome for strategic sites, as many inputs are missing or are not realistic.	developers should deduct the anticipated costs of the Levy from the price paid for land.
Clustering and distribution of affordable homes	Policy should include a caveat to enable alternative clustering and distribution of affordable housing if required by the Registered Provider, particularly in relation to management and maintenance. Need to provide clarity on what small groups or clusters means in practice.	Noted. Further exemptions and / or flexibility within the policy are 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. The Greater Cambridge Housing Strategy 2024-2029 includes specific requirements relating to the clustering and distribution of affordable housing, and is a material consideration in any planning decisions.
Affordable housing within the Green Belt	Make clear that requirements for affordable housing within the Green Belt is a consequence of Golden Rules and does not weigh in favour of development in the Green Belt.	Noted. The 'golden rules', and the circumstances for development in the Green Belt to address housing needs are established by national planning policy. The Local Plan does not need to replicate national policy.
Affordable housing contributions from developments for student accommodation	Welcome changes made to Policy H/AH relating to circumstances where affordable housing contributions will be sought from developments for student accommodation.	Support noted.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Affordable housing contributions from developments for student accommodation	Student accommodation is a sui generis use, and is not a residential use, and therefore it is therefore unreasonable for affordable housing contributions to be sought. It is also not viable for student accommodation schemes to contribute towards off-site provision of affordable housing, and no justification has been provided for the approach.	Noted. The Viability Appraisal for the GCLP clearly demonstrates that Purpose Bulit Student Accommodation is viable with 40% affordable housing with a healthy surplus, reflecting the strength of the student housing market in Cambridge. Given that there is an overall substantial need for housing in Greater Cambridge, the provision of student accommodation should not compromise the delivery of general needs and affordable housing. The supporting text sets out 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, based on the rational that other types of housing would not normally be delivered in these locations. However, on other sites, the provision of student accommodation would be at the expense of providing for general needs housing or other types of housing that would be required to secure affordable housing provision. As such, any student accommodation proposal should be required to still secure the same level of affordable housing provision that would have been secured if the site had been brought forward for any other form of housing. This would also apply where a University of Cambridge, Anglia Ruskin University or a University of Cambridge College campus is redeveloped for other types of housing.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		Policy requirements in the Local Plan have 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. 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. The Viability Assessment (July 2026) identifies that it is viable to seek 40% affordable housing from student accommodation developments.
Affordable housing contributions from older peoples accommodation	The Viability Assessment fails to demonstrate that 40% affordable housing is viable on older peoples housing schemes, and that reductions in planning contributions would be needed. Specific variables and assumptions should be used for these schemes in the Viability Assessment, that are different to mainstream housing.	The Viability Assessment (July 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 sets out at page 55 the assumptions applied specific to these two forms of older peoples accommodation. The appraisals show that Older Persons Living schemes have mixed viability results. Extra Care schemes in high value areas are viable, but in mid-value areas (and therefore also low-value areas), viability is more marginal. On those that are showing as marginal, they all still produce a positive residual land value (RLV), and require relatively small changes in inputs to be viable over the plan period. Sheltered Housing schemes may require a reduction in either affordable housing or other planning contributions to make them viable. However, it is for the Councils to determine which obligations should be reduced, if

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		required, taking account of the impacts to be mitigated and housing needs.
Meeting affordable housing needs	Relying on small windfall sites and exception sites will not meet the affordable housing needs of specific settlements. Policy should be updated to reflect Policy HO10 and allow maximum affordable housing delivery across sustainable locations, including rural settlements where local need is demonstrated.	Noted. 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 also provides flexibility by directing development to a range of locations, including smaller sites within Cambridge and the villages, to meet local needs and ensure a consistent supply of housing delivery. The Greater Cambridge Local Plan has been prepared under the legacy system (2012 Regulations) and is therefore being assessed at Examination for compliance with the NPPF 2024. The Local Plan includes Policy H/ES which relates to exception sites for affordable housing. The delivery of exception sites for affordable housing, alongside windfall sites within rural settlements, can be used to meet local affordable housing needs.
Unaffordability of housing	Need to develop effective strategies to tackle root cause of housing unaffordability i.e. the high price of housing for sale. Could be done though increased provision of small starter homes for sale.	Noted. 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

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		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.
Links to other policies	The policy would benefit from stronger links to other policies, such as: • Policy H/HM, which contains more detailed requirements relating to dwelling size, tenure and housing mix, and • climate change chapter, as lower income households are most exposed to fuel poverty.	Noted. The Local Plan should be read as a whole, and additional cross referencing is not necessary for soundness.

Policy H/ES: Exception sites for affordable housing

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy H/ES: Exception sites for affordable housing	8	9	6	2	6

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Policy support	The policy is broadly supported with specific recognition for: independent evidence; retaining affordability in perpetuity; parish/village local connection criteria; clustering of smaller settlements; market housing to support viability; exclusion of First Homes Exception Sites from the Green Belt; and references to Registered Providers and community led housing groups.	Support noted.
Split the policy	The policy should be split into two separate policies: one for rural exception sites and one for First Homes exception sites. This will make the policy easier for applicants and decision makers to interpret.	Noted. The policy is considered to be clear. It is considered appropriate to include Rural Exception Sites and First Homes Exception Sites within one policy due the similarities between the approaches and the criteria used to assess them.
Minimum affordable quota	The policy should mandate a strict minimum threshold of 50% affordable housing on exception sites to ensure they address local housing needs. Greater clarity needed regarding the proportion of market housing that may be permitted on rural exception sites.	Noted. The policy is considered to be clear. A minimum threshold is not considered appropriate because the level of market housing will be determined by a viability assessment in relation to the individual site. In practice, exception schemes are likely to deliver a far higher proportion of affordable housing than 50% given the thresholds that apply to market led residential schemes (40%) and sites within the Green Belt (50%).
Design criteria	Affordable and market homes should be fully integrated and the overall scheme should also be integrated with homes in the immediate vicinity.	Noted. The matters are appropriately addressed elsewhere in the Local Plan.
Eligibility criteria	The eligibility criteria should be extended so that potential occupants have lived in the	Noted. The eligibility criteria in the Local Plan are consistent with the criteria in the Greater Cambridge

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	village for at least 3-5 years to ensure schemes address deep seated rural needs rather than short term market anomalies.	Housing Strategy 2024-2029 and are appropriate for addressing housing need.
Green Belt	Criterion 1d should be tightened to require a clear assessment of effects on all Cambridge Green Belt purposes and for sites adjoining other settlements not related to the identified need to be considered where impacts are less.	Noted. The suitability of sites for Rural Exception Schemes in the Green Belt is already adequately addressed in the Local Plan and national planning policy and guidance. The widening of eligibility criteria would undermine the purpose of Rural Exception Schemes and negatively impact community support.
Assessing local need	The definition of local housing needs for rural exception sites should be aligned with the definition used for First Homes Exception Sites and therefore cover the whole of South Cambridgeshire in order to bring forward more sites.	Noted. The widening of eligibility criteria would undermine the purpose of Rural Exception Schemes and negatively impact community support.
Registered Providers	Requiring Registered Providers to be named in S106 agreements hampers the delivery of the site.	Noted. Registered Providers play an important role in raising community confidence and delivering better outcomes. As a result, they can speed up the delivery process. Naming the Registered Provider in the s106 increases certainty regarding delivery.
Housing Needs Surveys	Criterion 1a should be amended to delete requirement for 'long term' need to be identified or for the assessment to be undertaken independently.	Noted. The reference to 'long term' need clarifies that the policy seeks to address structural or persistent housing need and is not intended to address issues or events in a rural community that are likely to resolve themselves in the short term. Requiring surveys to be independent ensures a degree of objectivity and encourages community confidence in the results.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Remove reference to First Homes Exception Sites	References to First Homes Exception Sites are no longer necessary and could be removed.	Noted. The Greater Cambridge Local Plan has been prepared under the legacy system (2012 Regulations) and is therefore being assessed at Examination for compliance with the NPPF 2024.

Policy H/HM: Housing mix

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy H/HM: Housing mix	12	12	8	3	6

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Balanced mix across affordable tenures	Support the approach to ensure a balanced affordable mix across affordable tenures.	Support noted.
Providing a flexible approach	Support for the policy providing a degree of deviation from the proposed housing mix where this may be justified in relation to specific local circumstances, changes over time and scheme viability. The flexibility could be further emphasised by moving some of the supporting text into the policy criteria.	Support noted. Further detail in the policy is not considered to be necessary.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
More detail required	The policy should provide clear explanatory text setting out how applicants should demonstrate regard to the listed factors in Criterion 2 when justifying deviations from the prescribed housing mix.	Noted. The policy aims not to be overly prescriptive. Applicants should present the evidence they have used when choosing an alternative housing mix to justify this mix.
More flexibility regarding market housing	The housing mix requirements are unduly onerous, unjustified, not positively prepared and inconsistent with national policy. Greater flexibility is needed to reflect site-specific circumstances, local context, market demand and evidence of local housing needs.	Noted. The Councils consider that that policy is sound and justified by evidence related to housing need.
Alignment with National Planning Policy Framework (NPPF) 2026	The policy is inconsistent with NPPF 2026 Policy HO8(3) which states that where affordable housing requirements are met a flexible approach should be taken to the application of any development plan requirements relating to the number of bedrooms provided in market homes, taking into account prevailing market conditions. Criterion 4 should be amended to remove the requirement for up to date evidence on market housing and market housing should be removed from Table 8.	Noted. The Greater Cambridge Local Plan has been prepared under the legacy system (2012 Regulations) and is therefore being assessed at Examination for compliance with the NPPF 2024. However, the NPPF 2026 will be a material consideration in application of the development plan policies.

Policy H/GL: Garden land and subdivision of existing plots

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy H/GL: Garden land and subdivision of existing plots	3	4	3	1	3

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
A valuable additional source of housing supply	The Local Plan recognises that well-designed development on residential garden land and infill plots can provide a valuable additional source of housing supply.	Support noted.
Retaining biodiversity and green infrastructure	Introduce an additional criterion requiring the retention and enhancement of trees, biodiversity features and green infrastructure, together with explicit recognition of climate resilience and sustainable drainage measures.	Noted. These issues are addressed by other policies in the Local Plan, and the plan should be read as a whole.
Protecting spatial character	Expand Criterion 1(b) to state that proposals must not result in overdevelopment or harm the prevailing spatial character of the area.	Noted. These issues are addressed by other policies in the Local Plan, in particular within the Great Places theme such as Policy GP/QD, and the plan should be read as a whole.
Private amenity space	Criterion 1(d) should refer to the provision of private amenity space that is of an	Noted. This issue is addressed by other policies in the Local Plan, and the plan should be read as a whole.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	appropriate size, quality and functionality for both existing and proposed dwellings.	
Permeable materials	The requirement for permeable materials should be amended to maximise, rather than fully require, their use.	Noted. Surface water flood risk is a significant issue in the settlements of Greater Cambridge, and paving over garden land can add cumulatively to that risk. The policy requirement is an appropriate response to local circumstances.
Residential annexes	Further controls and criteria are required to ensure annexes are not occupied as independent living units.	Noted. The policy includes appropriate criteria and reference to the use of planning conditions to control the use of annexes. Therefore, occupation as a separate dwelling would require planning permission.

Policy H/SS: Residential space standards and accessible homes

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy H/SS: Residential space standards and accessible homes	16	118	13	3	12

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Change in Criterion	Increase aspiration for both affordable and market M4(3) standard housing.	Noted. The Councils have provided evidence to justify the requirement as set out in the Housing Needs of Specific Groups Study (2025). The policy provides a sound evidence based approach.
Alignment with the NPPF	Without clear evidence of all homes to be built to M4(2) the Councils should align criteria with Policy HO5 in NPPF 2026 and require no less than 40% of homes on major developments to be delivered as M4(2).	Noted. The Greater Cambridge Local Plan has been prepared under the legacy system (2012 Regulations) and is therefore being assessed at Examination for compliance with the NPPF 2024. The Councils have provided evidence to justify the requirement as set out in the Housing Needs of Specific Groups Study (2025). The policy provides a sound evidence based approach.
Criteria to include a cap for the number of market and affordable dwellings to be delivered M4(3)	Local Plan should set out that if schemes deliver more than 40% affordable housing, the M4(3) requirement is capped and the number based on the policy compliant affordable housing position. The Housing Needs of Specific Groups report (2025) shows that the overall need for M4(3) homes is quite low. The proposed requirement of 5% would result in an excess requirement and developments having specialist housing difficult to sell. A maximum cap should be introduced for schemes of 200 or more dwellings with the M4(3) market requirement only applying to the first 200 dwellings.	Noted. 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.
Removal of replication of Nationally	Concern around the duplication of NDSS in full and consistency with paragraph 16 of	Noted. The Councils have continued to replicate the NDSS within this policy as it provides

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Described Space Standards (NDSS)	the NPPF 2024. A cross-reference to the standards should be provided to enhance clarity.	developers/housebuilders and development management officers with a clear reference to the standards when considering planning applications.
Clarification around the interpretation of policy criteria	The Council can only require M4(3)(b) where it has nominating rights over who lives in the that house and not as the Councils suggest where they consider to be a need for such homes. This distinction must be made in the policy.	Noted. The policy requires the delivery of M4(3) standard dwellings, and then sets out that these should be delivered to M4(3)(a) unless the Council has identified a need for M4(3)(b) dwellings. 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).
Change to Balcony standards	The private amenity space standards are unduly rigid, onerous and go beyond building regulations. The balcony requirements do not allow developments to reflect their site content and surroundings. The minimum requirements for private external amenity space for apartments should be deleted or reduced.	Noted. The Councils include a specific requirement for apartments to provide direct private amenity space as well as set width and depth requirements to ensure developments provide appropriate amenity space and deliver healthy living conditions. 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.
Design restrictions due to policy criteria	Policy requires a blanket Nationally Described Space Standards (NDSS) and M4(2) standard and does not allow for things such as Flats Over Garages due to accessibility requirements.	Noted. As set out in the supporting information of the policy the Councils are aware that there may be specific developments were meeting the required internal space standards, amenity space requirements, and / or accessible and adaptable homes standards, would not be appropriate for the identified occupants. Any exceptions

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		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.
Challenge to adopting NDSS	Mandating NDSS for market housing exceeds Building Regulations and restricts buyer choice. NDSS should apply only to affordable housing.	Noted. Planning Practice Guidance states that justification for including the NDSS in a Local Plan should address the issues of need, viability and timing. Appendix 1 of the Homes Topic Paper (2025) addresses each of these and concludes that the continued requirement to meet the NDSS in the Greater Cambridge Local Plan is justified. The policy provides a sound evidence based approach to this issue.
Criteria to allow for deviation from space standards in site specific circumstances	The Councils should provide clarification in the policy to allow for deviations from specified standards in appropriate site-specific circumstances where these can be robustly evidenced and justified.	Noted. As set out in the supporting information of the policy the Councils are aware that there may be specific developments were meeting the required internal space standards, amenity space requirements, 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.

Policy H/SH: Specialist housing

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues	Of which supported the policy	Of which objected to the policy

			with Soundness		
Policy H/SH: Specialist housing	5	5	4	1	4

Theme of Representations	**Summary of Main Issues Raised in Representations**	**Councils' Response to Representations**
Unallocated and allocated sites	The 10% requirement approach is unsound as it applies to only unallocated sites and not to allocated sites of 1,000 dwellings or more.	Noted. The 10% requirement is explicitly built into the allocation policies for strategic sites (see Chapter 3 of the Local Plan) and therefore does not need referencing in this policy.
Broaden the policy focus	The policy overlooks broader housing demands beyond older persons and disabled accommodation such as that associated with the Cambridge Biomedical Campus and future economic growth.	Noted. These broader needs are not the focus of this policy, and they are addressed elsewhere in the Local Plan.
Viability on a site-by-site basis	Viability and needs testing should be done on a site-by-site basis to avoid impacting on deliverability. Viability should also consider whether specialist housing requirements undermine scheme deliverability when considered alongside other planning obligations and policy criteria.	Noted. The NPPF stresses the need to appraise the policies within the Local Plan to ensure the requirements on development are viable and to avoid the need for further viability testing at the development application stage. Exceptional circumstances can, however, still be considered through the planning application process, in accordance with Policy I/ID.
Delivery on a site-by-site basis	Provide greater flexibility in how specialist housing is delivered on a site-by-site basis.	Noted. The Councils consider that the policy provides sufficient flexibility, but is also appropriately specific to ensure it is effective.
Minor development	Clarification is sought on how the policy applies to minor development (schemes of less than 10 units)	Noted. The policy makes no distinction between minor and major development other than Criterion 4 which only

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		relates to unallocated strategic sites of 1,000 dwellings or more.
Relationship to Policy S/DE	Guidance should be provided on how Policy S/DE should be interpreted for specialist housing proposals, particularly where development beyond defined boundaries may be justified.	Noted. This is addressed by Criterion 3. The Local Plan must be read as a whole; it is not necessary to cross-refer or duplicate requirements in other policies.
Working age disabled adults	The policy lacks a delivery mechanism as there are no specific land requirements to address the housing needs of working age disabled adults and viability challenges mean they will struggle to compete with other specialist housing needs.	Noted. The supporting text is clear that development proposals should have regard to the Local Plan evidence base which considers the needs of a wide range of groups, and the relevant Supported Housing Strategy, which the Councils are required to prepare to meet the Supported Housing (Regulatory Oversight) Act 2023. The supporting text explains that the policy applies to a wide range of specialist housing which could fall under use classes C2 or C3, and also that most other forms of specialist supported accommodation (other than housing for older people) are likely to be considered as affordable housing. The preparation of the Supported Housing Strategy will provide an important opportunity to undertake a detailed assessment of current and future supported housing needs across Greater Cambridge, including the needs of working-age adults with disabilities, autism and complex support needs. The assessment will be undertaken in partnership with Cambridgeshire County Council, Registered Providers and other relevant stakeholders to ensure that the nature, scale and type of supported

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		housing required is better understood and reflected in strategic planning and commissioning priorities. The assessment will be carried out by March 2027, and it is anticipated that the Strategy will be approved in 2027. Taken together, the Councils consider that the approach set out in the Local Plan provides an appropriate framework to support the delivery of specialist and supported housing. The forthcoming Supported Housing Strategy will play a key role in identifying the needs for supported accommodation, assessing any gaps in existing provision, and informing future delivery, commissioning and partnership approaches to ensure those needs are appropriately planned for across Greater Cambridge.
Policy unnecessary	The Local Plan should rely on Policy HO9 in NPPF 2026 rather than introduce a local policy.	Noted. The Greater Cambridge Local Plan has been prepared under the legacy system (2012 Regulations) and is therefore being assessed at Examination for compliance with the NPPF 2024. However, the NPPF 2026 will be a material consideration in application of the development plan policies.

Policy H/CB: Self and Custom Build homes

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy H/CB: Self and Custom Build homes	18	20	18	1	13

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Policy stops or restricts small sites	The policy restricts self-build to developments of 20 or more dwellings. Clarify how the policy applies to minor development, including schemes below 10 units.	Noted. The policy does not restrict self-build plots to developments of 20 or more dwellings; however, it does require all developments of 20 or more dwellings to include self-build plots. The supporting text sets out that the Local Plan does not prevent the delivery of self and custom build homes on other schemes (i.e. developments of less than 20 dwellings) provided that these developments meet the policies within the Local Plan relating to residential developments. The Policy provides a sound approach to this issue, and the addition of additional detail is not necessary for soundness.
Requirements for small sites	Requirements applying to smaller and individual self/custom-build schemes should remain proportionate to their scale, nature and delivery model while retaining the	Noted. The requirements applying to smaller schemes are considered to be reasonable and proportionate. A number of criteria do not apply to smaller schemes. Those that do seek to ensure schemes meet the legal definition of self

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	safeguards necessary to ensure that the permission meets the legal definition of self/custom-build housing and therefore can be counted towards registered demand.	and custom build and meet satisfactory design standards. The Policy provides a sound approach to this issue.
Matching demand to the register	The Local Plan should clarify how different forms of provision will be assessed against registered demand and monitored to ensure demand is being met in terms of the nature of demand and not just the quantity.	Noted. The Policy provides a sound approach to this issue. The addition of additional detail is not necessary for soundness. The statutory requirement is to meet demand on the register in numerical terms only and does not require what is permitted to match with the wishes of those on the register exactly. The register is not considered to be an accurate measure of demand for different types of self and custom build.
Changing demand	The number of people joining the register has fallen in recent years and therefore the 5% requirement is not needed.	Noted. As set out in the supporting text, the 5% requirement on developments of 20 or more dwellings may be reduced where at least a one year oversupply of custom and self-build housing permissions exists and subject to agreement with the local planning authority.
5% requirement lacks flexibility	A 5% requirement on all developments of 20 or more dwellings is inconsistent with the Self-build and Custom Housebuilding Act and self-build provision should only be sought on sites where there is a demonstrable need or demand at the site concerned.	Noted. The Self-build and Custom Housebuilding Act places a statutory duty on local authorities to match demand as measured by the register with permissions for self-build at the local authority scale.
5% requirement lacks flexibility	The 5% threshold should only apply to schemes containing a minimum of 100 dwellings and should be capped so that it would only apply to the first 500 dwellings. Alternatively, suggestions included a	Noted. 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.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	minimum of 70 dwellings or a sliding scale with a lower percentage for larger schemes.	
5% requirement lacks flexibility - viability	Self-build can reduce the ability to design optimised layouts which can reduce densities and increase costs resulting in sub-optimal placemaking.	Noted. Impacts will be minimised if self-build is designed into the scheme from the beginning.
5% requirement lacks flexibility - phasing	Clarify how the requirement would be applied on multi-phase developments, and how the policy would retain flexibility for strategic sites that are delivered over a long period of time.	Noted. This issue is addressed by Criterion 2 and the supporting text.
The marketing period	The 12 month marketing period is agreed with but at this point remaining plots should be built out as market housing rather than transferred to a Registered Provider. Alternatively, the marketing period should be reduced to 6 months.	Noted. Given the current deficit in provision against demand measured by the register, plots should be sold provided they are marketed at an appropriate price point. There is no justification for a shorter marketing period.
Transferring plots to Registered Providers	Will slow down delivery as Registered Providers may not be interested in purchasing small sites.	Noted. Registered Providers will already be involved in delivering affordable housing on schemes of 20 or more dwellings.
Transferring plots to Registered Providers	Transferring plots to Registered Providers will artificially increase affordable housing contributions above a policy compliant affordable housing contribution and thus questions whether this policy is compliant with Regulation 122(2) of the Community Infrastructure Levy Regulations 2010.	Noted. The Councils consider that that policy is sound.
Transferring plots to Registered Providers	Support for the approach that after 12 months should be transferred to a	Support noted.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	Registered Provider or continue to be marketed for self-build.	
Delete criterion 3a and 3b	Criterion 3a and 3b should be deleted because they may reduce available plots, impose unrealistic valuation responsibilities on planning authorities, create an imbalance with professional developers, and ultimately hinder delivery.	Noted. The requirement to transfer unsold plots to a Registered Provider is intended to discourage developers from not selling plots for self-build and alternatively seeking to develop them out as market housing.
Flatted developments	Quotas should not be applied to flatted developments as developers already offer customer choices in standard delivery models.	Noted. Most customisation offered on flats would not meet legal definitions of self-build. The policy is designed to encourage a wider range of self-build options.
Excluding affordable housing schemes	The 80% affordable housing threshold for exemptions should be reduced to 50%. The use of viability considerations to justify exemptions is supported but this should be included in the policy wording.	Noted. The supporting text explains that 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. Therefore, the threshold is effectively 50%.
Excluding affordable housing schemes	Policy should clarify that an exemption also applies where schemes are delivering additional affordable housing above policy requirements.	Noted. The policy provides a sound approach to this issue. The addition of additional detail or other matters is not necessary for soundness. The supporting text explains that where schemes are delivering affordable housing at 10% or more above policy compliant levels, custom and self-build requirements may be lowered or waived subject to suitable viability evidence
Relationship to Policy S/DE	Greater flexibility required to allow self-build where evidence of local demand exists.	Noted. This issue is addressed in Policy S/DE. The Local Plan must be read as a whole; it is not necessary to cross-refer or duplicate requirements in other policies.

Policy H/BR: Build to Rent homes

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy H/BR: Build to Rent homes	3	3	2	1	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Affordable housing within Build to Rent developments	Support for Build to Rent developments being required to provide 40% affordable homes.	Support noted.
Harmful concentration	Reference to the wording harmful concentration is not deemed appropriate, as its subjective and open to inconsistent interpretation, and it is not proven that Build to Rent has any impact on the character of an area. Reference to harmful concentration needs to be removed or clearly defined by measurable criteria.	Noted. Planning policy criteria provide guidance for the decision taker, and determining whether a proposal complies with them typically requires the exercise of planning judgement. The policy and criteria provide a sound basis for decision making.
Flexibility	Local Plan needs to include flexibility where there is a demonstrable demand for	Noted. The Local Plan should be read as a whole, and this issue is addressed by other policies in the Local Plan.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	alternative residential development types to ensure responsive to local housing needs.	There is also 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 a policy or policies.

Policy H/CO: Co-living

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy H/CO: Co-living	3	3	2	1	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for policy	Support for a specific policy for co-living developments as they are an important component of housing market in Greater Cambridge.	Support noted.
Threshold for co-living developments	Proposed unit threshold does not reflect the operational and financial characteristics of the sector, is unjustified and fails to respond to market needs. Experience demonstrates that many successful co-living developments require significantly more than 200 units to achieve viability and	Noted. 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. The policy allows for a higher number of units where it is clearly demonstrated

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	support the level of shared facilities expected. Appropriate scale of development should be considered on a case by case basis.	there is a need in the proposed location and the number of units will not result in a harmful concentration or place undue pressure on local infrastructure.
Harmful concentration	Definition of harmful concentration is needed.	Noted. Planning policy criteria provide guidance for the decision taker, and determining whether a proposal complies with them typically requires the exercise of planning judgement. The policy and criteria provide a sound basis for decision making.
Car parking and active travel requirements	Flexibility for car parking is needed particularly in rural or semi-rural locations, alongside recognition that car parking is not inherently detrimental. Clarity needed regarding how active travel requirements should be applied across different settlement types.	Noted. The focus on highly accessible areas for this type of accommodation also means it is appropriate for the parking levels to respond to this higher level of accessibility.

Policy H/MO: Houses in Multiple Occupation (HMOs)

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy H/MO: Houses in Multiple	27	27	24	1	23

Occupation (HMOs)					

Theme of Representations	**Summary of Main Issues Raised in Representations**	**Councils' Response to Representations**
Role of HMOs in meeting housing needs	Support for recognition of role of HMOs in meeting housing need.	Noted.
Geographical scope of the policy	The geographical scope of the policy is unclear as in relation to harm the policy refers to surrounding area, however the supporting text discusses concentration at neighbourhood and street level. There is no indication of the geographical area that should be considered when assessing cumulative effects. A clear geographical framework would make decisions more predictable and help ensure that applications in similar circumstances are treated consistently.	Noted. The policy seeks to control any potential negative impacts by setting out criteria to be considered on a case-by-case basis. Planning policy criteria provide guidance for the decision taker, and determining whether a proposal complies with them typically requires the exercise of planning judgement. The policy and criteria provide a sound basis for decision making.
Concentration of HMOs	Policy should provide a clear, objective and enforceable framework for managing cumulative HMO concentration, complemented by a city wide Article 4 Direction. Should be a maximum of 10% of properties as HMOs within a 100 metre radius, with clear criteria for assessment. Strong demand for HMOs risks reducing family housing and allowing HMOs to	Noted. The policy seeks to control any potential negative impacts by setting out criteria to be considered on a case-by-case basis. Whilst some local planning authorities have planning policies restricting HMOs where the concentration goes above a certain number / distance 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.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	dominate neighbourhoods. Councils own evidence recognises impacts on character, amenity and housing mix, and recommends managing concentrations. Sandwiching and adjacent tests address immediate property relationships and not wider concentration. Density threshold gives an objective, defensible reason for refusal that "harm to the area" alone cannot. Without a concentration safeguard, HMO numbers could increase incrementally in areas that are already highly concentrated, with consequences for housing mix, neighbourhood character and residential amenity. Existing concentration should not justify further concentration. Existing concentration should be a reason for restraint.	
Sandwiching of C3 dwellings	Justification for sandwiching test needs to be clearly articulated, given that compliance with amenity criteria may already mitigate the concerns this test seeks to address. Conversion of a dwelling to a HMO, where the dwelling is already flanked by HMOs should be permitted. Policy is currently	Noted. The policy seeks to control any potential negative impacts by setting out criteria to be considered on a case-by-case basis. Planning policy criteria provide guidance for the decision taker, and determining whether a proposal complies with them typically requires the exercise of planning judgement. The policy and criteria provide a sound basis for decision making.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	unnecessarily restrictive, as where the dwelling is already flanked by HMOs and is being proposed as a further HMO this will not create additional harm. Requiring demonstration of exceptional circumstances creates uncertainty and may prevent otherwise acceptable HMOs from being permitted.	Additionally, there is 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.
Terminology	Terms including harm, suitable, appropriate, high-quality, high-concentration, good access, surrounding area, sufficiently high, and exceptional circumstances are subjective and require planning judgement, allowing inconsistent interpretation in decision-making.	Noted. Planning policy criteria provide guidance for the decision taker, and determining whether a proposal complies with them typically requires the exercise of planning judgement. The policy and criteria provide a sound basis for decision making.
Definition of harm and over-concentration	Harm is undefined. Naming the specific harms (e.g. noise, refuse capacity, parking, water pressure and availability, turnover impact etc) would make refusals easier to defend. Need to provide clearer guidance on how over concentration will be assessed to ensure consistency.	Noted. The policy does not need to list every example of potential harm in order to be sound. Planning policy criteria provide guidance for the decision taker, and determining whether a proposal complies with them typically requires the exercise of planning judgement.
Definition of sandwiching	Elsewhere, there are rules on whether sandwiching covers properties opposite, corner plots, and non-residential uses between two HMOs. Need to define sandwiching to avoid it being tested and narrowed through appeals.	Noted. The policy sets an appropriate framework for decision making. It is noted that some authorities produce supplementary guidance to illustrate the application of sandwiching.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Mix of housing	Suggest Local Plan outlines what other forms of housing need to be considered for community balance. Adding loss of family housing as a named consideration would align with the housing objectives, and add a distinct reason for refusal where relevant.	Noted. The strategic priority for homes sets out that the Local Plan is seeking to plan for enough homes to meet the identified needs, including different kinds of homes to suit different communities. The policies in the Local Plan as a whole seek to ensure that this strategic priority is delivered.
HMO register and monitoring of HMOs	The policy needs to be supported by a comprehensive published HMO register and sufficient resources for monitoring and enforcement. Without reliable data, proposals cannot be accurately assessed, monitored or consistently controlled. Iceni report undercounts HMOs, particularly in areas where there are large amounts of private rented accommodation.	Noted. It is noted that some authorities publish data on the location of existing HMOs, taken from a variety of sources. In preparing the Greater Cambridge Houses in Multiple Occupation (HMO) Study (2026) the consultants reviewed a range of data sources, including considering data protection regarding publication, as well as the separate management requirements for education institutional managed accommodation delivered as PBSA or HMOs. The study provides a robust evidence base to inform the Local Plan policy.
Relationship between student accommodation and HMOs	The Iceni report excludes university and college managed student accommodation from its HMO concentration analysis, risking an understatement of localised concentrations of HMOs. Need to make clear how university and college managed student accommodation (including HMOs) are treated when assessing proposals against this policy. If university and college managed student	Noted. It is noted that some authorities publish data on the location of existing HMOs, taken from a variety of sources. Policy H/MO relates to any proposals for HMOs that fall within use classes C4 and sui generis. Policy H/SA relates to any proposals for student accommodation. HMOs managed by educational institutions are exempt from licensing and not included in the statistics. Educational Institutions have to sign up to an accredited body who would regulate them such as ANUK. For the

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	accommodation is outside of the scope of this policy, it should still be separately identified as it is relevant to understanding of concentrations of shared student accommodation within an area and its impacts on the character of neighbourhoods.	largest scale of student accommodation, this would generally be considered as Purpose Built Student Accommodation and therefore be considered outside of HMOs.
Review mechanism	A committed review date (e.g. three years) is needed to keep thresholds evidenced and current.	Noted. Local Plans are subject to standard review requirements set by national planning guidance. A bespoke review requirement on the basis of this policy is not necessary or justified.
Exceptional circumstances	The word 'exceptional' should be removed from part 2 of the policy.	Noted. Further flexibility within the policy through the removal of 'exceptional' is 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.
Space standards	Minimum space standards do not necessarily ensure genuinely good-quality accommodation. The policy should distinguish technical compliance from quality. Solely considering the licensing minimum room sizes does not match with the requirement for a high-quality living environment, and does not provide a standard for high-quality. What is expected beyond the licensing standards to deliver high-quality rooms and appropriate	Noted. The policy requires all HMOs to meet the licensing standards and also the internal and external residential space standards set out in Policy H/SS. The plan should be read as a whole, and there are policies within the Great Places theme, such as Policy GP/QD, that also relate to the design of new developments and buildings.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	communal spaces? Licensing room sizes considered to be too small for high-quality. Whereas a modestly higher standard would be enforceable, and not just aspirational. Referring to proportionate for communal spaces is difficult to apply consistently or defend. Setting a minimum per person communal space requirement would resolve this.	
Management plans	The policy does not specify the minimum content of a management plan, how compliance will be monitored, and what action will be taken if arrangements are ineffective. The policy needs to set out what constitutes an adequate management plan and how its implementation will be secured and monitored. Management plans should avoid duplicating licensing controls. Management plans require adequate resources, monitoring and enforcement to be effective. Current staffing levels and budgets do not provide sufficient assurance that these requirements can be delivered in practice.	Noted. The supporting text sets out what is required in terms of management arrangements and highlights that this should be proportionate to the proposal, and also that a condition relating to the management of the HMO may be applied to relevant planning permissions.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Character of properties	Internal changes can be made that completely destroy the character of a property e.g. adding ensuites within existing bedrooms, changing use of communal spaces into bedrooms. Need to prevent the character of traditional family homes from being changed.	Noted. This is not a matter that can be addressed by the Local Plan.
Remove restrictive requirements	Remove the requirements around parking, cycle storage, living space, and refuse. Remove the very restrictive requirements relating to adjacent HMOs and sandwiching. Artificially reducing the population density of the city (by placing restrictions on HMOs) acts against its economy, increases inward commuting and traffic congestion, and raises rent levels exacerbating inequalities.	Noted. Policy requirements addressing amenity issues, including around cycle parking and waste management, are fully justified. The policy responds to clear evidence that these issues need to be effectively managed in relation to HMOs. Evidence informing the Local Plan recognises the importance of HMOs in meeting housing needs, but the potential impacts on amenity need to be managed, and policy is also needed to ensure that HMOs are of an appropriate quality.
Retrospective applications	Where conversion happens prior to an application, how will retrospective applications be assessed? Setting this out will remove ambiguity that could be exploited.	Noted. Retrospective planning applications will be considered following the normal processes set out in planning legislation and guidance. It is not a matter that can be addressed by the Local Plan.

Policy H/SA: Student accommodation

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy H/SA: Student accommodation	4	4	2	2	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for policy	Specific support for the amendments made to the policy which will support the move to expand part-time courses and accommodating part-time students in line with Government policy.	Support noted.
Clarification of how policy will operate in practice	Clarification sought on how part 1d will operate in practice, including how contributions to affordable housing in lieu of C3 loss will be calculated and assessed, and how the Council will determine whether development results in a permanent net loss of C3 housing.	Noted. 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.
Institutional support	The policy should be amended to remove the requirement for applicants to provide evidence of agreed interest from at least	Noted. The policy supports new student accommodation that meets identified needs of an existing higher education institution in Greater Cambridge. Paragraph

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	one existing educational establishment. This requirement is not justified by the evidence base, is not necessary to achieve the policy objective, and risks preventing the delivery of accommodation needed to address identified student housing requirements. It is also not considered reasonable and representative of locational demand for the majority of the new units to be located in one location on the edge of the City i.e. at Eddington.	9.109 provides justification for policy controls requiring a formal legal agreement with at least one existing educational establishment based in Greater Cambridge and for the future management and maintenance of the student accommodation. This part of the policy prevents sub-division to allow these units to be sold on the open market and / or to be occupied independently from the student accommodation and, ensures that these units are only used by their intended occupants and are not treated or sub-divided for Use Class C3 residential occupancy (or other use), without planning consent. The requirement of a formal legal agreement also ensures that student accommodation is well designed, provides appropriate internal and / or external amenity space and facilities (including provision for disabled students and staff needs).

Policy H/DC: Dwellings in the countryside

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy H/DC: Dwellings in the countryside	2	2	1	0	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Marketing period	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. This requirement should be restricted to buildings that are viable for employment use and not in poor condition. A market assessment report by a suitably qualified professional can demonstrate reuse potential where marketing is not appropriate.	Noted. There is no reason in principle why a redundant building in poor condition could not be re-developed for employment use.
Landscape impacts	To ensure consistency and robustness across the Local Plan, consideration should be given to incorporating landscape mitigation requirements within this policy where development may affect the Green Belt or wider countryside.	Noted. The issue is appropriately addressed elsewhere in the Local Plan. The Local Plan must be read as a whole; it is not necessary to cross-refer or duplicate requirements in other policies.

Policy H/RM: Residential moorings

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy H/RM: Residential moorings	0	0	0	0	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
No representations		

Policy H/GT: Gypsy and Traveller pitches and Travelling Showpeople plots

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy H/GT: Gypsy and Traveller pitches and Travelling Showpeople plots	6	6	4	0	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Provision of traveller sites within the Local Plan	Support for the inclusion of provision for traveller sites within the Local Plan.	Support noted.
Safeguarding pitches for Gypsies and Travellers and plots for Travelling Showpeople	Seeking safeguards to ensure that pitches and plots remain occupied by only Gypsies, Travellers and Travelling Showpeople to prevent depletion of authorised pitch / plot provision.	Noted. Policy S/DS safeguards sites for Gypsies and Travellers or yards for Travelling Showpeople that already have, or in future are granted, an unrestricted planning permission for that use. Planning permissions for traveller sites include conditions relating to the number of

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		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.
Meeting identified needs from other authorities	Uttlesford has an evidenced unmet need of 61 Gypsy and Traveller pitches, and given the strong housing market, economic and transport relationships between Uttlesford and Greater Cambridge, Uttlesford District Council consider there is a clear strategic basis for Greater Cambridge addressing a proportion of this need, particularly through increased provision within strategic sites with strong functional relationships with Uttlesford.	Noted. Our evidence shows that there is a need for additional Gypsy and Traveller pitches and Travelling Showpeople plots within Greater Cambridge, and the Councils' approach to meeting the identified accommodation needs of travellers in Greater Cambridge is covered within Appendix 11 of the Strategy Topic Paper (August 2026). The Councils have liaised with Uttlesford District Council throughout the plan-making process. This issue was raised for the first time through the Proposed Submission consultation; therefore it is not practicable for the Councils to address this need at this late stage. In addition, Uttlesford District Council have not submitted evidence as to why the need cannot be met in their district, and have not yet considered whether they can meet the identified need within their own district through a review of their development plan as required by Core Policy 60 in the Uttlesford Local Plan (adopted in March 2026).
Approach to meeting identified needs	Amendments needed to ensure the sequential approach to meeting needs as set out in the Accommodation Needs Assessment is followed. New permanent sites should only be permitted after existing-site turnover, regularisation,	Noted. The approach to meeting the identified accommodation needs of travellers is covered within Appendix 11 of the Strategy Topic Paper (August 2026). The Accommodation Needs Assessment (ANA, September 2024) sets out a series of options for meeting the identified accommodation needs of travellers, and the

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	expansion and other identified opportunities have been exhausted.	Councils have considered each of these options. Additionally, Policy H/GT requires that any proposals for new pitches or plots demonstrate need.
Traveller sites as part of strategic sites	Strategic development sites are required to make significant provision for Gypsy and Traveller pitches, and not all existing strategic sites have made provision. A large proportion of the identified need for pitches could be met if all strategic sites included in the Local Plan made provision. Strategic sites policies should include bespoke requirements for pitches in terms of numbers and timings, and the Councils should explore funding opportunities to deliver these pitches.	Noted. The approach to meeting the identified needs of travellers is covered within Appendix 11 of the Strategy Topic Paper (August 2026). Appendix 11 includes a review of all existing and proposed strategic sites in terms of their ability to include a traveller site(s). Specific requirements for traveller sites, including the number of sites / pitches, are set out in each of the allocation policies that are required to provide traveller sites. Additionally, 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.
Landscape requirements	Requirements for landscape mitigation from developments within the Green Belt or wider countryside should be incorporated into the policy, to provide consistency and robustness across the Local Plan. Should require landscaping measures that mitigate adverse landscape and visual effects whilst reflecting and respecting local landscape character.	Noted. This issue is appropriately addressed in Policy GP/LC, which should be read alongside this policy.
Smithy Fen	The Gypsy and Traveller policies in the Local Plan are not being applied to Smithy Fen, and although the objectives of these	Noted. The comments provide views on issues arising on specific sites or views on the application of previous policies, rather than expressing why the policy is unsound or changes that need to be made to it. Policy H/GT is a

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	policies are not illegal, the actions taken with respect to these policies are.	sound policy which will support consideration of future planning applications.

Consultation Statement

Summary of Representations and Councils' response - Infrastructure



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan Regulation 22 Consultation Statement (November 2026)

GREATER CAMBRIDGE
SHARED PLANNING

Infrastructure

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Chapter 10: Infrastructure	21	25	19	1	16

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Infrastructure gaps / deficiencies	The Plan doesn't address existing gaps/deficiencies in infrastructure and public services (sewerage, schools, health facilities, social services, road maintenance) caused by past lack of delivery.	The Infrastructure Delivery Plan uses an evidence-led methodology to evaluate current infrastructure capacity and increased demand resulting from planned housing and commercial development.
Neighbourhood plan policies	Infrastructure protections in the Harston Neighbourhood Plan (car parks) are not reflected in the Local Plan.	Noted. However, the councils are confident that the policies in the Proposed Submission Local Plan provide adequate coverage to manage future development proposals in Greater Cambridge. Adopted neighbourhood plans remain in force as part of the development plan, therefore there is no need to repeat such policies within the Proposed Submission Local Plan.
Infrastructure needs / requirements	Need for further investment in key infrastructure (transport, hospitals, water) to deliver number of planned homes / jobs without impacting quality of life for residents.	Noted. The Infrastructure Delivery Plan uses an evidence-led methodology to evaluate current infrastructure capacity and increased demand resulting from planned housing and commercial development. We have worked closely with relevant delivery agencies and bodies to identify the interventions needed to support planned

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		growth, and how such interventions would be funded and delivered.
Transport: evidence	Concern that the GCTS does not address congestion sufficiently / facilitate the proxy identified in the TER as essential for the development strategy to be accommodated on the transport network.	Noted. The Transport Evidence Report (2025) confirmed at a high level the mitigation needed to accommodate the emerging preferred development strategy on the transport networks. For Cambridge urban area the modelling informing the Report included a "City Access Proxy" due to the ongoing uncertainty at the time of preparation, around what measures might come forward in the City Centre. The final Greater Cambridge Transport Strategy published for approval by the Combined Authority Board in November 2026 directly responds to this issue, establishing a practical, phased approach to managing the connectivity impacts of congestion in and around Cambridge. The GCTS delivery plan includes shorter, medium term and longer-term interventions that provide enhanced connectivity to support both Local Plan development and existing movements. Modelling and connectivity analysis undertaken alongside the GCTS demonstrates that the package of Strategy interventions can provide this enhanced connectivity, gives more competitive journey times by public transport, supports improved travel choices across the sub-region. The improvements in connectivity and travel choice provided by the GCTS therefore facilitate the proposed level of development and,

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		whilst not eliminating congestion, this does not result in a severe adverse impact on the highway network. Note that neither the Transport Evidence Report nor the Greater Cambridge Transport Strategy rely on any kind of fiscal demand management.
Transport: evidence	TER relies on a different transport model than used on more recent plan evidence and includes interventions as baseline 2041 that may not be delivered by 2041.	Noted. The Transport Evidence Report 2021 and 2025 (TER) concludes that the preferred development strategy is capable of being accommodated on the local transport network in Greater Cambridge with appropriate mitigation. This was based on CSRM2 modelling, which was the up-to-date strategic transport model available at the time of evidence preparation. The transport mitigation measures needed to facilitate the proposed level of development without an undue impact on the highway network is set out in the Greater Cambridge Transport Strategy (GCTS), the Infrastructure Delivery Plan (IDP) and in relevant allocation policies in the Local Plan. For selected sites such as Cambourne North, this understanding has drawn on additional transport modelling using the most up to date strategic transport model available at the time. The final Greater Cambridge Transport Strategy establishes a practical, phased approach to managing the connectivity impacts of congestion in and around Cambridge. The proposed measures, and accompanying modelling and connectivity analysis, demonstrate that

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		improvements in travel choice, and enhanced levels of connectivity by public transport, can be achieved and that, although not eliminating congestion, the impact of the Plan is not severely adverse. The IDP and GCTS provide a clear understanding of the phasing, funding and delivery status of each required scheme, providing confidence that they will support the housing trajectory set out in the Local Plan. Detailed transport mitigation for each site will be confirmed at the planning application stage in accordance with the plan policies and for agreement with the Local Highways Authority and Local Planning Authority.
Transport	Plan does not address current and expected future congestion.	The transport mitigation measures needed to facilitate the proposed level of development without an undue impact on the highway network is set out in the Greater Cambridge Transport Strategy (GCTS), the Infrastructure Delivery Plan (IDP) and in relevant allocation policies in the Local Plan. The final Greater Cambridge Transport Strategy establishes a practical, phased approach to managing the connectivity impacts of congestion in and around Cambridge. The proposed measures, and accompanying modelling and connectivity analysis, demonstrate that improvements in travel choice, and enhanced levels of connectivity by public transport, can be achieved and that,

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		although not eliminating congestion, the impact of the Plan is not severely adverse. In combination, these site specific and strategic measures demonstrate that the sites included in the plan can be delivered.
Transport	Girton Interchange should be upgraded to all-ways to ensure traffic from Cambourne and Bourn Airfield don't travel through Hardwick.	Noted. The Infrastructure Delivery Plan uses an evidence-led methodology to 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 and the Greater Cambridge Partnership, the IDP identifies a range of priority transport measures to mitigate the transport impacts of growth brought forward by the emerging Local Plan. To inform this, the Councils carried out detailed transport modelling work to identify the range of interventions that will be needed to support the proposed allocation at Cambourne North throughout the plan-period and beyond (See Cambourne North Transport Strategy & Modelling Report Addendum (July 2026). Based on this work, it could be demonstrated that planned growth up to 2045 can be accommodated on the highways network without the need for further upgrades of the Girton Interchange. The Plan acknowledges that additional strategic highways mitigation measures may be required beyond 2045, establishing a requirement for this to be kept under review

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		including via engagement with relevant highways authorities as development of the site progresses, informed by up-to-date transport modelling.
Water	Plan should consider a larger, more efficient sewage treatment plant.	Noted. It is acknowledged that investment will be needed at wastewater treatment works across Greater Cambridge to serve the allocations proposed in this plan. Where upgrade requirements have already been identified, the Infrastructure Delivery Plan identifies these. Anglian Water have committed to identifying any further measures needed to address current and future development needs and have started work on a new Drainage and Waste Water Management Plan (DWMP), a statutory plan they are required to prepare which identifies how they will accommodate future growth needs including arising from this local plan.
Water	Need clarity around timing of Grafham to Madingley new water pipeline to ensure water supply.	The government has formed the Cambridge Water Scarcity Group, bringing together relevant agencies to deliver short and long-term solutions. Working with the group, we commissioned a study to explore whether the growth needs identified in the Local Plan could be met. A pipeline connection to Grafham Water will boost supplies to the Cambridge area from 2032, and the Fens Reservoir will further increase supplies from the mid 2030's. The first new homes at new strategic sites including Cambridge East, Cambourne, and Grange Farm, are not anticipated to be completed in the housing trajectory accompanying this Local Plan until 2032 when the new pipeline connection is anticipated to be operational.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Cumulative infrastructure requirements	Risk to viability and deliverability of plan from new obligations around net zero carbon, circular economy, biodiversity, green infrastructure, open space and affordable workspace. Policy requirements too generic with limited flexibility for site specific circumstances.	Noted. Policy requirements in the Proposed Submission Local Plan have been informed by proportionate evidence of infrastructure assessed for regarding viability. The plan is accompanied by a Viability Assessment.
Transport	Need more cycling and pedestrian areas in central Cambridge, together with overall of public transport and light rail / trams serving proposed new developments.	Policies of the Local Plan are designed to secure appropriate transport provision, with a particular focus on sustainable modes including active travel and public transport. The Greater Cambridge Transport Strategy identifies a range of mitigations needed to support development in Greater Cambridge, with Mass Rapid Transit included as part of a range of options.
Transport: evidence	Plan's transport strategy too reliant on buses, which suffer poor reliability due to congestion, and lack means of financing extra services. Road charging should be included. Modelling data out-of-date.	The transport mitigation measures needed to facilitate the proposed level of development without an undue impact on the highway network is set out in the Greater Cambridge Transport Strategy (GCTS), the Infrastructure Delivery Plan (IDP) and in relevant allocation policies in the Local Plan. The final Greater Cambridge Transport Strategy establishes a practical, phased approach to managing the connectivity impacts of congestion in and around Cambridge. The proposed measures, and accompanying modelling and connectivity analysis, demonstrate that improvements in travel choice, and enhanced levels of connectivity by public transport, can be achieved.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		Buses form one part of the transport strategy. The Combined Authority is implementing bus franchising across Cambridgeshire and Peterborough to deliver service improvements; this work includes consideration of costs and financing. Neither the Transport Evidence Report nor the Greater Cambridge Transport Strategy rely on any kind of fiscal demand management.
Transport: parking	Cycle and car accessibility and storage requirements presented as supporting information rather than included in the policies of the plan, making them optional.	Noted. Policy I/CV clearly sets out the requirements that cycle parking must meet, including being conveniently sited and accessible for all users, safe and secure, fit for purpose and easy to use. The supporting text provides additional detail on the interpretation of these requirements.
Transport: parking	Increased parking standards needed in Cambridge City centre to reflect high demand, and proposed garage dimensions out-of-date and inadequate for modern cars, cargo bikes and adapted cycles, conflicting with policies requiring facilities to be accessible, fit for purpose and safe.	Noted. Policy I/CV sets out cycle parking standards by land use as a minimum level of provision that must be provided; greater provision may be appropriate in areas with existing parking pressure. The minimum garage dimensions will accommodate most cars with cycle storage, even allowing for the increase in size of modern cars. It is important to ensure a range of cycle types and sizes can be safely and securely stored to enable people of all ages and ability to cycle for a range of trip purposes. Non-standard cycles include standard cycles with baskets and

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		child seats and cargo cycles and recumbent or hand cranked cycles with alternative frame styles, which require a different amount or type of space and/or locking mechanism. Policy I/CV provides flexibility over how the parking can be accommodated and is expressed as a minimum requirement.
Omission sites	Additional smaller scale allocations (omission sites) should be considered where existing infrastructure can already support growth.	Noted. The councils have considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. The strategy is for allocating sites is therefore considered to be sound. It has been demonstrated that the Local Plan will deliver a robust 5 year housing land supply and a supply of homes to meet the identified housing need for the plan period. Additional allocations for housing are not required.
Healthcare infrastructure	Central Eastern ICB, NHS Property Services and wider healthcare partners continue to work with the Shared Planning Service on the Infrastructure Delivery Plan (IDP) beyond the close of this consultation.	Noted. The output for this ongoing work will the Submission Greater Cambridge Infrastructure Delivery Plan and the request for continued co-operation and engagement is welcomed.
Transport: cross-boundary impacts	Greater consideration needed around cross-boundary highways impacts between Cambridgeshire and Suffolk.	Noted. The Transport Evidence Report (2021 and 2025) is based on modelling that is consistent with Department for Transport's guidance, which confirmed at a high level the mitigation needed to accommodate the emerging preferred development strategy on the transport networks. This included modelling traffic impacts arising from the development strategy, including cross-boundary impacts in a proportionate way.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		Mitigation measures, focused on improving accessibility by non-car modes and including vehicular trip budgets have been identified within the strategic site allocation policies and included within the Infrastructure Delivery Plan. In combination these measures will minimise the number of vehicle trips arising from new development and thereby limit the impact on the local or strategic highway network within Cambridgeshire or across the boundary. The Councils are committed to continued engagement with neighbouring authorities as necessary. This commitment is set out in the Statement of Common Ground.
Transport: evidence	Evidence to demonstrate that impacts on the Strategic Road Network have been fully assessed insufficient, with concerns relating to strategic transport modelling, trip budget assumptions, cumulative impacts, mitigation requirements, infrastructure funding, and deliverability, particularly at Cambourne North, North East Cambridge, Grange Farm, Cambridge East and A14-related allocations.	The Transport Evidence Report (2025) confirms at a high level the mitigation needed to accommodate the emerging preferred development strategy on the transport networks, which includes the Strategic Road Network. Mitigation measures, focused on improving accessibility by non-car modes and including vehicular trip budgets have been identified within the strategic site allocation policies and included within the Infrastructure Delivery Plan. In combination these measures will minimise the number of vehicle trips arising from new development and thereby limit the impact on the local or strategic highway network.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		The Councils are pleased to continue to engage with National Highways on these points alongside local transport partners, to ensure common understanding.
Power	NGET have identified an Overhead Transmission Line within the plan area which does not conflict with any policies or site allocations proposed.	Noted.
Infrastructure gaps / requirements	Recommends establishing a Greater Cambridge Business and Growth Forum to provide structured evidence on emerging barriers to investment and delivery and help to resolve issues that sit across different planning, utility and infrastructure bodies.	Greater Cambridge Shared Planning welcomes the suggestion for ongoing engagement with the Chamber of Commerce around the implementation of the Greater Cambridge Local Plan, though it is not deemed that the establishment of such a forum is essential to the soundness of the plan as proposed.
Water	Satisfied that the Water Cycle Study can be kept up to date as more information becomes available and that the Study, as pertaining to wastewater, can be considered sound at the present time; and that policies in the Plan are sufficiently positive to safeguard against environmental harm if growth comes forward early (ahead of the updated DWMP) or development phasing misaligned with WWTW investment upgrade plans.	Support noted and the request for continued co-operation and engagement is welcomed.
Emergency services	Cambridgeshire Constabulary and its Blue Light Partners require developer funded Infrastructure mitigate and manage impacts on service capacity from planned housing	While the omission is noted, the Council is confident that Policy I/ID: Infrastructure and Delivery, which is designed to secure suitable infrastructure provision and improvements necessary to make planning schemes

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	and population growth. The plan should attribute greater recognition to the important role played by these bodies by referencing planning for police, fire and rescue, and ambulance facilities in the Strategic Priority for infrastructure policies.	acceptable, is sufficiently clear and robust to secure appropriate contributions to mitigate the impacts of development on the operating capacity of the emergency services.
Emergency services	Cambridgeshire Fire & Rescue Service is operating at capacity, and planned housing and commercial development would have a substantial impact on its CFRS estate, vehicle fleet and staff operational assets and resources. This requirement should be more clearly identified in the Plan and its supporting evidence, and	The Council appreciates that the Cambridgeshire Fire & Rescue Service (CFRS) is operating at capacity, and the IDP recognises that planned housing and employment growth will further impact service delivery. However, further detailed assessment is required by CFRS to robustly justify the mitigation measures required to meet the demands to be placed on the service because of planned growth. Such evidence is required to ensure the Councils are able to comply with the statutory tests for planning obligations outlined in Regulation 122 of the Community Infrastructure Levy Regulations 2010. The IDP remains a live document and will be updated in due course to reflect changes in infrastructure planning, funding availability and stakeholder input. The Council welcomes further engagement with CFRS on this matter should further evidence be presented.

Policy I/ST: Sustainable transport and connectivity

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy I/ST: Sustainable transport and connectivity	49	60	37	7	32

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for the policy approach	Support for strong objectives and policies around active travel, public transport and sustainable movement, with an emphasis on vison-led approach and modal shift. Consistent with the NPPF. Clear recognition that transport provision should reflect location and context and its explicit inclusion of community transport and responsive services. Support for development only being permitted where they do not have unacceptable transport impact.	Support noted.
GCDC support	GCDC supports infrastructure first, vision-led approach given the existing constraints.	Support noted. We are committed to work with GCDC alongside other partners to progress the GCTS towards approval.

	GCDC will continue to collaborate on the Greater Cambridge Transport Strategy.	
Support for proposed Interventions	Hertfordshire County Council support the interventions identified in the Royston to Granta Park Strategic Transport Study.	Support noted.
Greater Cambridge Transport Strategy	CPCA reconfirms the position as set out in statement of Intent; seeking to have an approved Greater Cambridge Transport Strategy in place to support the Local Plan in November 2026.	Noted.
Cross-boundary transport matters	There should be a greater consideration of cross-boundary highways impacts and ensuring adequate mitigation, active travel and sustainable travel connections between Cambridgeshire and neighbouring authorities. Would welcome commitment in the policy to work with neighbouring authorities.	Noted. The Transport Evidence Report (2021 and 2025) is based on modelling that is consistent with Department for Transport's guidance, which confirmed at a high level the mitigation needed to accommodate the emerging preferred development strategy on the transport networks. This included modelling traffic impacts arising from the development strategy, including cross-boundary impacts in a proportionate way. Mitigation measures, focused on improving accessibility by non-car modes and including vehicular trip budgets have been identified within the strategic site allocation policies and included within the Infrastructure Delivery Plan. In combination these measures will minimise the number of vehicle trips arising from new development and thereby limit the impact on the local or strategic highway network within Cambridgeshire or across the boundary. The Councils are committed to continued engagement with neighbouring authorities as needed. This commitment is set out in the Statement of Common Ground.

Collaboration	Network Rail looks forward to working collaboratively with GCSP/developers to ensure that the rail infrastructure improvements required to support growth and delivered.	Noted. This commitment to working with key stakeholders has been set out in the Statement of Common Ground.
Transport Impact on Cambridgeshire from neighbouring authorities	Policy to consider impact of neighbouring county developments upon the proposed in county business developments, with better joined up consultation and cost sharing.	Noted. This matter cannot be dealt with through the policies within the Greater Cambridge Local Plan. Planning applications outside Greater Cambridge are determined in accordance with the relevant development plan of the respective local planning authority. The Councils are cooperating with neighbouring authorities on cross-boundary matters, as established in the Statement of Common Ground.
Alignment between transport mode-share targets and the plan's carbon budget	Plan's climate change chapter should explicitly link transport mode-share targets to the Plan's carbon budget.	Noted. Transport mode shares should be determined on a site-by-site basis, reflecting the policy requirement for prioritising accessibility by walking, wheeling, cycling and public and community transport.
Prioritise public transport in new settlements	Plan should prioritise public transport for all new settlements. Railways, where possible, should be able to take the strain. Railways and Buses make journeys more 'seemless'. Needs to be provided from the outset to ensure that resident can adopt sustainable travel habits.	Noted. The development strategy has included new settlements that maximise the opportunity to integrate into existing and planned Rail stations and Busways. All site allocation policies set out the required measures needed to ensure that they are sustainable in transport terms.
Cambourne North	Concern with the Cambourne North allocation relying on East West Rail and the Cambourne to Cambridge busway for sustainable transit, yet both systems bypass the Cambridge North employment hub, forcing car dependency and breaching the trip budget, with consequential environmental impacts.	Noted. The full list of transport requirements extends beyond East West Rail and the Cambourne to Cambridge Busway, noting the need to connect with a wide range of destinations. This is set out in the Cambourne North Transport Strategy (July 2026) having been tested through transport modelling and in collaboration with both the Highways and Transport Authorities.

Role and function of active travel routes	The policy and evidence need to more clearly recognise the relationship between Active Travel routes, Public Rights of Way (PROW) and countryside-access network. Each serve different functions, legal status, lawful users and design requirements. The needs of horse riders should be considered at the earliest stage of planning and infrastructure design. Consultation on new routes and proposed improvements must be conditioned at an early stage, to ensure their quality and usability.	Noted. As outlined in the supporting text paragraph 10.9 leisure routes should be improved in accordance with Cambridgeshire County Council Rights of Way Improvements Plan, which considers the needs and experience of a wide range of users.
Coordinated improvements to PROW	PROW enhancements are not delivered in a coordinated manner; suggest the Transport Proposals Database (TPD) or equivalent, should be upgraded to include 'all' required PROW enhancements, and referenced in the supporting text.	Noted. This matter cannot be dealt with through the policies within the local plan.
Promoting sites in sustainable villages	Several site promoters expressed support for the principle of directing development to locations that are accessible by sustainable modes of transport; requesting their site should be allocated as part of directing development to more sustainable villages and close to planned infrastructure.	Noted. The Councils consider that the allocations currently set out in the development strategy are appropriately located to ensure that they will be sustainable in transport terms. The suitability of other sites has been considered but the councils deem that the plan provides appropriate allocations to meet the identified needs.
Contributions for transport improvements	Direct improvements and commitments to transport infrastructure are secured through conditions or contribution through planning obligations, Community Infrastructure Levy or its successor. However, Policy does not state contributions will be sought for public transport and shared transport services.	Noted. This issue is appropriately addressed in Policy I/ID.

Bus priority measures	The plan is reliant on increased bus use to reduce reliance on the private car, but the policy does not set clear requirements to ensure that development is designed to enable safe, direct and efficient bus services, including high frequency services where needed.	Noted. The Policy seeks to embed bus routes and access to mobility hubs within the development and deliver on- and off-site measures to support the reliability of services.
Stronger measures to reduce car usage in new developments	Policy does not go far enough to ensure new development is car-light. Stronger requirements for lower parking provision, car-club vehicles, mobility hubs, high-quality cycling and public transport from first occupations would reduce car ownership and dependency, as well as requiring local services and facilities within walking and cycling distance of homes.	Noted. These requirements are covered in Policy I/ST and elsewhere in other infrastructure policies in the plan and therefore are not required to be repeated in this policy.

Trip Budgets	CPPF considers Policy I/ST unsound, ineffective, unjustified, and inconsistent with national policy. Policy references vehicular trip budgets without operational mechanics, monitoring frameworks, or legal enforcement. Subjective terminology creates developer uncertainty and land overvaluation, risking sustainable infrastructure delivery during viability assessments. Furthermore, the policy fails to mandate mode-shifting ahead of road capacity expansion and uses disjunctive phrasing ("or") instead of combining sustainable measures. CPPF proposes establishing a standardised trip budget and monitoring framework, defining objective standards (e.g., 400m walking distance to transit), citing Healthy Streets Indicators, enforcing combined transport packages, and prioritising mode-shift over road expansion.	Noted. Policy I/ST requires development to be designed through a vision-led approach, around the principles of walkable neighbourhoods to maximise accessibility by sustainable modes. The purpose of trip budgets is to cap the number of external vehicle trips generated by development, which will limit the highway impacts. Trip budgets form part of the transport mitigation requirement of the larger strategic sites and are addressed in individual site allocation policies; these set out the site-specific trip budget, together with monitor and management requirements. As such, the trip budget approach is a strong policy mechanism for securing sustainable transport outcomes, whilst providing appropriate flexibility over the design and physical measures required to achieve them. The approach set out in the plan policies accords with the technical note on Trip Budgets set out in Appendix 16 of the Development Strategy Topic Paper.
Safer cycling routes	A major barrier to cycling includes unsafe routes, particularly after dark. To enable overlooking, housing should be allowed along newly established car-free greenways out to major villages.	Noted. The Policy seeks to provide new, and improvements to existing, cycle routes to ensure they are safe for all users.
Need to accommodate car parking	The policy must clarify that investing in sustainable transport complements but does not eliminate the fundamental requirement for adequate on-site parking, particularly in rural and semi-rural areas, to avoid parking displacement.	Noted. Car parking is appropriately addressed in Policy I/CV.

Bus Services	The policy is ineffective as clause 2.e.ii places no requirement on the quality of bus services provided.	Noted. This matter cannot be dealt with through the policies within the local plan.
Missing / additional infrastructure requirements	Several responses requested for further transport schemes/improvements to be considered: • Orbital bus routes connecting Trumpington (via South West Travel Hub) to Eddington, Cambourne, and other growth locations. • A428 East bound needs a direct link to the M11 providing a direct link to the Biomedical site. • Improve access between Cambridge Station and City Centre. • Extend EWR eastwards to a new A11 Park and Ride (instead of CSET). • Harston is a key route into Cambridge but lacks adequate travel facilities for residents, which may worsen with growth and EWR. • Dual the A505 from Royston to A11.	Noted. There are a range of measures referenced in representations outside of the mitigation measures identified as being necessary to support developments in the local plan. These are matters for the transport authorities to consider.
Bus Depots	No policy supporting the retention, expansion or provision of bus depots, without which bus operators and Combined Authority face uncertainty over operational capacity needed to deliver the service levels the Plan assumes.	Noted. Provision of bus depots forms part of the Combined Authority's Local Transport Authority leadership on bus franchising. The need for additional bus depot provision is reflected in the final GCTS published for approval by the Combined Authority Board in November 2026. While Policy I/ST does not explicitly reference the support for the expansion or provision of new bus depots, the policies within the Plan as a whole can enable appropriate

		proposals meeting such needs to be considered. This is important as it means the Plan can be flexible and respond to the CPCA's plans for the implementation of bus franchising evolve over the coming months.
Points of clarification	Clarification is required in the policy to define the development threshold/quantum for what constitutes a 'larger development'. Whilst the intent of this requirement is supported, it is considered that this wording more appropriately relates to validation requirements rather than policy itself. Define "unacceptable transport and highways safety impact" clearly (and be consistent with national policy) and provide guidance on how impacts will be assessed and mitigated. Clarity should be provided around how early phase sustainable travel provision should be proportionately applied across different development scales.	Noted. The Policy outlines that qualifying developments are those meeting the County Councils' Transport Assessment Requirements and requires a Transport Assessment/Statement to assess and demonstrate how transport impacts will be mitigated. Development can be considered unacceptable on highways safety grounds and/or due to the resulting environmental, amenity and health impacts arising. Timely provision of infrastructure is required of all new development. Noted. The Policy requires a Transport Assessment/Statement to assess and demonstrate how transport impacts will be mitigated. Development can be considered unacceptable on highways safety grounds and/or due to the resulting environmental, amenity and health impacts arising. The policy also takes into consideration cumulative impacts. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, if considered necessary for soundness. The Councils consider that Policy I/ST provides sufficient clarity but also flexibility to support consideration of development applications of different scales and types. The policy requires appropriate measures to meet the first

		or early occupation of a site. Site specific details of this can be appropriately considered at the application stage.
Accommodating growth	The transport evidence suggests that a road charge or similar is essential to accommodate growth, however there a no plans to introduce one.	Noted. The Transport Evidence Report (2025) confirmed at a high level the mitigation needed to accommodate the emerging preferred development strategy on the transport networks, but was clear that mitigation needed to be identified within Cambridge to respond to the connectivity impacts of congestion. The final Greater Cambridge Transport Strategy published for approval by the Combined Authority Board in November 2026 directly responds to this issue, establishing a practical, phased approach to managing the impacts of congestion in and around Cambridge. The GCTS delivery plan includes shorter, medium term and longer-term interventions to provide enhanced connectivity to support both Local Plan development and existing movements and, whilst not eliminating congestion, does not result in a severe adverse impact on the highway network. Neither the Transport Evidence Report nor the Greater Cambridge Transport Strategy rely on any kind of fiscal demand management.
Cambourne North reliance on East West Rail	Need to demonstrate that sufficient transport capacity is secured for Cambourne North irrespective of EWR, and clarify responsibility for modelling and mitigating development-generated traffic. The housing trajectory should reflect the delivery of secured transport capacity.	Noted. The Transport Evidence Report, supplemented by further detailed Cambourne North transport evidence, demonstrates development can be accommodated on the local and strategic road network.

Transport impacts arising from development near stations	The new NPPF enables development near well-connected stations, including in Green Belt. Need to assess and mitigate cumulative impacts on the rural road network around those allocations.	Noted. Policy I/ST requires development to assess and mitigate their transport impacts, including on the local highway network.
Higher density development around stations	EWR Co support the Policy but recommends recognising railway station locations as potential higher-density, transit-oriented growth nodes, to avoid constraining sustainable development.	Noted. This is covered by existing national legislation and/or policy. The Local Plan does not seek to repeat national guidance or legislation; it provides locally specific planning policy reflecting the needs and opportunities of the area.
Needs of businesses	Support measures to improve public transport and active travel noting that improved connectivity can widen the effective labour market and improve journey reliability. However, it needs to recognise the requirements of business operations, including logistics and freight (and access to the strategic road network), servicing, shift working. Sustainable transport and business growth should be mutually reinforcing objectives.	Noted. Policy I/ST retains flexibility whilst seeking to promote sustainable modes appropriate to the location and uses proposed. Noting the specific locational requirements of logistics businesses, the Plan allocates logistics sites close to the strategic road network.
Connectivity tool	Reference should be included to the Department for Transport's Connectivity Tool to support consistent assessment of accessibility across settlement types.	Noted. The connectivity tool is referenced in the NPPF (2026). The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, if considered necessary for soundness.
Infrastructure viability	The Plan is not viable. Without major additional investment in essential transport, and other infrastructure, the additional jobs and homes will either not be delivered or will be delivered with further unacceptable deterioration in the quality of our lives.	Noted. The infrastructure requirements are set out in the Infrastructure Delivery Plan which have been subject to Viability Assessment.

Mobility hubs	The wording used to define mobility hubs should be expanded to encompass wider community and connectivity functions.	Noted. This issue is appropriately addressed in Policy I/MH.

Policy I/MH: Mobility hub facilities

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy I/MH: Mobility hub facilities	4	4	2	1	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Additional Criterion	The policy should include an additional criterion requiring step-free access, appropriate lighting and nature surveillance to ensure that mobility hubs are accessible, safe and future-proofed.	These issues are appropriately addressed in Policy GP/QD: Achieving high-quality development, which would also apply to proposals.
Delivery	The policy should recognise the importance of early delivery, phasing and long-term adaptability of mobility hubs within urban extensions. Hubs in these contexts should	The policy provides a framework for the enhancement of existing and the delivery of new mobility hubs. Where new hubs are being delivered in strategic developments consideration around delivery and appropriate phasing will come forward during the application stage.

	function as foundational infrastructure rather than retrospective mitigation.	
Clarity around how mobility hubs are defined	A conflict between how mobility hubs are defined in the glossary and supporting text of the policy. The glossary definition excludes private car parking from mobility hubs and the policies supporting text conflates hubs within major Park & Ride car parks.	The policy provides a clear approach to car parking, and the role mobility hubs can play in enabling interchange between modes. It is acknowledged that the definition in the glossary could more clearly reference the role of hubs in also supporting transfer from private vehicles as set out in policy part 2f. This can be addressed through a minor modification.
Parking thresholds to be included in criteria	The policy currently attempts to control vehicle parking by stating “only as necessary... to support modal interchange”. Further detail in the policy criteria is required to ensure that parking spaces at mobility hubs are proportionate to, and dictated by, a rigorously assessed local or strategic transportation need. This will remove the risk of delivery excessive surface parking under the label “mobility hub”.	The policy delivers appropriate guidance on this matter whilst retaining a degree of flexibility to respond to site specific circumstances and exploration of issues that will be required by Policy I/ST: Sustainable transport and connectivity.
Clarity around the interpretation of policy criteria	Clause 3d is unclear. Co-locating a mobility hub with a retail centre benefits both; The retail centre becomes is better connected through the hub and therefore receives more visitors; The Hub is strengthened by the routes it connects being better supported due to the additional attraction of the retail centre.	The intention of the policy is to ensure that if any additional facilities are being provided as part of mobility hub proposals and these are locating near existing retail centres that these facilities are appropriate and support their function.
Inconsistency with the National Planning Policy Framework (NPPF)	The 2024 NPPF is clear in its directive that development should be located in sustainable locations, where there is a genuine choice of transport modes. The	The policy delivers appropriate guidance in combination with other policies including Policy I/ST: Sustainable transport and connectivity.

	draft policy in its current form does not give substantial weight to development that provide mobility hubs in appropriate locations.	
Identifying Suitable Mobility Hub Locations	The policy should identify some appropriate locations where there is a long-term aspiration for the provision of a mobility hub.	The Councils have been engaging with CoMoUK 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.

Policy I/CV: Cycle and vehicle parking

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy I/CV: Cycle and vehicle parking Policy	28	28	25	0	25

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	University of Cambridge supports the policy's flexible approach to EV charging	Support noted.
Safer cycle lanes	It omits the need to improve cycle lanes and ensure they are safe, which will encourage fewer cyclists and e-scooter riders from cycling on pavements and endangering pedestrians.	Noted. This issue is appropriately addressed in Policy I/ST.
Allow more flexibility	Parking provision should be aligned to operational requirements, forecast demand, actual mode share and characteristics of individual occupiers and locations. A more flexible, evidence-led approach would avoid over or under-provision of parking.	Noted. The Policy already allows flexibility to determine the appropriate level of car parking provision through the vision-led approach and Transport Assessment / Statement, taking into consideration the site-specific characteristics of the location and development proposal.
Provide minimum car parking standards	Object to the lack of defined vehicular parking standards, relying instead on bespoke Transport Assessments. This creates ambiguity, uncertainty, and delays during application determination. Minimum parking standards should be established, which would align with national policy. Concern it could lead to inadequate provision in rural areas where car ownership is essential, leading to spill onto streets, causing inconvenience and safety issues.	Noted. The Policy reflects the national policy with a vision-led approach to transport planning and allows flexibility to determine an appropriate level of provision through a design-led, evidence-based approach, according to the site-specific characteristics of the development proposal and whether a site is an urban or rural location.
Need for independent oversight	Policy must be strengthened to require independent, professional evaluation of parking assessments, car pooling,	Noted. Information is assessed at the planning application stage. The Local Transport Authority and Local Highway

	commercial viability and take up of car clubs rather than relying solely on developer-submitted data.	Authority are statutory consultees on planning applications.
Car free development	Car-free developments inherently generate significantly higher volume of delivery traffic.	Noted.
Cycle parking	Colleges and the Universities should provide increased cycle parking for all students, given the high demand and overspill.	Noted. Policy I/CV sets out cycle parking standards by land use as a minimum level of provision that must be provided; greater provision may be appropriate in areas with existing parking pressure.
Cycle accessibility and storage	To make cycling a viable transport option, safe, convenient, and accessible cycle parking must be ensured. While the Policy outlines key requirements such as step-free routes, lighting, secure facilities, and inclusive design, these are only included in supporting information, not the policy itself. As a result, the Plan fails to guarantee these standards in new developments.	Noted. Policy I/CV clearly sets out the requirements that cycle parking must meet, including being conveniently sited and accessible for all users, safe and secure, fit for purpose and easy to use. The supporting text provides additional detail on the interpretation of these requirements.
Garage dimensions	Proposed garage dimensions are outdated and inadequate for modern cars, cargo bikes and adapted cycles. This creates access and storage problems and conflicts with policies requiring facilities to be accessible, fit for purpose and safe.	Noted. The minimum garage dimensions will accommodate most cars with cycle storage, even allowing for the increase in size of modern cars.
Non-standard cycle parking	At least 10% cycle parking is needed both for standard cycles and non-standard cycles which may be needed to transport children and for disabled access to the city.	Noted. It is important to ensure a range of cycle types and sizes can be safely and securely stored to enable people of all ages and ability to cycle for a range of trip purposes. Non-standard cycles include standard cycles with baskets and child seats and cargo cycles and recumbent or hand cranked cycles with alternative frame styles, which require

	The requirement to provide at least 5% of non-standard cycle parking is non-specific and does not provide sufficient flexibility for minor developments where such provision is unlikely to be required.	a different amount or type of space and/or locking mechanism. Policy I/CV provides flexibility over how the parking can be accommodated and is expressed as a minimum requirement.
Residential cycle parking design	Objection that the requirement for cycle parking to be integrated within the front of the house is overly prescriptive. Request more flexible wording in section 2h to accommodate different residential types, for example flats or maisonettes, and allow split parking provision where necessary.	To ensure cycling is an easy transport choice Policy I/CV requires cycle parking to be at least as convenient as car parking, accessible for all users and located as close as possible to the main entrance to buildings. In residential properties secure storage space should be located at the front of the property. Policy I/CV provides flexibility, enabling parking to be integrated within the property, within a garage or an alternative lockable area, therefore accommodating the needs of a range of residential types.
Mismatch with promoting low carbon modes	Mismatch with Climate theme strategic priority and I/ST3 which promote low carbon modes. It responds to and encourages car use, by requiring provision to match demand, rather than seeking to meet policy objectives by influencing demand. In clause 6, developments with sustainable transport are permitted under sufferance, rather than being encouraged or required.	Noted. Policy I/CV requires a minimum amount of cycle parking and allows flexibility to determine the appropriate level of car parking provision through the vision-led approach and Transport Assessment / Statement, taking into consideration the site-specific characteristics of the location and development proposal. Car-free and car-capped development will be encouraged in highly accessible locations, such as new urban fringe and new settlements, but would not be appropriate in remote rural areas without access to high-quality public transport.
Enforcement	To be effective policies MUST be enforced. This is not happening, citing examples of permitted developments with inadequate cycle parking provision, inaccessible, and poor design.	Noted.
Threshold for EV requiring a charging strategy	Define 'large-scale Major sites' to clarify the threshold requirement for the submission of	Noted. Major development is defined in the Glossary.

	a site wide electric vehicle charging strategy.	

Policy I/SD: Servicing and last-mile deliveries

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy I/SD: Servicing and last-mile deliveries	2	2	1	1	1

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
General support for the policy approach	Support for the policy's approach to lorry parking and servicing requirements for proposals that will introduce industrial and storage uses.	Support noted.
The policy will encourage unsustainable transport modes that will worsen congestion and emissions	The policy's approach only promotes sustainable transport modes under severance, which, in turn, will encourage last-mile deliveries by unsustainable means of transport.	Comment duly noted. The focus and intention of Policy I/SD is to ensure that innovative and/or sustainable forms of transport (e.g. cargo bikes) are prioritised as the means of making last-mile deliveries to reduce delivery vehicle traffic on Greater Cambridge's road network and any associated emissions. The policy's design requirements and Delivery and Servicing Plan requirements will ensure that the Councils have details of impacts stemming from a new development's delivery and servicing activity, which will be used to inform decision making and requests for

		appropriate mitigation. Therefore, it is considered that the policy is sound.

Policy I/SI: Safeguarding important infrastructure

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy I/SI: Safeguarding important infrastructure	15	15	9	4	7

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Military development safeguarding	Support for proposed safeguarding of activities and operational military development at Bassingbourn Barracks and Barton Road Rifle Range, with the proposed policy closely aligned with the 2024 and 2026 NPPF.	Comment noted and support welcomed.
East West Rail safeguarding	Opposed to extent of safeguarding associated with East West Rail.	Comment noted. East West Rail is being progressed by the East West Company Ltd and is subject to its own planning processes outside of the Local Plan. The extent of the safeguarded area, as illustrated in the Policies Map, directly accords with the area safeguarded through directions issued by the Secretary of State. These may be subject to ongoing revision as the project continues to progress towards a Development Consent Order application.

Cambridge Waste Water Treatment Plant: omission of safeguarded area for relocation	Support for omission of safeguarding designations for relocating the Cambridge Waste Water Treatment Plan to Honey Hill.	Comment noted. The potential safeguarding of land for waste water treatment infrastructure is a matter for the Minerals and Waste Planning Authority (Cambridgeshire County Council) in reviewing their Minerals and Waste Plan.
Fens Reservoir and Pipelines safeguarding	Request for updated delivery wording to state the reservoir is anticipated from 2036 at the earliest, and to amend Policy I/SI to safeguard and support the reservoir and associated pipelines/service reservoir. Development potentially affected by the project should consider latest project information and avoid prejudicing its delivery, operation or future expansion.	The Councils recognise the significant interdependency between delivery of the Local Plan strategy and the successful delivery of the Fens Reservoir scheme, under development by Anglian Water. Noting further detail around the proposed scheme is anticipated in 2027, the Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise.
Mullard Radio Astronomy Observatory at Lord's Bridge safeguarding	Support the principle of the policy protection for the Mullard Radio Astronomy Observatory at Lord's Bridge, but amendments suggested in the supporting text to ensure the policy is clear, effective and consistent with the 2026 NPPF (Policy PM15).	The support for the policy is welcomed. The Greater Cambridge Local Plan has been prepared under the legacy system (2012 regulations) and is therefore being assessed at Examination for compliance with the 2024 NPPF. The Councils are confident that the policy as drafted is effective and capable of avoiding or mitigating adverse impacts on the operation of the Lords Bridge Observatory, through mitigation or, in certain circumstances, the refusal of permission. The proposed modification is unnecessary.
Cambridge South East Transport (CSET) scheme safeguarding	Support for the principle of safeguarding the CSET route, but indicates the Policies Map does not accurately reflect the extent of land required to deliver the Cambridge South East Transport scheme. This should be updated before adoption of the plan, with the policy updated to reflect that the	Comments noted. The proposed safeguarding area for CSET aligns with the proposed Transport and Work Act Order limits, as submitted by the Greater Cambridge Partnership. Noting the consenting of the scheme is progressing in parallel to the preparation of this Local Plan, the Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the area covered by the Order

	final safeguarding area may differ from that known now.	change and it be deemed necessary to revise the Policies Map. The policy as proposed already incorporates a degree of flexibility, should a development proposal within the proposed safeguarding area not prejudice the construction or safe operation of the scheme.
Foxton sidings safeguarding	Draft Policy I/SI seeks to safeguard existing rail freight facilities and sidings at Foxton for rail freight and interchange uses. The policy lacks sufficient flexibility. Clarity and further guidance is needed on the evidence required to demonstrate that future development would not prejudice the operation or expansion of rail freight facilities.	Successive South Cambridgeshire Local Plans have safeguarded rail freight facilities at Foxton to ensure that use of this existing rail infrastructure is not prejudiced. This position is supported by Network Rail.
Conflict between EWR and Lords Bridge Observatory safeguarding	Policy I/SI is unjustified and ineffective because it fails to address the conflict between its protection of the Mullard Radio Astronomy Observatory and the proposed East West Rail Southern Approach which passes through all three Lord's Bridge safeguarding areas.	Noted, however it would be premature to make such an assessment at this stage. East West Rail is being progressed by the East West Company Ltd and is subject to its own planning processes outside of the Local Plan. It should also be noted that the safeguarding associated with the Mullard Radio Astronomy Observatory does not necessarily preclude development.
East West Rail safeguarding	Notes safeguarding of land at Fulbourn for a train care centre. Safeguarding area must remain under review and be updated through the Policies Map and East West Rail process, reflecting any changes in coordination with site allocations and transport requirements.	Comments noted.
Water and waste water asset safeguarding	The policy must explicitly safeguard water and wastewater assets whose loss, damage, restricted access or constrained capacity could stop existing communities or	The Councils recognise the significant interdependency between delivery of the Local Plan strategy and the successful delivery of additional water and waste water infrastructure.

	planned growth being served. This should cover existing, committed and planned assets—including operational land, access, easements, protected routes and expansion land.	With regards water assets, noting further work is being undertaken by Anglian Water prior to submitting a Development Consent Order application, the Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise. With regards waste water assets, the potential safeguarding of land is a matter for the Minerals and Waste Planning Authority (Cambridgeshire County Council) in reviewing their Minerals and Waste Plan.
East West Rail safeguarding	EWR Co generally supports policy and welcomes amendments made following the previous Reg 18 consultation. EWR Co recommends updating the policy if EWR safeguarding directions change before submission.	Comments noted. To ensure the Policies Map remains up-to-date and sound, the Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the area covered by the Safeguarding Direction change.
Cambridge Airport Public Safety Zone	Recommends amending criterion 5 to ensure safeguarding does not unnecessarily restrict development near Cambridge East Railway Station and the Area of Major Change.	Comments noted. As the proposed development at Cambridge East is dependent on decommissioning of Cambridge Airport, the Councils do not anticipate any conflict.
Railway safeguarding	Network Rail supports safeguarding of land required for the delivery of EWR and amendments made to reflect status of rail freight sites in Cambridge. Notes that safeguarding provisions do not prejudice or constrain the day-to-day operation of the existing railway, nor limit NR's ability to maintain, operate, and upgrade the railway and its associated infrastructure within the	Comments noted and support welcomed.

	safeguarded area as required to ensure the safe and efficient operation of the network.	

Policy I/AD: Aviation development

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy I/AD: Aviation development	3	3	2	0	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Development of Greater Cambridge's airfields	Comment suggesting that Cambridge's airfield should be retained to ensure Cambridge has transport connections to the rest of Europe and European businesses.	Comment duly noted. The Councils are confident that the spatial strategy, including its approach to the development of airfields, fully accords with national planning policy, and Councils' objectives for Greater Cambridge. The Cambridge Airport site has been identified for redevelopment since the 2003 Structure Plan should it become available. It is due to close following Marshall Group's decision to relocate its aerospace and defence operations to other locations in the UK. The site has been acquired by a partnership including Homes England. The spatial strategy and approach have been subject to considerable assessment, including Sustainability

		Appraisal, and are justified by the extensive evidence base which has informed the Plan.
Differences between conventional aircraft and low and zero carbon advanced air mobility technologies	The policy and supporting text should include wording that distinguishes between the impacts of conventional aircraft and the potential impacts of low and zero carbon air mobility technologies, which can have lower environmental impacts.	Comment duly noted. Whilst the Councils appreciate that innovative, low-carbon air mobility technologies can entail lower emissions and environmental impacts than conventional aircraft, Policy I/AD seeks to ensure that all forms of aviation development are made safe, and that any environmental disturbances are mitigated as appropriate. As such, the relevance of the policy's requirements will need to be considered on a case-by-case basis and further changes to the policy are not considered necessary at this stage.
Land contamination should be included as policy requirements	The policy and supporting text should make reference to PFAS contamination that can influence groundwater.	Comment duly noted. The remediation of land contamination and the control of groundwater pollution during construction and the operation of the proposed development are addressed by Policy CC/IW, Policy WS/HS and Policy I/CM of the Proposed Submission Local Plan. During decision making, Policy I/AD will be applied alongside all other relevant requirements of the Development Plan, as well as any national planning policy and guidance that also address matters of public health and the mitigation of environment health risks stemming from new development. Therefore, it is not considered necessary for Policy I/AD to make additional reference to land contamination.

Policy I/EI: Energy infrastructure masterplanning

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
I/EI: Energy infrastructure masterplanning	6	6	3	1	3

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support	Support for the policy to prevent delays affecting grid connections nationally and ensuring there is sufficient energy for existing and new development.	Support noted.
Allocating land for energy	The policy failures to make spatial provision for high-voltage grid connections to support the rapid increase in AI and demand for energy centres which is so prevalent in Cambridge.	Work carried out as part of the Cambridgeshire Local Area Energy Plan has considered the energy infrastructure needs associated with growth. This has not identified a need for the provision of specific high-voltage grid connections. While specific allocations are not required at this stage, policy I/EI seeks to safeguard land adjacent to existing infrastructure should further grid reinforcements be required. We continue to work with both UK Power Networks and the National Energy Systems Operator, who are preparing a Regional Energy Spatial Plan, to ensure that the infrastructure needs required to support growth in Greater Cambridge are accounted for in their business plans and funding applications to the Regulator.

Engagement	Concerns raised about ongoing need to engage with stakeholders early on in the process and ensure there is support for facilities coming through new development.	Concern noted. As part of the evidence base to support the plan, a specific piece of work has been produced to identify the electrical requirements associated with key growth sites, in order to identify locations where additional or upgrades to existing infrastructure may be required. This supplements the Cambridgeshire Local Area Energy Plan, and both pieces of work have been shared with UK Power Networks to inform their business planning. We continue to work with both UK Power Networks and the National Energy Systems Operator, who are preparing Regional Energy Strategic Plans, to ensure that the infrastructure needs required to support growth in Greater Cambridge are accounted for in their business plans and funding applications to the Regulator.
Viability	Concerns raised about costs of delivering infrastructure to businesses and individual development.	Concerns noted. The Councils' viability assessment includes consideration of the costs of upgrading infrastructure to support growth. As part of the evidence base to support the plan, a specific piece of work has been produced to identify the electrical requirements associated with key growth sites, in order to identify locations where additional or upgrades to existing infrastructure may be required. This supplements the Cambridgeshire Local Area Energy Plan, and both pieces of work have been shared with UK Power Networks to inform their business planning and their upcoming ED3 submission to Ofgem which includes specific infrastructure projects in the Greater Cambridge area to support growth.
Statutory responsibilities	There is a need to ensure that there is sufficient energy supply, the burden should be on the National Grid and Distribution Network Operators (DNOs) to ensure they	As part of the evidence base to support the plan, a specific piece of work has been produced to identify the electrical requirements associated with key growth sites, in order to identify locations where additional or upgrades

	plan for increased energy demands and undertake upgrades as necessary. By preparing a Local Plan which meets its need in full, National Grid and DNOs can see where growth is planned and what upgrade works will be required and when.	to existing infrastructure may be required. This supplements the Cambridgeshire Local Area Energy Plan, and both pieces of work have been shared with UK Power Networks to inform their business planning and their upcoming ED3 submission to Ofgem which includes specific infrastructure projects in the Greater Cambridge area to support growth. We continue to work with both UK Power Networks and the National Energy Systems Operator, who are preparing Regional Energy Strategic Plans, to ensure that the infrastructure needs required to support growth in Greater Cambridge are accounted for in their business plans and funding applications to the Regulator. The information submitted in response to this policy will help us to ensure that this infrastructure planning is based on the most robust and up to date information available.
Water pollution	Battery storage could contaminate water sources, and therefore mitigation measures are required.	Concerns noted. The issue of water pollution is dealt with in policy CC/IW (Integrated wate management, sustainable drainage and water quality). The Plan must be read as a whole, it is not necessary to cross-refer or duplicate requirements in other policies.

Policy I/ID: Infrastructure and delivery

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy I/ID: Infrastructure and delivery	32	40	28	2	23

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Transport - Buses	The Plan's transport strategy depends significantly on modal shift to buses but could be undermined by existing congestion and insufficient funding needed to make buses an attractive and reliable alternative. The Plan should propose to reallocate road space to prioritise buses and implement initiatives such a traffic circulation plan, kerbside management, and a road charge as a means to levy the funding required to raise ongoing revenue to provide for new routes, higher frequencies, longer operating hours and more weekend services.	Noted. The Transport Evidence Report (2025) confirmed at a high level the mitigation needed to accommodate the emerging preferred development strategy on the transport networks, but was clear that mitigation needed to be identified within Cambridge to respond to the connectivity impacts of congestion. The final Greater Cambridge Transport Strategy published for approval by the Combined Authority Board in November 2026 directly responds to this issue, establishing a practical, phased approach to managing the impacts of congestion in and around Cambridge. The GCTS delivery plan includes shorter, medium term and longer term interventions to provide enhanced connectivity to support both Local Plan development and existing movements and, whilst not eliminating congestion, does not result in a severe adverse impact on the highway network.

		Neither the Transport Evidence Report nor the Greater Cambridge Transport Strategy rely on any kind of fiscal demand management.
Grange Farm	The proposed new settlement at Grange Farm would be structurally car-dependent, because the segregated public transport link it needs is not funded.	Local Plan policies, supported by the Infrastructure Delivery Plan, identify the transport infrastructure required to deliver the strategy, including public transport connections to the new settlement at Land adjacent to A11 and A1307 at Grange Farm. Funding for the new connection will be from a number of different sources, including developer contributions.
Infrastructure funding	Without major additional investment in essential transport, hospitals, water supply, and wastewater infrastructure, the large number of additional jobs and homes proposed to 2045 will either not be delivered or, more likely, will be delivered at the cost of unacceptable deterioration in the quality of existing residents daily lives. Further evidence is needed to prove the infrastructure requirements can be met.	A role of the Local Plan, supported by the IDP, is to set out the infrastructure required to support planned growth and the anticipated cost and sources of funding. Although funding challenges are identified, there are a myriad of funding and delivery mechanisms that need to be explored to help close the funding gap, including business plans of utilities operators and service providers, as well as funding from developer contributions and central Government. The IDP provides a comprehensive schedule of critical, essential and place-making infrastructure, anticipated costs, funding sources, responsible delivery bodies and timescales. The IDP is a live document and is intended to be a tool to manage the delivery of infrastructure alongside growth and will be reviewed and updated periodically. It will also be used to lobby the responsible delivery bodies to secure the funding required.
Public Rights of Way	Supports the strategic role of Policy I/ID but considers that infrastructure planning and delivery should more clearly recognise the PRoW and wider countryside-access	Improvement and expansion of the PRoW network is already provided for through policies BG/GI and I/ST. It is not considered necessary or appropriate to further repeat these requirements within Policy I/ID.

	network, including accommodating equestrian use.	
Timely delivery	The Plan should provide greater certainty that community infrastructure is delivered in step with development rather than after occupation.	Part 2 of the policy requires necessary infrastructure to be co-ordinated, phased and secured in tandem with the build-out and occupation of development. It specifically requires a phasing strategy to be submitted with applications for phased developments to ensure necessary infrastructure will be delivered to support the occupation of each relevant phase.
Secondary school provision	There is a concern about secondary school provision, particularly in East Chesterton, which is not addressed in the Local Plan.	Cambridgeshire County Council (CCC) is responsible for secondary school places provision. CCC has been engaged in the preparation of the IDP and has confirmed there are sufficient secondary school places available to meet the needs of growth with and surround the East Chesterton area, including at Chesterton Community College and North Cambridge Academy, as well as SEND provision at Castle School and OA Cambridge. The IDP sets out a requirement for a new secondary school at Cambridge East to meet the education needs associated with development of this strategic growth site.
Utilities statements	Supports Policy I/ID and the requirement that infrastructure capacity is available, or can be made available, in time to serve development. Support for phasing strategies and Utilities Statement covering foul and surface water drainage.	Support is noted.
Developer burden	Concern that the policy places full responsibility on the developer to demonstrate sufficient capacity rather than the relevant provider. Any infrastructure requirements should be directly related to the impact of the proposed development.	The policy seeks to ensure adequate capacity exists or can be secured to serve the needs of a development. As set out elsewhere in the Local Plan, developers should engage service providers early in the design of their development so they can gain an understanding of existing capacity to serve the needs generated by their

		proposal, as well as any requirements to increase capacity sufficient to accommodate the impacts arising from the development. There is nothing in the policy to suggest developers would be required to deliver infrastructure for which they are not legally responsible for or to address historic deficiencies. The standards set out in relevant policies and the IDP should be used to determine acceptable standards of capacity required to be provided for a development.
Cross-boundary	Seek inclusion of a commitment to working with other authorities across administrative boundaries to take account of impact of cumulative and residual growth.	The Councils consider such a commitment is already made in Policy SP31, which states: “The council will continue to work with statutory consultees and infrastructure providers, organisations and other authorities within and across administrative boundaries to take account of the impacts of cumulative and residual growth.” As such, it is not considered necessary or appropriate to repeat this again within Policy I/ID.
Infrastructure Delivery Plan (IDP)	Welcome the opportunity to review the IDP as part of the consultation and would welcome further timely engagement in the process.	Noted. The IDP is intended to be a live document. As such, there will be ongoing opportunities to provide new evidence to inform subsequent reviews.
Viability	The viability evidence should demonstrate that affordable housing and essential infrastructure obligations can realistically be delivered together.	At a level of detail appropriate to plan-making, the viability evidence robustly demonstrates that development can meet the relative cumulative policy requirements of the plan and contribute towards infrastructure costs, noting that there are also other sources of funding that should be secured to deliver certain forms of infrastructure – for example user charges for utilities and central Government funding for schools and healthcare. The infrastructure schedule in the IDP identifies other relevant funding sources for specific types of infrastructure.

Infrastructure delivery	GCDC proposes the following minor change under paragraph 10.74 to recognise formal regeneration role: “The Greater Cambridge Development Corporation’s core functions include providing or facilitating the provision of infrastructure and it will play an important convening and co-ordination role in infrastructure delivery.”	Noted. This can be addressed through a minor modification in supporting text to highlight the role of the Development Corporation.
Cumulative policy burden	The draft Local Plan’s cumulative policy burden is a significant risk to development viability and delivery. While individually justified, their combined cost and practical implications may undermine schemes. Greater flexibility is sought to take account of site circumstances, viability, market conditions and long-term economic growth.	Noted. The cumulative viability impacts of the policy requirements on different development typologies have been assessed, including meeting relevant infrastructure needs. This is set out in the Viability Assessment that accompanies the Plan and has been informed by a detailed analysis of local market factors.
Cumulative impacts	As well as local infrastructure needed of a proposed development, the cumulative impact on the movement of people and goods within and beyond the area due to development sites across and beyond Greater Cambridge need to be accounted for.	Noted. The spatial strategy and much of the supporting evidence base is directed at ensuring planned growth can be accommodated for through provision of sustainable transport measures, including public transport and active travel and through the design of development that prioritises non-car modes.
Monitoring	Developers have fallen behind on delivering infrastructure and closer monitoring and action on this is needed.	Noted. Where development is required to provide or contribute towards infrastructure a condition or legal agreement is used to secure this. Such conditions or planning obligations are monitored and their delivery enforced.
Healthcare	Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from new development, whether	A role of the Local Plan is to provide certainty about the infrastructure required to support planned development. The Councils welcome the engagement of the ICB in setting this out more clearly in the IDP.

	improvement or expansion of existing provision or new purpose-built facilities.	
IDP	The IDP should look at infrastructure required beyond the plan period, having regard to any details established through a planning application in relation to phasing and the timing of infrastructure to ensure a development is appropriately services and any impacts mitigated.	Noted. However, Government guidance is clear that focus should be on the infrastructure required to support planned development within the plan period.
Community Infrastructure Levy	The proposed CIL is to help meet a gap in infrastructure funding relevant to the 2018 local plans. It should not be applied to new site allocations in the GCLP. Rather, a bespoke package of infrastructure required to support development within new site allocations should be determined through up-to-date evidence submitted with the planning application.	Noted. Regard should be had to the infrastructure requirements identified in the GCLP IDP as well those set out in the relevant site allocation policy and within other relevant policies of the local plan.
Viability considerations	Paras 8 to 10 of the Policy should be strengthened to confirm that viability consideration apply not only to direct financial costs but also to the practical implications of policy requirements.	Noted. Individual policy requirements set out circumstances where practical implications support a departure from policy and the acceptable alternatives that should be considered. If this results in viability implications, then this can be considered through application of Policy I/ID.
Affordable workspace	Concerns over some of the costs and value inputs adopted in the Viability Assessment to conclude Policy J/AW is viable.	Noted. The Councils are content that the Viability Assessment includes sufficient sensitivity testing to show the impact of different cost and value assumptions for different commercial typologies in different locations, applying different percentages of affordable workspace and discount on the viability of seeking affordable workspace informed by a detailed analysis of local market

		factors. Such sensitivity testing supports the approach taken in Policy J/AW as being viable.
Strategic Road Network	Concern that the impacts on the Strategic Road Network have not been fully assessed. Requires further modelling, mitigation identification, and the IDP to be updated.	The Transport Evidence Report (2025) confirms at a high level the mitigation needed to accommodate the emerging preferred development strategy on the transport networks, which includes the Strategic Road Network. Mitigation measures, focused on improving accessibility by non-car modes and including vehicular trip budgets have been identified within the strategic site allocation policies and included within the Infrastructure Delivery Plan. In combination these measures will minimise the number of vehicle trips arising from new development and thereby limit the impact on the local or strategic highway network. The Councils are pleased to continue to engage with National Highways on these points alongside local transport partners, to ensure common understanding.
Funding and delivery arrangements	Concern regarding the lack of a clear, costed and deliverable transport strategy for the Southern Cluster, which is critical to the success of the Wellcome Genome Campus and wider Development Strategy.	Noted. The updated IDP establishes the transport infrastructure measures required over the plan period to support planned growth within the Southern Cluster, including the likely cost of provision, priorities and timing for delivery, funding sources, and the bodies responsible for delivery.
Rail infrastructure	It is essential that new development contributes, where necessary and justified, towards improvements to rail infrastructure, stations and associated facilities where such measures are required to make development acceptable in planning terms.	Noted. Policy I/ID provides for the ability to secure improvements, such as to station capacity, where necessary to mitigate the impacts of a development and in compliance with Regulation 122.

Wastewater infrastructure	The Plan places heavy reliance on Anglian Water Services' next Drainage and Wastewater Management Plan (DWMP) (2030 – 2055) to deliver the required infrastructure upgrades needed to meet planned growth.	Noted. The IDP is a live document and will be monitored and updated periodically. Risks to the delivery of critical infrastructure will be flagged through this process and the relevant delivery bodies engaged. Where necessary, such risks will inform annual monitoring of the effectiveness of the Local Plan.
Blue Light Services	The Local Plan should attribute appropriate recognition and a higher profile to the important role played by the bodies that require developer funded infrastructure / facilities to mitigate and manage the impact arising on service capacity from planned growth.	Noted. The IDP establishes Blue Light Services as essential social infrastructure. However, in the absence of a detailed assessment of the impact of planned growth on service capacity, such impacts will need to be determined through individual development applications and, where necessary and justified, appropriate mitigation secured. The Local Plan does not seek to afford priority to certain types of infrastructure over others. Priorities will be determined based upon the assessment of a developments impacts and what is required to make a specific development acceptable in planning terms.
Hospital	The IDP is silent on the investment needed to renew/replace Addenbrooke's Hospital.	Noted. The ICB has been engaged in preparation of the IDP which reflects the 10-Year Health Plan for the Cambridge area, specifically the shift away from acute hospital dependency towards neighbourhood-based care as the means to meeting the healthcare needs of the existing and forecast population.

Policy I/DT: Digital and telecommunications infrastructure

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy I/DT: Digital and telecommunications infrastructure	8	8	6	0	6

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support for the policy and approach	Support for the aspirations of the policy to secure strong digital connectivity and mobile connectivity at new developments.	Support noted.
Burdens on developers	The policy wording and supporting text should make clear that delivery obligations are not placed on developers to provide the appropriate digital and telecommunications infrastructure.	Noted. The Councils understand that infrastructure operators and Mobile Network Operators are responsible for the delivery and maintenance of the respective network infrastructure; the policy does not shift this delivery burden but requires developers to engage with operators to ensure that new development will be appropriately connected in line with Government connectivity ambitions. This approach ensures that necessary infrastructure will be integrated into the earlier design stages of development, thus ensuring that the achievement of high-quality design and strong digital and mobile connectivity can be appropriately balanced.

Strengthening delivery requirements	Strengthen the policy wording – notably S/DT (6) – to prevent properties from being sold or occupied without essential digital connectivity, or introducing binding obligations for developers to secure connectivity before disposal.	Noted. The policy takes a positive approach to securing high-quality digital and mobile connectivity across Greater Cambridge by requiring developers to engage with network operators to factor appropriate infrastructure into the early stages of a development's design. As network delivery, enhancements and maintenance are the responsibility of infrastructure operators or mobile network operators, it is considered that introducing further obligations for developers would not be appropriate.
Strengthen policy wording to protect against street clutter	The policy wording and supporting text should be strengthened, requiring developers to dedicate space for digital and telecommunications infrastructure.	Noted. During decision making, Policy I/DT will be applied alongside all other relevant requirements of the Development Plan, including the design requirements of the Great Places chapter, as well as any national planning policy and design guidance. Therefore, it is considered that suggested amendment is not needed.

Policy I/CM: Construction management

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policy I/CM: Construction management	3	3	3	0	3

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Policy requirements	Object to requirement for CEMPs and DMPs to demonstrate commitment to a Considerate Constructors Scheme, which is overly onerous and beyond the standard scope of construction management plans.	Part 2 of the policy provides appropriate flexibility on this issue.
Policy requirements	Object to requirement for temporary haul roads to be formally agreed by the Local Planning Authority, effectively creating an unnecessary duplicate consenting regime.	The policy includes an appropriate requirement regarding temporary haul roads, due to their potential environmental impacts.
Policy requirements	Unclear whether management plans are a validation requirement at application stage or whether such documents are expected to be secured by planning condition.	As is set out in supporting text (paragraph 10.93), 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.

Consultation Statement

Summary of Representations and Councils' response - Appendices



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan Regulation 22 Consultation Statement (November 2026)

GREATER CAMBRIDGE
SHARED PLANNING

Appendix A: Glossary

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Glossary	0	0	0	0	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations

Appendix B: Strategic Policies in the Greater Cambridge Local Plan

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Strategic Policies in the Greater Cambridge Local Plan	0	0	0	0	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations

Appendix C: Housing requirements for neighbourhood areas within Greater Cambridge

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Appendix C	13	14	14	0	11

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Methodology / approach	Proposed approach is inadequate, is not an appropriate strategy, is not deliverable, and is not meeting local housing needs. Population based methodology does not reflect local market conditions, affordable or specialist housing needs, settlement hierarchy, demographics, affordability, service capacity or projected trends. Approach used does not align with the methodology for determining neighbourhood housing need. Requirements should be much higher. Requirements must be minimums, not ceilings.	Noted. 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, as required by national planning policy. 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. Individual Neighbourhood Plans could choose to exceed the housing requirement in response to particular local housing issues, such as an affordable housing needs assessment for the village or parish.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Include an adjustment for affordable housing needs	Identified housing requirements should include an adjustment so that affordable housing needs are met.	Noted. The local housing need calculated using the standard method already includes an uplift for affordability in its calculation, and therefore further uplifts are not considered necessary. The neighbourhood area housing requirements are not relied upon to meet the overall local housing need identified in the Local Plan.
Meeting identified housing needs	No clear mechanism as to how the identified housing requirements for neighbourhood areas would be delivered. Need to ensure each neighbourhood areas housing needs are met in full. Several neighbourhood areas with a localised need for housing, but without appropriate allocation of land to meet this need. Do not support the Councils intention for neighbourhood plans to be relied on to deliver rural growth. Local Plan needs a policy that deals with the scenario of a neighbourhood plan not being updated or not allocating land, and which would allow for neighbourhood plans to release land from the Green Belt. Questions about relationship between neighbourhood area housing requirements and windfall development.	Noted. National planning policy requires local plans to set out a housing requirement for designated neighbourhood areas, however, 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. 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. Exceptional circumstances have not been identified for release of land from the Green Belt through strategic policies, and therefore neighbourhood plans cannot release land from the Green Belt. The housing trajectory included in the Local Plan anticipates that the Local Plan housing requirement will

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		be met through housing delivered on both allocations and windfall sites. Neighbourhood area housing requirements are drawn from the proportion of the housing supply anticipated to be met through windfall sites. Therefore, a neighbourhood plan cannot count the delivery of homes from any Local Plan allocations towards meeting the housing requirement for its neighbourhood area. However, the delivery of homes from any allocations within a neighbourhood plan (provided that the allocations are not sites that already have planning permission, and are therefore already included in the Local Plan housing trajectory) will count towards meeting the overall Local Plan housing requirement.

Appendix D: Housing trajectory and five year housing land supply calculation

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Appendix D	20	39	39	0	31

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Projected delivery rates are unrealistic and over-optimistic	More realistic lead-in time and build-out rate assumptions need to be used. Housing Delivery Study Addendum 2026 fails to acknowledge significant variations in market around Greater Cambridge, and impact this has on deliverability of sites. It also repeatedly references the "strength of the market" as a reason behind the faith it has in development sites coming forwards. Actual lead-in times have been longer than anticipated by the Councils. Delivery peaks materially above recent performance at strategic sites, and assumption that can consistently deliver the peak annual rate.	Noted. 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. Local build-out rates and lead-in times from schemes within Greater Cambridge are considered both within the comparison of OxCam Arc developments and within the Lichfield's Start to Finish 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 i.e. the recommendations have different lead-in times and build out rates for new settlements, urban extensions, and non-strategic sites. AECOM also allow for variations from its recommendations where there is site specific evidence to support a different approach. The lead-in times for sites take account of site specific information including the likely delivery of specific infrastructure or the relocation of existing uses. Appendix 10 of the Strategy Topic Paper (August 2026) sets out how the housing trajectory for the Proposed Submission Local Plan has been created, including the assumptions used for the lead-in times for each of the new allocations.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		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.
Councils cannot demonstrate a five year supply	Consider that the Councils cannot currently demonstrate a five year supply, and the Councils five year supply on adoption will be marginal, remaining at less than 6 years until the mid 2030s.	Noted. The Housing Delivery Study – Addendum (June 2026) 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.
Methodology	Five year supply should be calculated using Sedgefield method in accordance with	Noted. The PPG provides guidance on the use of the different methodologies for calculating five year supply,

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	national policy, as the Councils have provided no justification for using Liverpool method.	and allows for local planning authorities to make a case to use the Liverpool method as part of the plan-making process. Paragraphs 2.40 and D.4 in the Proposed Submission Local Plan (August 2026) set out the justification for using the Liverpool method, taking account of the recommendations made by AECOM in the Housing Delivery Study – Addendum (June 2026). AECOM highlight in the Addendum that although the Councils can demonstrate a five year supply based on the Sedgefield method, taking account of the increased annual requirement (compared to the adopted Local Plans), the development strategy and necessary transport and water supply infrastructure, and the lead-in times for strategic sites to progress through the planning process, it is recommended that the use of the Liverpool method will be more reliable and robust. AECOM recommend that the Liverpool method is appropriate given the shortfall that arises during the beginning of the plan period, partially due to the development of allocations in the adopted Local Plans being delayed due to water availability and water quality issues, and also partially due to the Local Plan being unable to deliver an increase in annual completions before its adoption, as sites tend to need the Local Plan to be adopted before they can come forward through the planning application process, and can be delivered. Even though anticipated completions in most years prior to the adoption of the Greater Cambridge Local Plan are above the adopted annual housing

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		requirement of 1,675 dwellings, they are still below the new housing requirement of 2,289 dwellings.
Housing trajectory is vulnerable to delays	Excessive reliance on large strategic sites that need substantial infrastructure investment (that remains uncertain or unfunded) and new water resources.	Noted. 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 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. The Infrastructure Delivery Plan (July 2026) identifies the infrastructure requirements relevant to each of the strategic sites included within the Local Plan, including identifying funding and delivery timings. The Housing Delivery Study – Addendum (June 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.
Headroom of 8.2% is insufficient	Below the objective of 10% headroom, and below recognised best practice of 10-20%.	Noted. The Housing Delivery Study – Addendum (June 2026) sets out that there is no national policy requirement for headroom to be included, but it is sensible to do so to provide resilience. It also highlights that with the requirement to review local plans every five 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 tools at its disposal than the majority of local planning authorities across the country. The Cambridge

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		Growth Company's explicitly stated role is to enable and accelerate key developments in and around Cambridge. As such, this area will have 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.
Windfall sites	On adoption, the Local Plan will have to adhere to the NPPF 2026 for its five year supply, which no longer allows for an inclusion of windfall sites. Windfall allowance cannot be included in years 1-5 (NPPF 2024, paragraph 72a). Windfall development has declined, and Councils have not considered whether there are enough available sites to deliver assumed annual rates. Principle of including windfall sites is not disputed, but more than 5% of the supply is future speculative, unidentified development.	Noted. The Greater Cambridge Local Plan has been prepared under the legacy system (2012 Regulations) and is therefore being assessed at Examination for compliance with the NPPF 2024. Both paragraph 75 of the NPPF 2024 and Policy HO3 (paragraph 2) of the NPPF 2026 set out that an allowance for windfall sites can be included within housing supply calculations. The Housing Delivery Study – Addendum (June 2026) confirms that the recommendations in the Housing Delivery Study (October 2021 and October 2025) for the windfall allowance are realistic and reliable for use in plan-making in the Greater Cambridge area. The policies in the Greater Cambridge Local Plan do not seek to limit the delivery of windfall sites compared to current or previous policies, and therefore it is considered realistic that new homes will continue to be delivered on windfall sites. 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

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		windfall sites. Annual Position Statements that have been confirmed following submission to the Secretary of State include a windfall allowance within their five year supply.
Five year supply should not be calculated jointly	Councils have recently made a decision to calculate the five year supply individually for Cambridge and South Cambridgeshire. This change needs to be reflected in the jobs and homes targets and calculations in the Local Plan.	Noted. The Councils recent change to their approach to calculating five year supply relates to the housing land supply used for current decision-making. The Greater Cambridge Local Plan is a joint plan, with a joint housing requirement, and therefore it is sound to calculate the five year supply and housing delivery test results that relate to this plan on a joint basis.
Buffer should reflect latest Housing Delivery Test results	The recent Housing Delivery Test results require Cambridge to apply a 20% buffer, and this should be applied in the Local Plan.	Noted. The Housing Delivery Test 2025 results (covering the period 2022-2025) are 82% for Cambridge and 148% for South Cambridgeshire. If they had been published on a joint basis, the result would have been 121% for Greater Cambridge. A 5% buffer therefore applies when considering five year supply calculations for Greater Cambridge. The Housing Delivery Test Rule Book (updated August 2026) sets out in a section on transitional arrangements that where the housing requirement for the Housing Delivery Test is calculated using the standard method, that the revised standard method for calculating local housing need will only be used to calculate the housing requirement from 2027/28 onwards, and that the previous standard method will be used to calculate the housing requirement for the preceding years. It is therefore forecast that the Housing Delivery Test result for Greater Cambridge at the date of plan adoption will continue to result in a 5% buffer needing to be added to the five year supply calculation.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Should properly reflect the accelerated delivery of Northstowe	The Councils previous strategic spatial options explicitly included increased delivery rates at existing major sites, including Northstowe, and these assumptions are retained within the current housing supply. Important that the trajectory continues to recognise the opportunity for accelerated delivery at Northstowe and does not inadvertently constrain or understate the contribution that Northstowe can make to meeting the housing requirement.	Noted. Appendix 10 of the Strategy Topic Paper (August 2026) sets out how the housing trajectory for the Proposed Submission Local Plan was created. Anticipated housing delivery for existing sites, including Northstowe, reflects the Councils' baseline housing trajectory of existing supply. This baseline housing trajectory is updated annually and is produced following extensive engagement with landowners and developers.
Housing Land Supply evidence templates from Planning Inspectorate	The Housing Land Supply evidence templates from the Planning Inspectorate should be completed for each site included in the deliverable supply. More evidence is needed to demonstrate the deliverability of category (b) sites.	Noted. Within the guidance for the Housing Land Supply evidence templates from the Planning Inspectorate, it sets out that the templates are intended to provide a helpful way of presenting the information at examination, and therefore that local planning authorities may wish to use these templates in preparing their housing land supply evidence. Although not exactly in the format of the Planning Inspectorate templates, the Councils' reports provide the same site-by-site assessment of the deliverability and / or developability of sites. The Councils' baseline housing trajectory for existing supply 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

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		planning permission), and all sites for student or older peoples bedrooms. 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 Greater Cambridge Local Plan allocations, and this is set out in Appendix 10 of the Development Strategy Topic Paper (August 2026). The Councils are open to providing the information within the Planning Inspectorate templates if asked to do so by the Inspector at the appropriate point in the examination.

Appendix E: Monitoring framework

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Appendix E: Monitoring Framework	2	2	2	0	2

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Housing Land Supply	The use of a joint Greater Cambridge housing supply is outdated and does not reflect delivery risks in specific districts undermining confidence in the evidence base.	Noted. To support the Local Plan a joint Greater Cambridge housing supply has been used because the Local Plan allocates sites across the two districts, and it is therefore considered appropriate to calculate the housing land supply with the same geographic extent as the Local Plan.
Houses in Multiple Occupation	Policy H/MO stated purpose is to monitor the "impact of HMOs on wider housing delivery including delivery of family homes", but the metric is simply the number of HMOs permitted annually. There is no target or specific trigger, and it is classified as a contextual indicator with no specified action. Should include a meaningful indicators of cumulative concentration and housing-mix impacts, with defined thresholds or triggers and a clear indication of what action would follow if those thresholds were reached.	As discussed in the policy, the plan does not specific targets or percentages regarding concentration.

Appendix F: Marketing, local needs assessments and viability appraisals

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Appendix F: Marketing, local needs assessments and viability appraisals	0	0	0	0	0

Appendix G: Payments in lieu calculations

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
0	0	0	0	0	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations

Appendix H: Skyline and tall buildings guidance

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Appendix H	5	5	5	0	4

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Enforce height guidelines	It lacks legal mechanisms to enforce updated height guidelines against legacy masterplans and major allocations, risking city-wide height inflation through precedent.	Height thresholds identified through the Policy and Appendix H cannot override existing parameters for development sites. The assessment criteria require assessment of cumulative impact that will include extant permissions.
Factual amendment	Correct the spelling of "Redmeadow Hill" to "Red Meadow Hill" in Appendix H and throughout the Plan.	Noted. This can be addressed through a minor modification.
Design requirements	(Criterion 4): Add explicit design requirements covering massing limits, slender proportions, and detailed roofscape articulation for all proposed tall and landmark buildings.	Slender is covered in Criterion 3 which says, 'reflecting Cambridge's established character of slender 'incidents' punctuating the skyline'. 'Roofscape' measures are addressed in criterion 3. Further reference could be added to 5th bullet point to read 'Use roofscape and façade articulation along with shadow lines to provide visual interest and relief'.
Consented development	An exemption should be applied to paragraph H.25 which notes that where	Noted. The Local Plan cannot retrospectively require consented development to undertake additional

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	extant planning permissions have provided suitable assessment to demonstrate that the proposal will not cause inacceptable impacts, no further assessment is required within those parameters.	assessments, provided the development is built in accordance with the approved plans. Where a material amendment is proposed to an existing consent, the policy may need to be applied depending on the scale and nature of the amendments.
Factual amendment	Paragraph H24 should read Advice note 4 (not 3) Please amend for accuracy.	Noted. A minor modification can be made to correct the reference to read 'Historic England 2022 Tall Buildings: Historic England Advice Note 4' as identified as the reference details on page 2 of that document.
Heritage and context	There is a failure to consider heritage and statutory setting in developing the Tall Buildings policy, especially in assessing context.	Noted. The policy and Appendix H of the plan outlines how heritage assets and their setting must be considered at the planning application stage. This has been informed by a robust and comprehensive Skyline and Tall Buildings Strategy.

Appendix I: List of Safeguarded Public House Sites

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
List of Safeguarded Public House Sites	1	1	0	1	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Support Public House Inclusion	Meldreth Parish Council welcome the inclusion of The British Queen in Appendix I: List of Safeguarded Public House Sites.	Noted.

Appendix J: Shopfront guidance

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Appendix J	0	0	0	0	0

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations

Consultation Statement

Summary of Representations and Councils' response - Policies Map



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan Regulation 22 Consultation Statement (November 2026)

GREATER CAMBRIDGE
SHARED PLANNING

Policies Map

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Policies Map	26	33	28	0	23

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Babraham Research Campus	The annotation on the Policies Map for the strategic enhancement area should be corrected to S/SEA/BRC.	Noted. This can be addressed through a minor modification.
Stapleford and Great Shelford	The Policies Map should include the designations from the Stapleford and Great Shelford Neighbourhood Plan, and the designations from NH/11 and NH/13 of the adopted South Cambridgeshire Local Plan 2018.	Noted. All the allocations and designations included in made neighbourhood plans are shown on the digital Policies Map. Any designations from the adopted Local Plans that are being carried forwards into the Greater Cambridge Local Plan are shown on the Policies Map, including Important Countryside Frontages, Protected Village Amenity Areas, Local Green Spaces and Protected Open Spaces.
Safeguarding Important Infrastructure	The Policies Map needs to be updated to include revisions to safeguarding areas made by East West Rail and others.	Noted. As set out in the supporting text for Policy I/SI the safeguarding areas shown on the Policies Map reflect the latest Safeguarding Directions issued and the applications submitted for Transport and Works Act Orders. To ensure

	The Policies Map has overlapping safeguarded areas for different projects, and would be helpful if alternative colours could be used to differentiate between the different projects that are at different stages.	the Policies Map remains up-to-date and sound, the Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the area covered by the Safeguarding Directions or the applications submitted for Transport and Works Act Orders change. The digital Policies Map enables users to highlight the safeguarded areas for different projects individually.
Wind Turbine Zones	Understand that the ratings are based on visual landscape considerations, however, as these areas are within the Landscape Connectivity Zone (LCZ), and some areas within the Core Sustenance Zone (CSZ) for Eversden and Wimpole Woods SAC barbastelle bats, and may be impacted by wind turbines, these ratings should be reviewed to avoid encouraging wind turbine applications in these areas.	Noted. The wind turbine zone maps are for informational purposes only to help with the application of Policy CC/RE's requirements relating to landscape character and sensitivity. The map key is clear that these maps relate to landscape sensitivity that reflect the results of the Greater Cambridge Landscape Sensitivity Assessment: Part 2 (Renewable Energy Development); they do not represent zones of in-principal support for different scales of wind development. Policy CC/RE is a criteria-based policy and sets out all the impacts that must be considered, which includes protected habitats and species (see part 1b). The supporting text to Policy CC/RE makes clear that an Ecological Impact Assessment should include an appraisal of potential impacts on protected species, including commuting and foraging bats. Moreover, during decision making, Policy CC/RE will be applied alongside the ecological safeguarding requirements of the

		Biodiversity and Green Spaces chapter, as well as any national planning policy and guidance that address protected species and ecological sites.
Trumpington Neighbourhood Centre	A commercial unit near to Trumpington Community College has now been included within the Neighbourhood Centre without any justification, and should be removed.	Noted. A proposal for a hot food takeaway (sui generis) was granted permission on 16 October 2025 by the Planning Inspectorate for the change of use of 78 Poulter Walk from a restaurant/café (Class E(b)) to a hot food takeaway (sui generis). Following this decision, the boundary of the Clay Farm neighbourhood centre was amended, to include 78 Poulter Walk.
Grey Belt	Grey Belt should be identified on the Policies Map.	Noted. Grey belt is not a designation for inclusion on Policies Maps. The Councils evidence base only provides a provisional understanding of where grey belt in Greater Cambridge is located. The inclusion of grey belt on the Policies Map would not be appropriate.
Railway stations	The Policies Map should be annotated to show railway station related windfall growth locations.	Noted. The Policies Map is only required to show the spatial extents of policies included in the Local Plan. The Greater Cambridge Local Plan has been prepared under the legacy system (2012 Regulations) and is therefore being assessed at Examination for compliance with the NPPF 2024.
Amendments to reflect proposed changes	Amendments sought to the Policies Map to reflect changes requested to Green Belt, allocations, policy areas e.g. areas of major change, defined development extent, open space designations, important countryside	Noted. The Councils will ensure that any amendments that are made to policies which have a spatial element are reflected on future versions of the Policies Map. Responses to the specific requested changes are provided in the responses to the relevant policy.

	frontages, and safeguarding important infrastructure.	
Cambridge East	Allocation for Cambridge East should be amended to show the impacts of rail freight and air quality mitigation areas.	Noted but disagree, the presence of the Newmarket Railway line to the west of the Coldhams Lane does not mean that an area needs to be excluded from the allocation.
Honey Hill	Policies Map fails to include reference to Honey Hill and the relocation of the Waste Water Treatment Plant. Policies and Policies Map should be consistent.	Noted. The potential safeguarding of land for waste water treatment infrastructure is a matter for the Cambridgeshire and Peterborough Minerals and Waste Plan. The Policies Map shows the allocations and designations in the adopted Minerals and Waste Local Plan only.
Harston	The identification of Important Countryside frontages on the GCLP policies map for Harston does not visually stand out. Also omits new policies relating to safeguarded land included in Harston NP adopted in Oct 2025. These are annotated on Map HR2.	Noted. All the allocations and designations included in made neighbourhood plans are shown on the digital Policies Map.

Consultation Statement

Summary of Representations and Councils' response - SA-HRA



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan Regulation 22 Consultation Statement (November 2026)

GREATER CAMBRIDGE
SHARED PLANNING

Sustainability Appraisal

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Sustainability Appraisal	27	36	32	0	26

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Testing reasonable alternative strategy options	The Sustainability Appriasal ("the SA") should give further consideration to the social and economic implications of different levels of growth within the villages, taking account of those which would benefit from planned infrastructure improvements.	The Sustainability Appriasal ("the SA") has been prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 and assesses the likely significant effects of the Local Plan and its reasonable alternatives. This includes the appraisal of a range of spatial strategy options and site options in Chapter 4 of the SA for the Proposed Submission (Regulation 19) Local Plan. The PPG states that reasonable alternatives should be realistic options and should be sufficiently distinct to highlight the different sustainability implications so that meaningful comparisons can be made. The SA has assessed a range of reasonable alternatives throughout plan preparation, including different levels of growth and spatial distribution options, and sites including those in village locations.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		The appraisal considers the effects of the proposed spatial strategy, site allocations and policies included in the Plan against a range of sustainability objectives, including those relating to flood risk, biodiversity, landscape, transport and community impacts. The Development Strategy Topic Paper explains how the plan-making process has considered the merits of alternative strategies and site allocation options.
Testing higher growth	SA failed to consider higher growth level alternatives; it should consider the social, economic and environmental effects of higher levels of housing development to further support economic growth within the Greater Cambridge economy in accordance with Government aspirations for the area.	The reasons for discounting the minimum and maximum growth scenarios, selecting the preferred growth level, and choosing the preferred spatial strategy are set out in Chapters 2 and 4 and Appendix E of the SA. In relation to the appraisal of options that would achieve higher numbers of jobs and level of homes, this approach was rejected as it is not considered by the Councils to be the most likely future scenario. As such, the Councils do not consider that it represents Greater Cambridge's objectively assessed need and would therefore not be a reasonable alternative. The number of options appraised is considered appropriate to the plan-making process.
Sustainability Appraisal's (SA) consideration of embodied carbon	SA fails to strategically assess embodied carbon of new homes and infrastructure and impact on local and national carbon budgets, and capacity to meet needs in existing building stock.	The SA includes consideration of climate change and greenhouse gas emissions through SA objective 12: Climate change mitigation. The SA also considers the potential impacts relating to greenfield land take through SA objective 8: Efficient land use. However, as a strategic assessment of the Local Plan, it does not seek to quantify

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		the proportion of local or national carbon budgets that may be consumed by individual developments or the plan as a whole. The appraisal undertaken is considered proportionate to the strategic scale of the plan. The suggested additional work relating to embodied carbon budgets, existing housing stock utilisation and development sequencing is not considered necessary to meet the requirements of the SA or SEA Regulations.
SA's consideration of grey belt and the National Planning Policy Framework's (NPPF) "Golden Rules"	There is no real acknowledgement in the SA as to the role that the Green Belt Golden Rules would have as an assessed alternative. No assessment of grey belt.	Noted. Exceptional circumstances that justify the release of Green Belt land to meet general development needs have not been identified through the wider plan-making process. Only location-specific exceptional circumstances for Green Belt release have been identified at Babraham Research Campus and Cambridge Biomedical Campus due to the international economic importance of these campuses. As such, alternative strategy or site options that rely on further Green Belt release are not considered reasonable, regardless of the NPPF's Golden Rules or whether the site is grey belt. The appraisal of the spatial strategy options that focus on Green Belt is set out in Appendix C of the SA.
SA's consideration of infrastructure capacity	The SA should test alternatives where infrastructure constraints cannot be overcome, with Waterbeach New Town being given as an example.	Noted. The purpose of the SA is to consider the likely sustainability effects of the proposed strategy and reasonable alternatives at a strategic level. The effects of the policies and site allocations have been appraised by

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		the SA based on the assumption that they will be enacted by the Council as they are written. Detailed delivery risks and infrastructure timing assumptions have been considered through the wider evidence base supporting the Local Plan. The Councils recognise that the proposed development strategy and its strategic allocations will have significant impacts on Greater Cambridge's infrastructure. The impacts of the Local Plan have been carefully considered through extensive evidence developed in collaboration with relevant organisations, including for example evidence on water supply and wastewater capacity, transport, green infrastructure, healthcare and recreational facilities. For their respective topics, these studies provide a clear understanding of the infrastructure and policy measures required to mitigate the impacts of the planned growth. Drawing on this evidence, the Infrastructure Delivery Plan sets out for the Plan as a whole and for each strategic scale allocation the infrastructure required to mitigate the impacts of development, including funding and delivery timings. The allocation policies each include firm requirements to ensure that all impacts of development are addressed, which has informed the SA's appraisal of each site allocation.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
East West Rail (EWR) impacts	Evidence base treats EWR as a growth enabler, but it omits EWR's macro-construction carbon footprint, and the potential in-combination effects with the proposed growth in the wider Local Plan.	The cumulative effects reported in Chapter 6 of the SA consider the potential for in-combination effects between the growth set out in the plan and East West Rail. The in-combination effects reported are based on information available at the pre-application stages of the related Development Consent Order. They have been considered in relation to the total effects of the Local Plan and not in relation to the effects for individual options considered. The appraisal presented in the SA is considered proportionate to the strategic level of the Local Plan.
Testing reasonable alternative site options	The Plan should demonstrate that the final range of reasonable alternative site options was sufficiently broad, consistently identified and objectively justified, including where sites were previously appraised and then later not considered.	The SA has assessed site options using a consistent methodology and evidence base available at the time of assessment. Each individual site has been tested according to a proportionate and robust screening and testing process, as documented in the Housing and Economic Land Availability Assessment Update (HELAA) (2026). Sites that were screened out of further assessment through the HELAA have been document in Appendix 2 of the HELAA Report (2026). Appendix E of the SA sets out the reasons for including or excluding site options presented to the Councils as part of the SA's testing of reasonable alternative options. Sites that were scoped in for testing as a reasonable alternative site option are set out in Chapter 4 of the SA, whilst the Councils' reasoning for allocating / not allocating an identified reasonable

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		alternative has been set out in Appendix 8 of the Strategy Topic Paper (2026). The Councils consider the approach is proportionate and has allowed for a consideration of a broad number of different site options to inform plan making.
National rail freight strategies	The Plan fails to account for national rail strategies routing more diesel rail freight along the Newmarket Line.	The East West Rail scheme proposes a new station at Cambridge East, but its scope does not include the Newmarket line itself. The scheme aims to transform connectivity in the Oxford to Cambridge corridor, as well as facilitating the removal of freight traffic from the strategic and local road network, supporting associated carbon and air quality benefits. Work supporting the EWR scheme indicates that the current proposals would allow for up to two new freight services per day in each direction from Felixstowe via Cambridge through to Oxford and beyond, but decisions about freight services are outside of the scheme's scope, and there is no publicly available detail on this issue to assess. Therefore, it is considered this matter has been proportionately considered by the Plan and the associated evidence base.
Assessment of Policy S/CBN: Cambourne North	Councils to confirm that the cumulative impacts of Cambourne North, Cambourne West and Bourn Airfield have been considered, including effects on ordinary watercourses, community facilities and the	The appraisal considers the effects of the proposed spatial strategy, site allocations and policies included in the plan against a range of sustainability objectives, including those relating to flood risk, biodiversity, landscape, transport and community impacts. The

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	road network, and that reasonable alternatives to the proposed Strategic Enhancement Area has been explored.	cumulative effects of the Plan have been considered in Chapter 6, which also considers the potential for cross-boundary effects in relation to a neighbouring authority's plans, the Local Transport Plan, and nationally significant infrastructure projects. This includes assessment of the implications of growth in and around Cambourne as part of the wider pattern of development proposed through the Plan. The extent of the proposed Strategic Enhancement Area (SEA) is based on the Councils' technical review of the area's constraints, and given Cambourne North is at the early concept stages, it was considered that the SEA represents a reasonable opportunity to mitigate the wider impacts of the proposed growth around Cambourne. As the SA is a strategic-level assessment, it would not be proportionate for the SA to consider all possible iterations of an SEA area. It is not considered proportionate for the SA to appraise options for wetland and flood attenuation in relation to specific river corridors in the plan area or to appraise cumulative effects on particular roads given the scale of reporting that would be needed to complete this work to cover all parts of the plan area. Instead, this information is available in the Councils' wider evidence base that supports the Local Plan, which should be considered alongside the conclusions made in the SA.

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Alternatives to Policy S/CBN: Cambourne North	Unclear whether the assessment of growth opportunities west of Cambourne has been undertaken on the basis of fixed assumptions regarding the design, mitigation requirements and land take associated with EWR - potentially sustainable development opportunities may have been discounted on infrastructure assumptions that could change.	With regards the appraisal of development options to the west of Cambourne, the SA has appraised all reasonable alternative site options that were assessed through the HELAA as well as a range of spatial strategy options. Growth around Cambourne, which included an appraisal of site options to the west of Cambourne, is presented in Chapter 4 of the SA. The cumulative effects reported in Chapter 6 of the SA consider the potential for in-combination effects between the growth set out in the Plan and East West Rail. The in-combination effects reported are based on information available at the pre-application stages of the related Development Consent Order. They have been considered in relation to the total effects of the Plan and not in relation to the effects for individual options considered. The appraisal presented in the SA is considered proportionate to the strategic level of the Plan. It is also noted that the Councils' decisions regarding growth around Cambourne have been guided by a wider evidence base that explores the area's opportunities and constraints in greater depth. This evidence should be read alongside the conclusions made in the SA.
Assessment of Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm	Site tested despite rejection in HELAA. Unclear reasoning given, and how conclusion compares with reasonable alternatives, and whether the final version	Policy S/GF has been appraised alongside all other policies included in the Local Plan in Chapter 5 of the SA. The appraisal of the policy in the SA considers the findings for the equivalent site option (site ref OS280), as

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	of the proposed settlement has been assessed on a consistent evidential basis. Inconsistencies between HELAA and SA.	well as the specific mitigation requirements set out in the policy text. The appraisal of this site option is presented alongside other options in Chapter 4. Landscape effects for all site options have been considered through the appraisal relating to SA objective 6: Landscape and townscape. The appraisal of the site option (OS280) records a significant negative effect in relation to SA objective 6, reflecting the Red score of the site for landscape in the HELAA. It is recognised that the text describing the effects of Policy S/GF in Chapter 5 incorrectly describe an Amber effect. The SA has appraised a wide range of reasonable alternative site options in Chapter 4. Appendix E of the SA sets out the reasons for the Councils' decision making in relation to sites taken forward for allocation in the plan. This includes in relation to site 40250. The SA forms only part of the evidence that has been used to inform the Councils' decision making in relation to the selection of its preferred sites for allocation. The Development Strategy Topic Paper explains how the plan-making process has considered the merits of alternative strategies and site allocation options.
Assessment of Policy S/NS: Northstowe	SA expressly recognises that Northstowe benefits from existing planning permissions, is currently under construction and has	Noted. The approach to meeting the identified G&T accommodation needs is covered within Appendix 11 of the Strategy Topic Paper (August 2026) and the approach

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	already been subject to detailed scrutiny through the planning application process. Consequently, no equivalent site option was assessed through the HELAA and the SA. The SA does not test alternative for Northstowe of maintaining a policy framework based on existing consents and not requiring G&T and specialist accommodation.	to meeting the identified needs for specialist housing for older and disabled people is covered within Appendix 12 of the Strategy Topic Paper (August 2026). These Appendices include a review of all existing and proposed strategic sites in terms of their ability to include G&T sites and / or specialist accommodation. Specific requirements for both G&T sites and specialist accommodation, have been set out in a number of site allocation policies. Additionally, the existing strategic sites with planning permission all have conditions included as part of their outline planning permissions 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 gypsies and travellers and older and disabled people. The PPG states that reasonable alternatives should be realistic options and should be sufficiently distinct to highlight the different sustainability implications so that meaningful comparisons can be made. It is considered that the option identified in the representation is not realistic given the identified accommodation needs of gypsies and travellers and older and disabled people.
Assessment of Policy S/RSC/MF: Maarnford Farm	Query assessment of access to open space and sports facilities given the site's proximity to community green spaces. Clarification sought on references to building height which differ from policy requirement.	The assessment of access to open space and sports facilities is reflected in the appraisal of SA objective 4a: Proximity to healthcare facilities. The site allocated by Policy S/RSC/MF is site 40558b. The site was assessed through the HELAA as being more than 50m from the nearest open space or sports facility and also more than 720m from the nearest healthcare centre and not being of

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		a size that would support the delivery of a new healthcare centre. Therefore, a minor negative effect was recorded in relation to SA objective 4a for the equivalent site option in Chapter 4 of the SA. The SA states that Policy S/RSC/MF "requires development not to exceed local building heights of two storeys" with benefits expected in relation to SA objective 6: Landscape and townscape. The policy wording states that the "design of development should not exceed local building heights of two commercial storeys to ensure the development's design responds to the requirements of the IWM Duxford Air Safeguarding Zone". It is recognised that this requirement is included in the policy to help limit the potential for safety impacts on the Air Safeguarding Zone, however, the limitation of building heights could also benefit local character. Therefore, the effects reported in the SA in relation to SA objective 6 remain applicable.
Assessment of Policy CC/WE	Policy CC/WE policy shifts the burden of solving macro-regional water infrastructure deficits onto individual planning applicants. Micro-level developers possess no statutory power or legal mechanism under the Water Industry Act 1991 to expand regional utility capacity or reverse aquifer depletion.	Whilst wording to this effect was included in Policy CC/WE at the Draft Plan stage, it was not included in the Proposed Submission Local Plan as it was not reasonable to ask all individual developments to demonstrate water supply availability. 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

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		Supply evidence base exploring the availability of sustainable water supply alongside the anticipated development trajectory.
Site assessment of unallocated site	Suggestions that a site should be allocated because it has scored positively in the HELAA and the SA.	Noted. Whilst positive outcomes in the HELAA and SA are significant factors in the decision to allocate sites, allocation decisions have also been guided by the Councils' strategic objectives, the evidence of needs across Greater Cambridge, and wider infrastructure and constraints testing that has been set out in the accompanying evidence base. The Councils' reasoning for allocating / not allocating an identified reasonable alternative has been set out in Appendix 8 of the Strategy Topic Paper (2026).
Discounted sites	Suggestions that a promoted site should have been regarded as a reasonable alternative in the SA, and the reason for exclusion is not clear.	Noted. The SA has assessed site options using a consistent methodology and evidence base available at the time of assessment. Each individual site has been tested according to a proportionate and robust screening and testing process, as documented in the Housing and Economic Land Availability Assessment Update (HELAA) (2026). Sites that were screened out of further consideration through the HELAA have been document in Appendix 2 of the HELAA Report (2026). Appendix E of the SA sets out the reasons for including or excluding site options presented to the Councils as part of the SA's testing of reasonable alternative options.

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Natural England SA and Habitat Regulation Assessment (HRA) comments	Natural England highlight some of their comments on the HRA will also be relevant to the SA and that the SA should be updated as new evidence becomes available.	Noted. The SA has been updated throughout the preparation of the Plan as new evidence has become available. The SA will reflect changes made to the Local Plan following the examination hearings and any new evidence made available at this time will also be considered.
Conflict with Sustainability Objectives	SA objective 10 (achieve sustainable water resource management and enhance the quality of Greater Cambridge's waters), Paragraph 5.34 states that "Significant negative uncertain effects are expected". This demonstrates major doubt about the achievability of this objective.	Noted. The adverse effect reflects the location of Greater Cambridge within an area of known water stress and that growth will continue to put pressure on water resources. However, the SA also notes that to meet future demand, new water supply options are being developed such as a short-term transfer from Anglian Water's Grafham Water reservoir and a new Fens reservoir alongside enhanced demand management. In addition, there are a number of SPZs in the area with potential for adverse impacts on groundwater resources, which is also assessed by SA objective 10. The adverse effect recorded reflects the precautionary approach taken and the evidence available at the time, however it should be noted that Table 5.4 also shows the uncertainty around the effects. The cumulative effects of the plan are presented in Chapter 6. A mixed minor positive and minor negative effect is recorded in relation to SA objective 10 given the existing pressures in water resources but also considering the policies requiring mitigation in relation to water

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		management in the plan area (i.e. Policy CC/WE: Water efficiency in new developments, Policy CC/IW: Integrated water management, sustainable drainage and water quality and Policy BG/RC: River corridors).
Collaboration and cross-boundary matters	Evidence base on strategic cross-boundary cooperation does not reference the Greater Cambridge Development Corporation and has not directly named Cambridge University Hospitals NHS Foundation Trust.	Noted. Coordinated engagement with external infrastructure planning and delivery partners has been critical to the preparation of the preferred spatial strategy. The Councils will continue to work collaboratively with external working bodies, including the Greater Cambridge Development Corporation and the Cambridge University Hospitals NHS Foundation Trust; appropriate changes to documents supporting the Local Plan can be made, should this be considered necessary by the Inspector during the Examination.
Overly optimistic growth and delivery assumptions	SA should be updated to appraise various scenarios of delay to large sites, account for market absorption rates and model the impact that would have on the Local Plan delivering against objectives.	The SA considers the likely sustainability effects of the proposed strategy and reasonable alternatives at a strategic level. Detailed delivery risks and infrastructure timing assumptions were considered through the wider evidence base supporting the Plan. The Housing Delivery Study – Addendum (June 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.

Habitats Regulations Assessment

Policy	Total Number of Respondents	Total Number of Representations Received	Of which raised issues with Soundness	Of which supported the policy	Of which objected to the policy
Habitats Regulations Assessment	18	22	18	0	19

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In-combination effects with East West Rail	The Appropriate Assessment for the Eversden and Wimpole Woods Special Area of Conservation (SAC) fails to address the in-combination effects of the housing development in the Local Plan with East West Rail (EWR) on the SAC's barbastelle bat colony and does not meet legal requirements. This should be considered now and not wait for EWR's own Habitats Regulations Assessment (HRA).	Noted. Further consideration and assessment of residual in-combination effects in relation to EWR have been added to the Appropriate Assessment of the HRA. This is based upon the information published so far by the promoter of the EWR scheme which demonstrates that they are aware of the potential impact on Eversden and Wimpole Woods SAC and its barbastelle bat colony and intend that this will be fully assessed (including through its own HRA) and mitigated as part of that scheme. Natural England has advised on the need for collaboration and joined up design between the mitigation for the EWR scheme and future applications associated with the relevant allocations within the Local Plan to be explicitly stated within relevant Local Plan policies. Although the policies in the Reg.19 Local Plan are considered sufficient to achieve this, given Natural England's representations, the Councils are open to making modifications to the

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
		Local Plan during the Examination stage to address those representations. The HRA concludes no residual in-combination effects from the Local Plan or East West Rail associated with physical damage or loss of functionally linked habitat and/or non-physical disturbance to bats using functionally linked land.
Natural England's view on in-combination effects	Natural England consider that wording about residual in-combination effects and mitigation for these should be included before they can agree with the conclusion of no adverse effect on integrity on Eversden and Wimpole Woods SAC. Additional consideration of water issues is also needed. They anticipate these HRA matters will be able to be resolved however and believe the Plan itself to be sound.	Noted. The Councils are open to modifications being recommended by the Inspector at the appropriate point in the examination, should the opportunity arise and this has been included within the revised HRA.
Reliance on mitigation measures	The Habitats Regulations Assessment must not rely on surveys or mitigation deferred to the application stage. A competent authority cannot conclude no adverse effect on site integrity by relying on measures that are uncertain or will only be secured later.	Noted. The HRA for a Local Plan is at a strategic level and looks at the impacts of the proposed policies and site allocations on the integrity of Habitats sites. The policies include mitigation measures, such as the requirement for more detailed survey work, to ensure that this is considered at the more detailed application stage. The HRA takes into account these mitigation measures, but it wouldn't go down to the detail of individual schemes. In addition, the detailed survey work would not yet be available and would be carried out by the developers of

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		any subsequent proposals. If it was found that any development proposal may affect a Habitats site the applicant would also have to carry out their own HRA.
Other in-combination effects not considered	The Habitats Regulations Assessment (HRA) is legally flawed because it fails to consider the level of rail freight projected on the Newmarket line. It fails to model the in-combination air quality degradation (NOx) and Particulate Matter alongside the plan's wider housing allocations and the impacts on protected habitats. It also fails to evaluate the in-combination traffic generation arising from an infrastructure layout associated with Cambourne proposals that induces car dependency risks invalidating the Habitats Regulations Assessment.	Noted. The East West Rail scheme proposes a new station at Cambridge East, but its scope does not include the Newmarket line itself. Work supporting the EWR scheme indicates that the current proposals would allow for up to two new freight services per day in each direction from Felixstowe via Cambridge through to Oxford and beyond, but decisions about freight services (as well as the Newmarket line itself) are outside of the scheme's scope, and there is no publicly available detail on this issue to assess. The unconfirmed increase in freight on the Newmarket rail line has not been assessed in the HRA as the HRA only assesses committed or reasonably certain plans or projects. There is no certainty about an increase in rail freight and there are no applications, permissions or licenses to consider. With regards to development at Cambourne, the Cambridge to Cambourne busway and future East West Rail station in Cambourne should reduce future car dependency. These schemes have been accounted for in transport modelling supporting the Local Plan, which informed where air quality assessment should be carried out in line with Natural England's Standard Advice for Air Quality Impacts for Local Plans.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
Wider impacts	The HRA should be updated to identify Hardwick Wood's barbastelle maternity colony and its shared foraging resource with Eversden and Wimpole Woods SAC as part of the functionally-linked-habitat baseline for the SAC, drawing on East West Rail Company's 2022 radio-tracking survey and any further survey data available from East West Rail Company or the Cambridgeshire and Peterborough Environmental Records Centre. It should specifically consider whether recreation and visitor pressure arising from the Local Plan's allocations – individually and cumulatively – is capable of affecting the foraging resource shared between Hardwick Wood and the SAC	Noted. Hardwick Wood is not identified as a Habitats site and so technically does not need to be considered in the HRA. However, the mitigation measures in the Local Plan, the mitigation measures that will be proposed by EWR and the potential for collaboration and joined up design between the schemes and the mitigation proposed will also help to protect barbastelle bats from other maternity colonies. The reference to radio tracking surveys undertaken in association with EWR is noted but it is not necessary or proportionate to consider this evidence in detail in the Local Plan HRA. The HRA concluded that recreational pressure from the Local Plan could be ruled out on the basis of safeguards in Policies BG/BG, BG/EO, BG/GI, BG/PO and site-based policies. This would also apply to Hardwick Wood and other areas used by bats for foraging.
Air quality	The HRA of the Submission Plan is not yet complete. Paragraphs 6.5-6.11 in the HRA state that the adverse effects from vehicle emissions cannot yet be ruled out and that an air-quality assessment will be provided in an addendum. This is a critical element of the evidence base of the Plan that has not been completed and will not be	Noted. The air quality modelling and related ecological assessment has now been carried out and is included within the revised HRA. This shows that adverse effects on integrity have been ruled out.

Theme of Representations	Summary of Main Issues Raised in Representations	Councils' Response to Representations
	available until a later date, with no indication of when this will be available. The absence of this assessment and the likely implications on the spatial strategy and policies of the GCLP are therefore not known. The Councils will need to provide an appropriate opportunity to comment, particularly if the addendum materially changes the evidence or conclusions of the HRA.	
Water abstraction	Legal duty on competent authorities to ensure plans will not adversely affect European protected sites and sensitive watercourses. Unsustainable water abstraction risks breaching these statutory environmental limits unless non-abstractive supply solutions are guaranteed prior to occupation. Should be enforceable water supply policy triggers.	Noted. The HRA considers water quantity and found that adverse effects on integrity were ruled out because of legislative safeguards and additional measures in policies CC/WE, CC/IW, CC/FM and I/CM of the Local Plan.
Stewardship-responsible body	The safeguards for environmental protection are not sufficiently policed by the council who should outsource the outcomes of the policy to a more neutral observer (in context of wider comment which views a potentially incestuous relationship between the Cambridge Investment Partnership and the Planning Department). Planning Permission 19/0288/FUL 'Timber Work' (CIP site) is cited as an example where a	It is noted that CIP is a joint venture partnership between Cambridge City Council and The Hill Group. Planning applications submitted by CIP are subject to the same legislative requirements, development plan policies, statutory consultation and assessment processes as any other applicant. Similarly, the same compliance monitoring and enforcement mechanisms apply to developments undertaken by CIP as they do to any other developer operating within Greater Cambridge.

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	wildlife corridor identified as significant during the wildlife/arboricultural survey has not been protected or where development impacts adequately mitigated.	