Appendix 7: Full Summaries of all policies of the Site Allocations and Policy Areas

Overview and Summary of Representations Received at the First Proposals Stage:

The First Proposals continued the development of the seven themes and developed more specific policies under each theme. The First Proposals presented the seven themes in a theme tree with climate change, wellbeing & social inclusion, biodiversity and green spaces, and great places coming out of the foundations and roots of homes, jobs and infrastructure. It is proposed to carry the theme tree through this draft stage of consultation as the overarching themes remain the focus of the plan policies, and the tree is a main element of the storytelling for communications and engagement with residents and stakeholders.

These seven themes were:

- Development and Strategy
- Climate Change
- Biodiversity and Green Spaces
- Wellbeing and Social Inclusion
- Great Places
- Jobs
- Homes
- Infrastructure

The below sets out a summary of the representations received and the councils' responses to the representations for each policy chapter to provide an overview. For more detailed representations and responses on individual sites and policies, see appendices of this report.

The policies that have been introduced as new at the Draft Local Plan stage, and therefore do not have representations as these policies have not previously been consulted on are:

- Monitoring
- Specialist accommodation for looked after children
- Specialist accommodation for students
- Other caravan dwellers

Development Strategy

The development strategy covers the following topics and policies:

- Plan vision and strategic prioritie
- Policy S/JH: New jobs and homes
- Policy S/DS: Development strategy
- Policy S/SH: Settlement hierarchy
- Policy S/DE: Defined development extents
- Policy SS/GB: The Cambridge Green Belt
- Policy S/MO: Monitoring
- Strategic policies for the purposes of Neighbourhood Planning

S/DS: Development Strategy

Representations executive summary:

Regarding plan-wide development levels, representors (including a number promoting specific sites) proposed that the strategy should plan for more employment and housing, in order to support economic growth, reduce in-commuting, deliver more affordable housing, and to provide a more flexible supply of homes. A number of individuals, parish councils and community groups commented that the strategy should plan for less development, noting: the circular nature of planning for more and more growth, climate and nature impacts, harm to quality of life and the character of the area, that development will compound affordable housing challenges and existing inequality, or that the proposal is higher than government's standard minimum housing need. The Environment Agency and

Natural England stated that they were concerned about whether the growth proposed can be sustainable without causing further deterioration to the water environment. These bodies, together with Cambridge Water and Anglian Water, expressed their intention to work collaboratively with the Councils to explore the issue further. Other comments noted the need to reconsider the strategy in the light of COVID-19. The quick questionnaire included a related question (Quick question 1) which asked whether respondents supported the proposed housing level. Of 580 responses, 31% either strongly agreed or agreed; 16% were neutral, and 54% either strongly disagreed or disagreed.

There was wide ranging in principle support for the climate focused development strategy, including focusing development in locations which reduce need to travel, and in locations with existing and committed transport links. On the other hand, around 100 individuals supported the Friends of the River Cam letter objecting to the plan on the grounds of inadequate water supply, effect on national food supply, failure to minimise climate change, likely irreparable damage to ecosystems, carbon emissions from construction, lack of integrated public transport, undermining the Levelling Up agenda, democratic deficit in process and evidence base. The quick questionnaire included a related question (Quick question 2) which asked whether respondents agreed that new development should mainly focus on sites where car travel, and therefore carbon emissions, can be minimised. Of 572 responses, 68% either strongly agreed or agreed; 16% were neutral, and 16% either strongly disagreed or disagreed.

A number of comments, particularly from those promoting specific developments, argued that the plan was too heavily focused on strategic sites and too restrictive of village development. Regarding directions of growth, a limited number of individuals and developers argued that given previous plans had focused housing development to the north of Cambridge, future development should be focused to the south, close to the area of ongoing employment growth. Others proposed greater levels of development in the rural southern cluster and A428 corridor than was currently proposed in the plan. Regarding the economy, a number of landowners and

developers argued that more sites should be provided to meet specific sector needs.

A large number of landowners and developers argued that that the strategy relied too much on large urban extensions to Cambridge City and new settlements in South Cambridgeshire, which had infrastructure dependencies which therefore presented a risk to the deliverability of the plan. Comments expressed concern about the accelerated delivery rates assumed at the strategic sites included in the First Proposals. The same respondents proposed that the plan should include a greater number of smaller sites, particularly in the rural area, to allow a sufficient amount and variety of land to come forward to support the objective of significantly boosting supply of homes, and to support rural communities.

A small number of individuals expressed concern at the plan's reliance on East West Rail and/or objected to the East West Rail project. Equally a small number of individuals and parish councils expressed concern about whether transport and other infrastructure would cope with the pressure generated by the development proposed in the plan.

Regarding the approach to Cambridge urban area, comments were mixed, including support for densification from some individuals, concern from individuals regarding the impact of densification on quality of life, and comments from developers or landowners (or their agents) promoting village sites that brownfield sites can be challenging to deliver. Regarding the edge of Cambridge and in the Green Belt, comments included those from promoters of sites not included in the plan stating that exceptional circumstances existed to release their site from the Green Belt, and individuals and community groups objecting to the releases included in the First Proposals. Affected parish councils urged greater separation between proposed development - at Cambridge East and at Mingle Lane, Great Shelford - and their villages. Regarding new settlements, support was expressed by a limited number of individuals, East West Rail Company, and Cambridgeshire County Council, for

Cambourne as a location for expanded development. A number of site promoters for other locations highlighted the reliance of this site on the uncertain delivery of East West Rail. Regarding the rural area, individuals and parish councils supported the limits on rural development proposed in the plan.

The quick questionnaire included four related questions (quick questions 7 to 10) which were relevant to this policy. These questions asked respondents' views about development focused on the rural southern cluster, village development and provided the opportunity to identify additional sites. Responses to these questions broadly reflected the comments attributed to policy S/DS summarised above.

Response to representations:

The response to representations relevant to this policy includes:

- **Arguments for more development**: Our in principle approach to planning for employment and housing is to meet our objectively assessed needs, which, drawing on the methodology to calculate these, would support economic growth, mitigate against additional longer term commuting, and help limit further affordability pressures associated with housing delivery lagging behind employment growth. Planning for employment and housing beyond this level is unlikely to be achievable, noting the findings of our Housing Delivery Study – Addendum (2022), and that the higher employment scenario is described as 'less likely' by our consultants, and would have additional environmental impacts. Beyond this in principle position we are not yet able to confirm how much employment and housing we can plan for that can be delivered in a sustainable way.
- **Arguments for less development**: Planning for less than our objectively assessed needs would not meet national policy requirements to meet objectively assessed needs and support economic growth, and could result in social and equalities impacts such as potential increasing affordability issues and less affordable housing being provided in the area, and climate impacts arising from more longer distance commuting. Beyond this in principle position

we are not yet able to confirm how much employment and housing we can plan for that can be delivered in a sustainable way.

- **Providing flexibility**: We propose to plan positively to provide new land for the identified undersupply in particular types of employment, unless evidence identifies an insurmountable problem with achieving that in a sustainable way. This positive approach would ensure a flexible supply over the plan period and beyond, recognising the particular needs of the Greater Cambridge economy. For homes we plan to provide a flexible supply of homes to meet our needs, again subject to evidence not identifying an insurmountable problem with achieving that in a sustainable way. Further to this we have flexibility to respond to change from our policy approaches via future plan reviews.
- **Housing delivery challenges**: Our consultants have developed recommendations in terms of a windfall allowance, and lead-in time and build out rates for strategic and non-strategic sites that vary depending on the location and / or anticipated housing mix for the site. We propose to continue to use these recommendations when preparing the housing trajectory for inclusion in the Local Plan, as they have been developed having undertaken a detailed analysis of housing delivery in Greater Cambridge (including comparing the data to other areas and national research), following a literature review (including Inspectors Reports), and having considered whether past trends will continue into the future. Our consultants have confirmed that their recommendations continue to be realistic and reliable for use in plan-making in the Greater Cambridge area having considered the issues raised in representations on the First Proposals.
- **Need for supporting infrastructure**: We recognise the importance of ensuring infrastructure is delivered to support development. We will produce a full infrastructure delivery plan to support the draft plan consultation.
- **Need to consider water supply**: We are working with relevant partners (Environment Agency and Natural England) to understand the implications of water supply on the draft local plan targets for jobs and homes, to inform a conclusion regarding the most appropriate targets for jobs and homes to

include in the draft Local Plan, as well as to consider site specific sustainability implications of potential solutions to the additional growth.

- **Need to account for COVID-19**: Our Authority Monitoring Report monitors key indicators relating to the adopted Local Plans. Our 2022 updated employment and housing evidence accounts for COVID-19 impacts. We will keep our evidence up to date as appropriate to inform later stages of plan-making, and we have flexibility to respond to change via future plan reviews.
- **Overarching development strategy challenges:** We note strong support for the First Proposals overarching strategy approach. No new evidence submitted to the First Proposals has affected these principles. Our transport evidence supporting the First Proposals demonstrated that North East Cambridge and Cambridge East are the best performing new strategic scale sites available for development within Greater Cambridge, and are in broad locations that best align with the First Proposals strategy principles. There are no alternative strategic scale sites available for development in these broad locations. We are not proposing a full development strategy at this point, but propose to retain these principles in identifying sites to meet our needs, subject to the water and housing delivery constraints. Further issues relevant to specific strategic sites are addressed in their respective policies.
- **Scale of development challenges:** Our transport evidence informing the First Proposals showed that larger developments accommodating a wide mix of uses allow for more 'internalisation' of trips within the site, support viable delivery of infrastructure including green infrastructure and can provide a steady supply of development across a large number of years to support overall supply. As such we consider there is a strong rationale for the inclusion of strategic scale sites within our development strategy. Further issues relevant to specific strategic sites are addressed in their respective policies.
- **Need to consider transport and other infrastructure, including East West Rail:** We are not currently proposing a full development strategy at this point such that this issue is not relevant to decisions being taken in early 2023. We will respond to this issue for the draft plan consultation.

- **Spatial directions/broad locations challenges:** Our evidence and Sustainability Appraisal supporting the First Proposals consultation identified that locating development within Cambridge urban area forms a highly sustainable development option, primarily relating to the accessibility to existing facilities and services of sites within this broad location, and that the edge of Cambridge can be a sustainable location for homes and jobs (setting aside issues relating to Green Belt), being accessible to existing jobs and services, particularly where development is planned at sufficient scale to support new infrastructure. No new evidence was submitted to the First Proposals that would change our understanding of this. Impacts and delivery issues beyond this are site specific, and as such are addressed in their respective policies.
- We are not currently proposing a full development strategy at this point such that issues beyond the above are not relevant to the decisions being taken in early 2023, but will be taken into account in the preparation of the full draft plan and a response to those further issues will be provided at that time.

Plan Vision and Strategic Priorities

Summary of Responses:

Broad support for the vision and aims was expressed within the representations. Specific elements praised by respondents include the aspiration to locate development in the most environmentally friendly locations, the prioritisation of climate mitigation and adaption, the vision for villages and significance placed upon infrastructure and water. Respondents suggested improvements to the vision such as including references to Cambridge as a centre of educational excellence, tightening up language to avoid ambiguity and placing greater emphasis upon landscape, heritage, and nature.

Criticisms of the vision included a perception that it was too Cambridge-centric and rural settlements needed to be included. Other respondents were concerned that the level of development in the Plan could undermine environmental goals. One respondent noted that a greater emphasis on placemaking was needed, and several

argued that the Plan would not sufficiently address inequality. Other issues which respondents felt should gain prominence include water efficiency, the issue of the water supply, sustainable transportation. Cambridgeshire County Council also noted that it may be difficult to achieve the required significant infrastructure in a sustainable way. Other public bodies stressed how the Plan needs to protect sports facilities, promote healthier lifestyles, and safeguard biodiversity. Some developers stressed the importance of using the Plan to deliver ambitious housing targets, but also noted that the environmental aims of the plan should not have a detrimental impact upon the other elements of delivering sustainable development.

Councils' Response

Broad support for the Vision and Aims is noted.

Suggested improvements to the Vision and Aims have been taken into consideration. As a result, amendments have been made, including additional references to education, reducing environmental impacts, and safeguarding locally distinctive heritage and landscapes.

Concerns regarding potential impacts arising from the Vision and Aims have also been considered. Amendments have been made to address these concerns, including a greater emphasis on reducing environmental impacts and improving equality of access and opportunities for people.

Some representations suggested that the Vision and Aims should give greater prominence to certain issues. However, the issues raised are already addressed within the Vision and Aims (now strategic priorities), and no further changes are considered necessary.

Public bodies have commented that the Plan needs to do more to protect sports facilities, promote healthier lifestyles, and safeguard biodiversity. These issues are already addressed in other the policies of the Plan.

Some developers stressed the importance of delivering ambitious housing targets. This point is noted, and the issues raised are already addressed in the Development Strategy; no further changes are necessary.

S/JH: New Jobs and Homes

Representations executive summary:

A number of comments, in particular those also promoting specific development sites, welcomed the decision to exceed the housing target derived from the national 'standard method' for calculating the number of new homes. However, they also stressed the economic strengths of Greater Cambridge and, therefore, wanted the higher jobs forecast to apply and for this to influence a higher housing target. Evidence cited to inform this view included the Cambridgeshire and Peterborough Independent Economic Review (CPIER) 2018, historic growth trends, housing affordability and the ongoing need to reduce in-commuting to Greater Cambridge. In many cases, references to this evidence were linked to the promotion of individual development sites not included in the Plan. Some respondents wanted to see the housing target regarded as a minimum, which should be reviewed regularly in relation to jobs growth. A considerable amount of detailed technical evidence was provided which challenged the methodology for and approach to calculating the jobs and homes targets. This included concerns about the approach not taking account of supressed demand in past trends, recognising that historically employment growth across the area has been higher than forecasted.

Conversely, a range comments, particularly from individuals, parish councils, residents' associations and other organisations, questioned the need for the levels of growth included in the Plan. Concerns raised included the effect on climate change; the availability of water supply and the associated impacts on our area's chalk streams; the effect of development on water quality; insufficient transport and healthcare infrastructure; a reduced quality of life for existing residents and a harmful impact on local character. Some respondents noted the challenges associated with accurately forecasting jobs and homes over the plan period, due particularly to the effects of Brexit, the Covid19 pandemic and higher levels of homeworking. Reference was also made to the importance of taking account of the 2021 Census. A number of respondents expressed concern that housing targets for Neighbourhood Areas are likely to dissuade areas from preparing Neighbourhood

Plans; others wanted to see more land allocated in sustainable rural settlements to support local services.

Response to representations:

The Greater Cambridge Economic Development, Employment Land and Housing Relationships report (EDELHR) was completed in 2022 to update our understanding of employment and housing needs for the draft plan stage. This report comprises a proportionate check of the published Employment Land and Economic Development Evidence Base 2020 (ELEDS) and the associated Housing and Employment Relationships Report 2020, drawing on latest jobs growth data, COVID19 and home working trends, Census 2021, and accounting for substantive representations to the First Proposals.

The response to representations relevant to this policy includes:

- **Arguments to consider higher jobs/homes figures**: The EDELHR takes a robust approach to calculating the most likely employment outcome, allowing for future cycles and shocks. The EDELHR stated that the higher employment scenario is ‘a less likely outcome as it overly relies on the continuation of recent high rates of overall growth’. As such, the 2022 maximum level of homes, associated with the higher employment scenario, is not considered to represent the objectively assessed need for homes in Greater Cambridge, and would therefore not be a reasonable alternative.
- **Arguments to adopt Standard Method minimum homes**: Regarding comments questioning why we should plan for more than government’s Standard Method minimum, the EDELHR found that planning for the Standard Method housing figure set by government would not support the number of jobs expected to arise between 2020 and 2041. It would also be a substantially lower annual level of jobs provision than has been created over recent years. Planning for this housing figure would risk increasing further the amount of longer distance commuting into Greater Cambridge, with the resulting impacts on climate change and congestion. As such, 2022 Standard Method local housing need and the related number of jobs that that would

support, are not considered to represent the objectively assessed need for homes and jobs in Greater Cambridge, and would therefore not be a reasonable alternative. Responses to comments regarding the negative implications of growth are relevant to provision of homes and employment floorspace in response to identified needs. As such they are addressed in Policy S/DS: Development strategy.

- **Methodology and jobs forecasts challenges:** The EDELHR takes a robust approach to identifying the most likely jobs forecast, drawing upon latest available data in a way that is consistent with the approach taken in the published ELEDS**.** The approach to identifying the housing that would be needed to support this incorporates an assumption of providing opportunities for workers in those additional jobs to live close to where they work, thereby mitigating against additional longer distance commuting beyond that assumed by Standard Method. This approach would also help limit further affordability pressures associated with housing delivery lagging behind employment, in contrast to the alternative of identifying our need to be the Standard Method housing figure.
- **Need to account for COVID-19 and other changes:** The EDELHR approach takes account of latest jobs growth data, COVID-19 and home working trends and Census 2021 data and interviews with stakeholders.
- **Planning for industrial space:** The EDELHR considers updated property market data, supply trends and market signals as part of its recommended approach to identifying industrial/warehousing sector needs.

Policy S/JH New Jobs and Homes also covers a range of issues including:

- Jobs and Homes
- Gypsies, Travellers and Travelling Showpeople
- Residential moorings for boat dwellers
- Other caravan dwellers
- Specialist accommodation for looked after children
- Specialist accommodation for older people and disabled people

- Specialist accommodation for students
- Housing requirements for Neighbourhood Areas

Summary of issues arising from First Proposals responses:

A number of comments, in particular those also promoting specific development sites, welcomed the decision to exceed the housing target derived from the national 'standard method' for calculating the number of new homes. However, they also stressed the economic strengths of Greater Cambridge and, therefore, wanted the higher jobs forecast to apply and for this to influence a higher housing target. Evidence cited to inform this view included the Cambridgeshire and Peterborough Independent Economic Review (CPIER) 2018, historic growth trends, housing affordability and the ongoing need to reduce in-commuting to Greater Cambridge. In many cases, references to this evidence were linked to the promotion of individual development sites not included in the Plan. Some respondents wanted to see the housing target regarded as a minimum, which should be reviewed regularly in relation to jobs growth. A considerable amount of detailed technical evidence was provided which challenged the methodology for and approach to

calculating the jobs and homes targets. This included concerns about the approach not taking account of supressed demand in past trends, recognising that historically employment growth across the area has been higher than forecasted.

Conversely, a range of comments, particularly from individuals, parish councils, residents' associations and other organisations, questioned the need for the levels of growth included in the Plan. Concerns raised included the effect on climate change; the availability of water supply and the effect of development on water quality; insufficient transport and healthcare infrastructure; a reduced quality of life for existing residents and a harmful impact on local character. Some respondents noted the challenges associated with accurately forecasting jobs and homes over the plan period, due particularly to the effects of Brexit, the Covid pandemic and higher levels of homeworking. Reference was also made to the importance of taking account of the 2021 Census.

Gypsies, Travellers and Travelling Showpeople: In relation to identifying needs, there were suggestions that the needs of Gypsies,Travellers and Travelling Showpeople should be identified by following the London Gypsies & Travellers 'Best practice for assessing the accommodation needs of Gypsies and Travellers' and based on genuine consultation with the communities affected.

Residential moorings for boat dwellers: The issue of need for residential moorings was not covered in the First Proposals version of the Local Plan, and therefore there are no representations on this issue. Representations on the proposed policy for residential moorings (Policy H/RM) are included in the Homes Topic Paper (2025).

Other caravan dwellers: The issue of need for residential caravan sites was not covered in the First Proposals version of the Local Plan, and therefore there are no representations on this issue. Representations on the proposed policy for residential caravan sites (Policy H/RC) are included in the Homes Topic Paper (2025).

Specialist accommodation for older people and disabled people: Comments from developers that the plan fails to respond to NPPF as does not set a target for specialist housing for older people to be met within the plan period, and also does not identify how this need will be met. Suggestions that consideration should be given to allocating sites in sustainable locations, and that the proposed allocations will not deliver the types of housing required to meet the needs of specialist groups. Representations on the proposed policy for specialist housing (Policy H/SH) are included in the Homes Topic Paper (2025).

Housing requirements for Neighbourhood Areas: A number of respondents expressed concern that housing targets for Neighbourhood Areas are likely to dissuade areas from preparing Neighbourhood Plans; others wanted to see more land allocated in sustainable rural settlements to support local services. Comments suggested that the proposed approach to Neighbourhood Plan housing targets does not comply with the NPPF.

Response to issues raised in representations: The EHEU 2025 provides an up to date robust evidence base informing the identification of objectively assessed needs for the most likely forecast for jobs and the homes figure that would support this. Consideration of the most likely jobs forecast included review of latest historic employment data both from ONS and Centre for Business Research, as well as an in depth look at Greater Cambridge's key sectors, including stakeholder engagement, as reported in the Growth Sector and Industrial and Warehousing studies. The EHEU 2025 gives careful consideration of the data which now presents a clear understanding of the impact of and bounce- back from COVID, and accounts for Census 2021 data where it is considered to be robust. Identification of the most likely jobs forecast in the report is informed by consideration of growth rates across the local sectors, and is considered to be robust. It relies on much of the future period seeing strong growth of around 4,000 additional jobs per annum or more, but also builds in an assumption that there will be slower or contracting periods and unforeseen shocks, which is likely in most economies.

Identification of the jobs supported by Standard Method, and the homes required by the most likely jobs forecast, is completed using an approach that is consistent with that taken in the ELEDS 2020 and EHEU 2023, using assumptions accounting for the latest and most robust datasets.

Consideration of the impacts of the area's objectively assessed needs for homes and jobs, and the plan as a whole on climate, water supply and quality, and infrastructure, is included in relation to Policy S/DS, as informed by relevant evidence bases.

The objectively assessed housing need figure forms a starting point for the plan and is used as a minimum to be provided for. Policy S/DS identifies the amount of homes being planned for which substantively exceeds this figure.

Gypsies, Travellers and Travelling Showpeople: There were suggestions that the needs of Gypsies, Travellers and Travelling Showpeople should be identified by following the London Gypsies & Travellers 'Best practice for assessing the

accommodation needs of Gypsies and Travellers' and based on genuine consultation with the communities affected. The Accommodation Needs Assessment (ANA) undertaken by Arc4 (on behalf of the Councils) has been prepared: taking account of national guidance set out in Planning Policy for Traveller Sites and draft guidance on the review of housing needs for caravan dwellers, using methods established by Arc4 in the preparation of previous accommodation needs assessments, and reflecting practical experience that Arc4 have gained through planning decisions and appeals. The ANA calculates Gypsy and Traveller pitch and Travelling Showpeople plot requirements in Greater Cambridge, based on a review of existing data and by undertaking household surveys with residents or owners of existing pitches and plots.

Residential moorings for boat dwellers: The issue of need for residential moorings was not covered in the First Proposals version of the Local Plan, and therefore there are no representations on this issue. Responses to the representations on the proposed policy for residential moorings (Policy H/RM) are included in the Homes Topic Paper (2025).

Other caravan dwellers: The issue of need for residential caravan sites was not covered in the First Proposals version of the Local Plan, and therefore there are no representations on this issue. Responses to the representations on the proposed policy for residential caravan sites (Policy H/RC) are included in the Homes Topic Paper (2025).

Specialist accommodation for older people and disabled people: There were suggestions that the Local Plan fails to respond to the NPPF as it does not set a target for specialist housing for older people to be met within the plan period, and also does not identify how this need will be met. The Housing Needs of Specific Groups Update for Greater Cambridge (2025) identifies the needs for different forms of specialist accommodation for older people and disabled people within the plan period, and these needs are set out within Policy S/JH: New jobs and homes. An explanation as to how these needs will be met is set out in within Policy S/DS: Development Strategy, but it is anticipated that a mix of types, tenures and sizes of homes or bedspaces for older people and disabled people will be delivered

on the strategic sites allocations and through windfall developments that come forwards in accordance with the specific policy for specialist housing (Policy H/SH) and the suite of policies that allow for windfall residential developments within Cambridge, and our towns and villages.

Specialist accommodation for students: The issue of need for student accommodation was not covered in the First Proposals version of the Local Plan, and therefore there are no representations on this issue.
Responses to the representations on the proposed policy for student accommodation (Policy H/SA) are included in the Homes Topic Paper (2025).

Housing requirements for Neighbourhood Areas: National planning policy requires Local Plans to include housing requirements for designated neighbourhood areas within their strategic policies, and outlines that the requirement should reflect the overall strategy for the pattern and scale of development and any relevant allocations. Policy S/JH therefore includes housing requirements for the designated neighbourhood areas within Greater Cambridge, with the individual housing requirements calculated taking account of the overall housing requirement, the development strategy, existing supply and the proposed additional allocations, and the population of the neighbourhood area.

National Planning Practice Guidance makes clear that where a Local Plan sets out a housing requirement for a designated neighbourhood area, that this requirement is not binding as neighbourhood planning groups are not required to plan for housing.

Therefore, the inclusion within the Local Plan of specific housing requirements for designated neighbourhood areas does not mean that these designated neighbourhood areas are required to consider housing needs or allocate sites to accommodate the housing requirement. Any made (adopted) Neighbourhood Plans do not automatically need to be reviewed to take account of the identified housing requirement.

As part of the evidence base to support a Neighbourhood Plan, neighbourhood planning bodies may commission additional housing needs evidence to understand

their particular needs, including for affordable housing, homes for older people, or housing mix.

Climate Change

Summary of the main issues raised in general comments on the climate change theme:

There was strong support for the general direction of the climate change policies in representations submitted from individuals, parish councils and developers. Some representations asked the councils to ensure that new housing will use up-to-date heating technology and the representations emphasised the need to constantly review the policy in the context of new technologies and government targets. Some respondents felt that the First Proposals omitted important things, such as a retrofitting policy and the provision of gardens or allotments which could store carbon. Several representations also objected to policies on the grounds that the level of development in the Local Plan would exacerbate pre-existing water issues, thereby negating the climate change policies. Other representations, including one by the Cambridge Doughnut Economic Action Group also objected, arguing that growth and sustainability are incompatible. Some developers and landowners supported the policies and often explained how their site could fulfil these policies. Other developers, such as Southern and Regional Developments Ltd, objected to the policies because they thought that the proposed standards were too high which would make the policies undeliverable.

Strong support for this overarching theme and that the location and design of development will play a key part in the transition to net zero carbon. However, given the climate crisis some representations question whether the policies go far enough, whether they will be successfully implemented in new developments, and the need for retrofit in existing properties.

Response to the Main Issues Raised in Representations:

Respondents raised a number of important matters through previous consultations on the emerging Local Plan. These matters have been considered during the preparation of the plan and its policies.

The Councils' response to these matters include:

- The Councils will operate proactively on the matters of water supply and water efficiency in new developments. Policies are proposed which will seek high levels of water efficiency.

- Acknowledging that best practice standards can change over the lifetime of the Local Plan policies will be drafted to ensure that innovative solutions are not unduly disregarded.

- An integrated approach to renewable and low-carbon energy infrastructure will be needed if it is to operate effectively in our homes and places of work

- The role of green infrastructure and new habitats in new developments can make important contributions to carbon sequestration, and this is addressed by proposed policies.

- In a number of cases the policies proposed in the plan do go above typical standards, but they respond to our evidence of what is needed to respond to climate change in Greater Cambridge. They have been tested through evidence and are considered to be viable.

The following proposed policies areas are addressed in this topic paper:

- CC/SD: Sustainable development and the climate emergency
- CC/DC: Designing for a changing climate
- CC/NZ: Net zero carbon new buildings
- CC/WE: Water efficiency in new developments
- CC/IW: Integrated water management, sustainable drainage and water quality
- CC/FM: Flood risk management
- CC/RE: Renewable energy projects and infrastructure
- CC/CE: Supporting a circular economy and sustainable resource use
- CC/CS: Supporting land-based carbon sequestration and carbon sinks
- Policy CC/SD: Sustainable Development and the Climate Emergency

CC/SD: Sustainable development and the climate emergency

Summary of issues arising from First Proposals representations:

During the First Proposals consultation, general comments in relation to the Climate Change Chapter requested the Local Plan's climate change vision to advocate a more holistic approach to carbon offsetting (Marshall Group Properties) and sustainable development through considerations of the natural environment (Natural England). Comments also suggested that policies in the Climate Change Chapter needed to clarify what details applicants would be expected to submit for Local Plan policies to be effective. There were requests for clarity on how information will be secured in terms of design-led solutions and the limits set within the policy were received in relation to Policy CC/DC. Also, for policy to clarify how applicants should demonstrate water efficiency were received in relation to Policy CC/WE. Requests for the Local Plan to incorporate a more holistic approach to securing multi-functional benefits for climate change, flood management, water resources and water quality through the protection and enhancement of the natural environment were received in relation to Policy CC/FM.

Response to the main issues raised in representations:

The councils acknowledge that sustainable development is multifaceted and involves various aspects of the built and natural environment. To integrate a more holistic approach to sustainable development within the Local Plan, Policy CC/SD has been drafted to guide the way in which applicants should present how their proposal will deliver places that are adapted to and mitigate the effects of climate change. This approach to Sustainability Statements is a progression of Policy 28 of the Cambridge Local Plan (2018) and Policy CC/1 of the adopted South Cambridgeshire Local Plan (2018).

The councils also acknowledge that some solutions can entail a variety of environmental benefits and that these interconnected solutions need to be explored thoroughly when designing places. Therefore, Local Plan policies have been drafted in such a way that solutions with the capacity to deliver interrelated benefits are explicitly supported (e.g. SuDS and their potential to facilitate a combination of flood

risk improvements, water quality improvements, biodiversity enhancements and amenity uplifts). Determining an appropriate design-led solution to climate change mitigation and adaptation will need to be conducted on a case-by-case basis, accounting for the various development opportunities and constraints. Policy CC/SD has been drafted to ensure that applicants will provide details of the sustainability benefits their proposals will bring and justification for the approaches to design and construction being proposed.

International Leadership and Collaboration

With the support of the regional Cambridgeshire and Peterborough Climate Action Plan (2022–2025), this reaffirms the UK's climate leadership role through the UNFCCC climate agenda and associated commitments made at the 2024 UN General Assembly. This includes contributing to global climate finance goals and addressing climate-driven international risks, such as conflict and displacement. These commitments reinforce the importance of domestic policy alignment with global climate action.

Policy CC/DC: Designing for a Changing Climate

Summary of issues arising from First Proposals representations:

Support for the policy was expressed within representations from a variety of respondents; several proposed additional elements to include in the policy such as site-wide adaptive measures, green walls and sustainable drainage systems. Other respondents, such as Bassingbourn-cum-Kneesworth PC, questioned the applicability of some of the policy's technical stipulations which could require rephrasing elements of the policy's wording. Respondents also disagreed about the scope of the policy. Some, such as the Cambridge Doughnut Economics Action Group, thought it should go further and provide targets for developers to meet. Contrastingly, some respondents, including the Home Builders Federation, felt that the councils had not adequately considered how the policy would affect the viability of housebuilding. Several respondents, such as Countryside Properties, also

asserted that this was not a matter for planning but should be left to Building Regulations.

Response to the main issues raised in representations:

At the time of writing, Paragraph 1A of Section 19 of the Planning and Compulsory Purchase Act 2004 states, '[development] plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change'. The introduction of this paragraph was made by Section 182 of the Planning Act (2008). Moreover, Paragraph 164 of the NPPF (December 2024) states that new development should be planned for in ways that 'avoid increased vulnerability to the range of impacts arising from climate change' and 'help to reduce greenhouse gas emissions'. Therefore, opting to remove this policy on climate change adaption and relying solely on Building Regulations would conflict with both national policy requirements and the Local Planning Authority's legal duty.

The councils acknowledge comments in relation to the various design solutions that could be integrated or encouraged as part of development to ensure it is resilient to the impacts of climate change. Policy CC/DC now requires applicants to consider a series of placemaking measures that can help to make a development resilient to climate change, as well as highlighting the linkages with other policies in the Local Plan. Policy CC/SD has also been drafted, requiring applicants to demonstrate the sustainable design solutions integrated as part of the proposal.

The councils acknowledge comments regarding the need for policies on sustainable development to be applicable to all types of development, where reasonable and necessary. The policy direction to Policy CC/DC has been clarified to ensure that climate resilience is also an explicit consideration for commercial, infrastructural and mixed-use developments, as well as residential proposals. The preferred policy approach has also sought to simplify the design and overheating priority order, with the policy's supporting text providing clarification on how the cooling hierarchy should be followed. Absolute targets and standards for the adaptability of new

buildings was considered by the councils during the drafting of the policy, but it was considered that this would be better navigated using the UK Net Zero Carbon Buildings Standard, which includes standards for climate adaptability.

It is acknowledged that planning policies on sustainable development should also consider the sustainability benefits that can be delivered as part of change of use proposals or refurbishment projects that require planning permission. In ensuring that existing buildings can be considered, Policy CC/SD has also included projects involving existing buildings within the scope for Sustainability Statement requirements.

Policy CC/NZ: Net zero carbon new buildings

Summary of issues arising from First Proposals representations:

The general thrust of the policy received a significant level of support from parish councils, organisations such as Carbon Neutral Cambridge, CPPF and the Wildlife Trusts, members of the public and some of the area's developers and landowners including the University of Cambridge and the Marshalls Group. There were calls for specific targets to be set around embodied carbon associated with demolition and remediation of sites.

A number of organisations, including the University of Cambridge, while supportive of the policy, felt there is a need for some flexibility in the application of specific targets, to take account of different building types where a more nuanced approach may be needed, for example R&D buildings.

Those objecting to the policy, primarily developers and the Home Builders Federation, were concerned that the delivery of net zero carbon policy is not a matter for planning but should be left to Building Regulations and the emerging Future Homes Standard. They raised concerns around the technical feasibility of the policy, impact on viability and implementation of the policy. The issue of policy

implementation was also raised by some Parish Councils. It was also argued by developers that policy should only consider regulated energy and not unregulated energy (energy used by plugged-in appliances) as these are outside of the control of developers. Many considered that the delivery of net zero carbon was best left for national standards and that the role of the decarbonisation of the grid also needed to be recognised. Concerns were also raised that the policy referenced no new gas connections.

Some raised concerns that the policy does not contain targets for existing buildings and did not recognise the importance of reusing rather than demolishing existing buildings. There were requests for the policy to more explicitly include refurbishments/reuse of existing floorspace within its scope and to factor material circularity.

Response to main issues raised in representations:

With regards to the calls to set specific targets for embodied carbon, while there are a number of 'best practice' approaches to embodied carbon, including the RICS Whole Life Carbon Assessment, the pilot UK Net Zero Carbon Buildings Standard, and the LETI and RIBA 2030 targets for embodied carbon, there are no nationally defined 'targets' for reducing the embodied carbon associated with constructing new developments. A further challenge faced by industry is a lack of consistent measurement, leading to mis-aligned benchmarks, project targets and claims. Targets set via planning policy will only be useful once measurement is consistent. However, there is a consensus best practice accepted approach to assessing whole life carbon including embodied carbon: the RICS Whole Life Carbon Assessment (WLCA). RICS WLCA expresses how to implement the relevant British Standard (EN15978). RICS WLCA splits up the whole life carbon into 'modules' from A0 to C4. The 'A' modules are upfront embodied carbon (up to completion of the building), 'B' modules are in-use, and 'C' modules are end of life. Recommended best practice targets to be achieved in the 'A'-modules have been proposed within the newly released UK Net Zero Carbon Buildings Standard (developed by a coalition of effectively all the relevant standard-setting bodies in the UK built environment industry, released in pilot form in Autumn 2024). These

UKNZCBS targets are available for new build and retrofit, for a wide range of building types. The UKNZCBS pilot states intent to also provide equivalent targets for life-cycle embodied carbon (which would include all modules from A to C except the parts of the B-modules that relate to operational energy and water use).

In relation to objections that the setting of targets related to net zero carbon should be left to Building Regulations, the Planning and Energy Act enables LPA's to set targets in advance of Building Regulations. The 2023 WMS does not rule out local planning authorities being able to set local energy efficiency targets that go beyond current or future Building Regulations but notes that to be found sound these must have a well-reasoned and robustly costed rationale, as detailed above. And while the WMS does suggest that metrics should be expressed as a percentage uplift on Target Emission Rate (TER), legal advice procured by Essex County Council and Etude notes that while the WMS is policy guidance to which regard must be had, deviation from its guidance can be justified as long as there is clear evidence which provides the reason for doing so, and which demonstrates the viability of policies. The Council's net zero carbon evidence base provides evidence to demonstrate that achievement of the policy requirements is both technically feasible and viable. Furthermore, similar energy metric based policies have been considered at examination and found sound, most recently in the Tendring Colchester Borders Garden Community Development Plan document.

With regards to the need to consider the decarbonisation of the grid, this has been considered in the development of the policy. It was deemed necessary for new developments to contribute to total energy use due to the significant expansion of renewable energy that will be required nationally to support grid decarbonisation. Reliance on the Future Homes Standard would only require new homes to be 'zero carbon ready', leaving further carbon reduction to achieve net zero carbon to home owners and the decarbonisation of the grid, further adding to the retrofit burden and the 28 million homes in the UK already needing retrofit to achieve net zero carbon by 2050. Such an approach would also exceed the housing sector carbon budget for Greater Cambridge, required to ensure that the area plays

its fair share in achieving the legislated national carbon budgets. Work is currently underway to develop a Local Area Energy Plan for Cambridgeshire, which will consider the infrastructure required to achieve net zero carbon by 2050 and the costs of this infrastructure. This will help to set out the scale of the challenge in meeting net zero carbon and the importance of ensuring that all of the energy requirements of new development are kept at an absolute minimum. A report carried out by the Aldersgate Group has already highlighted that that without significant investment, the UK's electricity grid will become significantly constrained from 2030 as the economy electrifies. While the Aldersgate report is focussed on industrial electrification, it highlights the need to ensure that new development utilises new energy metrics to deliver low energy buildings, helping to reduce peak demands on the grid.

While the Objections related to the need for targets to be set for existing buildings are noted, policy in the local plan is focused on new development, with many of the areas required to retrofit or refurbish existing homes being covered by permitted development rights. Planning can also only be concerned with the proposals for which planning permission are sought, so for example, if planning permission for an extension is sought, it is not possible to use planning conditions to require improvements to be made to the rest of the property in order for a net zero carbon target to be achieved. The UK Net Zero Carbon Buildings Standard does include energy use intensity targets for retrofits, becoming more challenging over time, the use of which could be encouraged via local plan policy. But the standard does not yet include space heating demand targets for retrofit, which are to be added over time as the standard develops beyond the initial pilot phase. As such the setting of specific targets for retrofit would be a complex task requiring significant modelling of different housing architypes to determine what could be considered technically feasible and viable targets to reflect the variety of typologies of existing buildings. A better solution would be for Building Regulations to be updated to require Consequential Improvements for the existing building stock given that most retrofit measures are covered by Building Regulations requirements. The issue of the need to promote the adaptive reuse instead of the demolition of existing buildings has

been incorporated into policy CC/CE (Supporting a Circular Economy and Sustainable Resource Use).

With regards to representations suggesting that the space heating demand should be amended to 15 kWh per m^2 instead of 15-20, the levels set in the policy is in line with the recommendations of the Committee on Climate Change. In addition, it allows for some flexibility for those house types where achievement of a strict space heating demand of 15 kWh per m2 could be more challenging, for example bungalows and detached dwellings.

Some representations called for flexibility in the application of targets for specific building types, notably research and development buildings. It was decided that all non-residential building types (except schools) should align with the UKNZCBS 2030 EUI targets. Current Greater Cambridge policy already includes a "where feasible" clause for non-residential targets (excluding schools). It has also been suggested that a "where viable" clause should be added in as a further caveat, to account for the fact that there is limited evidence to demonstrate whether there will be a cost uplift to meet these targets that could impact viability. Reference to viability has now been added to the policy wording, alongside the existing reference to technical viability.

Policy CC/WE: Water efficiency in new developments

Summary of issues arising from First Proposals representations:

There was strong support for the policy direction from a range of public bodies and individuals. Many representations expressed concern about the level of water stress in the area and damage to chalk streams and stated that there should be a limit on growth if there is insufficient water or until further water supply is available. The Environment Agency and Natural England identified that the Water Cycle Strategy will need to demonstrate how water to meet growth needs will be supplied sustainably. Other comments related to the need for collaborative working, and that there will be more detail about this future supply in the Water Resources Management Plans being produced by the water companies.

There was support for the proposal to require high water efficiency standards, noting the potential of rainwater harvesting and greywater recycling to achieve these. However, there were also representations from developers saying that 80 litres per person per day is unrealistic and would have an impact on the viability of developments, and that the Building Regulations level of 110 litres should be used. Some representations from developers and landowners highlighted some of the potential problems with rainwater harvesting and greywater recycling such as maintenance issues, where there is limited roof collection (such as flats) and that rainwater is limited in this part of the country. There were some suggestions on the policy wording. For example, whether the standard would apply to all sizes of developments, if BREEAM is the right tool to use for non-housing developments and is the term “unless demonstrated impracticable” too weak, giving developers a let-out. The Environment Agency stated that to ensure the policy is effective, further guidance would be needed regarding the evidence applicants would be expected to submit to demonstrate that this standard has been achieved and how this would be monitored.

Response to main issues raised in representations:

Support for the policy direction was noted. There were concerns about growth and the impact it is having on the environment. Housing and employment growth targets are based on the standard method, as set out as a requirement by Chapter 5 of the NPPF (December 2024). The councils acknowledge that significant growth in the area raises serious considerations with regards to sustainable water supply and water infrastructure. The councils agree that partnership working with Government bodies, local water authorities and landowners will be integral in ensuring sustainable water supply for both existing and future communities. This issue and how it is being addressed in the overall Local Plan strategy is addressed in the Strategy Topic Paper.

The standards proposed are achievable and viable. The approach reflects evidence that the cost effectiveness of such measures can improve with the scale of the project. This cost effectiveness of community scale measures, particularly for rainwater harvesting, was also shown in the CIWEM’s ‘Water Reuse in New Housing’ report. As a result the policy includes a more stringent water efficiency level for larger developments where community scale measures for water recycling could be implemented in addition to water efficient fixtures and fittings.

Cost of implementing the propose standard has been accounted for the in Local Plan Viability Assessment.

BREEAM is an industry standard certification scheme to assess the environmental performance of buildings. This standard is in the current adopted Local Plan policies and has been practical to use and it is also used in the Shared Standards. As such it seems an appropriate tool. The wording 'unless demonstrated impracticable' allows for some flexibility depending upon the exact circumstances, but the onus is on the developer to demonstrate within the Sustainability Statement the reasons why the full BREEAM credits required in the policy would not be achievable.

It is agreed that the Local Plan should be clear as to how the Councils wish to see water efficiency details presented as part of a planning application. The policy is clear that details about how the water efficiency levels have been achieved should be submitted as part of a Sustainability Statement.

Policy CC/IW: Integrated Water Management, Sustainable Drainage and Water Quality

Summary of issues arising from First Proposals representations:

A variety of organisations expressed support for the policy. Several respondents, including Cambridgeshire County Council and the Environment Agency, showed support for managing water on site at source. There was also support for incorporating brown/green roofs where practical, use of permeable surfaces and use of sustainable drainage systems (SuDS) as ways to reduce flooding in new development. Many comments highlighted the impacts of climate change and the effects on weather and flooding and that this would need to be considered. There were comments from Anglian Water on the benefits of sustainable drainage systems for improving water quality and reducing the amount of water entering the wastewater system. Organisations including Historic England argued that the policy needed to ensure that the design of SuDS would not harm other aspects of the built or natural environment. Wates Development argued that sites of all scales and not just large sites can adopt ambitious water use targets and implement water recycling systems. Anglian Water requested that the policy recognise the capability for pollution control to be introduced as part of SuDS systems.

Response to main issues raised in representations:

The Councils acknowledge that best-practice guidance and standards for all aspects of development can change over the duration of a plan period. Therefore, the Local Plan policies will be drafted to ensure that innovative solutions to contemporary

problems, including sustainable drainage and water quality control, are not unduly disregarded by the planning system. The matters of flood risk management and Integrated Water Management systems have been separated into two policies: Policy CC/IWM and Policy CC/FM. This approach has been adopted to allow the councils to more clearly establish their support for measures designed to enhance water quality, mitigate against water pollution, and introduce natural forms of drainage. Requirements in relation to site-wide considerations of IWM systems and surface-water drainage strategies have been included. In addition, provisions have been included in relation to the long-term management and maintenance of surface-water drainage infrastructure.

Comments made by individuals highlighted that drainage requirements should account for the impermeable clay ground in Cambridgeshire and ensure that drainage requirements do not rely solely on ground infiltration. The policy recognises the various ways that surface-water flooding can be sustainably drained, adhering to national guidance and former approaches to surface-water drainage. Reference has also been made to supplementary planning guidance prepared by the LLFA, which provides applicants with additional technical guidance on alternative drainage solutions that can be used where infiltration to the ground may be unfeasible due to a site's geology or topography.

The policy has also been constructed to include references to allowances for climate change; references to the drainage priority order and the addition of grey water recycling systems; inclusion of provisions on pollution control; and inclusion of provisions regarding the long-term management of the drainage and pollution control infrastructure.

Below-ground heritage assets are protected by both the National Planning Policy Framework (NPPF Paragraphs 207 and 213) and the Ancient Monuments and Archaeological Areas Act 1979 and Policy GP/AR:Archaeology of the draft Local Plan. Therefore, it was not considered necessary to repeat this within this policy.

Policy CC/FM: Flood Risk Management

Summary of issues arising from First Proposals representations:

Consultees expressed support for policy requirements in relation to flood risk management. Various Parish Councils requested that the policy should include provisions for the delivery and long-term management of flood defences, and that these details should be agreed prior to the occupation of development. The Cam

Valley Forum proposed including areas for storage of flood waters. Cambridgeshire County Council requested that Local Plan policies relating to flood risk and drainage accounted for the impact of climate change and requested that the Local Plan acknowledged the Cambridgeshire Flood and Water Supplementary Planning Document (SPD) (2016).

Individual respondents commented that efforts to manage flood risk and integrate drainage strategies should be wary not to cause any harm to the integrity of aquatic ecosystems or cause damage to water bodies up or downstream of a development. The Environment Agency thought that the scope of the policy needed to be widened to reduce flood risk in a more holistic manner including securing both mitigation and betterment through growth. The Environment Agency also highlighted that the Local Plan should be supported by robust evidence, including a Water Cycle Study, a more obviously demonstrated sequential test and a Level 2 SFRA.

Response to issues raised in representations:

Policy CC/FM has been prepared to outline how flood risk and flood risk management will be considered when determining planning applications for new development, adding evidence-based local requirements to extant national planning policy requirements related to flooding. Policy CC/FM highlights that development proposals will be supported where development will not pose an undue risk to both the forthcoming development and communities elsewhere (both within Greater Cambridge and beyond), having regard to flood risk predictions that factor climate change. To assist applicants with the preparation of flood risk assessments and arrangements regarding flood defences and flood mitigation strategies, references to the Cambridgeshire Flood and Water Supplementary Planning Document (SPD) (2016) or successor documents adopted by the Lead Local Flood Authority have been included within the supporting text of the policy.

The Councils appreciate that flood mitigation measures and new development should not worsen issues up or downstream from a development site. Flood management requirements will be read alongside the Local Plan's requirements for integrated water management systems, which actively seek to ensure that solutions that introduce a range of integrated water management benefits (e.g. biodiversity improvements, water quality improvements using natural drainage systems, and efficient water reuse systems, alongside flood risk management) are taken, wherever possible.

The Councils have sought to ensure that the Local Plan is based upon a robust evidence base. A Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA) have been prepared, which identifies areas in Greater Cambridge that are at risk of flooding from all sources and looks at the anticipated impact of climate change. In line with comments received from the Environment Agency, a separate stand-alone Sequential Test report has been produced to show the Council's process in the selection of sites for allocation for development by following a sequential approach and avoiding high risk areas using the information in the SFRAs.

Policy CC/RE: Renewable and Energy Projects and Infrastructure

Summary of issues arising from First Proposals representations:

A variety of organisations expressed support for the policy. There were several suggestions to improve the policy, including: more explicit support for the delivery of an accessible anaerobic digestion plant; clearer requirements for the incorporation of community power projects into new settlements; and support for the installation of solar panels onto the roof of houses.

Some respondents argued that the policy needed to emphasise a holistic, district-wide strategy to renewable energy production, whereas others focussed upon how individual buildings could contribute. One respondent questioned whether the electric cables in South Cambridgeshire's villages have capacity to support electric cars or heat pumps. A range of respondents suggested that the policy should set out clearer criteria around the potential impact of developments on the character of the surrounding landscape, biodiversity, and the historic environment. Some suggested that the policy should explicitly restrict development that would interfere with military aviation activities. Several respondents, including the Campaign to Protect Rural England, objected to the policy on the grounds that it would not halt the removal of farmland.

Response to issues raised in representations:

The councils recognise that an integrated approach to renewable and low-carbon energy infrastructure will be needed if it is to operate effectively in our homes and places of work. While policy CC/RE forms part of this integrated approach, work has recently started on a Cambridgeshire Local Area Energy Plan, which will consider the infrastructure needed to support the delivery of net zero carbon across the county. As part of this work, consideration will be given to the decarbonisation of heating systems and transport alongside an uplift in renewable energy generation. The work will also provide information in relation to the costs of such infrastructure and will enable the development of business plans to help deliver that infrastructure. Policy CC/RE will provide policy support for the introduction of low-carbon energy generation and energy infrastructure, which will function alongside other local planning policy requirements regarding the assessment of grid capacity and the introduction of ancillary systems, such as battery storage systems, that will facilitate an integrated approach to renewable energy delivery in Greater Cambridge (e.g. Policy I/EI).

In response to those respondents who objected to the loss of farmland as a result of renewable energy projects, in particular solar farms, the councils agree that the loss of the best and most versatile agricultural land should be avoided. This has therefore been reflected in the criteria-based approach in this policy, as well as a stipulation that proposals should also include plans for their end-of-life treatment, including the decommissioning of any infrastructure and measures to return the site to its former condition. Policy CC/RE will also be read alongside Policy J/AL: Protecting the best agricultural land, which generally guards against the irreversible loss of Grades 1, 2 or 3a agricultural land. It is important to note that many renewable energy projects can be designed and delivered to support the continued use of agricultural land in tandem with new infrastructure, for example land around solar panels can be used for livestock, and wind turbines are usually spaced to the extent that crops can continue to be farmed.

In response to feedback, the policy has also been designed to encompass criteria relating to a wider range of impacts arising from renewable energy projects, following the hierarchy of avoidance and then minimisation and/or mitigation of impacts. In response to the representations, specific criteria have been added to address concerns around biodiversity, impacts on heritage assets, including their setting, and the safe operation of aviation. In relation to landscape impacts, specific reference has also been made to part 2 of the Greater Cambridge Landscape Sensitivity Assessment (2021), which provides a clear framework to support applicants in understanding the suitability of their site for renewable energy development in landscape terms. Additionally, policy wording has also been introduced to ensure

that, where cross-boundary impacts could arise from the proposed development, decisions will be considerate of neighbouring local authority requirements.

Policy CC/CE: Supporting a Circular Economy and Sustainable Resource Use

Summary of issues arising from First Proposals representations:

A variety of organisations expressed support for the policy. Respondents, such as Cambridgeshire County Council, included suggestions to make the policy more legible to members of the public. Some organisations, including Croydon PC, suggested ideas to improve the policy, such as ensuring that new settlements have community bins similar to ones implemented in Eddington. Respondents differed in their reactions to the scope of the policy; the Cambridge Doughnut Economics Action Group for example, argued that targets were needed to ensure developers deliver the policy. Contrastingly, some respondents, such as the Metro Property Unit Trust, sought to narrow the policy's scope, suggesting that the policy should only be applied to major developments. The Home Builders Federation asserted that these requirements should be dealt with via national regulation as opposed to local planning policy. Some developers, such as Martin Grant Homes, used their representations to explain how their proposed site accords with the policy's requirements.

Response to main issues raised in representations:

There is a national commitment to achieving net zero carbon by 2050; reductions in waste generation and unnecessary demolition activity will play critical roles in achieving this target through the facilitation of reductions in embodied carbon. Paragraph 8 of the NPPF states clearly that "minimising waste" and supporting movements towards a "low carbon economy" are core components of the environmental objective of the planning system, whilst Paragraph 161 of the NPPF is clear that plans should "encourage the reuse of existing resources, including the conversion of existing buildings". Notwithstanding the above, Paragraph 27 of the NPPF requires strategic policymakers to take consistent approaches with other strategic bodies, particularly on matters such as waste. Therefore, it was not considered appropriate for the Local Plan to omit requirements for sustainable resource use and waste management.

Feedback received during the First Proposals consultation was broadly positive, providing support for local planning policy on sustainable waste management and the integration of circular economy principles in the Local Plan. It is recognised that effective resource and waste management needs to be considered when a development is operational, as well as during the construction process. This will

need to include the consideration of material reuse, recycling or other material recovery as part of development. Moreover, innovative waste management solutions have been implemented in new development across Greater Cambridge, such as the underground bin system introduced in Eddington; the councils agree that innovative solutions that facilitate sustainable waste management and operational resource use should be encouraged by local planning policy. Therefore, support for innovative waste management solutions has been built into the policy, in addition to requirements for waste sorting and storage facilities to align with or exceed guidance contained within Cambridgeshire County Council's RECAP Guidance (or successor documents).

The councils agree that where possible existing buildings should be reused or repurposed, unless a clearly evidenced more sustainable outcome, can be delivered through their demolition and replacement. However, it is also acknowledged that details submitted as part of a planning application should be proportionate to the scale and nature of a proposed development in line with the NPPF. A standalone Circular Economy Statement will be required for large-scale development (i.e. development of 150 dwellings or more, 15,000 square metres or more, or where the site area is 2 hectares or more) or development that involves the demolition of existing buildings. Smaller scale developments will also be expected to integrate circular economy principles, but this can be sufficiently demonstrated as part of a Sustainability Statement for the proposed development. The supporting text has clarified the details expected as part of the Circular Economy Statement – as waste output and material requirements can vary considerably from project to project, targets for waste outputs and material circularity are not proposed to be included within policy and will instead need to be established on a case-by-case basis as appropriate to the development in question. In a similar vein, targets for whole life carbon are not proposed at this stage as this will vary depending on the type of development being proposed. It is noted that for the UK Net Zero Carbon Buildings Standard, metrics related to whole life or life cycle carbon are expected to evolve over time.

To maintain the policy's focus on circular economy principles and sustainable resource use, the policy title has been altered in line with the suggestion made by Cambridgeshire County Council. Requirements for Construction Environmental Management Plans (CEMPs), which cover aspects of construction management and pollution control beyond waste and resource management, were also moved to a separate, complementary policy within the Local Plan (Policy I/CM) to maintain Policy CC/CE's focus on the circular economy and sustainable resource use.

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

Summary of issues arising from First Proposals representations:

As part of the First Proposals consultation, there was general support for a policy related to land-based carbon sequestration. Some suggested that for developments over a certain threshold, soil management plans should be required to demonstrate that carbon sequestration would be maintained into the future. A number of developers also supported the policy, noting the potential that the landscape strategies for new developments offered in relation to enhancing carbon sequestration through new habitat creation and requesting that this be acknowledged by the policy.

Response to main issues raised in representations:

The role that the provision of green infrastructure and new habitats as part of new developments can play in carbon sequestration has been added to the policy in response to representations calling for the policy to recognise and support this approach.

Policy GP/LC: Protection and enhancement of landscape character

Summary of issues arising from First Proposals representations:

Many respondents generally supported the policy direction.

Some suggestions were made to the policy wording including requests for more clarity to identify what makes green gaps 'important'. Some respondents identified areas of particular landscape value that should be protected such as the green corridors around the River Cam, River Great Ouse, Hobson's Brook and West Cambridge and the landscape south of Cambridge Biomedical Centre around White Hill. A few developers and landowners wanted the policy to allow for the consideration of development on its own merits and asked that the policy recognised the positive impact that development can have upon the character of landscapes. There were also requests for new developments to retain and enhance landscape features that have particular value, rather than retain all landscape features.

Cambridge Past, Present and Future argued that similar Local Plan policies had not been effective at protecting the setting of Cambridge from the cumulative impact of development and that the policy should require the planting of trees early to improve the screening of the city. The Campaign to Protect Rural England (CPRE) also expressed a wish that the policy would prevent visually intrusive developments occurring. Contrastingly, Metro Property Unit Trust argued that the policy needed to ensure that the protection of trees is measured against other elements of the

proposal. North Newnham Residents Association provided a number of comments relating to how the policy should protect and enhance hedges.

Response to Main Issues Raised in Representations:

Many comments were received in relation to the protection of specific areas of landscape value. A 'character-based approach' has been followed for the policy based upon the Greater Cambridge Landscape Character Assessment (GC LCA) (2021). This approach has been followed as it recognises the character, diversity and natural beauty of all landscapes across the whole of Greater Cambridge rather than a 'local landscape designations approach' which identifies and focuses on specific areas of greater landscape value.

As explained above, the reference to important green gaps made at First Proposals was in response to continuing Policy NH/1 in the South Cambridgeshire Local Plan (2018) which protects the areas of countryside between Longstanton village and the new town of Northstowe. It was considered that there are no other specific green gaps that are important from a landscape point of view and that it is unnecessary to include this as part of the policy. The continuation of the protection of the gap between Longstanton and Northstowe is included within the Northstowe policy.

The policy seeks to protect, conserve and enhance the landscape and recognises that development can provide opportunities for this. It has been drafted to recognise that landscape features that positively contribute to the quality and character of the area should be protected, conserved and enhanced, responding to a comment that not all landscape features have value.

The policy has a clause relating to the cumulative effects of development to avoid incremental harm to local landscape character. Policy BG/TC: Tree Canopy Cover and the Tree Population requires additional tree planting and the protection of trees and hedgerows.

The GC LCA looked in detail at the physical and human/cultural influences to identify the Landscape Character Areas including the consideration of historic landscape character. This is therefore an intrinsic part of the description of each Landscape Character Area and the landscape sensitivities and landscape guidelines provided in the GC LCA, and which should be considered in new development proposals. With regards to Heritage Impact Assessment (HIA), the methodology for carrying out HIAs in Greater Cambridge recognises the importance of all strategic views across and

within the city. Through the Skyline and Tall Buildings Strategy, the viewpoints are being updated in consultation with Historic England, including dynamic views.

With regards to criticism of existing development proposals, all applications are subject to landscape character policies in the adopted Cambridge and South Cambridgeshire Local Plans (2018). These policies refer to older studies and the more recent 2021 GC LCA is also used in the consideration of development proposals as an updated piece of evidence that covers the whole of Greater Cambridge . The identification of sites within the Local Plan has followed a rigorous approach to site assessment, set out in the Greater Cambridge Housing and Economic Land Availability Assessment (HELAA). The sites were assessed against a wide range of criteria including landscape and townscape, carried out by landscape architects.

Responses to representations regarding Important Countryside Frontages are included in the Protected Open Space study, which is an appendix to the Biodiversity and Green Spaces Topic Paper.

Historic England (HE) commented that views from the south and east of the city are being underplayed as a characteristic of the city and suggested that Heritage Impact Assessment should look at this issue. HE also argued that the policy should ensure that new development positively responds to Cambridge's historic landscape. Natural England stated that locally designated landscapes should be identified within the plan and given policy protection.

Some respondents argued that specific site proposals in the First Proposals would not be in line with this policy, in particular sites at Babraham, Sawston, and there was reference to Anglian Water's proposal at Honey Hill. Developers such as TOWN, argued that the policy will need to recognise the strategic objectives of the North East Cambridge Area Action Plan and avoid imposing conditions that could unreasonably restrict development.

Some respondents including some Parish Councils argued that Important Countryside Frontages (ICFs) are an important policy tool for protecting villages, whereas other respondents saying they were an unnecessary additional layer of constraint to development. Some respondents asked for additional ICFs , whereas other respondents asked for ICFs to be removed.

In terms of the additional survey questions, there were a high number of representations in response to Q.4 (Cambridge North-East) which supported the protection of existing natural and landscapes, or provision of new green spaces. In response to Q.7 (southern rural cluster), Q.8 (villages), Q.13 (aspirational vision for Greater Cambridge), there were some representations which expressed support for protecting Greater Cambridge's landscape and there were concerns that new development could harm existing landscapes.

Biodiversity and green spaces

Summary of the main issues raised in general comments on the biodiversity and green infrastructure theme:

The majority of comments provide broad support for the objectives and priorities for improved biodiversity was expressed within the representations from a range of individuals, organisations and developers, with comments that policies must be as strong as can be to protect and enhance existing green spaces and networks. Comments included that the area has good green spaces which add to the rural character, are a huge asset and should be protected from development, but that there is pressure on green spaces, often conflict between recreational use of green spaces and biodiversity, and that sufficient land should be provided for both. It was suggested the Objectives should include the 'Doubling Nature' ambition. A small number of comments raised concern about the environmental capacity of the area, suggesting that the aims of this theme would be challenging to deliver, and suggesting that the development strategy did not accord with those aims.

There was support for this being a key theme for the plan, and lots of ideas about how biodiversity and green space could be enhanced. Comments raised issues about how designated sites should be recognised in the plan, and how impacts should be considered. A range of specific issues were identified, including the importance of protecting chalk streams.

Response to the Main Issues Raised in Representations:

Respondents raised a number of important matters through previous consultations on the emerging Local Plan. These matters have been considered during the preparation of the plan and its policies.

The Councils' response to these matters include:

- Comments supporting the broad approach to the theme are noted.
- The plan seeks to address the needs of places for wildlife, and places for people, and reflecting the importance of requiring appropriate quantity and quality of green infrastructure. Jobs

The following proposed policies areas are addressed in this topic paper:

- BG/BG: Biodiversity and geodiversity
- BG/GI: Green infrastructure
- BG/TC: Improving tree canopy cover and the tree population
- BG/RC: River corridors
- BG/PO: Protecting open spaces
- BG/EO: Providing and enhancing open spaces

Policy BG/BG: Biodiversity and geodiversity

Summary of issues arising from First Proposals representations:

Broad support for the policy principles was expressed within the representations from a range of individuals, organisations and developers, with comments including that preserving and enhancing biodiversity was important for health and wellbeing, carbon sequestration, place making, and benefits the economy. Comments suggested that the policy and objectives should be strengthened to guide development away from sensitive areas and refuse development that has adverse effects, and that buffer zones are needed to protect wildlife beyond sites and create green corridors. Comments noted that the policy only relates to controlling the impact of developments not improving existing sites (which was considered a missed opportunity).

Many comments, particularly from related organisations, supported the proposal for 20% biodiversity net gain. Concerns were raised by some developers that the minimum 20% Biodiversity Net Gain (BNG) target was double the Environment Bill's proposed level of 10%, that it was not justified, too onerous and not achievable in all cases, and that there needs to be further consideration of viability and deliverability and flexibility to avoid stifling development. Some comments considered that the BNG approach can fail to deliver benefits if new ecosystems are substituted, and green networks interrupted. Comments were received from developers promoting sites with the opportunity to deliver BNG. Other comments suggested that the 20% was not high enough, and a higher requirement should be included if doubling nature was to be achieved.

Concerns were raised by some individuals and community groups about how BNG will be calculated. Comments suggested a need for professionally accredited independent reports, and that the assessment should consider all important species, local and special characteristics, and adjoining nature sites.

Comments were expressed about off-site provision of biodiversity, that the creation of larger networks will be beneficial to wildlife and support ecological resilience, that clear delivery mechanisms were required which could include purchasing credits, the need to ensure developers deliver before occupation, and encouraging collaborative working with developers. Others commented that off-site provision might not provide benefits to local residents.

Response to Main Issues Raised in Representations:

Support for, as well as concerns about, the policy exceeding 10% national mandatory BNG were received. National Planning Practice Guidance on BNG sets out that plan-makers may seek a higher percentage than the statutory objective of 10% BNG on an area-wide basis or for specific allocations for development where this is supported by local evidence. Greater Cambridge has a relatively low level of designated sites and priority habitats compared with other English districts; this deficiency means there is a greater need to repair that loss and restore biodiversity

across the area, where possible, through the planning and development process. The draft policy approach aims to increase the provision for nature, to help address biodiversity losses due to development and to create additional opportunities for people to interact with nature. The Councils have sought to provide robust justification for the amended draft Policy approach for 20% net gain 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 on practice. It may be viable for some major developments to deliver higher targets and there are examples of proposals achieving greater than 20% BNG in Greater Cambridge. However, 20% BNG has been demonstrated to be deliverable for major development in the context of the Greater Cambridge Area through whole plan viability testing and example in practice, and the policy makes clear that viability will be considered as set out in national planning policy and guidance.

Concerns about how BNG will be calculated were acknowledged. The assessed measurement of BNG (over the pre-development biodiversity value) will be measured using the statutory version of the biodiversity metric tool which enables baseline units for a site (forecast for when the proposed development is in place) to be compared with its post intervention situation. Scoring biodiversity mitigation through this metric gives weight for local mitigation but also for siting BNG at strategically important sites across wider geographies; the balancing of both aiding in the most appropriate outcome for BNG from the development proposal. The Councils will verify the accuracy of the biodiversity value calculations and consider the merits of any off-site net gain measures with reference to strategic locations identified within the Cambridge Nature Network, Cambridgeshire and Peterborough Local Nature Recovery Strategy, or Greater Cambridge Green Infrastructure Strategic Initiative Area. Evidence supporting the draft plan highlighted that due to the way biodiversity net gain is calculated, there are anecdotal concerns that there may sometimes be a margin of error that falls within the 10% threshold for BNG. As such, a key concern is that a 10% biodiversity net gain may not deliver net gain, but possibly result in meeting an older metric of ‘no net loss’ for biodiversity onsite. As such a biodiversity net gain requirement of 20% for major development safeguards

against that margin of error to deliver more credible outcomes for BNG in Greater Cambridge.

Regarding off-site provision of biodiversity: BNG can be achieved on-site, off-site or through a combination of both measures; the policy sets out that the Councils will seek to achieved BNG on-site wherever this is feasible and effective and only secure BNG off-site when on-site options have been exhausted. However, it is recognised that on some sites practical, sustainable ecological enhancement may not be viable.

Representations proposed that the policy and objectives should be strengthened to guide development away from sensitive areas and refuse development that has adverse effects. This is aspect is covered by the policy, ensuring that development proposals which have a direct or indirect adverse effect on sites of biodiversity or geological importance will not be permitted, and that exceptions will only be made where the public benefits significantly outweigh any adverse impacts.

Concerns that the policy only relates to controlling the impact of development not improving existing sites were considered. The draft plan takes an integrated strategic planning approach to biodiversity in the local plan, seeking to protect and enhances biodiversity in many ways; for example, creating new habitat, supporting the restoration of degraded areas, encouraging the delivery of offsite BNG within areas identified within the LNRS priority areas and, supporting the development of green infrastructure providing a range of benefits to the environment and local communities (see also policy GI/GI). The BNG system itself is a mandatory approach to development and/or land management (under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), that aims to leave the natural environment in a measurably better state than it was beforehand; developers can achieve BNG through onsite enhancements, offsite biodiversity units, or statutory biodiversity credits, with legal agreements ensuring long-term compliance.

Finally, the Councils are committed to the protection and enhancement of biodiversity and will work with partners to ensure a proactive approach to protection, enhancement and management of biodiversity when considering development proposals; supporting sustainable development and ensuring delivery of the minimum requirements for BNG as set by the policy (unless development proposal is exempt). No Change to policy approach.

Policy BG/GI: Green Infrastructure

Summary of issues arising from First Proposals representations

Broad support for the policy intention was expressed within the representations from a range of individuals, organisations and developers, with comments that multi-functional, connected, green infrastructure is a key part of a successful spatial strategy.

Comments also included that the policy direction was good but ambiguous and needed clarification, including how it relates to other Aims and policies within the Plan and to Natural England's Accessible Natural Greenspace Standards. Comments that green infrastructure doesn't respect boundaries, encouraging partnership working, and the need for clear funding mechanisms for delivery.

Some developers commented that the policy should be a recommendation not a requirement, should recognise some sites may not be able to deliver due to locational constraints, site size and viability, that development should not be opposed where reasonable steps have been taken to protect and incorporate GI. Some comments from individuals expressed concern how the policy would be delivered via the planning process to ensure contributions will invest in strategic initiatives, and that the policy approach did not include a standard for measurement or achieved performance of developments.

There was widespread support for the green infrastructure initiatives, with many comments about specific initiatives including suggested amendments to their boundaries, joining up with other initiatives such as National Trust's Wicken Fen Vision, and proposing other ecological measures for inclusion.

Comments suggested the policy should consider the additional recreational pressure arising from developments, encourage increased access to green spaces through joining up spaces, and that all homes without gardens must have easy access. Comments included that the policy lacked specific proposals for improving public access and connectivity, including for horse riding.

Response to main issues raised in representations:

Comments relating to specific green infrastructure initiatives suggested alteration to the boundaries of the strategic green infrastructure initiatives as shown on the map were considered. However, the strategic green infrastructure initiatives relate to general strategic initiatives for a given area and were not intended to be spatially specific or function as a policy boundary to protect existing green infrastructure. Therefore, it would not be appropriate to alter these boundaries to include/exclude specific parcels of land.

Representations, particularly those from developers, proposed that the policy should function as a recommendation and not a requirement. This suggestion has not been implemented, as the aim is to provide the strongest support for green infrastructure. Therefore, the draft policy has been drafted in a manner so that the policy requirements are not recommendations.

Comments regarding recreational pressure, and specific recommendations regarding access to green space are addressed in policy BG/BG and BG/EO respectively. Requests for specific mentions of horse riding are considered to be too detailed within the scope of this high-level policy.

Finally concerns regarding the need for the policy to consider additional recreational pressure arising from new developments were acknowledged. This aspect will be

covered in the policy through the implementation of Green Infrastructure Standards which will include quantity standards for green infrastructure. Once the evidence base in finalised, the requirement to adhere to these standards and requirements will be incorporated into this policy.

Policy BG/TC: Improving Tree Canopy Cover and the Tree Population

Summary of issues arising from First Proposals representations

There was broad support for the objectives and priorities for improving tree canopy cover and tree population was expressed within the representations from a range of individuals, organisations and developers, noting the existing low level of tree cover in Cambridgeshire, with comments that policies must be robust to protect trees and to deliver enhancements through development. Comments were made proposing specific tree canopy cover requirements on all new development, with the inclusion of ongoing maintenance, and replacement of trees when felled. Comments noted the importance of planting the right tree species in the right location. Comments were expressed by one parish that a community forest or strategic plan is needed with allocated sites within the district, linking existing ancient woodland habitats, providing wildlife corridors.

Concerns from some developers on the wording stated the policy was contradictory stating both that “all trees should be protected” and “only trees of value should be protected”, and that policy detail is vague and did not provide details on when its applied. Additionally, there were requests for policy flexibility on tree removal due to disease, age or safety concerns.

Further responses requested a more flexible approach applied to the policy, balancing priority for tree planting with provision of sustainable development, suggesting an explicit policy direction toward “trees of value” rather than blanket protection and balancing tree removal against the benefits of bringing development forward.

Response to main issues raised in representations:

Comments suggested that the policy propose specific tree canopy cover requirements on all new development, with the inclusion of ongoing maintenance and replacement of trees when felled. The draft policy considered this suggestion along with updated evidence and the policy draft now requires major development to demonstrate, via a Tree Canopy Cover Assessment, how development will achieve a minimum future canopy cover of 30% on site, along with requiring the long term maintenance of any newly planted trees (via planning conditions and/or obligations as appropriate). The First Proposals policy direction indicated that the policy would require development proposals to provide appropriate replacement tree or hedgerow planting, where felling is proved necessary. Extant policy 71: Trees (Cambridge Local Plan) has been carried forward to ensure the draft policy requires appropriate tree/hedgerow species to be planted in the vicinity where felling is approved.

Comments suggested that a community forest or strategic plan is needed with allocated sites within the district, linking existing ancient woodland habitats, providing wildlife corridors. The development of all allocations in the plan has taken account of existing biodiversity features including trees, alongside consideration of opportunities to enhance and expand the green infrastructure network, drawing on our identified Green Infrastructure initiatives. We have now done a further check of the draft LNRS to consider the overlap with the emerging plan. The Councils aim to include clear green infrastructure ambitions for within strategic allocations at the Proposed Submission stage, which may include woodland proposals where appropriate.

Developers raised concern that the policy was contradictory stating both that “all trees should be protected” and “only trees of value should be protected”, and that policy detail is vague and did not provide details on when its applied: The councils will protect trees of current and future amenity value. Trees, groups of trees and woodland will be assessed by the Councils in accordance with the amenity assessment (Policy P2) Cambridge City Councils tree strategy (2016-2026) or successor document.

In relation to requests for policy flexibility on tree removal due to disease, age or safety concerns, the councils recognise that in some specific instances felling of existing trees or hedgerows may be necessary to meet wider placemaking objectives. In order to determine whether felling or significant surgery to trees or hedgerows is acceptable, the amenity value of the tree(s) and/or hedgerows, condition and potential lifespan will be weighed against the safety from removal, the protection of other important site features or any more general benefits of a new development.

Policy BG/RC: River Corridors

Summary of issues arising from First Proposals representations:

General support for the policy direction was expressed by a range of individuals, organisations and environmental bodies, particularly for the protection and restoration of river corridors, including chalk streams and floodplains, due to their importance for biodiversity, flood management, and landscape character.

Comments on applying the policy to development included support for ensuring proposals protect the setting, views and historic significance of river corridors, with specific calls for appropriate building setbacks to allow for natural processes and flood resilience. Concerns were raised about the impact of high-rise buildings on biodiversity and visual amenity, particularly from lighting and overshadowing. While improved public access was welcomed, several respondents highlighted risks of overuse and habitat degradation, recommending impact assessments and collaboration with landowners to balance recreation and environmental protection.

Suggestions to strengthen the policy included expanding its coverage to additional watercourses such as the Ivel tributary, Hobson’s Brook, Wilbraham River and River Great Ouse. There was support for recognising aquifer-fed brooks and for including Riverscape Opportunity Areas to encourage habitat creation. Re-naturalisation projects, such as those at Logan’s Meadow, were widely supported for their

environmental and flood management benefits. Respondents also called for greater provision for equestrian access, alignment with green infrastructure policies and a mapped nature recovery network with restoration targets.

Broader concerns included pressures from tourism and commercial river uses, the environmental impact of large infrastructure projects such as the wastewater treatment plant relocation, and the need for clearer policy wording to ensure effectiveness. Anglian Water proposed a Memorandum of Understanding to support water resource projects benefiting the Cam.

Response to issues raised in representations:

Comments raised on the protection of river corridors have been addressed through clearer and more detailed policy wording. The final policy now requires development to assess and respond to views, protect biodiversity and character and support the re-naturalisation of rivers and restoration of natural floodplains.

In particular, the policy scope has been broadened to address all river corridors within Greater Cambridge.

Concerns about environmental impacts, including from lighting, high-rise development and recreational pressure, have been reflected through strengthened requirements to balance access with habitat protection. The policy also supports improved walking and cycling routes, including the Cam Valley Trail, where appropriate.

Suggestions for greater clarity and alignment with wider strategies have informed the inclusion of references to the Greater Cambridge Landscape Character Assessment and the Local Nature Recovery Strategy.

Policy BG/PO: Protecting Open Spaces

Summary of issues arising from First Proposals representations:

Broad support for the policy intention was expressed within the representations from a range of individuals, organisations, and public bodies. Comments were received that the policy needs to be considered against competing policy requirements, that it needs to address the future stewardship of open space and recognise its value in reducing recreational pressures on vulnerable sites and the heritage value of sites. Comments were made that the policy should recognise that open spaces are historic and part of the historic environment (not just viewed in terms of green infrastructure). A number of comments were made by individuals and parish councils regarding the impacts of development on landscape and open space in specific locations.

Response to main issues raised in representations:

There were suggestions to strengthen this policy to reflect environmental aspects. However, it is considered that the environmental aspects of any development involving open space would be adequately covered by polices within the Biodiversity and Green Spaces chapter.

In response to comments highlighting the need for assessment on appropriate basis within the policy, the draft policy seeks to provide a clear and unambiguous guidance on how to treat proposals within differing contexts. Caveats have been included within the policy that allow for exceptions where adequate reprovision is provided and where there is an educational need.

While it is acknowledged that many open spaces form part of the historic environment, it is considered that the historic environment aspects of any development involving open space would be adequately covered by other policies within the Great Places chapter.

Finally, objections were raised that highlighted the policy is contrary to Green Belt losses arising from recent and proposed development. Representations on this topic are not pertinent to this emerging policy and should be considered against policy GP/GB.

Policy BG/EO: Providing and Enhancing Open Spaces

Summary of issues arising from First Proposals representations:

General support for the policy direction from a range of individuals, organisations, developers, and public bodies, with new provision of open spaces widely supported.

Comments regarding the application of this policy for new development included those suggesting that: the policy should be applied on a site-by-site basis; smaller developments should ensure provision of open space; onsite provision not off-site financial contributions should be required; new dwellings should have provision for food growing space (this point was also supported in response to the quick questions); open space should be provided within reasonable walking distance of residents' homes; standards should continue to differentiate between Cambridge City and South Cambridgeshire to reflect the differences between the two areas; SUDs should not be treated as open space; and open space should include provision for biodiversity. A few developer comments wanted more clarity regarding the specific policy requirements.

Broader comments about open spaces included suggestions that the policy direction under BG/GI should also be applied to BG/EO, and that multifunctionality should not reduce amount of overall public space; comments highlighted how open spaces can form an important part of the setting of heritage assets; support for provision of allotments, concern relating to multi-storey buildings which risk dominating open space and affecting the character of Cambridge; requests for provision of new skateparks and growing spaces; and requests that open space was provided to meet the needs of equestrians. A few developers identified that their site would provide open space to meet needs.

Response to main issues raised in representations:

Comments raised relating to the accessibility of open space have been addressed through the open space standards used by the policy which aim to ensure that any open space provision is accessible for the intended users.

Representations, particularly those from developers, proposed that the open space standards used should continue to differ between Cambridge and South Cambridgeshire. This suggestion has not been fully implemented as one of the

reasons for making a joint local plan for Greater Cambridge is to ensure that there is a consistent approach to planning across both areas. However, the open space standards used allow for site-specific local constraints and opportunities associated with the nature of the proposed development to be taken into consideration.

Representations, particularly those from developers, also raised concerns about the lack of clarity relating to the open space standards. The Greater Cambridge Green Infrastructure Strategy and Greater Cambridge Interim Sports Strategy have now been implemented within the policy to provide additional clarity about the open space provision requirements for new development which was missing at First Proposals. Further work will be completed prior to Proposed Submission to provide a full set of open space and green infrastructure standards.

Wellbeing and Social Inclusion

Summary of the main issues raised in general comments on the wellbeing and social inclusion theme:

There was good general support for the overarching aims of the proposed wellbeing and inclusion policies from site promoters, the University of Cambridge, the Cambridgeshire and Peterborough Clinical Commissioning Group, Cambourne TC and Central Bedfordshire Council. Huntingdonshire District Council had no comment on this policy area. Two site promoters expressed the need for a more balanced provision of affordable housing and sustainable travel across Greater Cambridge, in order to achieve the Local Plan's identified wellbeing and social inclusion aspirations. Fen Ditton PC was broadly supportive of aspiration but concerned with the ambiguity in some of the detail.

One member of the public expressed a need for new residential development to be no more than 4 storeys high, inclusive and provide open spaces with a balanced approach to cycling. Existing sporting facilities must be maintained and improved to safe, modern requirements. One member of the public suggested the Local Plan should include policies to protect cultural significance, specifically to support cultural activities and to provide for, and safeguard public and private spaces for arts and other activities.

In terms of social & transport infrastructure provision, comments from two members of the public and three PCs: Bassingbourn-cum-Kneesworth, Great Shelford; and Teversham were received. They cited concerns over the need: to consider the impact of high growth strategy on existing residents; for access to GPs and other primary care services and the retention of those services in villages; for active travel to be a feasible choice; and to invest in sports and leisure facilities, swimming pools, across the city and especially near large new developments. There was little evidence of detailed plans regarding infrastructure to support well-being and inclusion, communities need green community spaces, public parks, policing, schools, shops. They noted transport to any services and social support are essential to achieving wellbeing along with lower housing densities, increased dwelling space standards and access to private amenity space. Histon & Impington PC stated water efficiency must be compulsory.

DB Group Holdings raised the matter of the Local Plan ensuring a variety of employment opportunities are available across the District for all members of the community. Cambridge Past, Present & Future noted the protection and enhancement of the Historic Environment is not just key to creating and providing Great Places but also a vital part of Wellbeing.

One member of the public cited the North East Cambridge proposal, with the relocation of Cambridge Waste Water Treatment Plant (CWWTP).will have a negative impact on residents and users of the surrounding area. Another member of the public suggested policies should acknowledge both the health and amenity benefits of visible green open space even if not publicly accessible. A different member of the public noted the need to balance climate change mitigation and adaptations with provision of a good standard of amenity. There was also no mention of people with disabilities. Linton PC highlighted the need to consider needs of elderly people.

The Environment Agency, while supportive of the opportunity to level-up communities, tackling this green inequality at scale and improving the health and wellbeing of those living and working in the GC area, caveated that for this to be achieved this needs to be balanced with the need to protect the environment, by providing appropriate wildlife refuges from human disruption and interference.

The Cambridge and South Cambridgeshire Green Parties considered the Local Plan will only worsen environmental damage and fail to serve Cambridge citizens who are disadvantaged, and the planned growth will only serve our significantly privileged citizens.

Many comments were submitted by site promoters indicating that their sites, if allocated for development would support the Local Plan's aspiration for creating healthy developments. Stapleford PC advised against 100-dwelling add-on developments rather the provision of infill brownfield sites with affordable housing would support inclusivity and develop wellbeing.

Several groups and individual members of the public highlighted the negative impact the relocation of CWWTP to Honey Hill would have on local amenity in terms of noise, odour and vibration pollution.

Response to the Main Issues Raised in Representations:

Respondents raised a number of important matters through previous consultations on the emerging Local Plan. These matters have been considered during the preparation of the plan and its policies.

The Councils' response to these matters includes:

- General support for the policy approach under this theme is noted.
- Protecting and enhancing community and cultural infrastructure is a goal of this local plan. Policies address a range of infrastructure issues, and have been informed by evidence to ensure that needs are appropriately responded to.
- Making places accessible has been addressed by a number of policies in the draft plan. The needs for different groups are also addressed, including in the housing chapter which responds to the need for accessible and specialist housing.
- Policies address environmental issues, including how green infrastructure can be protected and enhanced.

The following proposed policies areas are addressed in this topic paper:

- WS/HD: Creating healthy new developments
- WS/NC: Meeting the needs of new and growing communities
- WS/CF: Community, sports, and leisure facilities
- WS/CH: Cultural and Creative Hubs
- WS/MU: Meanwhile uses during long term redevelopments
- WS/IO: Creating inclusive employment and business opportunities through new developments
- WS/HS: Pollution, health and safety
- WS/PH: Protecting Public Houses

WS/HD: Creating healthy new developments

Summary of issues arising from First Proposals representations:

There was general support for the approach towards the WS/HD Creating healthy new developments policy from a range of organisations including Cambridgeshire and Peterborough Clinical Commissioning Groups, Cambourne Town Council, Great and Little Chishill Parish Council, Cambridge and South Cambridgeshire Green Parties, two members of the public and three developers; one of which suggested the policy should go further with other measures which maximise wellbeing benefits. There were also many comments from individuals and site promoters stating the application of Health Impact Assessments should only relate to major developments with one site promoter requesting the threshold be outlined.

Suggested policies requirements included integrating transport and cycling infrastructure which supports all types of uses and users into developments, and include links to the importance of adequate levels and qualities of accessible green infrastructure. One developer and another site promoter, while supportive of the application of health principles to new development, stated the ten Healthy New Towns principles were onerous and development should apply these flexibly where possible.

Cambridge and South Cambridgeshire Green Parties supported the idea of “high quality people-focused spaces” but requested more details on these. They suggested the Local Plan should support interventions like those set out in the ‘Encouraging Healthier Takeaways in Low Income Communities’, for example providing incentives for local businesses who already produce healthy food to have a presence in local shops in areas such as Chesterton, Arbury, Abbey and Kings Hedges.

Response to Main Issues Raised in Representations:

Responses received from the First Proposals Consultation suggest that the policy should consider the size of development which will be liable to the policy implications, this has been addressed within the policy to show which developments will need to provide a Health Impact Assessment and which developments will need to demonstrate they are working towards Healthy New Towns principles. Responses expressed support for hot food takeaway restrictions. This has been addressed by a hot food takeaway buffer area around secondary schools, FE colleges and youth centres.

WS/NC: Meeting the Needs of New and Growing Communities

Summary of issues arising from First Proposals representations:

In general. respondents to the First Proposals consultation supported the approach to Policy WS/CF, but suggested that the policy could be clearer about what provision of community facilities would be deemed ‘appropriate’ for new development. Two site promoters suggested that the policy should set out how new community, sports and leisure facilities will be provided and sustained through new development, and that type and scale of facilities should be commensurate to the size of the development proposed.

Taylor Wimpey UK Ltd and Countryside Properties requested that planning policy clarified what thresholds will be set for on-site or off-site contributions to the delivery

of facilities. Their comments also asked that planning policy clarified what would constitute “large-scale development” for the purposes of the policy, and whether this would be based on NPPF definitions or a locally set measure.

The Cambridge and South Cambridgeshire Green Parties highlighted the social impact of access to a good standard of education. Cambridgeshire County Council (Education) raised associated safeguarding concerns where facilities are used by the school and the wider community. Separate access arrangements are needed and expected to be fully funded by the developer to mitigate the level of risk.

Cambridgeshire County Council highlighted that early engagement is needed to mutually agree the basis on which access to educational facilities will be managed. One developer highlighted that the capacity of existing facilities and capacity offered by educational establishments needs consideration to ensure that provision is not sought where capacity exists elsewhere.

Cambridgeshire and Peterborough Clinical Commissioning Group requested that planning policies actively support the strategic plans of local health commissioners, and new health facilities to meet the needs of the population should be supported.

Trumpington Residents Association commented that there is a need to provide for the long-term support for community, sports and leisure facilities, continuing beyond the early stages of a development.

Response to Main Issues Raised in Representations:

Support for general policy approach though more details of new provision required: The recently published evidence documents including the South Cambridgeshire Community Facilities Study (2024), the Greater Cambridge Cultural Infrastructure Strategy (2025) & accompanying map, the Greater Cambridge Interim Sports Report

and the Greater Cambridge Retail and Leisure (2025) provide a comprehensive body of evidence to inform the provision of local and regional facilities across Greater Cambridge. These can also be used to support the need for commensurate S106 contributions, where applicable. The plan has sought to provide thresholds regarding the scale of development when contributions may be required where appropriate.

Regarding education and Concerns raised over access of school facilities and cost to mitigate: the policy approach encourages the early consideration of design solutions, such as separate access routes or shared-use layouts, that enable appropriate community use of school facilities. Where such provision is feasible, it is expected that the necessary design and infrastructure costs would be incorporated into the overall development proposal, typically through developer contributions.

WS/CF: Community, Sports, and Leisure Facilities

Summary of issues arising from First Proposals representations:
There was general support for the proposed approach to Policy WS/CF during the First Proposals consultation. Those indicating their support included Bassingbourn-cum-Kneesworth PC, Steeple Morden PC, Guilden Morden PC, Great and Little Chishill PC and Marshall Group Properties.

Cambourne Town Council supported the policy but stated the local planning policy should not rely on community hubs providing facilities as they do not meet all the diverse age and cultural needs. Croydon Parish Council and Trumpington Residents Association, while both supportive of the policy, noted the need for transport for outlying villages to access facilities and for long-term support for community, sports and leisure facilities beyond the early stages in a development, respectively.

The Cambridge and South Cambridgeshire Green Parties noted that the growing inaccessibility to social care and services mean many families miss out on help, entrenching patterns of inequality throughout lives. They requested better

accessibility to community, sports and leisure facilities, and recreational green open spaces.

In relation to sports facilities, responding parties highlighted that subscription-based sports facilities should be discouraged to enable their use by all. Sport England also requested their 'Active Design' guidance be referenced in the policy for the development of new facilities that encourage people to take part in sport and physical activity. A series of comments were raised regarding specific community facility needs, including needs for regional-scale facilities:

- The Cambridge Futsal Club, with the support of Cambridge Handball Club, indicated the lack of a venue in the whole of Cambridgeshire large enough to host national-level indoor sports events watched by seated spectators.
- One member of the public highlighted that Cambridge skateparks are not suitable for year-round use; to be suitable in winter these require lighting and rain covers.
- One member of the public requested the prioritisation of a new swimming pool for public access in Cambridge and South Cambridgeshire, citing a lack of provision and capacity in South Cambridgeshire, and capacity issues at Cambridge's swimming pool facilities. The response highlighted that this should consider both existing and future demand for swimming pool facilities, especially from students and South Cambridgeshire population into Cambridge.
- Histon and Impington Parish Council stated the need to aim for a swimming pool within cycling distance of every community.

Barrington Parish Council requested a much stronger policy definition for community healthcare facilities which should be prioritised given their poor provision under the current Local Plan. Cambridgeshire and Peterborough Clinical Commissioning Group requested planning policies actively support the strategic plans of local health commissioners, and that new health facilities to meet the needs of the population should be supported. The Cambridgeshire and Peterborough Clinical Commissioning Group requested that planning policy supports the principle of NHS land and property being used for alternative uses as part of wider NHS estate reorganisation

programmes where the existing facility is neither needed nor viable for its current use.

The Education and Skills Funding Agency (Department for Education) requested the policy makes clear that education facilities serving a wider catchment area will not be considered a town centre use requiring sequential approach to be applied, but that any such facilities must be in sustainable, accessible locations.

One member of the public requested further information about preventing landlords from evicting Clubs operating on their land or charging a rent so high the Club is forced to leave.

Response to Main Issues Raised in Representations:

Regarding community/leisure/sports facilities: Support for policy approach though more details of new regional provision required: The recently published evidence documents including the South Cambridgeshire Community Facilities Study (2024), the Greater Cambridge Cultural Infrastructure Strategy (2025) & accompanying map, the Greater Cambridge Interim Sports Report and the Greater Cambridge Retail and Leisure (2025) provide a comprehensive body of evidence to inform the provision of local and regional facilities across Greater Cambridge. These can also be used to support the need for commensurate S106 contributions, where applicable.

Flexibility of location of regional education facilities. The sequential approach provides a logical approach to ensure all sustainable, accessible town centre locations are first considered. With the planned improvements to the local transport network and the emerging new centres, it is important that these centre locations are given priority in the determination of a suitable site. The sequential test, subject to an impact assessment not raising any concerns that cannot be satisfactorily mitigated, allows for development on sites, outside a designated centre.

Regarding healthcare: Support for approach with more detailed definition, greater prioritisation of healthcare facilities and a more flexible approach towards NHS estate reorganisation: With acknowledgment of the changing format of NHS healthcare provision, the policy approach towards the loss of an NHS healthcare facility has been amended to provide greater flexibility. The justification for the loss would be permissible where it is clearly demonstrable that the site/facility forms part of an approved NHS reorganisation strategy. Ad hoc facility losses would not be acceptable. Policy approach amended.

Policy WS/CH: Cultural and Creative Hubs

Summary of issues arising from First Proposals representations:

Representations were made during the First Proposals consultation in relation to other local planning policies, which are considered to be directly relevant to cultural and creative hubs in the sub-region.

In response to the proposed approach to WS/CF, Cambourne Town Council warned about the limitations of community hubs not being able to meet the needs of diverse ages and cultural needs.

In relation to the proposed approach to Policy J/VA, Great and Little Chishill Parish Council noted that Cambridgeshire is an important tourist destination and so the visitor economy should be supported. Moreover, commenting parties, including Abrdn, the Universities Superannuation Scheme – Commercial, the Universities Superannuation Scheme – Retail and the Imperial War Museum/Gonville and Caius College highlighted that visitor attractions can complement other planning uses, which help to create particular destination or cultural hubs. However, Cambridge Past, Present & Future and the National Trust highlighted that some visitor attractions are operating close to their limits and that expansion of visitation or services at certain sites will need to be carefully balanced with the need to manage demand pressures on existing facilities.

Response to main issues raised in representations:

The recently published evidence documents including the South Cambridgeshire Community Facilities Study (2024), the Greater Cambridge Cultural Infrastructure Strategy (2025) & accompanying map, the Greater Cambridge Interim Sports Report and the Greater Cambridge Retail and Leisure (2025) provide a comprehensive body of evidence to inform the provision of local and regional facilities across Greater Cambridge. These can also be used to support the need for commensurate S106 contributions, where applicable.

WS/MU: Meanwhile uses during long term redevelopments

Summary of issues arising from First Proposals representations:

A wide variety of organisations, citizens, landowners, and developers expressed support for this policy. Persimmon Homes East Midlands were supportive of the policy but asked that it not be mandatory. A few respondents asked for the policy's scope to be amended to include different uses: Cambridgeshire and Peterborough CCG for example asked for developers to provide short-term solutions for the NHS to deliver services for new residents whilst development was taking place, Cam-Skate asked for skateboard facilities to be included in the policy and Cambridge and South Cambridgeshire Green Parties recommended that temporary spaces be used to assist with unaffordable housing via property guardianship. Several respondents objected to 'meanwhile uses' being implemented in the Green Belt.

Response to main issues raised in representations:

Responses received from the First Proposals Consultation suggest that the policy should specify the type of uses permitted under meanwhile uses. That approach may be unnecessarily restrictive, where the policy can instead manage the potential impacts of uses rather than the type of use. The draft policy takes a flexible approach to encouraging meanwhile uses which will be beneficial for the local community and local businesses.

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

Summary of issues arising from First Proposals representations:

There was some support for the aims of policy from a mix for parish councils, private developers and other agencies. A number of developers discussed how the development of their site would support the policy. Several suggestions were made for the detailed policy wording including:

- its application only to strategic development over a certain scale;
- flexibility where it is not possible meet the policy due to local circumstances or the availability of labour;
- the inclusion of text that supports employment related development that would generate high skilled jobs locally;
- requiring developers to offer apprenticeship scheme linked to Further Education opportunities.

There were also a number of objections to the proposed policy direction with the Home Builders Federation suggesting that it is not justified against the tests set out in the NPPF and the CIL regulations with work already taking place to improve skills and opportunities through the CITB.

Questions were asked around how expansive the definition of “inclusive” would be and how it would address socio-economic exclusion. There was also a request for support for more opportunities for young people to develop in the science and tech sectors and within Cambridge University.

Response to Main Issues Raised in Representations:

Comments in general support of the approach are noted. One comment questioned whether this requirement met CIL regulations. Similar requirements have been included in many local plans elsewhere in the country. The policy requirements are related to the development in scale and kind. They are directly related as they focus on opportunities provided the site. The requirement is necessary to make the development acceptable in planning terms, as it addresses some of the externalities caused by the development in terms of wellbeing and social inclusion. Some

comments mentioned the needs for requirements to be flexible, and the scale to be appropriate. The draft policy is considered to have stuck the right balance on when the requirements are applied.

WS/HS: Pollution, health and safety

Summary of issues arising from First Proposals representations

A wide variety of respondents expressed support for this policy. The Environmental Agency supported the policy but argued that its scope needed to be widened to protect Cambridge's aquifer. The Environmental Agency also noted that hazardous facilities have the potential to pollute the environment, but strategic planning of waste and resources can address this issue. The University of Cambridge also asked for the policy's scope to be widened so that it will protect Cambridge's research environment; specific requests included adding mitigation against electromagnetic interference into the policy and protecting research undertaken by the Mullard Radio Astronomy Observatory. Croydon PC asked for the policy to be reviewed in the context of major transport infrastructure and Linton PC asked for exclusion zones around key infrastructure cables and sites.

Some parish councils argued that pollution levels were unacceptable, so the monitoring of existing high-density areas is required, and mitigation measures should be implemented in areas of new development. Similarly, the Cambridge and South Cambridgeshire Green Parties included numerous recommendations to address pollution in existing city-centres and new settlements. Trumpington Resident Association argued that reducing light pollution should not be used to justify not lighting pedestrian desire lines. Several developers objected to the policy, arguing that it fails to recognise that potential negative impacts from development can be mitigated against.

Response to main issues raised in representations:

Protection of Cambridge's aquifer: this policy seeks prevention of any impacts to controlled waters due to land contamination, including to the underlying aquifer. No

Change in policy approach (however, please also see policies CC/WE and CC/WQ in climate change chapter of the plan in regard to the protection of Cambridge's aquifer).

Mitigating electromagnetic interference: The policy also references other sources of environmental pollution should specific issues arise. Please also see Policy I/DT: Digital and Telecommunications Infrastructure, which requires telecommunications and digital infrastructure development to demonstrate that there will be no significant and irremediable electromagnetic interference with other electrical equipment, air traffic services, instrumentation operated in the national interest, or other operations and equipment that are sensitive to electromagnetic pollution). No Change in policy approach.

Strategic waste and resources planning regarding hazardous facilities: Policy applies appropriate protection to and from hazardous installations. Planning applications for the development of hazardous installations/ pipelines and development close to hazardous sites or pipelines will be referred to the Health and Safety Executive, Natural England, the Environment Agency and/or other expert statutory bodies as required. No change in policy approach.

Policy WS/PH: Protecting Public Houses

Summary of issues arising from First Proposals representations:

The majority of respondents expressed support for the policy and the approach to protecting public houses. Comments broadly supported the policy approach, however comments were raised that although public houses should be protected, in some circumstances it may not be viable so the policy should allow for their loss. Similarly, one comment suggested the policy should be realistic in its approach if the local community cannot support a public house. However, Cambridge Past, Present & Future suggested the policy could safeguard public houses by nominating them as assets of community value. This was also reflected in other comments regarding the importance of public houses in providing positive impacts and employment

opportunities for communities. Other comments were made regarding that the policy focuses entirely on public houses, not reflecting the other types of community assets that need safeguarding.

Response to Main Issues Raised in Representations:
Comments in support of the policy approach are noted. In terms of not protecting pubs which are not viable, the policy includes appropriate criteria that can be applied to ensure that every effort is made to protect pubs, but this is balanced with the need to being buildings back into use if demonstrated this is not possible.

Great Places

Summary of the main issues raised in general comments on the great places theme:

Many individuals, public bodies, third sector organisations and developers expressed support for the aims of the Great Places policies.

A number of respondents emphasised the importance of including policies which will protect Cambridge's historic environment. Cambridge Past, Present and Future commented that the Local Plan needs to not only focus upon historic assets, but also recognise the historic significance of the whole of Cambridge and ensure that its historic setting is protected from cumulative impacts. Historic England (HE) provided a detailed representation, in which they expressed concerns about the density and height of some of the site proposals and the need for Heritage Impact Assessment to be carried out to inform the next stage. HE also noted the need to have policies covering designated and non-designated historic assets, heritage at risk, historic shopfronts, and tall buildings. Comments also noted that Great Places are more than just about the design of buildings but creating communities with access to services, facilities, nature and open spaces.

Some comments considered that development proposed would impact negatively on the delivery of the goals set out in this chapter. A few developers commented that the sites that they were proposing would fulfil the aims of the policies. Several

commentators emphasised the importance of delivering facilities and infrastructure to ensure that new development results in great places.

In terms of the additional survey questions which were attached to this round of consultation, in the responses to Q.13 (which relates to the aspirational vision for Greater Cambridge) there was a strong aspiration to preserve Greater Cambridge's historic buildings and wider heritage and a critical comment of GCSP's approach to urban design of new settlements. The need to protect the qualities of the area was highlighted, raising issues of landscape, heritage, and character.

Response to the Main Issues Raised in Representations:

Respondents raised a number of important matters through previous consultations on the emerging Local Plan. These matters have been considered during the preparation of the plan and its policies.

The Councils' response to these matters includes:

- Acknowledging support for policies which address great places themes.
- Policies have been developed to ensure the historic environment is considered in planning decisions. Heritage impact assessments have been prepared to inform proposed site allocations.
- Agree that delivering great places is more than just the design of buildings. The plan as a whole seeks to address the full range of issues that will be needed to create successful communities. Wellbeing and social inclusion

Summary of the main issues raised in general comments on the wellbeing and social inclusion theme:

There was good general support for the overarching aims of the proposed wellbeing and inclusion policies from site promoters, the University of Cambridge, the Cambridgeshire and Peterborough Clinical Commissioning Group, Cambourne TC and Central Bedfordshire Council. Huntingdonshire District Council had no comment on this policy area. Two site promoters expressed the need for a more balanced provision of affordable housing and sustainable travel across Greater Cambridge, in order to achieve the Local Plan's identified wellbeing and social inclusion aspirations.

Fen Ditton PC was broadly supportive of aspiration but concerned with the ambiguity in some of the detail.

One member of the public expressed a need for new residential development to be no more than 4 storeys high, inclusive and provide open spaces with a balanced approach to cycling. Existing sporting facilities must be maintained and improved to safe, modern requirements. One member of the public suggested the Local Plan should include policies to protect cultural significance, specifically to support cultural activities and to provide for, and safeguard public and private spaces for arts and other activities.

In terms of social & transport infrastructure provision, comments from two members of the public and three PCs: Bassingbourn-cum-Kneesworth, Great Shelford; and Teversham were received. They cited concerns over the need: to consider the impact of high growth strategy on existing residents; for access to GPs and other primary care services and the retention of those services in villages; for active travel to be a feasible choice; and to invest in sports and leisure facilities, swimming pools, across the city and especially near large new developments. There was little evidence of detailed plans regarding infrastructure to support well-being and inclusion, communities need green community spaces, public parks, policing, schools, shops. They noted transport to any services and social support are essential to achieving wellbeing along with lower housing densities, increased dwelling space standards and access to private amenity space. Histon & Impington PC stated water efficiency must be compulsory.

DB Group Holdings raised the matter of the Local Plan ensuring a variety of employment opportunities are available across the District for all members of the community. Cambridge Past, Present & Future noted the protection and enhancement of the Historic Environment is not just key to creating and providing Great Places but also a vital part of Wellbeing.

One member of the public cited the North East Cambridge proposal, with the relocation of Cambridge Waste Water Treatment Plant (CWWTP).will have a negative impact on residents and users of the surrounding area. Another member of the public suggested policies should acknowledge both the health and amenity benefits of visible green open space even if not publicly accessible. A different

member of the public noted the need to balance climate change mitigation and adaptations with provision of a good standard of amenity. There was also no mention of people with disabilities. Linton PC highlighted the need to consider needs of elderly people.

The Environment Agency, while supportive of the opportunity to level-up communities, tackling this green inequality at scale and improving the health and wellbeing of those living and working in the GC area, caveated that for this to be achieved this needs to be balanced with the need to protect the environment, by providing appropriate wildlife refuges from human disruption and interference.

The Cambridge and South Cambridgeshire Green Parties considered the Local Plan will only worsen environmental damage and fail to serve Cambridge citizens who are disadvantaged, and the planned growth will only serve our significantly privileged citizens.

Many comments were submitted by site promoters indicating that their sites, if allocated for development would support the Local Plan's aspiration for creating healthy developments. Stapleford PC advised against 100-dwelling add-on developments rather the provision of infill brownfield sites with affordable housing would support inclusivity and develop wellbeing.

Several groups and individual members of the public highlighted the negative impact the relocation of CWWTP to Honey Hill would have on local amenity in terms of noise, odour and vibration pollution.

Wellbeing and social inclusion was highlighted as an important theme, particularly in light of the pandemic. Issues raised crossed a number of the other themes.

Response to the Main Issues Raised in Representations:

Respondents raised a number of important matters through previous consultations on the emerging Local Plan. These matters have been considered during the preparation of the plan and its policies.

The Councils' response to these matters includes:

- General support for the policy approach under this theme is noted.

- Protecting and enhancing community and cultural infrastructure is a goal of this local plan. Policies address a range of infrastructure issues, and have been informed by evidence to ensure that needs are appropriately responded to.
- Making places accessible has been addressed by a number of policies in the draft plan. The needs for different groups are also addressed, including in the housing chapter which responds to the need for accessible and specialist housing.
- Policies address environmental issues, including how green infrastructure can be protected and enhanced.

The following proposed policies areas are addressed in this topic paper:

- GP/PP: People and place responsive design
- GP/QD: Achieving high quality development
- GP/HD: Housing density
- GP/ST: Skyline and tall buildings
- GP/QP: Establishing high quality landscape and public realm
- GP/LC: Protection and enhancement of landscape character
- GP/CC: Adapting heritage assets to climate change
- GP/HE Historic Environment
- GP/HA Designated Heritage Assets
- GP/ND Non-Designated Heritage Assets
- GP/AR Archaeology
- GP/CC: Adapting Heritage Assets to Climate Change
- GP/SF: Shopfronts

The Green Belt policy has been moved to the strategy theme:

- GP/GB: Protection and enhancement of the Cambridge Green Belt

Policy GP/PP People and place responsive design

Summary of issues arising from First Proposals representations:

Many individuals, public bodies and developers expressed general support for policy GP/PP.

Some respondents argued that policies need to avoid creating repetitive buildings such by as requiring varied height and massing, and that a policy that is applicable to Greater Cambridge shouldn't dilute the details relating to the special character of Cambridge. A few landowners suggested that developments which demonstrated a high standard of design should be fast-tracked through the planning application process.

There were different perceptions about what the scope of the policy should be; a few of landowners argued that design codes should not be imposed on smaller developments where other mechanisms could achieve similar outcomes. Similarly, a few developers argued that the phrasing of the policy should be altered so that new development only needed to respond to local design contexts rather than the architecture of the Greater Cambridge area. On the other hand, the Cambridge Doughnut Economics Action Group argued that the policy was too narrowly focussed upon aesthetics, when actually a more holistic approach was required to promote things such as connected, participatory collective spaces.

Historic England questioned whether one policy relating to design would be sufficient, whereas a few respondents queried whether having two policies was necessary. Developers such as Abrdn argued that the policy needed to include sufficient flexibility for well-designed and high-quality buildings even if they are taller than the surrounding townscape. Contrastingly, Historic England and others argued that great care needs to be taken to protect Cambridge's skyline, views, and approaches and that the Local Plan should be informed by a Tall Building and Skyline study.

Many commentators noted the need to engage with local communities to improve the design of developments and when creating design codes. The British Horse Society argued that greater attention needs to be paid to designing for non-motorised forms of transport and developments should maximise opportunities to link and enhance with existing Public Rights of Way. Some developers commented that

their sites could fulfil the policy and one respondent argued that the relocation of the waste water treatment plant to Honey Hill would contravene this policy.

In terms of the additional survey questions which were attached to this round of consultation, in response to Q.7 (southern rural cluster) and Q.9 (villages) respondents suggested including more public benches and picnic tables, a changing art space, and creative features to make new development attractive places. There was also an expressed desire for new development to designed for children and for new development to reflect village character. For Q.4 (Cambridge North-East), many comments emphasised the need for North-East Cambridge to have a good centre with amenities, for it to be a 'micro-city' within the city, or to incorporate a 'new' architectural style. Similar comments were expressed for Q.3 (Cambridge East) with some respondents requesting that the design uses a precedent of 'Garden City' design or include architecture which celebrates its aviation heritage.

Policy GP/QD Achieving High Quality Development

Summary of issues arising from First Proposals representations:

Many respondents expressed support for the policy.

A few developers specifically welcomed the policy's encouragement of mixed-use proposals. Croydon Parish Council expressed their desire to keep the landscape rural and the Trumpington Residents Association stressed the importance of delivering high quality buildings and enforcing planning conditions.

Some comments highlighted the need for planning to avoid creating bland developments. There were many suggestions to improve the policy, some included introducing additional architectural design standards, on-street parking provision, Passivhaus standards, crime prevention measures. Some respondents stated that design codes should reflect local building typologies, topography and that the policy should ensure that the use of previously developed or underutilised sites in the urban area can be maximised. Some comments stated that design guides shouldn't be imposed on small developments where other mechanisms could achieve similar outcomes. One developer stated that if a development meets the policy's objectives,

the policy should ensure that this carries significant weight in the determination of the proposal.

Some respondents questioned whether it is unusual to have two design policies in the Local Plan and whether it could be covered in one policy. The Wildlife Trust also asked that the Building with Nature standards referred to in policy BG/GI are formally incorporated as a requirement into this policy or GP/QP. Historic England asked for a separate policy relating to tall buildings. Other respondents noticed that parking is referenced twice in the policy under 'climate-positive' and 'local character' and it does not need to be repeated. Some respondents asked for clarification to be provided within the policy as to what is regarded as 'significantly taller' to understand when additional assessment will be required.

Some developers supported the policy and asserted that their sites could deliver the policy's objectives. Other comments highlighted specific sites or proposals that they considered would not meet the policy objectives.

In terms of the additional survey questions, there were a high number of representations which emphasised the importance delivering high quality development. Such representations can be found in response to Q.3 (Cambridge East), Q.4 (Cambridge North-East), Q.5 (Addenbrookes), Q.6 (Cambourne), Q.7 (southern rural cluster), Q.9 (kinds of housing, jobs, facilities, or open spaces in villages) and Q.13 (aspirational vision for Greater Cambridge). In answer to Q.12 (what should we prioritise when planning homes for the future?), 64% of respondents expressed a desire for safe streets where children can play outside, 30% expressed a desire for accessibility and adaptability for wheelchair users and 51% expressed a desire for secure cycle parking.

Response to Main Issues Raised in Representations:

The Councils acknowledge the critical importance of delivering high quality, inclusive, and sustainable development across Greater Cambridge. This ambition underpins the vision for the area and informs the objectives of Policy GP/QD. Achieving high quality development is not limited to aesthetics or individual buildings; it encompasses a wide range of considerations including placemaking, functionality,

local character, climate resilience, biodiversity, accessibility, and the relationships between built form and open space. Support from policy 2018 local plan and of the adopted South Cambridgeshire local plan 2018.

There was particular support for the policy's focus on creating active, attractive and well-integrated places that reflect the identity of Greater Cambridge. Developers also expressed support for the policy's encouragement of mixed-use development, recognising the value of combining different functions in a way that enhances vibrancy and supports resilient communities. This aligns with the policy's aim to ensure proposals are designed with communities in mind and integrate successfully with surrounding uses.

A key theme raised was the need to avoid bland, generic development. Respondents called for a stronger design-led approach and highlighted the value of incorporating high-quality architectural detail, contextual materials, and sensitive street design. In response, Policy GP/QD draws upon the principles of the National Model Design Code (MHCLG, 2021), which provides a nationally recognised framework for securing design quality through a place-based approach. This includes guidance on layout, street hierarchy, façade quality, environmental performance, landscape integration (including tree-lined streets), and use of local materials. These principles are supported in the National Planning Policy Framework (NPPF, 2024, paragraph 133), which reinforces the importance of design accountability and consistency in achieving high-quality development.

The Councils recognise the need for a proportionate and flexible approach. Therefore, Policy GP/QD provides an overarching framework, but allows for tailored design responses depending on the scale, skyline, context, and nature of the development. These expectations are supported by Appendix F of the Cambridge Local Plan (2018): Tall Buildings and the Skyline, which remains a key reference for evaluating proposals that may affect the character of Cambridge's skyline. Determining an appropriate design-led solution to high quality building development will need to be conducted on a case-by-case basis, accounting for the various growth opportunities and constraints. Policy GP/QD has been drafted to ensure that applicants will provide details and benefits of the clarity, proportionality, and integration with other standards and guidance their proposals will bring and

justification for the approaches to design and construction being proposed. This will be a key tool in delivering places that are sustainable, inclusive, distinctive, and enduring.

Policy GP/HD: Housing density

Summary of Issues Arising from First Proposals Representations:

General support for the policy, with developers supporting that there is no specific density figure being required, seeking to make the most of sustainable sites, and noting that the policy adheres to NPPF.

It should be a design-led approach, appropriate to local circumstances, and that the drive for higher density should not override consideration of landscape, townscape and heritage impacts from inappropriately tall buildings.

Parish councils were concerned that rural and non-rural areas should not be the same density.

Lockdowns underscored the crucial role of green spaces and corridors for the mental and physical health, especially for those living in high density housing, and that the policy should ensure accessible green space provision and provide opportunities for food growing where private gardens are not provided.

Policy should be amended to require smaller units on higher density sites in town centres and close to transport interchanges and on small, constrained sites, as these are less suited to families.

Policy should allow room for extensions to help families adapt and remain within their homes and communities. Also, to address concerns that at higher densities parking and hard landscaping areas increase the risk of surface water flooding, that the policy should require use of permeable materials.

Wide ranging concerns included that there is a need for proper family homes with gardens, higher densities will create the ‘slums of tomorrow’ leading to anti-social behaviour, crime, anxiety and mental ill-health, that a lack of parking impacts on community cohesion, and that there have been poor schemes in the past, with the Cambridge Station area mentioned.

Concern that if densities are increased too much it might decrease the quality of life, and might impact the quality of the city, including its economic prospects as companies will not want to move here.

Response to Main Issues Raised in Representations:

General support for the policy – noted

The policy includes a design led approach, which can respond to local circumstances but also the need to uplift density in appropriate locations.

Concern that rural and non-rural areas should not be the same density has been addressed by ensuring appropriate issues are considered when determining density.

Crucial role of green spaces – policies elsewhere in the draft plan seek to ensure development is accompanied by greenspace.

Policy should be amended to require smaller units on higher density sites – the draft plan also has policies on housing mix to ensure that needs are met overall but there will be locations where a greater mix of smaller units are more appropriate.

Policy should allow room for extensions to help families adapt and remain within their homes and communities – this has to be balanced against using land efficiently and providing homes where there is good access to public transport.

Higher densities parking and hard landscaping areas increase the risk of surface water flooding – the drat local plan includes polices to ensure flood risk is properly considered, managed and mitigated.

Wide ranging concerns included that there is a need for proper family homes with gardens, higher densities will create the ‘slums of tomorrow’. Concern that if densities are increased too much it might decrease the quality of life – Higher density developments in the right places can be delivered at a high quality, and the plan includes a range of policies to ensure sites are well designed and accompanied by the right services and facilities.

Policy GP/ST: Skyline and tall buildings

Summary of Issues Arising from First Proposals Representations:

A standalone policy was not proposed in the First Proposals.

Response to Main Issues Raised in Representations:

A standalone policy was not proposed in the First Proposals.

Policy GP/QP Establishing high quality landscape and public realm

Summary of issues arising from First Proposals representations:

Many respondents expressed general support for the policy.

There were various suggestions to improve the policy. Many comments focussed upon improving the quality and experience of public spaces through the introduction of Home Zones, Low Traffic Neighbourhoods and the principles of the 15-Minute City. Trumpington Residents Association (TRA) and others commented on the quality of the existing streetscape, the capacity of the streets and spaces within the city and their overall maintenance. Cambridge and South Cambridgeshire Green Parties argued that footways need to be more porous for pedestrians but also protect them from motorised vehicles. The same respondent asked how the Local Plan will treat anti-terror architecture.

Metro Property Unit Trust suggested narrowing the policy's scope to ensure that developments should just be landscape-led, but also respond to other design, land-use and landscape considerations. Contrastingly, the Royal Society for the Protection of Birds Cambridgeshire/ Bedfordshire/ Hertfordshire Area suggested expanding the scope of the policy to include local landscape and habitats and the need to prevent the introduction of new, or expansion of existing invasive species. The Wildlife Trust considered that the Building with Nature standards referred to in Policy BG/GI should be formally incorporated as a requirement into this policy or another appropriate policy such as GP/QD. A few developers questioned how the last bullet point of the policy, 'appropriate types of open space' will be tested, measured, and applied.

In terms of the additional survey questions, in relation to Q.7 (southern rural cluster) and Q.9 (kinds of housing, jobs, facilities, or open spaces to include in villages) there were a number of suggestions, including an expressed desire for new development to be designed for children and a wish to make new development reflect village character. In relation to Q.4 (Cambridge North-East), a high number of respondents expressed a desire for green spaces, tree, etc. to be included in the design of the site. Similar aspirations were expressed in response to Q.5 (Addenbrookes), Q.6 (Cambourne), Q.7 (southern rural cluster), Q.9 (kinds of housing, jobs, facilities, or open spaces to include in villages) and Q.13 (the broad aspirational vision for Greater Cambridge). In terms of enhancing connectivity, respondents expressed support in relation to Q.3 (Cambridge East), Q.4 (Cambridge North-East), Q.6 (Cambourne), Q.7 (the southern rural cluster), Q.9 (the villages) and Q.13 (the broad aspirational vision for Greater Cambridge). There were particularly detailed representations expressing a desire to improve connectivity in Addenbrookes which was linked to Q.5 (Addenbrookes).

Specific comments in relation to public art were not made during the first stages of this consultation process.

Policy GP/LC: Protection and enhancement of landscape character

Summary of issues arising from First Proposals representations:

Many respondents generally supported the policy direction.

Some suggestions were made to the policy wording including requests for more clarity to identify what makes green gaps ‘important’. Some respondents identified areas of particular landscape value that should be protected such as the green corridors around the River Cam, River Great Ouse, Hobson’s Brook and West Cambridge and the landscape south of Cambridge Biomedical Centre around White Hill. A few developers and landowners wanted the policy to allow for the consideration of development on its own merits and asked that the policy recognised the positive impact that development can have upon the character of landscapes.

There were also requests for new developments to retain and enhance landscape features that have particular value, rather than retain all landscape features.

Cambridge Past, Present and Future argued that similar Local Plan policies had not been effective at protecting the setting of Cambridge from the cumulative impact of development and that the policy should require the planting of trees early to improve the screening of the city. The Campaign to Protect Rural England (CPRE) also expressed a wish that the policy would prevent visually intrusive developments occurring. Contrastingly, Metro Property Unit Trust argued that the policy needed to ensure that the protection of trees is measured against other elements of the proposal. North Newnham Residents Association provided a number of comments relating to how the policy should protect and enhance hedges.

Historic England (HE) commented that views from the south and east of the city are being underplayed as a characteristic of the city and suggested that Heritage Impact Assessment should look at this issue. HE also argued that the policy should ensure that new development positively responds to Cambridge's historic landscape. Natural England stated that locally designated landscapes should be identified within the plan and given policy protection.

Some respondents argued that specific site proposals in the First Proposals would not be in line with this policy, in particular sites at Babraham, Sawston, and there was reference to Anglian Water's proposal at Honey Hill. Developers such as TOWN, argued that the policy will need to recognise the strategic objectives of the North East Cambridge Area Action Plan and avoid imposing conditions that could unreasonably restrict development.

Some respondents including some Parish Councils argued that Important Countryside Frontages (ICFs) are an important policy tool for protecting villages, whereas other respondents saying they were an unnecessary additional layer of constraint to development. Some respondents asked for additional ICFs , whereas other respondents asked for ICFs to be removed.

In terms of the additional survey questions, there were a high number of representations in response to Q.4 (Cambridge North-East) which supported the protection of existing natural and landscapes, or provision of new green spaces. In response to Q.7 (southern rural cluster), Q.8 (villages), Q.13 (aspirational vision for Greater Cambridge), there were some representations which expressed support for protecting Greater Cambridge's landscape and there were concerns that new development could harm existing landscapes.

Response to Main Issues Raised in Representations:

Many comments were received in relation to the protection of specific areas of landscape value. A 'character-based approach' has been followed for the policy based upon the Greater Cambridge Landscape Character Assessment (GC LCA) (2021). This approach has been followed as it recognises the character, diversity and natural beauty of all landscapes across the whole of Greater Cambridge rather than a 'local landscape designations approach' which identifies and focuses on specific areas of greater landscape value.

As explained above, the reference to important green gaps made at First Proposals was in response to continuing Policy NH/1 in the South Cambridgeshire Local Plan (2018) which protects the areas of countryside between Longstanton village and the new town of Northstowe. It was considered that there are no other specific green gaps that are important from a landscape point of view and that it is unnecessary to include this as part of the policy. The continuation of the protection of the gap between Longstanton and Northstowe is included within the Northstowe policy.

The policy seeks to protect, conserve and enhance the landscape and recognises that development can provide opportunities for this. It has been drafted to recognise that landscape features that positively contribute to the quality and character of the area should be protected, conserved and enhanced, responding to a comment that not all landscape features have value.

The policy has a clause relating to the cumulative effects of development to avoid incremental harm to local landscape character. Policy BG/TC: Tree Canopy Cover and the Tree Population requires additional tree planting and the protection of trees and hedgerows.

The GC LCA looked in detail at the physical and human/cultural influences to identify the Landscape Character Areas including the consideration of historic landscape character. This is therefore an intrinsic part of the description of each Landscape Character Area and the landscape sensitivities and landscape guidelines provided in the GC LCA, and which should be considered in new development proposals. With regards to Heritage Impact Assessment (HIA), the methodology for carrying out HIAs in Greater Cambridge recognises the importance of all strategic views across and within the city. Through the Skyline and Tall Buildings Strategy, the viewpoints are being updated in consultation with Historic England, including dynamic views.

With regards to criticism of existing development proposals, all applications are subject to landscape character policies in the adopted Cambridge and South Cambridgeshire Local Plans (2018). These policies refer to older studies and the more recent 2021 GC LCA is also used in the consideration of development proposals as an updated piece of evidence that covers the whole of Greater Cambridge . The identification of sites within the Local Plan has followed a rigorous approach to site assessment, set out in the Greater Cambridge Housing and Economic Land Availability Assessment (HELAA). The sites were assessed against a wide range of criteria including landscape and townscape, carried out by landscape architects.

Responses to representations regarding Important Countryside Frontages are included in the Protected Open Space study, which is an appendix to the Biodiversity and Green Spaces Topic Paper.

Policy GP/HE Historic Environment

Summary of Issues Arising from First Proposals Representations:

Historic England provided substantial comments in response to Policy GP/HA, which included various suggestions. Of particular note were comments that the initial policy approach set out in the First Proposals was too focused on the City and more needed to be done to recognise heritage across Greater Cambridge in a holistic way. Historic England suggested that the Councils should provide a positive strategy for the historic environment and include a strategic policy for the pattern, scale and quality of development, and the conservation and enhancement of the natural, built and historic environment. Other commenting parties considered more could be done to recognise the value of heritage beyond designated heritage assets.

Response to Main Issues Raised in Representations:

Heritage assets play an important part in the local character and identity of the district, and it is it important that both designated and non-designated heritage assets are recognised, protected and wherever practical enhanced by development. Therefore, in refining the Local Plan's approach to the historic environment, the Councils have prepared Policy GP/HE as a means of ensuring the historic environment is considered holistically through a strategic policy framework.

This overarching policy sets out the heritage strategy, alongside broader principles of conservation.

GP/HE address concerns raised in representations regarding HIAs by ensuring that applications have to submit a thorough, comprehensive and proportionate Heritage Impact Assessment, which considers the cumulative impacts, heritage significance and opportunities for enhancement.

Policy GP/HA Designated Heritage Assets

Summary of Issues Arising from First Proposals Representations:

The comments from the first proposals of the Local Plan express broad support for the inclusion of a heritage policy, however some comments raised concerns about the policy's current scope and effectiveness. A central issue raised is the overly narrow focus on designated heritage assets within Cambridge city, with comments made about the insufficient attention currently being given to the heritage significance of surrounding villages, non-designated assets, and wider historic landscapes. Respondents felt that the policy fail to reflect the full richness of the historic environment, including intangible heritage, and lacks references to key resources such as the Cambridgeshire Historic Environment Record and local Conservation Area Appraisals.

Many comments highlighted the need for a more holistic and strategic approach to heritage across the entire Local Plan. It was suggested that rather than being confined to a single chapter, historic environment considerations should be embedded throughout the plan, influencing decisions on growth, infrastructure, and sustainability. Further comments suggested that the proposed policy would not adequately balance development with heritage protection and enhancement. Several stakeholders recommend involving Historic England's Historic Places Panel to provide a wider strategic overview.

Some respondents criticised approaches taken to the Strategic Heritage Impact Assessment (SHIA) and individual Heritage Impact Assessments (HIAs), which were viewed as lacking rigour, transparency, and coverage. Comments were received around how these assessments effectively assess the cumulative impacts of development, and how they properly evaluate Cambridge's heritage as a whole. Other respondents suggested there was an overreliance on visual distance rather than cultural significance, limited consideration of archaeological potential, and limited assessments of non-designated areas or approach roads into the city.

While a number of comments were generally supportive of the policy, some suggested it did not fully align with national policy and guidance suggesting that new policies for issues such as Heritage at Risk, historic shopfronts, and the treatment of archaeology, should be introduced to address gaps in the proposed policy approach.

Response to Main Issues Raised in Representations:

Policy GP/HA addresses concerns raised in representations around the design and impact of new development on designated heritage assets. By encouraging design that responds positively to the heritage context, new development will need to contribute to and enhance local distinctiveness, thereby ensuring growth complements rather than erodes the unique character of Greater Cambridge's historic urban and rural assets.

GP/HA also addresses concerns raised in representations regarding conservation areas, with clear and concise policy requirements, in regard to development that would affect the designated heritage asset, alongside buildings or structures that make a positive contribution to the wider conservation area.

In responses to the responses received, we have developed additional heritage policies to address the broad and diverse heritage of Greater Cambridge, including GP/HA which addresses designated heritage assets, GP/ND which addresses non-designated heritage assets with explicit reference to the Cambridgeshire Historic Environment Record, GP/AR which addresses archaeology and GP/SF which addresses shopfronts. Having individual policies for each element of the historic environment has enabled us to develop more specific and targeted approaches to different types of historic assets.

Policy GP/ND Non-Designated Heritage Assets

Summary of Issues Arising from First Proposals Representations:

11.5 The comments received during the First Proposals consultation reflected the strong support for the protection and enhancement of the historic environment

of Greater Cambridge. Comments received emphasised the need for a broader and more inclusive approach to heritage, expanding beyond designated heritage assets and more explicitly including non-designated heritage assets as part of the decision-making process. This included the need for references to be made to local records such as Cambridgeshire's Historic Environment Record.

Response to Main Issues Raised in Representations:

The Local Planning Authority acknowledge that planning policy should approach the historic environment holistically and consider aspects of the historic environment beyond designated heritage assets. The Local Planning Authority also appreciates that non-designated heritage assets can play a very important role in helping to define the historic character of Greater Cambridge and that some locally important heritage assets make major contributions to community identity and wellbeing. Therefore, Policy GP/ND seeks to introduce policy requirements that seek to preserve non-designated heritage assets and ensure that decisions are balanced when considering development that either directly or indirectly affects these assets.

The Local Planning Authority also acknowledge that non-designated heritage assets are considered differently to designated heritage assets, both in terms of national planning policy and in law. Policy GP/ND has sought to separate requirements for designated heritage assets from non-designated heritage assets to provide clarity to both applicants and decision makers. This includes reference to Cambridgeshire's Local Heritage List – the primary database of non-designated heritage assets in Cambridgeshire.

Policy GP/AR Archaeology

Summary of Issues Arising from First Proposals Representations:

Comments received emphasised the need for a clearer approach to archaeology within the Local Plan. This included the need for references to be made to local records such as Cambridgeshire's Historic Environment Record.

Response to Main Issues Raised in Representations:

The Councils appreciate that archaeology is a significant consideration for planning decisions and that the matter of archaeology can be very complex. Therefore, to clarify the Local Plan's archaeological requirements, taking account of the archaeological potential across the whole of the Greater Cambridge area, it was considered that the matter would be best addressed under a separate local planning policy, particularly when factoring the recent guidance published by Historic England.

Policy GP/CC: Adapting Heritage Assets to Climate Change

Summary of issues arising from First Proposals representations:

Broad support for the policy was expressed within the representations from a range of individuals, public bodies, organisations and developers. Histon and Impington PC supported the policy on the condition that retrofitting improvements don't harm heritage assets. Linton PC questioned the need for old buildings to adapt and argued that modern changes could harm the buildings. Comments included the need for clarity regarding what interventions are necessary to end heritage assets reliance on fossil fuels, that the policy should relate to all buildings of traditional construction and should relate to policy CC/NZ.

Cambridge Past, Present & Future stated that it would be useful to provide clear guidance on the appropriate location of solar panels on heritage assets and buildings within conservation areas. Gamlingay Parish Council stated that more support is needed to help residents with listed buildings retrofit temporary fittings to roof structures.

Historic England (HE) broadly support the policy but provided comments including that it should articulate the significant carbon output that is produced when demolishing old buildings and policies should recognise the benefits of sympathetic restoration and retrofitting historic buildings. HE noted that listed buildings, buildings in Conservation Areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of Building Regulations where compliance would unacceptably alter their character and appearance. HE noted that

traditional buildings can be impacted by climate change to a greater degree than modern buildings and linked a number of publications to help guide the draft policy.

In terms of the additional survey questions, in relation to Q.4 (Cambridge North-East) and Q.13 (aspirational vision for Greater Cambridge) some respondents expressed a preference for retrofitting properties over creating new development.

Response to main issues raised in representations:

Responses to general issues raised in representations include:

Representations calling for the policy to consider all buildings of traditional construction – policy in the local plan can only be applied for works that require planning permission. Traditionally built properties that do not fall under the definition of a heritage asset may not require planning permission for certain works to enhance their environmental performance and would fall outside the lens of the policy. However, it is noted that guidance for these types of properties is still important, and indeed the guidance documents and whole buildings approach referenced in the policy will be applicable. As such, wording has been added to the supporting text to promote the use of this guidance for all traditionally built properties.

Representations calling for guidance on the placement of renewable energy technologies for listed buildings – Historic England already publish guidance.

Policy GP/SF: Shopfronts

Summary of issues arising from First Proposals representations

A standalone policy was not proposed in the First Proposals.

Response to Main Issues Raised in Representations:

Through drafting of the local plan the Councils identified that a new standalone policy was needed to address this issue.

Jobs

Summary of the main issues raised in general comments on the jobs theme:

Some developers, private-sector organisations and councils expressed support for the aims of the policies in this section. A few parish councils argued the statistics forecasting jobs growth need to be reconsidered after Covid-19 and three respondents argued that the figures were too high.

A few landowners argued that the policies do not promote the needs of Cambridge's high technology clusters or life sciences sectors. Some landowners also emphasised the need for the Local Plan to be flexible in its approach to commercial, retail and leisure uses. Contrastingly Histon and Impington Parish Council argued that new jobs should not be limited to high-tech jobs but cover a range of employment types. The Cambridge and South Cambridgeshire Green Parties argued that the Local Plan must effectively tackle poverty and inequality in Greater Cambridgeshire and that growth in high-tech clusters will not address these problems. Great Shelford Parish Council argued that the policies in the Jobs Chapter needed to place a greater emphasis upon protecting the rural economy. There were a few comments relating to sites, with developers arguing that their site could deliver the aims of the policies.

Response to the Main Issues Raised in Representations:

Respondents raised a number of important matters through previous consultations on the emerging Local Plan. These matters have been considered during the preparation of the plan and its policies.

The Councils' response to these matters includes:

- The evidence informing the needs identified in the plan has been updated to inform this draft local plan. Further information on this can be found in the strategy topic paper.
- Updated evidence has also been prepared to examine employment land supply needs, including for specific sectors.

- Policies have been included which seek to share the benefits of growth and development. Policies in this chapter propose to require an element of large scale proposals to provide affordable employment space. A policy requiring employment and skills plans as part of proposals is included in the wellbeing chapter.
- Policies are included to support the rural economy.

The following proposed policies areas are addressed in this topic paper:

- J/NE: New employment and development proposals
- J/RE: Supporting the Rural Economy
- J/AL: Protecting the best agricultural land
- J/PB: Protecting Existing Business Space
- J/AW: Affordable workspaces and creative industries
- J/EP: Supporting a range of facilities in employment parks
- J/RC: Retail and Other Complementary Town Centre Uses
- J/SA: Cambridge City's Primary Shopping Area
- J/MS: Markets and Street Trading
- J/VA: Visitor accommodation, attractions and facilities
- J/FD: Faculty development and specialist / language schools

Policy J/NE: New employment and development proposals

Summary of issues arising from First Proposals representations:

This policy attracted a substantial number of detailed representations. Some parish councils, district councils, landowners and developers expressed support for the policy. Reasons included that it would support delivery of a mix of types of employment, ensure developments were appropriate in scale to their location, and could support providing jobs where there are good transport links.

Babraham Research Campus Ltd broadly supported the policy but asked that policy wording is clearly written to confirm that employment development will be supported in policy areas in the countryside. Other respondents sought amendments to policy areas, such as at Granta Park. Gamlingay Parish Council asked that proposals are

proportional in scale and retain the character of the rural area so that they correspond with Gamlingay's Neighbourhood Plan.

Some individuals perceived there to be enough employment in the area and thought that facilitating more jobs would create a need for more homes. Contrastingly, other respondents, mainly developers and landowners, perceived the policy to be too restrictive, and that greater flexibility was required. Some argued that the policy should do more to support clusters, and allow more employment development in various locations. Endurance Estates argued that the emerging policies for industrial development would suppress demand. The same respondent argued that the employment land evidence base underestimates the actual need for Class B2 and B8 uses. Similarly, Newlands Developments argued that the Plan needs to account for increasing growth in the research and innovation, logistics and advanced manufacturing sectors especially in the context of the Oxford-Cambridge Arc. Tritax Symmetry stated that the failure to address logistics floorspace will lead to increased vehicle miles as businesses and households are supplied from facilities further away. A few developers, including Lolworth Developments Limited, stated that the Plan does not meet NPPF's requirement for planning policies to accommodate the bespoke locational requirements for storage and distribution operations of all scales.

The Education and Skills Agency asked for the policy to recognise the direct and indirect skills and employment benefits of education facilities. BioMed Realty asked for the policy to support the needs of clusters and proactively recognise opportunities for some densification to make best use of established R&D Parks, and that policies within the emerging local plan should explicitly support employment development. Hallam Land Management Limited argued that here should also be consideration of data centres. There were a few site-specific comments where developers promoted their land as a suitable place to deliver the policies. There were also objectors such as Trumpington Resident Association who argued that certain sites were not appropriate for development.

Response to Main Issues raised in representations:

A number of comments raise issues about the overall quantity and type of employment land being supported by the plan. The strategy section of the plan considers these issues and has been informed by update evidence regarding need. The plan has also considered the needs of clusters, considering both quantitative and qualitative aspects of policy. Sites like Babraham Research Park and Granta Park have received specific policy responses in the draft plan responding to their specific circumstances. Since the First Proposals consultation additional evidence has been commissioned regarding the need for industry and warehousing land, and the strategy has responded to that need with proposed allocations.

A site representation was received to the call for sites submissions update in 2025 suggesting alternative uses for the Eternit site in Meldreth, for residential use or alternative industrial uses. The site did not meet the identified strategy approach to residential development. Very limited information was submitted on the suitability for alternative uses as a data or energy centre. It remains proposed as an established employment area.

Policy J/RE: Supporting the Rural Economy

Summary of issues arising from First Proposals representations:

The University of Cambridge and several parish councils supported the policy.

The Campaign to Protect Rural England (CPRE) stated that the policy should be strengthened and properly enforced citing issues of security from opening up tracks and bridleways. At the same time, the British Horse Society highlighted the importance of the bridleway network for economic social and well being. KWA Architects argued the scope of the policy should not be limited to reusing and replacing buildings to allow, for example, for the equestrian industry's needs to be taken into account. Bassingbourn-cum-Kneesworth Parish Council wished to ensure that small employment sites should not expand into the countryside. Anaerobic digestion was highlighted as a potential alternative use and the need for a strategic

plan identified. Cambridge Past Present and Future stated that if proposals relate to solar or windfarms the policy need to relate back to CC/RE and protection of landscape. Huntingdonshire District Council expressed concern over the deliverability of the policy in the context of the wide range of uses facilitated through the prior approval and notification process.

Response to Main Issues Raised in Representations:

Paragraph 88 of the NPPF states that planning policies and decisions should enable the development and diversification of agricultural and other land-based rural. The draft policy seeks to strike the right balance between supporting the rural economy, and restricting development where it would not be sustainable. The policy focuses initially on using existing resources such as redundant buildings, but will allow new buildings in appropriate circumstances. In combination with other policies in the plan this is considered an appropriate level of flexibility. Some types of development are now covered by permitted development rules, but it is important that the plan maintains a policy framework for the consideration of proposals when permission is required.

Policy J/AL: Protecting the best agricultural land

Summary of issues arising from First Proposals representations:

Some parish councils, government and political organisations expressed support for the policy, caveated by Gamlingay Parish Council that it must be above sea level and have suitable drainage. Abbey Properties Cambridgeshire Limited questioned the need for this policy as they perceived it to already be included in national policy. Claremont Planning Consultancy suggested that there will be some instances where the loss of agricultural land will be required to meet development needs. In contrast, a number of respondents argued that the Plan's infrastructure and housing proposals would contravene this policy and the National Planning Policy Framework. It was suggested that this loss should be explicitly quantified in individual site policies. The Campaign to Protect Rural England argued that the policies should be strengthened

and properly enforced cited the damage and security issues caused by opening up tracks and bridleways.

There were requests that the policy take account of alternative reversible uses of agricultural land, for example equestrian uses and the land needs of renewable or infrastructure developments, was requested. Cambridge and South Cambridgeshire Green Parties asked for reassurances that this policy would not prevent habitat restoration projects on drained peat soils currently under agricultural use.

There were a few representations relating to specific sites; some argued that the policy would be contravened by the relocation of the Cambridge Waste Water Treatment Plant and the Cambridge Biomedical Campus proposals. Whereas some developers argued that there were clear instances when it would be necessary to build upon agricultural land and posited specific examples.

Response to Main Issues Raised in representations:

The NPPF states that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. 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. This policy seeks to clarify how the NPPF will be applied in Greater Cambridge through preventing development which would lead to irreversible loss of Grades 1, 2 and 3a agricultural land unless under specific circumstances.

National Planning policy requires strategic policies to provide for objectively assessed needs for housing and other uses any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. The plan allocations have been through a comprehensive assessment in the HELAA process, and sustainability appraisal, where a wide range of factors, including the grade of agricultural land

have been assessed. It is not possible to meet needs only using brownfield land in this area, and much of the remaining land is agricultural.

On other issues raised, footways and bridleways are addressed in Policy I/ST: Sustainable Transport and Connectivity. Point 2 allows that temporary uses may be possible with an appropriate condition. The policies caveat under Point 1 for sustainability considerations and the need for the development provide the potential flexibility to address important climate change and infrastructure projects.

Policy J/PB: Protecting Existing Business Space

Summary of issues arising from First Proposals representations:

Some individuals, developers, charities, and parish councils expressed support for the policy. Contrastingly, Croydon parish council argued that protecting business spaces should be considered on a case-by-case basis. A few developers, including Abrdn, argued that the policy should recognise the increasing importance of town centres catering for flexible uses, and that office uses are not always required. The same respondents also stated that re-developing brownfield land and re-providing existing uses alongside co-located residential uses is a better way to utilise land. DB Group Holdings LTD argued that protection for existing business space needs to extend to ensure that expansion opportunities are supported. The same group asked for measures to be included to ensure that other development that is supported by the Plan does not constrain existing successful business sites. There were also some site-specific comments, where developers and landowners explained how their sites could fulfil the aims of the policy.

Response to Main Issues Raised in Representations:

The representations provide a range of opinions, supporting the need for protection of employment land through to the need for flexibility. The draft policy strikes the right balance, protecting this important resource, but not being so onerous as to provide unreasonable levels of long term protection.

Policy J/AW: Affordable workspace and creative industries

Summary of issues arising from First Proposals representations:

There were less representations in response to this policy compared to other policies in the Jobs Chapter. Some developers, parish councils, charities, and landowners expressed support for this policy. Histon and Impington PC wanted the affordability of the workplaces to be higher and set at 80% rather than 60%.

Contrastingly, Mission Street Ltd questioned the requirements of the policy due to a perceived lack of evidence justifying the level of affordable workspace and the scale of development that should provide it. The same respondent asked for clarity relating to key terms in the policy and asked for the policy to have greater flexibility so that the rate of affordable workspace is proportionate to the scale of the development. Abbey Properties Cambridgeshire Limited argued that it was not acceptable for a commercial development to subsidise workspace. Cambridge and South Cambridgeshire Green Parties supported the aims of this policy but wanted the rate which is considered 'affordable' to be set through assessment of the ability of the target market to pay the rates. Contrastingly, the Universities Superannuation Scheme recommend that affordable workspace requirements are subject to viability to ensure marginal schemes are not unnecessarily restricted from coming forward. The same respondent also argued that the provision of affordable workspace on-site is not always appropriate and wanted the policy to allow for financial contributions for equivalent off-site provision. A few developers and landowners put forward site specific comments and explained how their sites would deliver the aims of the policy.

Response to Main Issues Raised in Representations:

A need for affordable workspace has been identified. Further work will consider the appropriate levels of discount and these will be tailored to reflect market rates in different areas. The requirements for workspace will be a percentage and therefore will vary according to the scale of the development. An example is provided to aid understanding so that consultees can respond to the direction of travel. The policy recognises that there may be circumstances where off-site provision or payments in-

lieu may be appropriate. Requirements for affordable workspace from commercial developments have operated successfully in other areas such as Hammersmith and Fulham and Lambeth. The policy recognises that there may be circumstances where off-site provision or payments in-lieu may be appropriate.

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

Summary of issues arising from First Proposals representations:

Issues raised in the representations include:

- General support for supporting a range of facilities from a number of the organisations that responded to the consultation.
- Requests for additional types of facilities to be added to the policy. These included showering facilities and water refilling stations, flexible business space and a range of green spaces.
    - A request for Section 106 contributions to pay for facilities and for investment support for active travel.

Response to Main issues raised in representations:

Responses largely supported to aim of delivering appropriate facilities. The wording of the policy provides a broad framework that provides flexibility for employment parks to accommodate a tailored range of facilities to support the amenity of workers.

Policy J/MS: Markets and Street Trading

Summary of issues arising from First Proposals representations:

A standalone policy was not proposed in the First Proposals. However, in response to the proposed policy on Retail and Centres some respondents, especially parish councils, noted the importance of protecting and supporting smaller shops, services, and amenities in villages and elsewhere. Some respondents argued that facilities in

new settlement centres should be protected to serve the residents and prevent car journeys.

While there was general support for the Council's strategic vision for Greater Cambridge, with a focus on community building, climate change mitigation and adaption, and enhancing local character, some respondents expressed concern that the proposed policies would not support the delivery of this vision. For example, on community building, some felt that the narrow focus on centres would result in heartless, community-poor developments.

The need for a more focused, standalone approach on markets emerged from this body of responses, given the potential for markets to positively support community development, alongside the need to put in place sufficient safeguards to ensure that permanent shops are not adversely affected by market traders selling similar goods and services.

Response to Main Issues Raised in Representations:

The policy takes a balanced approach in response to the general comments raised at the First Proposals consultation. Successful markets can play a crucial role in supporting community development and cohesion, supporting local economic development by providing opportunities for small and micro businesses to trade and enabling different members of the together to interact and connect.

The policy responds positively to those respondents that felt the Local Plan could go further in supporting initiatives that support community building. It provides explicit support for the establishment of new markets and the creation of well-designed places for them to take place, spaces which can be used flexibly for other community uses outside of trading hours.

However, in response to the concerns raised about the lack of safeguards to protect smaller shops, especially in villages, the markets policy puts in place proportionate criteria to ensure that markets complement rather than compete with permanent shops. This will be particularly important in villages, where the permanent retail offer

can be a lifeline for local residents, and in emerging centres where permanent shops are at the early stages of establishing themselves.

Policy J/RC: Retail and Other Complementary Town Centre Uses

Summary of issues arising from First Proposals representations:

Several respondents expressed support for the proposed policy in the First Proposals (J/RC). Bassingbourn-cum-Kneesworth PC argued that the policy needed to have a greater focus on rural shops and services. Abrdn, the Universities Superannuation Scheme and the Education and Skills Funding Agency, supported elements of the policy but objected to potential Article 4 Directions that restrict alternative uses, arguing that alternative uses improve vitality of city centres.

Contrastingly, Cambridge Past, Present and Future argued that shops and services should be protected from change of use through removal of permitted development rights. A few developers, including Abrdn, felt that the policy lacked sufficient flexibility to enable Greater Cambridge's centres to adapt to the contemporary economic climate; in particular, the aspect of the policy which would resist the loss of retail or other town centre uses in existing centres and primary shopping areas. Cambridge and South Cambridgeshire Green Parties argued that encouraging small-scale units in Cambridge may not be sufficient to attract the range of users mentioned in the policy.

Representations made in relation to other Local Plan policies are also relevant considerations for this policy. The Education and Skills Funding Agency (Department for Education) suggested that the Local Plan makes clear that education facilities serving a wider catchment area will not be considered a town centre use requiring sequential approach to be applied, but that any such facilities must be in sustainable, accessible locations (representation made in relation to the proposed approach to Policy WS/CF).

Response to Main Issues Raised in Representations:

The plan seeks to protect and enhance the town centres of Greater Cambridge, but there are limits to what can achieved given the flexibility provided by national planning policy and general trends in retail provision. There were mixed views on whether Article 4 notices should be used to enable greater control change of use. The supporting text around the proposed policy clarifies the potential for these to be considered outside the plan making process, subject to there being sufficient evidence, but also highlights the potential for other planning controls, including conditions, to restrict inappropriate conversions wherever possible.

Some representors sought an emphasis on protecting rural shops and services. Reflecting the vital role these play in maintaining the rural economy and serving the day-to-day needs of residents more sustainably, the proposed policy incorporates specific protections for main town centre uses across Greater Cambridge's full network of centres, including both rural centres and minor rural centres, but also affords protection for village shops and services in smaller villages not part of the centres hierarchy. These are tied to the criteria established in Policy W/CF Community, Sports, and Leisure Facilities. The policy directs proposals for new town centre uses to the larger designated centres, in line with the proposed hierarchy, ensuring proposals are of an appropriate scale to the location.

In response to the comments raised around education uses in town centres, the NPPF is clear that education facilities should not be considered a main town centre use and, as such, are not subject to sequential testing. The policies in the draft Local Plan collectively do not preclude education uses within the network of centres, with the exception of within ground floor spaces within the Primary Shopping Area (see Policy J/SA), however proposals would be considered on their merits in line with the general requirements of this policy and other relevant policies in the Plan, in particular Policy WS/CF Community, Sports and Leisure Facilities which establishes criteria for the provision of new facilities, including education.

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

Summary of Issues Arising from First Proposals Representations:

Cambridge's city centre was a key issue raised in response to Policy J/RC. Some respondents, such as the Universities Superannuation Scheme, supported the development of a specific approach to retail policy for Cambridge City Centre, including its shopping areas. Histon and Impington Parish Council questioned whether the City Centre would be able to support leisure activities. Others highlighted that flexible approaches may be needed to use classes to combat empty shops and help the City Centre function as an experiential destination, whilst some objected to the use of planning controls to control the change of use of existing buildings.

Response to the Main Issues Raised in Representations:

The policy responds directly to the feedback received in the First Proposals by proposing a specific policy for the Primary Shopping Area, which puts in place additional safeguards against inappropriate uses and proposals that would harm the role and purpose of the City Centre. The policy also, in response to comments raised by respondents, clarifies the range of specific uses (beyond retail) that would be deemed acceptable in ground floor spaces, and provides particular support for leisure and cultural development that would complement ground floor uses, recognising the need for additional flexibilities to enable the city centre to evolve sustainably whilst supporting its vibrancy and vitality.

Policy J/VA: Visitor accommodation, attractions and facilities

Summary of issues arising from First Proposals representations:

The consultation on the First Proposals indicated that in general there was support for the proposed policy direction. CBC Ltd indicated that a need for visitor accommodation, for both business and visitor use, and a conference centre had been identified at Cambridge Biomedical Campus. Marshall Group Properties stated that there are opportunities at Cambridge East to provide a range of retail and leisure

services and facilities. There were requests for recognition in the policy of the potential role of retail centres, and particularly the city centre, in providing space for new visitor accommodation and attractions.

Concern was expressed over the loss of housing to short terms letting accommodation. There were also concerns over the capacity of visitor attractions to accommodate increased visitor numbers, with the levels likely to grow given growing population in the area and the development of new visitor accommodation. There was a request that the policy should support well-designed, sustainable improvements to existing attractions and a suggestion that new visitor accommodation should be asked for a contribution to mitigate their impact. Greater clarity was requested regarding when new attractions would be acceptable in rural areas and concern that the policy would have the potential to conflict with the Plan's green infrastructure policies.

Response to Main issues raised in representations:

Comments in general support of the policy approach are noted. Comments suggested support for additional visitor accommodation at specific strategic sites such as the Cambridge Biomedical Campus and Cambridge East. This is addressed in the policy and site specific policies for these sites consider this issue.

In terms of visitor pressure, Cambridge City Council is working in partnership with South Cambridgeshire District Council and Visit Cambridge partners: Cambridge BID, King's College and Curating Cambridge to develop a new Destination Management Plan (DMP) for Greater Cambridge. The new DMP will provide the strategic roadmap for the sustainable development, delivery and management of tourism in Greater Cambridge. This aims to ensure that the visitor economy continues to positively contribute to the city and region in the future.

One representation queried what new attractions would be acceptable in rural areas given potential conflict with other policies. The draft policy clarifies that the focus is on supporting existing tourism assets, and that scheme is in scale with its location and the nature of the facility it supports.

The draft policy recognises the potential negative impacts of short term lettings and, where planning permission is required, introduces criteria which must be met in order for any application to be approved.

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

Summary of issues arising from First Proposals representations:

There were not many representations in response to this policy. A parish council, the University of Cambridge, Anglia Ruskin University, and a developer expressed support for the policy. The Education and Skills Agency supported the policy direction but recommended that the supporting text makes a distinction between privately operated and state-funded education, due to changes of use under permitted development rights. Anglia Ruskin University provided a lengthy representation where they suggested improvements to the policy to better reflect their strategic priorities. B Marshall objected to the policy on the grounds that providing student accommodation for language students worsens the learning experience and leads to more under-utilised facilities and removes a source of income for low-income families. Contrastingly, F Gawthrop asked for the policy to be strengthened to not allow language students to stay in family dwellings.

Response to Main issues raised in representations:

In addition to this policy, the Eastern Gate Public Realm Improvement Area covering ARU's East Road campus is proposed in the draft plan. Together, these policies support ARU's approach that their East Road campus and the wider area along East Road is the most sustainable locations for faculty development for ARU during the next plan period.

Further clarification has been provided to make clear that homestays are an acceptable form of off-site residential accommodation. This would mean a family remains resident in the property with one or more students. However, entire residential properties used to accommodate specialist college or language school

students (and staff) with no resident family is not an acceptable form of off-site residential accommodation.

Policy J/RW: Enabling remote working

Summary of issues arising from First Proposals representations:

Some parish councils, developers, developers, political organisations and the University of Cambridge expressed support for the policy. A few respondents, including Carbon Neutral Cambridge, emphasised the importance of ensuring the policy Greater Cambridge's rural communities. Two commenters, including Central Bedfordshire Council, argued that the policy could be strengthened to refer to the provision of home office space in new dwellings as the emphasis is currently on the delivery of external hubs or extensions. The Cambridge and South Cambridgeshire Green Parties asked that extensions were rigorously tested for proof of a need for homeworking.

Response to Main Issues Raised in Representations:

Representations showed general support for measures to support remote working. However, a revised policy approach is now proposed.

Homes

Summary of the main issues raised in general comments on the homes theme:

There is general support for the proposed housing policies from some Parish Councils, Cambourne TC and some site promoters. General comments on the homes chapter include support for the Local Plan requiring a wide range of housing – type, size and tenure - as this will improve the ability of the market to achieve enhanced levels of delivery and will support the creation of diverse communities. Specific comments suggest the need for family homes with gardens within the city and the need to reuse vacant buildings to minimise whole life carbon emissions. Parish Councils suggest that there is a need to prevent building of new homes while others remain empty, and the need to protect new homes from being lost to buy to let. Metro Property Unit Trust asks for the housing policies to recognise the

importance of purpose-built student accommodation, as this reduces the demand on the existing and proposed housing stock. Great Shelford PC highlight that homes do not make a community, and that they need to be supported by infrastructure. Many respondents emphasises the need for affordable housing, others questioned the need for more housing.

Response to the Main Issues Raised in Representations:

Respondents raised a number of important matters through previous consultations on the emerging Local Plan. These matters have been considered during the preparation of the plan and its policies.

The Councils' response to these matters includes:

- Noting support for address a range of housing issues in the emerging plan.
- Both Council's acknowledge that bringing vacant homes back into use is an important issue. Making the best use of existing homes in Cambridge is one of the key objectives in our Housing Strategy. Empty homes make up less than 1% of the housing stock.
- The draft plan identifies a range of specialist housing needs, including student accommodation.
- The draft plan is informed by an Infrastructure Delivery Plan, and includes policies that seek to ensure infrastructure responds to the need generated by new developments.

For the specific policies set out in the Homes chapter, a summary of the responses received on each policy are set out below:

- H/AH: Affordable housing
- H/ES: Exception sites for affordable housing
- H/HM: Housing mix
- H/GL: Garden land and subdivision of existing plots
- H/SS: Residential space standards and accessible homes
- H/SH: Specialist housing
- H/CB: Self and custom build homes
- H/BR: Built to rent homes

- H/CO: Co-living
- H/MO: Houses in multiple occupation (HMOs)
- H/SA: Student accommodation
- H/DC: Dwellings in the countryside
- H/RM: Residential moorings
- H/GT: Gypsy and traveller pitches and travelling showpeople plots

Policy H/AH Affordable Housing

Representations Received:

There is support for the policy direction from many developers whilst parish councils, community groups and individuals want the policy to go further by providing homes that are more affordable, more secure and are run by community groups or local authorities. There are also calls for affordable housing to be targeted at local people, older people and key workers and for a broader range of affordable tenures including low cost home ownership. Parish councils, community groups and individuals want to see the 40% requirement strictly enforced whilst developers call for flexibility based on robust viability assessments and review mechanisms which also cater for specific needs of schemes such as Extra Care schemes which cannot compete with market housing. They also highlight exemptions set out in the NPPF. There are disagreements over clustering with parish councils wanting affordable housing spread across developments but developers calling for some flexibility to match Registered Provider preferences. Developers argue that allocating more small sites will deliver more affordable housing more quickly than relying on strategic sites with their significant infrastructure overheads.

Council Response

There is an acute need for affordable housing in Greater Cambridge, and therefore seeking high levels of affordable housing on major developments for housing will make a significant contribution towards responding to our identified affordable housing needs. At least 40% affordable homes on major developments (including Built to Rent developments) and at least 50% affordable homes on Green Belt developments have been demonstrated to be deliverable through whole plan viability

testing. National planning policy only allows affordable homes to be sought on major developments for housing, and therefore the policy reflects this, however, developers or Registered Providers can choose to deliver affordable homes on smaller developments or through the delivery of rural exception sites for affordable housing (see Policy H/ES). The draft policy takes account of the changes to national planning policy and guidance in relation to the provision of affordable housing that have been published since First Proposals, including the removal of the specific requirement for 25% of the affordable homes to be First Homes.

Cambridge and South Cambridgeshire have been identified as areas of high affordability pressure, and it is therefore important that the delivery of affordable housing for rent is prioritised, whilst also recognising that other affordable tenures may be required to support the delivery of affordable housing for rent through cross subsidy. The draft policy seeks an affordable housing tenure mix that will meet a wide range of housing needs and create mixed and balanced communities, whilst also taking account of viability. The Local Plan as a whole seeks to deliver truly affordable housing by requiring the provision of affordable housing on new major developments, but also by combining this with directing new homes to the most sustainable locations within Greater Cambridge where there is access to public transport or services and facilities within walking or cycling distance, and by requiring all new homes to be designed to meet the highest achievable standards for water and energy use therefore reducing utility bills.

National planning policy makes clear that planning applications that comply with up-to-date policies should be assumed to be viable. However, national planning policy and guidance does allow for applicants to demonstrate through a viability assessment that in their particular circumstances that if some or all of the development requirements are imposed then the development is unviable. National planning policy and guidance have not been replicated in this policy as Local Plans should avoid unnecessary duplication with policies in the NPPF. No specific details have been provided on which costs may have been underestimated, however, the Viability Assessment to support the Greater Cambridge Local Plan has been

prepared taking account of statutory requirements, guidance and best practice, and it considers a range of development scenarios and residential typologies. The Viability Assessment has specifically considered the delivery of affordable housing on specialist housing developments, such as for older people, and has concluded that it is viable to seek similar levels of affordable provision as with other homes.

National statutory and/or regulatory requirements apply such that no affordable homes can be protected in perpetuity, however any capital receipts received from the sale of an affordable home are reinvested into affordable housing in Greater Cambridge. Local Lettings Plans will be used where appropriate to prioritise affordable rent and social rent housing for local workers or specific groups of people. The mix of houses and flats on a new development is the result of its design, and is influenced by its location and the character of its surroundings – specific requirements are set out in Policy H/HM. To create mixed and balanced communities the policy requires new affordable homes to be dispersed in small groups or clusters throughout the development, and the policy allows some flexibility to reflect site specific circumstances. The policy does not preclude the delivery of modular pod affordable homes to meet the needs of those that are homeless.

A variety of sites have been considered through the Housing and Economic Land Availability Assessment process and assessed against the development strategy for the Local Plan, and those sites identified as suitable and deliverable within the plan period have been allocated. Having considered a range of alternative strategies, the proposed development strategy focusses site allocations for new homes and jobs to the most sustainable locations of Cambridge urban area, the edge of Cambridge and the new settlements as these have: the least climate impact, active and public transport as the natural choice, and jobs, services and facilities near to where people live. Affordable homes will also continue to be delivered on windfall sites and through rural exception sites for affordable housing.

H/ES: Exception sites for affordable housing

Summary of issues arising from First Proposals representations

There was general support for the policy with parish councils and individuals seeking stronger controls whilst developers prefer a more flexible approach. The stronger

controls suggested include: the requirement for local community support and/or leadership; robust evidence of local need; stricter criteria particularly in the green belt; local connection policies; no market housing; and prioritising the most sustainable communities and community led housing initiatives. Those arguing for more flexibility suggested: prioritising key workers alongside local people; allowing schemes in the green belt and across all types of villages; and a more positive approach to market housing.

There was some concern that rural exception schemes could be used as a trojan horse to enable larger schemes or schemes on unsuitable sites to come forward. However, it was also suggested that rejected larger/unsuitable sites should be considered for rural exception schemes.

There was a preference for rural exception sites to be prioritised over First Homes exceptions sites with Green Belt controls seen as a key tool for achieving this.

Response to issues raised in representations:

A number of responses called for stronger controls on exception sites. The draft policy approach already included a number of controls to ensure that sites are appropriate in terms of meeting local need and being a suitable scale and design in relation to the adjoining settlement. Some suggestions were already addressed by the draft policy approach while some were considered impractical or contrary to national planning policy.

Robust evidence of local need, local connection criteria and the requirement of a sequential test in the Green Belt have all been used very successfully in rural exception site policy for many years. The most sustainable communities have always been the most likely location of exception schemes as they tend to be bigger and have greater levels of need. They also tend to have better facilities. Community led housing schemes can be delivered through exception sites but they still need to meet the same criteria as other proposals.

The requirement for local community support or leadership is impractical although always welcomed and could be a material consideration in considering proposals given that rural exception schemes should be addressing local need. Failure to garner support could be indicative of issues with the proposal.

Not accepting any market housing would be contrary to national planning policy although the draft policy does seek to minimise market housing to that required for viability purposes.

Developers preferred a more flexible approach to exception sites. The draft policy is considered to be sufficiently flexible to allow affordable housing schemes to be delivered which address identified housing need. It is important that clear constraints are applied to the inclusion of market housing to ensure that exception sites remain focused on their priority. National planning policy is very clear about how exception sites can be used in the Green Belt and there is no scope to flex this (and this approach is supported by many respondents). Key workers are not specifically included in the priority groups for exception sites. However, where they are eligible for affordable housing they will be eligible subject to them meeting other criteria.

The danger of exception sites being used as a loophole to increase delivery of market housing on inappropriate sites is recognised. The draft policy sets out clear criteria for where a small amount of market housing will be considered acceptable. It is important that any viability assessments use exception site land values as their starting point.

It is a sensible suggestion to review sites rejected for allocation through the call for sites process for potential exception sites. However, any forthcoming sites will still need to meet the policy criteria and demonstrate they are suitable for development

as rural exception sites or First Homes exception sites. The consideration of sites does not need to be included in the policy.

Some respondents argued that custom and self build plots should not be included within exception sites. However, Greater Cambridge is failing to meet its statutory duty to grant sufficient permissions for custom and self build plots to match demand as measured by the custom and self build register. This has contributed to a number of appeals being lost. Therefore, it seems reasonable to encourage the consideration of custom and self build plots wherever appropriate. If planned correctly there is no reason why custom and self build plots should create additional management or maintenance issues. Neither should they cause viability issues as demand is strong and numbers can be planned to ensure viability remains intact. The policy encourages rather than requires custom and self build plots.

There were calls to prioritise rural exception sites over First Homes exception sites. Rural exception sites have played an important role in supporting rural sustainable communities in South Cambridgeshire for decades. There are more than 50 such schemes in the district enabling people unable to afford market prices to live where they have deep seated roots. Rural exception schemes are considered to make a more valuable contribution to rural communities than First Homes exception sites and will therefore be prioritised.

Policy H/HM: Housing mix

Summary of issues arising from First Proposals representations:

Support, from Parish Councils and site promoters, for the approach that new developments should have a mix of housing sizes. However, site promoters are seeking more flexibility in the approach to allow for changing market conditions, changing requirements, and site-specific circumstances. Site promoters suggest the policy does not stipulate percentages, includes indicative mix only or the ranges for some housing sizes and tenures are amended, and that each development should

determine its own mix. Parish Councils would like policy to address need for provision of bungalows and protection of existing smaller homes. Comments that housing mix should allow for the provision of homes for young single person households. A site promoter objects to the potential to include a planning condition that removes permitted development rights for extensions where that would cause harm to the housing mix. Another site promoter highlights that use class C2 schemes with self-contained dwellings will not always be able to provide the mixes suggested due to their different requirements.

Response to issues raised in representations:

Ensuring local planning policies are both relevant and adaptable to local development contexts is a key consideration for the Councils. The percentage housing mixes presented within the Housing Needs of Specific Groups Update for Greater Cambridge (2025) have been included within the policy to provide applicants and decision-makers with a baseline housing mix to which new development of 10 or more dwellings should aim to achieve, unless an exception to the mix can be justified. Inclusion of the indicative housing mix within the policy is considered reasonable because it will ensure that new residential development will aim to deliver homes in line with forecast demand figures for the Greater Cambridge area. This approach is a progression of Policy H/9: Housing Mix of the adopted South Cambridgeshire Local Plan (2018) but adapted to include requirements for Cambridge and figures that are based on more up-to-date evidence of the area's needs.

Notwithstanding the above, the Councils also acknowledge that there are circumstances where a rigid housing mix would prevent some types of development from meeting specific needs or would be difficult to accommodate given the character and housing mix of the surrounding area. Developments of a particular nature, such as student accommodation development, specialist housing for older people, or developments for custom and self-build homes, may be allowed to deviate from the housing mix requirements in the policy, subject to the submission of evidence as part of a planning application that the development will meet an

identifiable accommodation need. The policy also highlights that deviations from the housing mix may be allowed due to the location of a particular development and the nature of the surrounding character, but planning applications will need to be accompanied by evidence that, to the satisfaction of the Local Planning Authority, justifies the alternative housing mix.

Acknowledging comments that new development should support the delivery of different types of housing, as well as different housing sizes, the policy explicitly supports proposals that introduce different accommodation types that are both sympathetic to a site's specific development context and any identified local or community needs.

The Councils also accept that the use of planning conditions or other planning obligations need to be relevant to the development permitted and reasonable in all respects. Therefore, only in some special circumstances, the Local Planning Authority may use planning conditions or other planning instruments to protect the housing mix of developments that have been designed to meet a particular community need.

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

Summary of issues arising from First Proposals representations:

There was general support for the policy from a range of public bodies and third sector organisations, although there were some additional comments that gardens can help mitigate surface water flooding and provide buffer zones to ecological sites, the policy needs to be strongly worded to prevent detrimental impact on neighbours, and there is a need to consider each proposal on a case by case basis. A parish council commented that green space is needed around properties in rural settings and developments in villages should have gardens of a reasonable size. One individual was opposed to sub-division of plots unless on very large plots where in keeping with the surrounding.

Concern was raised that there is often little biodiversity mitigation required for in-fill developments and that there has been a gradual loss of green habitat and trees. It was suggested the policy should be strongly worded to require biodiversity mitigation/enhancement. Also, Anglian Water were concerned that parking and hard landscaping areas increase the risk of surface water flooding and suggest the policy should require use of permeable materials.

Response to issues raised in representations:

There were comments which were strongly in favour of protecting gardens. This policy responds to these concerns by setting criteria to guide development on garden land to ensure that new development is appropriate and alongside consideration of other policies in the Local Plan mitigates negative impacts on ecology, biodiversity, heritage, surface water flooding and other local considerations. The detailed criteria set out in criterion 1 enable proposals to be considered on a case by case basis.

Policy H/SS: Residential space standards and accessible homes

Summary of issues arising from First Proposals representations:

Support for use of nationally described space standards from a mix of respondents. However, site promoters and housebuilders have asked for additional evidence and justification for their use as required by the NPPF. A statement that there are no nationally prescribed standards for use class C2 schemes.

General support for requirements for accessible and adaptable homes – meeting M4(2) and M4(3) standards. However, specific comments seeking higher proportion of homes required to meet M4(3) standards and requesting that this applies to both market and affordable homes. An individual is seeking amendments from these national standards. Site promoters and housebuilders suggest that additional evidence and justification is needed, and that an ageing population alone is not a reason to seek these standards

Support for requirement that new homes should have their own private amenity space, but with some respondents seeking flexibility as they do not believe that it is

always necessary. A request that student accommodation is exempt from this requirement.

Response to issues raised in representations:

There were calls for the Councils to provide evidence and justification for the inclusion of residential space standards in the Greater Cambridge Local Plan, as required by national planning guidance. The Councils have set out their evidence in Appendix 1 to this Topic Paper. As required, the Councils have provided justification for requiring internal space standards by considering need, viability and timing:

- Need: the research undertaken has demonstrated that since the introduction of the nationally described space standard, the majority of planning applications in Greater Cambridge comply with the nationally described space standard. This is in contrast to applications received prior to 2018. Furthermore, the research has shown that the policies are being applied flexibly. Additionally, societal trends provide further justification of need in the Greater Cambridge area.
- Viability: the nationally described space standard was applied as the minimum standard to all scheme typologies for all appraisals and it has not impacted viability. All typologies were found to be policy compliant in terms of being able to deliver appropriate levels of affordable housing and infrastructure contributions.
- Timing: As an internal residential space standard policy has been applied across Greater Cambridge since 2018, it is considered there is no need for a transitional period.

Comments suggested that there are no nationally prescribed standards for use class C2 schemes. As set out in the supporting text, there may be specific developments where meeting the required 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 identified occupants

Respondents highlighted that it will not always be possible for every home to have direct access to private amenity space. The policy continues to seek private external amenity space for all new homes, however, the policy requirements allow for

flexibility in the form of the provision of the private external amenity space, and consideration to be given to the location, context, orientation, and design of the proposed development. The policy also provides criteria to ensure that appropriate communal spaces can be delivered on certain schemes.

Developers had called for minimum private external amenity space standards to be defined in future drafts of the Greater Cambridge Local Plan. The policy sets out clear criteria for private external amenity spaces, as well as a set of defined minimum standards, that must applied in combination when formulating proposals. These have been set to ensure that all dwellings across Greater Cambridge are delivering private external amenity spaces that are well designed and appropriate for the intended dwelling.

There were several respondents requesting the Councils to provide evidence for the proportion of dwellings designed to meet the Building Regulations M4(2) and/or the M4(3) standards set out in the Local Plan, and the Councils to consider the inclusion of a proportion of market housing to meet the wheelchair user standards. National planning guidance sets out that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Building Regulations M4(2) and/or M4(3) standards and should not impose any additional information requirements. As set out in the Housing Needs of Specific Groups Update 2025, it is evident that there will be increases in the proportion of older people and those with health and mobility problems during the plan period. There is also an identified specific need for homes for wheelchair users. In light of this evidence, the policy requires all new build dwellings to be at least Building Regulations M4(2) compliant, and a proportion of both market and affordable dwellings to be the higher Building Regulations M4(3) standard.

Policy H/SH: Specialist housing

Summary of issues arising from First Proposals representations:

There was general support for a policy focus on specialist housing and homes for older people from parish councils and developers. Parish councils want housing for older people to be integrated within wider communities and close to local services

and transport. They also call for more independent living opportunities for the more able older people to allow downsizing and for accommodation to be sufficiently flexible to allow people to stay in their homes if their mobility decreases. Developers want more land set aside for specialist housing and homes for older people with specific allocations to avoid crowding out from other housing types. They argue for a greater variety of sites to increase choice for older people. They also argue that the First Proposals are too dependent on urban extensions and new settlements and call for more brownfield and windfall sites in urban and suburban locations alongside release of land in the green belt. One developer supports the continuation of the existing approach used in Cambridge based on the criteria-based Policy 47: 'Specialist Housing' within the 2018 Cambridge Local Plan.

Response to issues raised in representations:

There were calls for housing for older people to be integrated within wider communities and close to local services and transport. Ensuring that strategic sites include a proportion of accommodation for older people will help to achieve this as the developments can be planned so that accommodation for older people (and other specific groups where appropriate) are close to services that meet their needs.

It was argued that creating more independent living opportunities for more able older people will allow downsizing. Creating more independent living opportunities is partly about providing more choices. The more options older people have the more likely they are to find accommodation that enables them to live independently for longer. Some of these choices will be generated by offering a wider range of specialist accommodation, some will be generated by specifically adapting mainstream housing (facilitated through accessibility standards) and some will be generated by ensuring market housing is generally more spacious (through residential space standards).

Developers want more land set aside for specialist housing. The allocated strategic sites include requirements for the provision of specialist housing, and this draft policy requires unallocated strategic sites of 1,000 dwellings or more to include 10% of these homes as specialist housing for older and disabled people. The plan includes specific requirements for specialist housing for older people and disabled people, but

also allows for a potential reduction in the requirement if the identified needs can be demonstrated to have been met or offset. This approach provides flexibility in responding to changes in market demand and is therefore considered more robust over the longer term.

Some respondents argued that the First Proposals are too dependent on urban extensions and new settlements. The criteria policy approach allows sites to come forward across a range of spatial areas where appropriate. For example, proposals will need to be proportionate in scale to the settlement where they are proposed. However, it is considered preferable that a significant proportion of specialist housing is provided on strategic sites as these are best able to integrate older people and other specific groups with the facilities and services they need.

There was support for the continuation of the existing approach used in Cambridge. Policy 47 of the current Cambridge Local Plan (2018) set out specific criteria against which all proposals for specialist housing will be assessed. The draft policy applies these criteria across Greater Cambridge. The criteria aim to ensure that specialist housing is needs driven, suitable for intended occupiers, close to essential services and facilities and does not over-dominate local areas. In addition, the criteria set out the conditions which must be met for proposals that will result in the net loss of specialist housing.

Policy H/CB: Self and Custom Build Homes

Summary of issues arising from First Proposals representations:

Some general support for the policy, however detailed comments from developers / housebuilders on specifics of the proposed approach. Site promoters supported the requirement for self and custom build homes to be linked to demand on the Greater Cambridge Custom and Self Build Register and highlighted that this will mean that continual monitoring is required to ensure up to date information is available. Comments from some that the proposed approach will not deliver the necessary plots to meet the demand from the register and that the plots will not meet the wishes of those on the register, but this is countered by others that consider that the proposed approach will deliver more plots than there is demand for. Requests for

further evidence and justification for the proposed approach, including the requirement for 5% custom and self build homes on major developments. Site promoters suggest that the policy should have a more flexible approach that supports self and custom build developments on the edge of settlements. Developers and housebuilders have highlighted concerns about the viability of the proposed approach and also that the marketing period for a custom and self build plot before it can be built without the self and custom build restrictions should be reduced to 6 months. Home Builders Federation suggest that including self and custom build plots within major developments adds to the complexity of their delivery. Specific request for custom finish to be included within the policy to enable high density developments to be able to comply with the requirements.

Response to issues raised in representations:

There were calls for more monitoring to ensure permissions better match demand. Legislative changes have already impacted on the nature of permissions that can be counted as custom and self build permissions and our monitoring systems have been adapted to reflect these by capturing the reason for classifying each permission as a custom and self build permission. The register is not considered to provide an accurate reflection of the nature of demand. Registrants have provided little information about their needs and circumstances, there may be a significant gap between what registrants desire and what they can afford, and many registrants may no longer be interested in building their own home in Greater Cambridge (they may already have built their own home in Greater Cambridge or elsewhere or may have changed their plans). Government guidance and legislation is clear that even where registrants are no longer interested in building their own home in Greater Cambridge they should not be removed from the measure of demand.

It was argued that more evidence is needed to justify the requirement for 5% custom and self build homes on all proposals of 20+ dwellings. Greater Cambridge has a significant deficit in matching the supply of custom and self build permissions to demand and this deficit has widened in recent years. A number of decisions to refuse permission for custom and self build homes in South Cambridgeshire have been overturned at appeal. Inspectors have concluded that the shortage of supply

has outweighed any conflicts with the Local Plan where there are no significant impacts on the character of the local area. Delivering custom and self build homes on larger sites is a key part of the strategy to increase delivery in accordance with the spatial strategy.

There was support for specific custom and self build sites on the edge of settlements. The majority of custom and self build homes permitted in Greater Cambridge since 2016 have been in, or adjacent to, villages in South Cambridgeshire. The policy is intended to create a more balanced spatial distribution of custom and self build but it is intended that there will continue to be opportunities for custom and self build housing within rural communities. However, an exception site approach is not supported as this will potentially displace rural exception sites which have a strong track record in helping to sustain balanced communities in South Cambridgeshire villages where house prices can be out of reach of local people.

Developers called for more flexibility to reduce custom and self build plots due to viability and to lessen marketing periods before plots can be switched to market housing. Viability assessment has demonstrated that the requirement to include 5% of homes within proposals of 20 or more dwellings as custom and self build plots is viable at the plan level. Specific sites will have the opportunity to identify site specific issues. A twelve month marketing period is essentially a compromise between those that want shorter or longer periods but seems to be a commonly adopted approach. The requirement that custom and self build plots not delivered as custom and self build dwellings should be built out as affordable housing should act as an incentive for delivery. The register indicates strong demand but the policy recognises that if this current deficit in supply recedes the 5% level could be lowered to better match supply and demand.

There was support for custom finish to be included to enable high density flatted developments to comply with requirements. It is recognised that high density flatted developments will make up a major element of housing delivery in Greater Cambridge and a failure to deliver custom and self build homes on these sites would undermine the plan’s ability to match demand. The Greater Cambridge Housing Strategy 2024-2029 recognises the potential to deliver custom finish homes in these

developments but it is essential that they meet the legal definition of custom and self build housing if they are to contribute towards meeting the statutory duty to permit sufficient permission to match demand.

Policy H/BR: Build to Rent Homes

Summary of issues arising from First Proposals representations:

There is support from site promoters and developers, and some Parish Councils, for the proposed approach to Build to Rent, given that it plays an important role in meeting housing needs, provides choice to residents and diversifies the housing market, and helps to create mixed and balanced communities. However, there are differing opinions on whether 20% affordable homes is the right approach, and strong objections from site promoters to any kind of restriction or limit on the amount of Build to Rent allowed within a development. Some site promoters and developers have suggested that there needs to be more flexibility within the proposed approach, and that more research is needed on Build to Rent by the Councils to inform the Local Plan and North East Cambridge Area Action Plan. An individual is concerned that there are already too many Build to Rent developments.

Response to issues raised in representations:

There was support for the inclusion of a positive policy for Build to Rent. The policy is supportive of Build to Rent homes proposals where they meet a range of criteria. This approach is consistent with national policy and uses local evidence to shape the criteria where appropriate.

There was opposition to the imposition of any limits on Build to Rent. The First Proposals suggested exploring the appropriateness of introducing a limit to the scale of Build to Rent as a proportion of all dwellings. Whilst this has proved impractical the explicit policy intention remains that Build to Rent proposals do not create an over-concentration of this tenure in a local area. Proposals will be assessed on a case by case basis against a range of criteria designed, in part, to ensure Build to Rent proposals reflect local demand, contribute to place shaping, and support the

development of mixed and balanced communities. Assessing proposals on a case by case basis also allows for specific circumstances affecting viability to be considered. However, evidence suggests that 20% Affordable Private Rent is viable, and therefore the standard 40% rates for other types of homes is proposed.

Some respondents argued that Build to Rent is not affordable. Evidence has shown that Build to Rent can form one option in a complex housing market. It will not be affordable to all households but is likely to be affordable to some households that cannot afford, or do not wish, to purchase their own home. Local Plan viability evidence demonstrate that 40% affordable homes within Build to Rent schemes is achievable but this may need to be balanced with the level of discount in comparison with local market rents (including service charges) on a case by case basis to achieve affordability for more households.

Policy H/CO: Co-living

Summary of issues arising from First Proposals representations:

The issue of Co-living was not covered in the First Proposals version of the Local Plan, and therefore there are no representations on this issue.

However, during the drafting process and development of evidence, it was considered that the Local Plan would be more effective with a standalone policy that responds to the demand for co-living accommodation.

Response to issues raised in representations:

The issue of Co-living was not covered in the First Proposals version of the Local Plan, and therefore there are no representations on this issue.

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

Summary of issues arising from First Proposals representations:

Despite the low number of responses there was no consensus. Those in support recognised the contribution HMOs make to the housing mix but also wanted the policy to include purpose built self-contained housing for single person households and to be tightened to improve the quality of HMO housing. However, some respondents were concerned that the development of HMOs has a negative effect on the character and social cohesion of neighbourhoods.

Response to issues raised in representations:

Some respondents recognised that HMOs play an important role in diversifying the housing mix. The policy is supportive of HMO proposals where they meet a range of criteria. This approach is consistent with national policy and uses local evidence to shape the criteria where appropriate.

There were calls for stronger controls to ensure HMOs do not have a detrimental impact on local neighbourhoods and that the quality of accommodation is appropriate. The policy will seek to control the degree of concentration in any neighbourhood whilst also driving up the quality of accommodation by requiring explicit management arrangements alongside the application of various space standards.

There was support for the delivery of purpose-built self-contained housing for single person households. However, this policy is focused on HMOs. The role of single person self-contained dwellings in diversifying the housing mix is recognised and is addressed through Policy H/HM: Housing mix.

Policy H/SA: Student accommodation

Summary of issues arising from First Proposals representations:

There was general support for the proposed student accommodation policy approach subject to a review of the overall student accommodation need. Croydon Parish Council raised concern about this need detracting from permanent local housing. One member of the public commented that there were already too many students. Histon & Impington Parish Council objected to student accommodation not providing visitor parking.

In terms of location, site promoters requested the city centre be treated as an appropriate location for new student accommodation. On this matter, Linton Parish Council supported the conversion of unused commercial buildings to student accommodation as a means of sustaining the city centre. One property developer suggested student accommodation directly adjacent to existing/proposed educational establishments should be supported.

The University of Cambridge raised concern about the intention for self-contained accommodation to be counted towards delivering the overall housing requirement for Greater Cambridge and highlighted that this approach should not be to the detriment of meeting other housing needs. Similarly, the Home Builders Federation highlighted the need for local evidence to ensure the dwelling equivalency rate used for student accommodation avoids overestimating the supply of homes returning to the open market.

Anglia Ruskin University raised concern with the policy approach which it considered unduly restrictive in that individual sites are effectively required to remain in their current general residential or student use, despite both contributing towards delivering the overall housing requirement. It suggested more policy flexibility in relation to individual sites.

Response to issues raised in representations:

In response to the concern about counting self-contained accommodation towards the overall housing requirement for Greater Cambridge, no changes have been made to the policy approach. The needs of the student population are reflected

within the area's local housing need, therefore any new units are counted towards meeting this need. Student accommodation provided either as self-contained units or bedspaces will contribute towards delivering the overall housing requirement for Greater Cambridge.

In response to the specific comments raised about the location of student accommodation, the proposed policy already supports such development in an appropriate location for the institution it is intended to serve and is therefore sufficiently flexible to afford support for new student accommodation in both the city centre and directly adjacent to existing/ proposed educational establishments. . The councils recognise the growth needs of the two large universities (The University of Cambridge and Anglia Ruskin University) and other educational institutions within Cambridge City and more widely Greater Cambridge which has been locally evidenced.

In response to feedback that visitor parking should be provided due to uses associated with student accommodation, while the policy approach for all new student development will require new development to be in locations well served by sustainable modes of transport, the potential for impacts on other local parking provision are noted. The policy will require all new proposals for student accommodation to demonstrate that they do not detract from local amenity, including parking provision, therefore the need for amenities such as visitor/disabled parking would be considered on a case-by-case basis.

The suggestion made by Anglia Ruskin University for the policy to be more flexible in relation to an individual sites use, rather than individual sites effectively required to remain in their current general residential or student use, is already consistent with the policy approach. The policy provides for a range of student needs, whilst ensuring that any loss of student accommodation is balanced with the need to provide accommodation to meet the needs of existing higher education institutions. The policy supports development which releases private housing back onto the local housing market which is currently tied to an educational institution, and which also contributes towards delivering the overall housing requirement. Therefore, no change in policy approach is proposed.

While there has been no significant change in the overall policy intent from First Proposals, the policy has been amended to apply a criteria-based approach applied to student accommodation provided specifically for postgraduate, academic staff and academic visitors, which has been informed by updated evidence and precedent use of conditions in developments containing student accommodation.

Policy H/DC: Dwellings in the countryside

Summary of issues arising from First Proposals representations:

There is support for the principle of the dwellings in the countryside policy from some Parish Councils and the Cambridge and South Cambridgeshire Green Parties. Additionally, Pembroke College state the policy would provide flexibility for development in countryside whilst ensuring the setting is not adversely affected. Cambridge Past, Present & Future suggest a need for clarification in the supporting text on the meaning of replacement dwelling in the green belt not being 'materially larger', and Parish Councils suggest dwelling density in the countryside should differ from that in towns and cities, and prioritising agricultural, low paid, essential and rural workers.

KWA Architects object to the policy, requiring wording changes to extensions in the Green Belt taking account of the permitted development precedent, occupancy of rural workers dwellings allowing family-living rights, and a three year limit on temporary dwellings for new rural businesses.

Historic England has concerns over reuse of buildings in the countryside highlighting that any proposals need to consider the historic environment and that heritage assets may form part of the local heritage of an area. Whilst Steeple Morden Parish Council stress the importance of ensuring structures are sound, Croydon Parish Council comment that dwellings should remain contiguous with villages, and Gamlingay Parish Council state that stand-alone annexes should be refused permission to limit number and sprawl into open countryside.

Response to issues raised in representations:

Parish Councils raised a number of issues, sometimes based on local experiences. Proposals for new annex accommodation will have to meet the criteria set out in Policy H/DC: Dwellings in the countryside. Criterion 5a is clear that extensions must not create a separate dwelling or be capable of separation from the existing dwelling and criterion 2 requires that replacement dwellings are on a one for one basis.

It is agreed that housing densities are likely to be lower in the countryside than in towns and cities. Most proposals where Policy H/DC: Dwellings in the countryside is an important factor will be for single dwellings and are likely to involve much lower densities than typically found in urban areas. However, the suggestion that proposals should be contiguous with village boundaries is impractical as by definition the policy is largely concerned with sites in the countryside and many will be some distance from village boundaries.

The call for dwellings to be prioritised for agricultural, low paid, essential and rural workers over commuters is addressed through criteria 6-9 which support the development of dwellings to meet the needs of rural based enterprises. However, it would be inappropriate and impractical to focus other parts of the policy, such as extensions and replacement dwellings, on these groups.

The suggestion that structures should be of sound build is supported through criterion 1b (re-use of buildings) and criterion 5b (extensions to dwellings).

Historic England's concerns that the re-use of buildings element of the policy should consider the impact on the historic environment is partially addressed through criteria 1c and 1d. Additionally, proposals will have to comply with the plan as a whole including policies with a specific focus on protecting the historic environment.

The requirement for replacement dwellings in the green belt to be not materially larger than the one they replace reflects national green belt policy and each case will need to be judged on its own merits. Previous plans have attempted to use a 'percentage uplift' approach to controlling proposals but this proved difficult to operate.

The policy wording regarding extensions in the green belt is consistent with the wording in the NPPF (paragraph 154c). The supporting text in the policy is also clear that in determining what constitutes 'a disproportionate addition' account will be taken of the extent to which the dwelling could be extended under permitted development rights.

The concern that dwellings to support rural based enterprises should be restricted to single workers is not recognised. It is wholly reasonable that where a worker who needs to be on site requires a family home that this is allowed. Each case should be treated on a case by case basis and the applicant should explain why the type of dwelling proposed is required when the planning application is submitted.

Temporary dwellings to support a rural based enterprise may be permitted for up to 3 years where more time is needed to demonstrate the viability of a business. A concern was expressed whether this was long enough, but it is considered that up to 3 years provides an appropriate time length to test the viability of a business.

Policy H/RM: Residential moorings

Summary of issues arising from First Proposals representations:

There was support for addressing provision from Huntingdonshire District Council. The Cambridge and South Cambridgeshire Green Parties highlight the need for engagement, and for provision of appropriate facilities.

Response to issues raised in representations:

Concern that issues with current provision should not be replicated in any new provision has been addressed through criterion 1h which requires that the design of new moorings is appropriate for the intended use and issues such as flood risk and manoeuvrability have been considered. The Accommodation Needs Assessment of Gypsies, Travellers, Travelling Showpeople, Bargee Travellers, and other caravan and houseboat dwellers identified limited demand for additional residential moorings but the stakeholder engagement did call for any additional moorings to be supported by investment in facilities to address current deficiencies.

Policy H/RC: Residential caravans

Summary of issues arising from First Proposals representations:

The Cambridge GRT Solidarity Network and Cambridge and South Cambridgeshire Green Parties raised concerns regarding sufficient provision of sites and the effective assessment of need. The Environment Agency highlight the importance of addressing flood risk.

Response to issues raised in representations:

One respondent suggests we review the vulnerability of tenure but did not provide details on the nature of the vulnerability. However, the government has published a collection of resources on park homes including information on buying and selling park homes, fees and other payments, and site rules. These are considered to come under the jurisdiction of environmental health and are not considered to be matters of planning policy.

Another respondent suggests the policy should distinguish between mobile home parks and caravans on farms used by seasonal agricultural workers. All proposals for residential caravans will be assessed against the same criteria as other proposals for residential development. However, each proposal will be assessed on its own merits. In certain limited circumstances caravans for seasonal workers can benefit from permitted development rights. However, they will often still be subject to other licensing requirements beyond the jurisdiction of planning.

One respondent highlights that caravans and mobile homes are particularly vulnerable to flood risk. However, the draft Local Plan already has a robust flood risk policy (Policy CC/FM: Managing Flood Risk) which takes account of climate change. Each proposal will be assessed on its own merits and proposals for residential caravans and park homes will need to demonstrate that they have addressed flood risks in a manner appropriate to the development proposed.

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

Summary of issues arising from First Proposals representations:

A number of organisations highlight the importance of provision of sites, and ensuring those sites are suitable, such as having access to facilities, and appropriate foul drainage. Best practice examples are highlighted. One developer expresses concerns regarding the provision of sites as part of major developments.

Response to issues raised in representations:

There are suggestions that additional sites should be allowed in a range of locations with access to facilities, to provide choice for future residents. The Local Plan as a whole seeks to direct new homes to sustainable locations with the least climate impact, active and public transport options, and near to jobs, services and facilities, and national planning policy states that local planning authorities should very strictly limit new pitches or plots in the open countryside away from existing settlements. The draft policy allows for new pitches or plots to be delivered in a range of locations provided that a series of criteria are met.

There are concerns regarding the provision of sites as part of major developments, however, strategic sites provide an opportunity to deliver Gypsy and Traveller pitches, alongside other types and tenures of housing, to ensure that new communities meet the needs of different groups in sustainable locations with access to services and facilities. It is therefore important that both allocated and unallocated strategic sites are required to provide serviced land to accommodate Gypsy and Traveller pitches so that this land use can be considered, alongside the other land uses, within the masterplanning and design process.

There are suggestions for additional site considerations. National planning policy for travellers sets out specific considerations for the design of sites or yards, and these are reflected in the requirements set out in this draft policy. Specific requirements in relation to Green Belt and flood risk have not been included in this policy, as these are set out in national planning policy and also included within Policy GP/GB: The Cambridge Green Belt and Policy CC/FM: Managing Flood Risk of the Local Plan.

The policy requires the provision of essential utilities including drainage and sewerage, and other policies in the Local Plan will also apply to any proposals such as Policy CC/IW: Integrated Water Management, Sustainable Drainage and Water Quality.

Policy H/CH: Community-led housing

Summary of issues arising from First Proposals representations:

There were few comments on this policy but they were broadly supportive. It was argued that community-led housing should be seen as part of a broader package of affordable housing options but there were differing views on how community-led housing should relate to rural exception sites. There was a suggestion that the policy could adopt the proposed approach to custom and self build homes whereby 5% of dwellings on larger sites should be set aside for community-led housing.

Response to issues raised in representations:

There was support for the broad concept of community led housing with various suggestions for policy detail. Community led housing can play an important role in the housing market by meeting local and specific needs that cannot be readily addressed through more mainstream or large scale delivery models. However, it is important that community led housing is not built in inappropriate locations or displaces other more appropriate housing schemes. Assessing community led housing proposals against the policies applicable to residential developments in general provides a level playing field. Policies to support exception sites and custom and self build will also provide opportunities to deliver more community led housing but not at the expense of other more valid proposals.

It was suggested that the community led housing policy should mirror the custom and self build policy. To an extent this will happen as self build community led housing proposals will be supported by the custom and self build policy where appropriate. However, it is not proposed to introduce a ‘percentage policy’ where, for

example, all schemes over 20 or more dwellings are required to deliver 5% of these as community led housing. This could have the consequence of concentrating community led housing within larger scale developments when most groups are seeking a more rural location or a site with specific characteristics often related to a community of interest. Larger scale development proposals could include a community led housing element where demand is identified, potentially as part of their affordable housing requirement. However, it is anticipated that the majority of community led housing proposals will come forward as windfall sites.

It was argued that the plan must be clear about which policies will apply to community led housing developments. Community led housing proposals will be considered against the same criteria as other housing proposals which should aid clarity. It is not proposed to introduce policy based exceptions as this could lead to poor quality development. Where there are viability or other reasons why it is not appropriate to apply certain criteria or policies to a specific proposal these should be justified in the same way that other residential proposals would be required to.

Infrastructure

Summary of the main issues raised in general comments on the infrastructure theme:

Many respondents expressed support for the broad direction of the policies. Some respondents added caveats to their support, requesting that development is located appropriately to maximise the benefits from new strategic infrastructure and that new infrastructure receives adequate investment. Shepreth Parish Council argued that new development should fund the expansion of existing infrastructure. Natural England and the Environment Agency commented that infrastructure and connectivity improvements must be achieved in balance with the need to protect natural spaces and wildlife, ensuring that adverse impacts to the natural enviro environment are avoided.

Some comments focussed on the relationship between national and local government. One respondent argued that discussion should take place with national government to enable Water Resources East to bring forward their timelines for

infrastructure projects. Great Shelford Parish Council perceived there to be little joined up thinking between local authorities in relation to overseeing different infrastructure projects. Croydon Parish Council argued that national infrastructure policy will overshadow local policy, rendering the proposals irrelevant.

There were many suggestions to improve the policies. These sought to address perceived shortcomings on issues such as utilities to support sustainable travel and net zero, the need for improved health infrastructure, the needs of disabled people in respect of reducing car travel, the management of journeys to school and college, and broadband provision. A few respondents considered that the forecasted energy grid capacity figures were too low and would need to be increased. A few respondents considered that infrastructure should be operational before new houses were occupied.

Some respondents criticised the public transport system in Greater Cambridge, arguing that it needs to be improved to bring benefits to the area. Universities Superannuation Scheme argued that the Local Plan should recognise an integrated transport solution will take years to deliver and in the interim there should be no restrictions on existing modes of transport. One respondent questioned whether people buying new homes will necessarily be working or studying within the 30-minute walking radius. A number of respondents asked for specific traffic interventions in their area and North Newnham Resident Association asked for roads to not be destroyed when things such as bus lanes are added to them.

There were a few comments arguing against the proposed relocation of the Cambridge Waste Water Treatment Plant on the grounds that it was functioning infrastructure. Another respondent argued that national infrastructure projects, such as East- West Rail do not align well with GCSP's proposals. A few developers argued that that their sites were well-placed to deliver the aims of the policy and therefore the Plan should allocate their sites. One commentator argued that GCSP needed to enforce all developer obligations.

There were lots of comments, particularly in the quick questionnaire, about the need for facilities to accompany housing development, such as schools, doctors, green spaces, and transport infrastructure to deal with congestion, and questions whether infrastructure could cope with planned development.

Response to the Main Issues Raised in Representations:

Respondents raised a number of important matters through previous consultations on the emerging Local Plan. These matters have been considered during the preparation of the plan and its policies.

The Councils' response to these matters include:

- The location of development proposed in the strategy has considered the availability and proximity of infrastructure.
- Infrastructure needs have been explored though the Infrastructure Delivery Plan which accompanies this consultation.
- Water issues have been explored further, and evidence prepared to support the draft plan to demonstrate how a sustainable water supply will be available to support the proposals.
- Anglian Water's proposal to relocate the Cambridge Waste Water Treatment works has now received planning consent, the local plan therefore responds to the development opportunity available near the Cambridge North station.
- Policies are proposed which address the requirements, funding and timing of infrastructure provision.

The following proposed policies areas are addressed in the infrastructure chapter:

- I/ST: Sustainable transport and connectivity
- I/TH: Travel Hub Facilities
- I/EV: Parking and electric vehicles
- I/SD: Servicing and Last-mile Deliveries
- I/SI: Safeguarding important infrastructure
- I/AD: Aviation development
- I/EI: Energy infrastructure masterplanning
- I/ID: Infrastructure and delivery
- I/DT: Digital and telecommunications infrastructure
- I/CM: Construction management

Policy I/ST: Sustainable Transport and Connectivity

Summary of issues arising from First Proposals representations:

Many respondents supported the policy. However, a substantial number of respondents added caveats to their support and provided suggestions to improve the policy. For example, some respondents stated that a more ambitious approach is needed, that the effects of home working need to be considered in the policy and concerns were raised about e-scooters.

Some respondents argued that the policy had omitted things such as how elderly and disabled people will be included in the design of transport routes. Some argued that the policy should focus on designing active transport routes and not the provision of car parking. Other comments emphasised the importance of integrating new developments and new communities into existing facilities and transport routes.

Cambridgeshire County Council (CCC) suggested including a reference to CCC's Transport Assessment Team's guidelines for new developments. North Hertfordshire District Council asked for more data relating to Cambridge South Station due to their concerns that it could create pressures in North Hertfordshire. Suffolk Council suggested that the policy should aim to enable transport across administrative boundaries. Suffolk Council also argued that there is a need to add rail dualling to the infrastructure delivery plan. Persimmon Homes East stated that the findings from the Active Travel Toolkit must be included in viability assessments. One commentator asked for the Active Travel Toolkit to be available for consultation prior to publication.

Many developers and landowners argued that the policy's aims will be achieved if development is directed to sustainable locations. Linked to this, many developers and landowners argued that their sites were well-placed to deliver the policy's aims. Smarter Cambridge Transport (SCT) argued that growth in the region will lead to an increase in Park and Ride usage, but the Plan has not allocated land for this. SCT

also suggested that the Plan safeguards land for infrastructure and includes a policy for planning gain to retrofit infrastructure which is missing from areas which are not reached by funding.

Gamlingay Parish Council suggested that there needs to be a cycle link between Potton and Cambourne to address the missing link in the Bedford and Cambridge route. There were a few comments criticising the location of East West Rail. Some respondents objected to redeveloping NEC on the grounds that it would increase traffic. The Campaign to Protect Rural England (CPRE) perceived there to be a lack of joined-up thinking between Greater Cambridge's local authorities. CPRE and a few other respondents argued that there needs to be an integrated transport plan which aligns with the Local Plan. Trumpington Residents Association stated that development should be restricted unless essential infrastructure is planned and financed. The Cambridge and South Cambridgeshire Green Parties argued that travel hubs are incorrectly equated as Park and Ride locations.

Response to Main Issues Raised in Representations

The policy seeks to ensure new development is located and well-designed with high quality connections and transport infrastructure providing real opportunities to switch between different travel modes, to provide a genuine travel choice for people of all ages and abilities and to reduce the reliance on the private car. It prioritises non-car modes but does not exclude cars, to create places and spaces with people at the heart.

The Local Transport and Connectivity Plan (LTCP) is a suite of documents setting out the long-term strategy for transport in Cambridgeshire and Peterborough. It sets out a vision and goals for how transport supports a better future and describes the projects needed to make that new future possible; this includes things like better buses and helping more people to cycle and walk. A range of transport projects and schemes are being planned and brought forward by bodies such as Cambridgeshire and Peterborough Combined Authority and Greater Cambridge Partnership, including public transport and cycle routes and new Park & Ride provision.

Part of the LTCP, the Greater Cambridge Transport Strategy (GCTS), will evidence the transport measures needed to address travel needs and enable development in Greater Cambridge. Developers will be required to mitigate their transport impacts, including by providing contributions towards the delivery of transport infrastructure identified in the GCTS (and other transport plans), enhancing the provision across Greater Cambridge. Transport mitigation associated with delivery of the development strategy is being considered in the Local Plan Infrastructure Delivery Plan and Viability Appraisal.

Policy I/TH: Travel Hub Facilities

Summary of issues arising from First Proposals representations:

This is a new policy approach, so was not subject to consultation in the First Proposals. However, the following representations were made with regards to park and ride usage that have helped to formulate this new policy.

Transport Evidence shows traffic is assumed to grow from 2015 baseline, contravening local transport objectives, and huge growth in Park and Ride use for which land is not allocated.

Scale of development puts pressure on travel links to City. Development should be net reducer of greenhouse gases and cars into City, not just provide access to Park and Ride. Subsidise buses, provide for other modes. Long delivery times for large scale infrastructure projects, no immediate effects. Public transport is lifeline to some people; consider good value, single ticketing. Travel hubs are incorrectly equated to Park and Ride; suggest pilots be set up.

Response to Main Issues Raised in Representations:

This is a new policy approach, so was not subject to consultation in the First Proposals. Comments were received with regards to allocation of land for additional park and ride facilities, this policy seeks to support and enhance the use existing

park and ride provision to create travel hubs. Proposals for new travel hub sites in appropriate locations will also be supported in principle, subject to the satisfactory assessment of the proposed development's transport effects, and the demonstration of the need for and feasibility of such development. Applications will be considered on merit it has not been considered necessary to allocate additional land for this purpose.

Policy I/EV: Parking and Electric Vehicles

Summary of issues arising from First Proposals representations:

A variety of organisations expressed general support for the policy. Some organisations supported the policy but suggested changes, including providing additional information about the required parking standards, providing flexibility to consider site specific circumstances, and minimising visual clutter.

Some respondents provided critical responses to the policy; North Newnham Residents Association for example wrote that there is a tension between parking provision and encouraging more sustainable modes of transport which could require improvements at the expense of cars. B Hunt questioned whether the policy is needed when the Greater Cambridge Partnership are preparing an integrated parking strategy. A few respondents, including the Home Builders Federation, asserted that electric vehicle requirements should be addressed through building regulations. A few respondents, including Smarter Cambridge Transport stated that the policy title should be amended to reflect a wider range of transport modes.

Cambridge Past and Present and Future argued that the electric grid will need an increase in capacity of local substations by around 50% to deliver the policy. Persimmon Homes East wrote that viability does not consider the upgrades to the national grid that would be required by the policy.

Some respondents provided comments specific to the cycle and mobility parking elements of the policy and included suggestions to improve the policy. Examples include using S106 monies to retrofit neighbouring communities, ensuring there is space for non-standard cycles such as e-scooters in new developments, and

ensuring that new developments deliver storage for all users. Some respondents provided comments specific to the car parking elements of the policy. Examples include addressing the lack of parking for visitors and deliveries in new developments, including operational parking for logistics uses, and designing new developments in a way which will prevent parking on the pavement.

Some respondents provided comments specific to the electric vehicle elements of the policy. Examples of the suggestions include addressing the issue of charging points in public car parks and on streets, the need for more charging points at community facilities in rural areas and rapid charging points were perceived to be essential.

Response to Main Issues Raised in Representations:

The policy reflects the updated NPPF by requiring developers to justify and evidence the level of car and cycle parking provision for their development proposals through a vision-led approach. The policy provides flexibility to respond to site specific circumstances within the overall transport aim of promoting sustainable modes of transport. Noting that there is a higher propensity for cycling within Greater Cambridge the policy includes minimum cycle standards, including a requirement for a proportion to accommodate non-standard cycles, to ensure sufficient provision to meet local needs.

The updated Building Regulations set out requirements for electric vehicle charging. The policy ensures there is sufficient grid capacity and that infrastructure for electric vehicles is considered and designed-in from the outset and is located so that it does not cause street clutter or conflict with active travel routes and users. Charging infrastructure requirements is being considered in the Local Plan Infrastructure Delivery Plan and Viability Appraisal.

Policy I/SD: Servicing and Last-mile Deliveries

Summary of issues arising from First Proposals representations:

Many respondents expressed support for the policy, for example, the Universities Superannuation Scheme requested that the role of larger logistics, warehousing

facilities and last-mile hubs are supported in the Local Plan. Huntingdonshire District Council suggested more information needs to be included to understand how unacceptable impacts to the strategic networks are to be assessed and also requested additional information to assess the impact of developments upon surrounding areas. Histon and Impington Parish Council emphasised the need for GCSP to speak to people in the logistics industry so they can gain more expertise.

Smarter Cambridge Transport (SCT) argued that the Local Plan needs to identify a logistics hub location and included possible suggestions where it could be located and requirements it needed to meet. SCT also asserted that there should be a variety of sites in different locations to provide break-out and consolidation logistic centres. I Butnar argued that cargo cycles for local deliveries and the provision of cycling logistics depots should be common across Greater Cambridge. Similarly, SCT stated that the access roads for logistic hubs should be appropriate in relation to weight and size of vehicles and non-motorised user routes should be sufficiently wide for cargo bikes to use. Endurance Estates argued that Logistical hubs will not address longer journeys by delivery vehicles because the identified need for strategic logistics floorspace will not be met and therefore their site should be allocated.

The Cambridge and South Cambridgeshire Green Parties requested stronger wording in the policy to support the need to move to a system of rail freight and suggested a further ‘Green Line’ should be established so that existing levels of road freight transport will not increase as a result development. They also proposed ensuring villages have access to freight travel hubs to lower net carbon emissions. A few developers explained how their sites could potentially deliver the aims of the policy.

Response to Main Issues Raised in Representations:

Support for the general policy approach, particularly the move towards sustainable modes of transport for last-mile deliveries, has been noted. The Councils agree that the perspectives of stakeholders operating in the logistics sectors will be important in shaping appropriate logistics facilities in the area. The Local Plan will be subject to various rounds of consultation where stakeholders can provide further comments on

the approach to planning policy, and stakeholders will be able to provide their views on site-specific proposals through the planning application process itself.

The Councils also recognise and appreciate that modal shifts away from road freight vehicles towards more sustainable means of transportation will play a significant role in helping to reduce greenhouse gas emissions and local road traffic. The policy provides explicit support for sustainable, innovative approaches to last-mile deliveries such as providing facilities as part of consolidation centres that support the use of cargo bikes or electric vehicles. The draft plan has responded to the opportunities provided by rail. The movement of freight is also a matter for the local transport authority to consider in their transport plans. The Cambridgeshire and Peterborough Combined Authority and the Greater Cambridge Partnership have commenced work on freight strategies for Cambridgeshire.

The Councils' approach to freight consolidation has been informed by the various studies and strategic actions discussed above. The evidence indicates that efficiency improvements to local logistics activities could be improved through enhanced micro-consolidation and macro-consolidation facilities. The preferred policy approach seeks to support new micro-consolidation centres given the need for sustainable last-mile facilities in Greater Cambridge. In addition, the need for employment land for logistics and distribution has been considered through the employment needs evidence. Allocations are proposed in response to this need.

Policy I/SI: Safeguarding Important Infrastructure

Summary of issues arising from First Proposals representations:

A variety of organisations expressed support for the policy's direction. The policy was supported by the Environment Agency, who also noted that they expected safeguarding to include what is required for water infrastructure more broadly (water supply and waste), green infrastructure and biodiversity. The University of Cambridge supported the intention to continue to safeguard research at the Mullard Radio Astronomy Observatory at Lord's Bridge.

Anglian Water Services Ltd requested that GCSP considers safeguarding land in the next stages of the Local Plan for new infrastructure, possibly including a recognition of the need for the Cambridge Waste Water Treatment Plan relocation. The Defence Infrastructure Organisation (DIO) which is linked to the Ministry of Defence, stated that Bassingbourn Barracks should be identified as safeguarded infrastructure to support its ongoing defence needs and protect it from being impacted by external development. The DIO suggested that GCSP should consider including a specific planning policy to deliver this. DIO also stressed the importance of safeguarding the airspace above Cambridge airport and keeping it free from obstruction. The DIO also noted that the Plan needs to ensure that new development does not disrupt their technical asset 'East 2 WAM Network' which contributes to aviation safety by feeding into the air traffic management system.

B Marshall criticised the policy for not mentioning water infrastructure and did not perceive the Lord's Bridge Telescope to be important infrastructure. I Butnar asserted that the rail infrastructure plans are not ambitious enough and instead the policy should place a greater emphasis upon how the provision of station can help neighbouring communities thrive. Steeple Morden Parish Council suggested including disused railway lines for potential infrastructure needs.

Response to issues raised in representations:

Multiple stakeholders who own or operate infrastructure made representations highlighting the manner in which their infrastructure should be safeguarded. In response, stakeholders have been contacted to assess appropriate safeguarding options which have been implemented into the policy wherever possible. Where infrastructure has been covered by policy within the existing local plans, infrastructure operators have been directly consulted to ascertain whether the existing safeguarding policy adequately safeguards the relevant infrastructure.

The Environment Agency made a representation suggesting flood risk infrastructure should be safeguarded and that the SFRA evidence base can inform the identification of flood risk infrastructure for safeguarding. Beyond the functional floodplain, the SFRA does not identify any specific flood risk infrastructure for

safeguarding. It is considered that policy CC/FM will adequately manage any development which would affect the integrity of flood risk infrastructure.

Anglian Water reference the potential for safeguarding the location identified for the relocated Cambridge Treatment Works. Subsequently the site has gaining a Development Consent Order. Safeguarding waste site sis a matter for the Minerals and Waste Local Plan.

Policy I/AD: Aviation Development

Summary of issues arising from First Proposals representations:

A limited number of representations were received to this policy. A few parish councils expressed general support for the policy. There were some criticisms of the policy: Cambridgeshire County Council questioned the wording of the policy, specifically the implication that aviation would not have a significant adverse impact on the environment. The Cambridge and South Cambridgeshire Green Parties also argued that, due to environmental concerns, the policy should support no development of the airport except under exceptional circumstances. Contrastingly, D Lister perceived the balance of the Plan to be weighted too far towards protecting other parties from aviation and does not do enough to protect airfields.

There were some suggestions to improve the policy: Imperial War Museum and Gonville and Caius College argued that the proposed policy does not consider Policy TI/5 from South Cambridgeshire's Local Plan and stated that the Local Plan needed to align with policy proposals from Civil Aviation Authority. Steeple Morden Parish Council argued that the Local Plan should recognise the need for a national network of general airfields.

Response to Main Issues Raised in Representations:

The National Planning Policy Framework requires planning policies to recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the General Aviation Strategy. The draft policy recognises their economic benefits, and with the

application of this policy and the policies within the wider plan will allow their adaptation whilst considering environmental impacts.

Policy I/EI: Energy Infrastructure Masterplanning

Summary of issues arising from First Proposals representations:

There were many comments expressing support for the policy. A few respondents added caveats to their support: Carbon Neutral Cambridge wanted the policy strengthened to require developers to contribute to the costs of improving the power grid and others argued that smart localised energy systems should be the new norm, no matter the size of new development and that new development provides an opportunity to bring this service to existing developments.

Some comments criticised the policy; Persimmon Homes East Midlands argued that clarification is required on the definition of an energy masterplan and the outcomes of these should be fully considered within any viability assessment. D Blake stated that the policy mentions digital systems but omits discussion of water supply, sewage, gas, and hydrogen. Metro Property Unit Trust stated that the policy only sets requirements for households and should also set the requisite non-residential floorspace threshold, including whether thresholds/exemptions for other types of applicable accommodation. Cambridge and South Cambridgeshire Green Parties stated that the threshold should be based on impact, not scale. R Pargeter stated that the policy focusses on new development, but a significant increase in electric cars is likely to require grid reinforcement, especially in rural locations, even in the absence of any new site developments.

A few comments wanted to change the scope of the policy. Bassingbourn-cum-Kneesworth PC argued that the timespan for these changes should be brought forward in anticipation of new demand from new railways. D Lister stated that the plan should consider the role of a distributed grid of micro generation, not just large power station supply and substation infrastructure. Cambridge Past, Present & Future states that there needs to be committed way forward for strategic electrical energy supply planning.

Response to Main Issues Raised in Representations:

A number of respondents requested clarification on the definition of an energy masterplan and the need for the outcomes of these to be fully considered within any viability assessment. Further detail on the content of energy masterplans along with the scale of development that they will be required for has now been added to the policy. With regards to impact on viability, the Cambridgeshire Local Area Energy Plan will include costings of the infrastructure required to support growth, which will be fed into the viability work that will accompany the Local Plan.

Representations were also received suggesting that the policy should also include water, although consideration of water infrastructure is included within policy I/ID: Infrastructure and Delivery. There were also comments about the scope of the policy and the thresholds at which the policy should apply, and the policy has been updated to clarify the thresholds for both residential and non-residential development. While there was some call for the policy to be based on impact instead of scale, at present the threshold for the preparation of energy masterplans is based on number of new homes and non-residential floorspace. This is in recognition that for many schemes, the exact level of energy requirements may not be known at the application stage.

Comments were also received regarding the need to also consider the impact of the impacts of the significant increase in electric cars on the need for grid reinforcement, especially in rural locations, even in the absence of any new site developments. The impact of the electrification of transport is being considered as part of the Cambridgeshire Local Area Energy Plan, which will look at both the requirements of new development but also the increase of electric vehicles across Cambridgeshire. This plan will identify where further grid reinforcements are planned and will help to inform UK Power Networks business plans.

Some comments requested a change of scope of the policy, for example bringing forward the timespan in anticipation of new demand from railways, giving consideration to the role of a distributed grid of micro generation and the need for a committed way for strategic energy supply planning. While these issues sit outside the remit of a local plan, they will be considered as part of the Cambridgeshire Local Area Energy Plan, which is currently under development and due for publication late

2025/early 2026. It should be noted that this document will not be a static document but a digital plan that will be kept up to date as new projects are identified, helping to identify the costs associated with upgrading the energy system to support net zero carbon and growth, and helping to inform UK Power Networks business planning. The Cambridgeshire Local Area Energy Plan will also inform the Regional Energy Spatial Plans currently under development by the National Energy System Operator (NESO). The Cambridgeshire Local Area Energy Plan will form part of the evidence base for the Greater Cambridge Local Plan and will inform viability work.

Policy I/ID: Infrastructure and Delivery

Summary of issues arising from First Proposals representations:

Some respondents expressed general support for the policy, although a few added caveats to their support. The Wildlife Trust stated that greater emphasis should be placed on funding strategic natural greenspace and green infrastructure which needed to be delivered with explicit funding mechanisms outlined in the Infrastructure Delivery Plan. The Cambridge and South Cambridgeshire Green Parties stated that the policy should include penalties for not delivering on infrastructure commitments.

Some respondents criticised the policy; D Lister stated that thresholds for contribution to infrastructure should be replaced as it allows for developments to be sized just under the threshold to avoid contributions. Cambridgeshire and Peterborough Clinical Commissioning Group stated that funding must be consistently leveraged through developer contributions for health and care services to meet growing demand.

Cambridgeshire County Council expressed a preference for contributions towards educational facilities to be sought through S106. The Education & Skills Funding Agency of Department for Education posted a substantial representation and made many points, including their request that the Plan identifies specific sites that can deliver school places to support growth based on the latest Infrastructure Delivery Plan, that viability assessment inform options analysis and site selection in the district, and they recommend that to pass the soundness test of ‘effectiveness’, the

Plan should ensure that education contributions made by developers are sufficient to deliver the school places required to meet the increase in demand generated by new developments.

A few respondents argued that the scope of infrastructure provided for in the Local Plan should be widened. North Hertfordshire District Council requested that GCSP shares data with them to understand the potential impact of Cambridge South Railway Station. Suffolk County Council provided a substantial representation which emphasised the importance of cross-boundary working on a number of key planning issues, such as transport and green infrastructure and the need to ensure that planning obligations can be used to mitigate impacts upon neighbouring authorities.

Response to Main Issues Raised in Representations:

The common issue raised on the draft policy was that it was not detailed enough about a specific form of infrastructure the individual respondent was concerned with. However, this is not easily addressed, as requirements will vary on a site by site basis, informed by a range of policies and the Infrastructure Delivery Plan. The policy has been amended to be clear that the Councils expect development proposals to meet relevant development plan requirements in full on site through the design led approach and to contribute towards strategic infrastructure as identified through the Infrastructure Delivery Plan.

The reference to the ‘relevant development plan requirements’ avoids the need to list the out the infrastructure types in this policy as the relevant policies e.g. on green infrastructure, education, or community facilities, will provide clarity on the scope of the infrastructure items to be defined under each, and will set out the policy requirements to be met by new development and the form of any obligation, including whether off-site provision or a financial contribution in lieu is acceptable. This is preferrable approach than seeking to cover this under the one infrastructure policy which would be unable to recognise and account for any nuisances between different forms of infrastructure.

Policy I/DT: Digital and Telecommunications Infrastructure

Summary of issues arising from First Proposals representations:

Some organisations expressed general support for the policy, with a few organisations such as Carbon Neutral Cambridge emphasising its importance. Some parish councils stated that there was a need for enhancement of mobile phone coverage in villages with poor reception by well sited and suitably camouflaged masts.

Trumpington Residents Association stated that there was a need for the GCSP to ensure that the policy is properly implemented so that residents have connectivity when they move into new homes. Respondents criticised the policy, stating that the wording of the policy provides a loophole for developers and instead the policy should mandate that new developments have at least 1 gigabit per second connectivity. They also stated that it should be mandated that developers supply Category 6 network points in every room in new dwellings to allow hard wiring equipment. Cambridge Past, Present & Future also criticised the policy stating that it was disappointing that developers are not required to consider gigabit connections at all sites and that Cambridgeshire needs to support the delivery of gigabit connections in areas where fibre connections are not cost effective.

A few developers asked for confirmation in relation to whether all development is required to provide a 'Connectivity Statements', or whether the policy direction is intended for major developments. If the latter, floorspace, and dwelling thresholds should be stated, to provide applicants with clarity. Some other developers argued that it is important that the eventual policy wording recognises to what degree digital infrastructure is under the control of the developer themselves as opposed to statutory bodies. Linked to this, the Home Builders Federation argued that the Council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in statutory Building Regulations.

Response to Main Issues Raised in Representations:

In developing the policy, the councils have sought to make digital connectivity requirements for new development clear, outlining that a gigabit capable connection (i.e. connectivity speeds of at least 1 gigabit per second) should be delivered unless an agreement cannot be reached with network operators to provide such a

connection. The councils recognise the need for the policy to be clear when requirements will take effect and how applicants should demonstrate compliance with stated policy requirements. Thresholds for development floorspace or the number of units have been built into the policy for small-cell technology requirements or for when network coverage will need to be assessed. Furthermore, Connectivity Plans will not be a planning requirement for new dwellings as they are already a requirement of Approved Document R of The Building Regulations. However, the councils will expect planning applications to be accompanied by correspondence with both digital and telecommunications network operators to confirm how the proposed development will be connected, and details of how digital and telecommunications infrastructure, including cabinets, ducting and masts, have been integrated into the wider placemaking strategy for the proposed development. Requirements have been set out within the policy and guidance on how to demonstrate compliance with these policy requirements has been provided within the supporting text.

The position adopted by the councils does not conflict with the position adopted by the Building Regulations Approved Document R and is considered to be in alignment with Government plans to ensure that the country's homes and places of work are equipped with next-generation communications infrastructure. The policy approach taken by the councils seeks to ensure that new non-residential development also benefits from the same level of digital connectivity as new homes to ensure that businesses in Greater Cambridge will also benefit from reliable, high-speed network connectivity.

Policy I/CM: Construction Management

Summary of issues arising from First Proposals representations:

Various consultees expressed support for policy requirements in relation to construction management and CEMPs. Some respondents highlighted that CEMPs should include how the sourcing and transportation of materials from construction will be managed to limit the carbon emissions from construction activity. Others

highlighted that construction activity should prioritise on-site material reuse, which could be controlled as part of submission documents such as CEMPs. Others stated that policy should be clear on the stage in the planning process when CEMPs are required.

Response to Main Issues Raised in Representations:

The councils acknowledge the support received in relation to the introduction of CEMP requirements as part of the Local Plan. The councils have sought to ensure that the details expected as part of CEMPs are made clear to applicants within the policy and supporting text. Requirements have been included for temporary haulage roads and material storage to ensure that trips to/from sites during construction are limited to only what is required.

With regards material reuse during construction, construction management requirements will be read in conjunction with the Local Plan's approach to the circular economy, material reuse and sustainable waste management (Policy CC/CE). In addition to details on the secure storage of construction materials to limit waste from contamination or loss due to theft, reference has also been made to DEFRA's Code of Practice for the Sustainable Use of Soils on Construction Sites to safeguard against the need for unnecessary soil waste and imports.

Sustainability Appraisal:

There was support from statutory consultees regarding the overall approach, with detailed comments to be taken into account for the next stages. Other comments questioned the assessment of individual site proposals. In some cases this was because village development was felt to have been unfairly assessed against sustainability objectives. There were comments regarding the relationship between the Cambridge waste water treatment works relocation proposals and the North East Cambridge site.

Habitats Regulations Assessment:

Natural England is generally supportive of the interim findings of the HRA. Other comments raise issues regarding water supply impacts, and recreation impacts on protected sites.

Sites

First Proposals stage

To inform the First Proposals 2021, more than 700 sites were tested by the councils through the Greater Cambridge Housing and Employment Land Availability Assessment (2021) (HELAA), in a wide range of locations across Greater Cambridge. Following this consultation 43 new sites were tested and a further 181 sites were retested based on updated information.

The testing of sites for possible inclusion in the First Proposals development strategy and through sustainability appraisal focused on sites informed by the emerging preferred strategy option, and the testing carried out utilising the agreed HELAA methodology concluded as to whether a site was suitable, available and achievable for development.

Draft Plan stage

For this draft plan stage, in addition to over 700 sites previously tested by the councils through the HELAA 2021 98 new sites were tested and a further 196 sites were re-submitted, following their submission in representations to the Greater Cambridge Local plan, including during the First Proposals 2021 consultation.

The testing of sites for possible inclusion in the draft plan development strategy and through sustainability appraisal has again focused on sites informed by the emerging preferred strategy option (see below), and the testing carried out via the HELAA as to where a site was suitable, available and achievable for development.

Overview of approach taken to identifying sites for assessment

Following a review of responses to the First Proposals consultation, meetings were held by the Joint Local Planning Advisory Group between Autumn 2022 and Spring 2023 where members looked at the issues raised through the consultation. In early 2023 members made decisions about the Development Strategy, key sites and an updated need for jobs and homes. These decisions have guided the preparation of the Draft Local Plan.

The broad strategy choices considered to be reasonable options at First Proposals stage remain valid, and the following groups of sites sitting within these broad strategy options have been tested:

- Newly promoted sites

- Previously submitted sites reassessed based on updated information

However, the 2025 housing and employment need figures are higher than those that informed First Proposals 2021. This has resulted in a necessity for a re-examination of options, and a widening of testing to ensure reasonable options have been fully considered. As such, sites need to be identified from additional broad strategy sources of supply that align with the First Proposals development strategy principles.

Drawing on the above, the additional broad strategy source of supply now subject to site specific consideration for allocation, and to sustainability appraisal, is new settlements.

Cambridge Urban Area

The development strategy for Cambridge Urban Area has sought to direct development to where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live. We have sought to make the most of brownfield land, and to use the land we have identified efficiently.

Summary of the main issues raised in general comments:

Support was noted for:

- Development, protection and enhancement of the historic core
- Development of brownfield sites
- Protection and enhancement of the character of local area
- Reduced pressure on rural areas and reduced redevelopment of greenfield locations
- The change of use of existing buildings
- Engagement with network rail was welcomed

Concerns raised with regards to:

- The benefits of redevelopment of retail parks and the football ground were questioned, suggesting that this would have a detrimental effect on local facilities and could potentially result in current occupiers looking for new sites in rural areas.

- To protect wildlife there needs to be a balance between wildlife and people living in the urban area
- Loss of grassland
- A need to address capacity issues in Cambridge city centre.
- Better co-ordination of transport bodies
- Use of realistic traffic modelling to remedy the issues of gridlock
- Reduction in unnecessary private car use
- Resolve the lack of secure parking
- Over reliance on proposed development in the urban area and to the northeast of Cambridge to support the housing needs arising from growth
- Cultural provision has not been addressed, resulting in pressure on existing uses

Issues raised in the representations include:

- General support for developing in the Cambridge urban area, with particular support from Parish Councils.
- Huntingdonshire District Council and the University of Cambridge commented on protection of the historic core, appropriate design for new developments, regeneration of areas that are not fulfilling their potential, re-use of brownfield sites (particularly existing buildings) and enabling a decrease in climate impacts.
- Teversham PC raised concern about the benefits of redeveloping particular sites if facilities are then lost or relocated to rural areas. Concern was also raised about the potential for loss of green spaces impacting on wildlife and quality of life.
- Cambridge Past, Present & Future and Cambridge and South Cambridgeshire Green Parties raised concern about whether the capacity of the urban area was able to accommodate the scale of the proposed growth.
- Parish Councils, Cambridgeshire County Council and the University of Cambridge raised concern about private car use, and potential for use of alternative forms of transport.
- Site promoters' comments highlight the need for a better balance of development across Greater Cambridge and the problems of focussing on

large sites. Comments that no reference has been made to the pandemic and its implications for future development.

- Support noted for protection of the historic core, however, Historic England and Cambridge and South Cambridgeshire Green Parties highlight the need to consider wider setting and views, and submission of more detailed considerations and evidence.
- General support for appropriate development in the Cambridge urban area is noted.
- Policies in the wider draft local plan should seek to ensure that heritage is appropriately protected and development is of high-quality design.
- Concerns raised by Cambridge Past, Present & Future and Cambridge and South Cambridgeshire Green Parties about the capacity of the urban area to accommodate the scale of the proposed growth.
- Comments from Parish Councils, Cambridgeshire County Council and the University of Cambridge about private car use, and use of alternative forms of transport.
- Site promoters' comments highlight the need for a better balance of development across Greater Cambridge and the problems of focussing on large sites.
- Comments were made that no reference has been made to the pandemic and its implications for future development.

Response to Issues Raised in the Representations

- Some representors made representations with regards to potential loss of open space and existing provisions as a result of site allocations. These issues have been carefully considered through the site testing process. Responding to national planning policies to make best use of brownfield land including through development densities, whilst protecting character and heritage.
- Some representors made representations, with regards increased traffic and gridlock and over car use, resulting in the need for more alternate transport options. Transport modelling has been used to inform the local plan.

Measures will be designed to address traffic in Cambridge, along with improvements to support public transport and active travel. The Cambridgeshire and Peterborough Combined Authority, as the local transport authority, are developing a transport plan in parallel with the local plan.

- Some respondents made representation as to whether the Greater Cambridgeshire area, could sufficiently accommodate the amount of growth proposed. A range of different strategy choices have been considered to inform the strategy of the draft local plan. The approach responds to climate change and sustainability evidence, providing the best opportunity for growth to be supported by infrastructure.
- Representation was made that the plan does not mention the implications of the pandemic. There are many changes which have followed the pandemic which have influenced the draft local plan. The importance of green infrastructure and open space has been recognised, and the need for a variety of local community spaces and cultural provision. Health and wellbeing are also an integral theme of the plan
- Historic England highlight needs to consider wider setting and views, and need for more detailed considerations and evidence. The draft local plan has been informed by a suite of evidence. Including Heritage Impact Assessments and a Tall Building Study.

Edge of Cambridge

The Local Plan seeks to complete the planned new neighbourhoods on the edge of Cambridge from previous plans as well as bringing forward new opportunities for sustainable developments, which successfully link the city to the countryside, and where active and public transport is the natural first choice.

Issues Raised in the Representations Include:

- Proposed approach to development on the edge of Cambridge
- General support for development on the edge of Cambridge.
- Encroachment into the Green Belt should be minimal taking account of the purposes of the Green Belt.
- Setting of Cambridge needs to be considered and preserved.

- New development needs to include provision of education and health services and facilities that are delivered in a timely manner and connected to the community,
- Site allocations need to include clear requirements for well-designed places that promote healthy lifestyles, including provision of open spaces, good access to sustainable modes of transport and taking account of the lessons learnt from the pandemic,
- New development needs to include truly affordable housing
- Concerns raised about over development on eastern edge of Cambridge
- Focussing new development on large sites could lead to problems with infrastructure provision, viability and housing delivery
- Concerns raised that new developments could have negative effects on traffic such as congestion, with impacts on those travelling into Cambridge from the villages.
- Concerns raised that not enough sites are being allocated to meet long term demand and given its sustainability there are more sites that could be allocated, including several new sites suggested.
- There is need for a better balance of development across Greater Cambridge, due to the high reliance on infrastructure delivery.
- Representation made from promoters and landowners with regards to rejected sites and requests for allocation of specific sites.

Response to Issues Raised in Representations

- Representations supporting the approach set out in the First Proposals are noted.
- Some representors considered that no further development should take place in the Green Belt, others, including a range of site promoters, considered that more sites should be identified. These issues are addressed in the Strategy Topic Paper.
- Representations highlighted the need for development to be supported by sufficient infrastructure, affordable housing and open spaces. The Draft Plan is informed by an Infrastructure Delivery Plan, that is reviewed and updated

as the plan progresses. Where appropriate policies require developers to contribute to meeting infrastructure needs.

New Settlements

The Local Plan seeks new towns to mature into great places to live and work, making the most of their existing and planned public transport links to Cambridge and other centres. Towns should be real communities with their own distinctive identity, with the critical mass necessary to support local businesses, services and facilities.

Issues Raised in the Representations Include:

- Broad support for new settlements, while noting the need to ensure that they have their own identity and provide the necessary services, facilities, public transport and other infrastructure.
- Sport England highlight the need to provide significant on-site facilities for sport and physical activities, with requirements identified through evidence.
- Parish Councils support the use of brownfield sites, and reduction of allocations on greenfield sites.
- Representations submitted by some site promoters' highlight the potential for further new settlements to be identified, including the creation of delivering new settlements around existing infrastructure and services.
- Other site promoters' highlight the need for a better balance of development across Greater Cambridge and the issues raised of focussing development on large sites.
- Representations received from site promoters for the allocation of specific sites

Response to Issues Raised in Representations:

- Support for the new settlements approach in the First Proposals consultation is noted.
- Some representors propose alternative strategies and question the approach to new settlements. However, in the context of Greater Cambridge, and when

considering green belt policy, the strategies proposed are the appropriate element for meeting development needs.

- Representors raise the importance of infrastructure delivery to meet the needs of new settlements. The Draft Local Plan is supported by an Infrastructure Delivery Strategy, which at an early stage seeks to identify the infrastructure that will be needed, how much it will cost and how it will be funded.
- In addition to the existing sites proposed, several more sites have been submitted through the Call for Sites process. The additional sites have been tested and considered against alternatives. To meet development needs a new settlement site has been identified.

Rural South Cambridgeshire

South Cambridgeshire is home to over a hundred villages, ranging from larger Rural Centres like Sawston and Histon and Impington which provide services to surrounding villages, and to very small villages like Heydon and Newton with very limited services.

The Local Plan wants rural villages to continue to thrive and sustain their local services without encouraging lots of new homes in places where car travel is the easiest or only way to get around. Therefore, some development is proposed in and around villages that have good transport links and services, while in smaller villages, only small-scale infill development and affordable housing would be permitted.

Issues Raised in the Representations Include:

- A number of Parish Councils support the strategy for the rest of the rural area. Some considered that Neighbourhood Plans should have greater influence on the proposed strategy. They also highlighted preservation of rural character and identity of villages as being important. In addition, development should be limited to that required based on local needs. Loss of good farmland and countryside should be avoided.
- A number of site promoters objected to the small amount of growth proposed for the rest of the rural area, for reasons including:

    - The long-term viability of rural settlements is ignored;
    - The approach is counter to the national planning policy objective of supporting and promoting mixed and balanced communities;
    - The approach ignores the need for local affordable housing and the need for more small and medium sized sites that can be delivered more quickly.
- Several site promoters suggest that more investment should be put into improving transport links in the villages
- Site promoters suggest that there are opportunities for a cluster of developments around Melbourn due to its public transport links, services and facilities, whereas Melbourn PC state that the village has no further capacity for development based on its existing infrastructure provision.
- Garden centres are not referred to in the First Proposals Plan. Respondents commented that garden centres should be recognised within the rural area strategy, as they provide employment, retail and leisure opportunities
- Support was submitted for the rejection of specific sites, along with requests from site promoters for specific sites to be allocated

Response to Issues Raised in Representations:

- Representation from several Parish Councils support the strategy for the rest of the rural area which is noted.
- Some comments recommend higher levels of development and that the plan should have allocated more sites. Many of the representations reflect comments and issues addressed when considering the Strategy section of the Draft Plan. Having considered a range of alternative strategies, the proposed development strategy directs site allocations for new homes and jobs to the most sustainable locations of Cambridge urban area, the edge of Cambridge and the new settlements as these have: the least impact on climate change, active and public transport as the natural choice, and jobs, services and facilities near to where people live.

Rural Southern Cluster

South of Cambridge, the area around the M11 and the A1307 corridor is home to a range of major business parks with world-leading facilities and has some excellent and improving public transport links. The Draft Local Plan supports this business cluster through ensuring that more business space is provided where needed but also seek opportunities for new homes in this area.

Issues Raised in the Representations Include:

- Representations support the approach for the clustering of development in the Rural Southern Cluster, however:
    - There is a need to protect villages from disproportionate levels of development, as this will have impacts on village character, historic assets, landscape character, and wildlife habitats.
    - The scale of proposals is inadequate and does not take account of the economic potential of the area.
    - Further Green Belt release is necessary to ensure vitality of rural areas.
    - Sites within public transport corridors should be prioritised.
    - Small sites included in Neighbourhood Plans should be included.
    - Concerns were raised over traffic congestion, inappropriate infrastructure, lack of water supply, and effects on landscape and floodplains,
    - There are other public transport and employment clusters within the area that should also be considered, for example around Melbourn.
    - There is a need to consider the cumulative effects and impacts of the level of development proposed in this area, particularly on transport, landscape, agricultural land, and existing settlements,
    - Provision of infrastructure should be a priority for new developments.
- New development needs to include truly affordable housing.
- New development needs to include provision of health services and facilities.
- Site allocations need to include clear requirements for well-designed places that promote healthy lifestyles.

Site Specific Comments:

- Granta Park and the Welding Institute should be referred to given their importance to the area.

Rejected Sites:

- Support for the rejection of specific sites.
- Requests from site promoters for specific sites to be allocated

Response to Issues Raised in Representations:

- Some comments seek additional development, and that the plan should have allocated more sites, and released further green belt. Many of the representations reflect comments and issues addressed when considering the Strategy section of the Draft Local Plan.
- Other comments reflect concerns about the level of development. The Draft Local Plan has been informed by a range of evidence to identify development needs and select the sites to meet that need. This includes consideration of infrastructure needs, and how the needs generated by new development will be met.

Policy Area and Site Allocations Responses

Areas of Major Change – Cambridge Urban Area

Key Issues Raised

- General support for the approach towards the identified Areas of Major Change Cambridge urban area, with some suggesting modifications to the approach. These include the inclusion of F1 (education uses) proposed by the Education and Skills Funding Agency - Department for Education.
- Another comment indicated the need for the policy guidance of these areas to be informed by the impact of both existing and committed housing development.
- There was strong opposition from Fen Ditton PC regarding the offsetting of development with a country park on productive, carbon sequestrating farmland.
- Equally, one member of the public objected to the omission in Figure 16: Map showing proposed Areas of Major Change in Cambridge urban area not displaying reference to the proposed relocation site for the Waste Water Treatment Works in a similar manner to the NEC area, to provide proper context for North East Cambridge (Policy S/NEC) in terms of future land use and corresponding Green Belt cost and should exclude both until DCO approved.
- One member of the public questioned why Cambridge Local Plan Policy 18: Southern Fringe Areas of Major Change, with its important safeguards, was not being brought forward.
- Another member of the public supported Policy 18 not being taken forward.
- East West Main Line Partnership‘s current proposal to approach Cambridge from the South is based on the opportunity for major developments throughout the Southern Fringe, contrary to Cambridge Local Plan Policy 18: Southern Fringe Areas of Major Change limiting such development.

Council’s Response

- The list of Areas of Major Change Policy Areas is based upon those areas that have many landowners or where significant change is expected for a range of different proposals over the course of the plan period.
- The policy should help ensure a coordinated and much more consistent approach is taken towards infrastructure delivery, density, activity and movement as well as their successful integration with neighbouring areas.

Site Area

North East Cambridge (Cambridge East)

Key Issues Raised

- There was general support for the development at Cambridge East, particularly the relocation of the airport to allow for the delivery of a mixed-use site, providing open spaces, housing (including affordable housing), employment, retail, and cultural facilities with high quality and comprehensive transport networks. Supporters of the proposed policy direction included: Huntingdonshire DC, Cambridge Past, Present & Future, National Trust, Anglian Water Services Ltd, Marshall Group Properties, and some individuals.
- There was encouragement for transport improvements on already congested access routes, provision of public transport to improve connectivity, and support for separate designated cycle and walking infrastructure.
- There was some concern for the relocation of the current airfield, particularly the uncertainty of timing of the relocation of the airport and related uses, resulting in unforeseen delays in relocation affecting the delivery of housing within the plan period (including affordable housing).
- Reliance on the GCP Cambridge Eastern Access scheme, and deliverability and viability development risks leaving the plan vulnerable at examination stage.
- Campaign to Protect Rural England were concerned with the loss of existing jobs on the site, with many representations to question 3 also raising concern for the displacement of a skilled workforce and engineering jobs that had been part of the airport for decades.
- Some comments including those from Historic England, Save Honey Hill, Cambridge Past, Present and Future, Parish Councils, and individuals were in opposition to the development as they thought the character and landscape of the surrounding areas should be retained with likely pressures on areas including Teversham village, the Green Belt land, Eastern Fens and Fen Ditton. This was also reflected in the responses to question 3 of the questionnaire.

- In addition to these representations, question 3 of the questionnaire was also related to the provision of housing, jobs, facilities and open spaces at Cambridge East. Many responses voiced concerns for impacts on water supply and aquifers at high demand. Other responses raised concerns for the provision of biodiversity and green spaces through a range of landscaping of all scales.
- Additionally, comments on question 3 thought that the development should be built with a range of well-designed and climate friendly homes (including affordable housing) to accommodate families with provision of a range of job opportunities, retail and leisure facilities within a 15-minute radius to support the local community without having to travel elsewhere. These responses also supported the need for design of safe, and cohesive communities that support the mental health and wellbeing of people living there.
- Although responses to the policy were generally in support of improvements to existing road infrastructure and provision of public transport, cycle and walking infrastructure, a high number of responses to question 3 were concerned for impacts on infrastructure from development at Cambridge East. Some comments suggested that congestion will be increased even with improvements due to reliance on cars to travel into town by older people and disadvantaged groups and expressed the need for parking on-site for people who need a car. However, most responses to question 3 were in support of creating a car-free development and the provision of zero carbon transport options, with separate cycling and walking infrastructure. Lastly, some comments suggested the provision of a light railway, metro or underground as an alternative to bus use.

Council's Response

- **Objections relating to the relocation of the Waste Water Treatment Plant (WWTP):**

  The impact of the proposed development at North East Cambridge (NEC) has been carefully considered across a range of issues. The impact of the relocation of the WWTP to an off-site location, including the impact on the Green Belt, the environment and water discharge into the River Cam, will be

considered as part of the separate WWTP DCO process being undertaken by Anglian Water. The outcome of the DCO process will inform the Local Plan Sustainability Appraisal in terms of its in combination effects with other plans and projects, as noted in the Sustainability Appraisal accompanying the First Proposals.

- Pursuing a medium growth approach to NEC that does not require the relocation of the WWTP would not be achievable in terms of the cost of reconfiguring the existing WWTP, and would not make best use of brownfield land. Allocating the site for a significant amount of employment uses with little or no housing provision would require the Councils to meet our jobs and housing need for the area at alternative, less sustainable, sites, and would also worsen the existing issue of significant amounts of in-commuting into the area.
- North East Cambridge and Cambridge East are the most sustainable new strategic scale locations available to meet our objectively assessed needs for development; not including development at North East Cambridge would require the Councils to meet our jobs and housing need for the area at alternative, less sustainable, sites.
- **Support for development:**
  North East Cambridge forms a highly sustainable development option, including being the best performing new strategic scale location available for development within Greater Cambridge in transport terms. In accordance with the NPPF, by promoting the effective use of land on previously developed or brownfield land, including supporting the development of under-utilised land and buildings, the proposed policy approach at North East Cambridge seeks to make the best use of land by placing homes, jobs and other supporting services and facilities within the existing urban area of Cambridge.
- **Deliverability challenges:**
  Information regarding the expected submission of the DCO for the relocation of Cambridge Wastewater Treatment Plant provides confidence that we can expect the full site to be available for redevelopment by the middle of the plan period, enabling significant delivery of jobs and homes by 2041. Infrastructure and viability evidence supporting the AAP confirm that development at North

East Cambridge is viable, robust and that a policy compliant provision of affordable housing as well as necessary infrastructure can be delivered.

- **Concern for impacts:**
  Representations on this topic are not relevant to the decisions being taken in early 2023 relating to the principle of development at North East Cambridge, but will be taken into account in the preparation of the site allocation policy for inclusion in the full draft plan and a response to those further issues will be provided at that time.

Site Area:

S/AMC/AS: Abbey Stadium

Key Issues Raised

- There was some support for this site to be an Opportunity Area and despite the impacts to local residents on match days, the stadium and club are popular with local residents.
- Comments also noted that the Plan needs to provide a solid planning policy framework to secure the future of the Club either on or off site.
- Some comments raised environmental and transport concerns around relocating the stadium to an alternative, edge of city, location.
- There is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording.

Council's Response

- The policy now provides a clear framework for the redevelopment of the existing stadium and identifies that improvements will be required to improve accessibility to the site.
- The policy identifies the specific heritage assets within close proximity to the site, but a Heritage Impact Assessment has not been undertaken given this is a policy area rather than an allocation.

- The policy encourages additional supporting uses and making the best use of the existing site to discourage the potential of the stadium relocating out of the city.
- The role of the stadium for community support is noted and non-match day uses are encouraged in the policy.

Site Area:

S/AMC/BC: Beehive Centre

Key Issues Raised

- The Policy Area was supported by Railpen with Croydon PC recommending underutilised areas like The Beehive and the Grafton Centres be used for housing.
- Cambridgeshire County Council highlighted the site is within the St. Matthew's Primary School catchment and is a restricted site and cannot expand.
- The intention to 'improve…infrastructure delivery' in the Opportunity Areas could enable longer-term solutions for the school's needs, e.g., new-build and relocation as part of the holistic approach outlined.
- The Education and Skills Funding Agency - Department for Education states the site should allow the potential inclusion of F1 (education use).
- One member of the public stated any replacement uses should ensure leisure and retail amenities still exist for a growing population.
- Historic England noted the site is immediately adjacent to the Mill Road Conservation Area and recommended an Historic Impact Assessment to inform policy wording.

Council's Response

- With the potential transformation of the Beehive Centre area into a hub for science and innovation, it is important that it is integrated positively with both the adjacent Cambridge Retail Park and the surrounding neighbourhoods.

- The policy will ensure the site's reconfiguration/intensification allows for the enhancement of the area's character by enhancing the pedestrian and cycle experience and reducing congestion.
- The policy makes clear the need for proposals within the site comply with a Council approved development and environmental strategy to guide the site's re-configuration over the short, medium and long-term.

Site Area:

S/AMC/EB: East Barnwell

Key Issues Raised

- Policy S/AMC/EB East Barnwell was not included in the First Proposals consultation document.

Council's Response

- The shopping centre now has planning permission for a mix of life sciences (research and development), hotel and retail/leisure uses.
- Development is expected to deliver the new hotel adjacent to East Road with the remainder of the project to involve the conversion of the existing shopping centre into laboratory space with shops on the ground floor.
- The policy supports an urban design led approach to future development which should include townscape analysis and any relevant heritage assets along with the wider historic environment.
- There is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording.

Site Area:

S/AMC/FBG: Fitzroy/Burleigh Street/Grafton

Key Issues Raised

- This Policy Area was supported by Croydon PC who recommended that underutilised areas like The Beehive and the Grafton Centres could be used for housing.
- Historic England noted the area was within the Kite conservation area and there were several listed buildings in this area. It recommended an Historic Impact Assessment to inform policy wording.

Council's Response

- The shopping centre now has planning permission for a mix of life sciences (research and development), hotel and retail/leisure uses.
- Development is expected to deliver the new hotel adjacent to East Road with the remainder of the project to involve the conversion of the existing shopping centre into laboratory space with shops on the ground floor.
- The policy supports an urban design led approach to future development which should include townscape analysis and any relevant heritage assets along with the wider historic environment.

Site Area:

S/AMC/SCL: South of Coldham's Lane

Key Issues Raised

- Historic England highlighted the need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording.

Council's Response

- Heritage Impact Assessment has been prepared and informs the policy wording. Development requirement added to the policy.

Site Area:

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

Key Issues Raised

- General support for the approach towards the identified Opportunity Areas in Cambridge.
    - Those who supported this approach included Bassingbourn-cum-Kneesworth PC, Cambridgeshire County Council, Croydon PC and Cambridge Past, Present & Future.
- The policy was also supported along with public realm improvements by Trinity Hall, Jesus College and Socius Development Limited on behalf of Railpen.
- One member of the public also suggested these sites include passivhaus housing, more green spaces and smaller shops.
- Histon & Impington PC questioned the evidence to support the Plan's claim that there is already sufficient land assigned for job creation in the correct place.
- They noted the business park to the North of Waterbeach on the A10 is still only partially occupied several years after it was opened: many businesses consider the location that far out of Cambridge to be unacceptable.
- One member of the public objected to the omission in Figure 17: Map of proposed opportunity areas in Cambridge urban area not displaying reference to the proposed relocation site for the Waste Water Treatment Works in a similar manner to the NEC area, to provide proper context for North East Cambridge (Policy S/NEC) in terms of future land use and corresponding Green Belt. Should exclude both until DCO approved.
- Jesus College indicated Land to the North of Station Road, Cambridge is also a potential allocation for employment use in the Local Plan.

Council's Response

- The policy provides a clear requirement for co-ordinated public realm improvements in these areas as part of the policy's 'place-making' objective.

- The policy encourages a range of uses that support or deliver local shops and services.
- The policy also requires site promoters to develop a policy framework to resolve challenges that can arise with complex development opportunities, to guide the re-configuration of these sites.
- The allocation of employment sites is considered separately to this policy.

Site Area:

S/PRIA/CRP: Cambridge Retail Park

Key Issues Raised

- This Policy Area was supported by Railpen with Croydon PC recommending underutilised areas like The Beehive and the Grafton Centres be used for housing.
- Cambridgeshire County Council highlighted the site is within the St. Matthew's Primary School catchment and is a restricted site and cannot expand.
- The intention to 'improve… infrastructure delivery' in the OAs could enable longer-term solutions for the school's needs, e.g., new-build and relocation as part of the holistic approach outlined.
- The Education and Skills Funding Agency - Department for Education states the site should allow the potential inclusion of F1 (education use).
- One member of the public stated any replacement uses should ensure leisure and retail amenities still exist for a growing population.
- Cambridge Past, Present & Future stated Land at Cheddars Lane should be included in the Opportunity Area.
- Historic England noted the proximity of several designated heritage assets and recommended an Historic Impact Assessment to inform policy wording.
- Fen Ditton PC noted Newmarket Road retail and Beehive areas both fulfil an important function for residents and questioned why the Tesco site had been excluded.
- The sites' accesses should also be investigated due to road congestion.
- The Cambridge and South Cambridgeshire Green Parties agreed that Newmarket Road Retail Park and the Beehive Centre are not the best use of

this land. The retail park model places great emphasis on access by car, disadvantages small independent businesses, and contributes to the decline of high streets.

- The Cambridge and South Cambridgeshire Green Parties supported redevelopment of these areas to meet identified needs.

Council's Response

- With the proposed transformation of the Beehive Centre area into a hub for science and innovation, it is important that the Cambridge Retail Park is allowed to retain 'bulky goods' retailers from the Beehive by making much better use of the site as well as ensuring it meets the future retail needs of the city and local communities.
- The policy should ensure the site's re-configuration/intensification allows for the enhancement of the character of Newmarket Road by enhancing the pedestrian and cycle experience and reducing congestion.
- The policy makes clear the need for proposals to integrate with the adjacent Beehive Centre development site and the surrounding neighbourhoods.
- It should also ensure development within the site complies with a Council approved development and environmental strategy framework to guide the site's response.

Site Area:

Eastern Gate Opportunity Area, including north area of St Matthew's Piece and allotments on New Street.

Key Issues Raised:

- Concern that the north area of St Matthew's Piece and the allotments on New Street are identified as 'opportunity areas'. as they are protected open space. The areas need to be removed from the classification of an 'opportunity area' and re-classified as untouchable protected open space
- Request that all the protected open space areas within the footprint of the 2018 'Eastern Gate Opportunity Area' are retained
- Policy should set maximum building heights (2+1) along New Street - the northern boundary of St Matthew's Piece

- One member of the public suggested that any prioritisation of the Newmarket Road area should focus on: Improving public transport links to these areas.
- Developer support for continuation of Eastern Gate Opportunity Area. The SPD should be updated to reflect developments built out and that the St Matthews Centre site should be identified as a site capable of delivering mixed use education and student accommodation facilities (58941/58945)
- Need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording.

Council's Response:

- The policy area is now a designated Public Realm Improvement Area and not an 'Opportunity Area'; this means new development within these areas should contribute to the improvement of the area's character and connectivity, not just internally but also with surrounding neighbourhoods and other Areas of Major Change and Public Realm Improvement Areas.
- Development proposals involving the loss of protected open space would normally only be granted if they comply with the relevant policy to safeguard such spaces.
- With the number of new developments in the area and especially with proposals at the Beehive Centre and Grafton Centre, an urban design led approach is taken, including townscape analysis and character appraisals to evidence appropriate scale and massing of development proposals in the policy area.

Site Area:

Mitcham’s Corner (S/OA/Policy 22) including parts of the Central and Castle and Victoria Road Conservation Areas.

Key Issues Raised:

- Historic England noted Mitcham’s Corner (S/OA/Policy 22) included parts of the Central and Castle and Victoria Road Conservation Areas. It recommended an Historic Impact Assessment to inform policy wording.

Council's Response:

- The policy area is now a designated Public Realm Improvement Area and not an 'Opportunity Area'; this means new development within these areas should

contribute to the improvement of the area's character, this would include avoiding any potential impact on local heritage assets guided by policies in the draft local plan.

Site Area:

Mill Road Opportunity Area, Mill Road (S/OA/Policy 24) including the Travis Perkins site on Devonshire Road and parts of the Mill Road, Kite and Glisson Road Conservation Areas.

Key Issues Raised:

- Socius Development Limited on behalf of Railpen supported the proposed retention of Mill Road Opportunity Area, Mill Road (S/OA/Policy 24) including the Travis Perkins site on Devonshire Road. The policy should however explicitly attach positive weight to development that helps to meet the aims of the Opportunity Area policy.
- Historic England noted the site includes parts of the Mill Road, Kite and Glisson Road Conservation Areas. It recommended an Historic Impact Assessment to inform policy wording.

Council's Response:

- The policy clearly supports proposals which provide sustainable forms of transport and co-ordinated public realm improvements, to help develop local 'place-making' along with proposals that provide support for local shops and services.
- The policy area is now a designated Public Realm Improvement Area and not an 'Opportunity Area'; this means new development within these areas should contribute to the improvement of the area's character, this would include avoiding any potential impact on local heritage assets guided by policies in the draft local plan.

Site Area:

Old Press Mill Lane site.

Key Issues Raised:

- The University of Cambridge questioned why the Old Press Mill Lane site was designated as an Opportunity Area under Old Press/Mill Lane (S/OA/Policy 26) and as a site allocation.
- Historic England noted the many listed buildings on site and recommended an Historic Impact Assessment to inform policy wording.

Council's Response:

- Given the sensitivity of the site's location, in terms of both historic buildings and quintessential riverside setting besides/close to the River Cam, it is important that the remaining undeveloped site takes account of the approved masterplan for the wider area; which itself was informed by the many constraints and considerations listed in the Old Press/Mill Lane Supplementary Planning Document.

Site Area:

Various urban site allocations in Cambridge.

Key Issues Raised:

- Proposed approach to site allocations:
  General support received for the proposed approach to site allocations in Cambridge urban area, however suggestions included:
  - More homes should be identified in Cambridge to reduce the number of new homes identified in rural areas.
  - Fewer homes should be identified in the urban area considering the pandemic and need for more personal and recreational space.
  - Existing adopted allocations should be reviewed and not automatically carried forward, and assurance provided regarding their delivery and ability to meet housing need.
- Rejected or de-allocated sites:
  - Support for the rejection of specific sites and de-allocation of sites from an individual and a resident's association.
  - Requests for specific sites to be allocated from site promoters.

Council's Response:

- More or fewer homes should be identified in Cambridge: Cambridge urban area is the most sustainable location in Greater Cambridge, and sites have

been allocated to make the most of its accessibility to existing jobs, services and public transport. A variety of sites have been considered through the Housing and Economic Land Availability Assessment process and assessed against the development strategy for the Local Plan, and those sites identified as suitable and deliverable within the plan period have been allocated. All new residential developments will be required to meet relevant Local Plan requirements such as internal space and open space standards.

- Existing adopted allocations should be reviewed: all adopted allocations have been reviewed alongside new sites, and those that continue to be identified as suitable and deliverable within the plan period have been allocated.
- Support for the rejection of specific sites, support for de-allocation of sites and requests for specific sites to be allocated: new or updated evidence and representations received to the First Proposals consultation have all been considered, and those sites that continue to be identified as suitable and deliverable within the plan period have been allocated.

Site Area:

Garages between 20 St. Matthews Street and Blue Moon Public House, Cambridge.

Key Issues Raised:

- Representations advised of need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording, protect and preserve the mature tree on the eastern edge of the site.
- Consideration should be given to the impact of this development on water/sewerage capacity.

Council's Response:

- Historic England state the need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording. In response a Heritage Impact Assessment has now been prepared and informs the policy wording. Development requirement has been added to the policy.
- Must protect and preserve the mature tree on the eastern edge of the site - a development requirement has been added to the policy, requiring the mature tree to be retained.

- Consider impact of this development on water/sewerage capacity - this allocation and the wider Local Plan has been reviewed by the respective utility providers as part of the preparation of the Infrastructure Delivery Plan. Any deficiencies in water and sewerage capacity because of any of the allocations will be addressed under site specific requirements. Mitigation measures will be secured and delivered through a legal agreement at the planning application stage

Site Area:

137-143 Histon Road, Cambridge

Key Issues Raised:

- Representations advised there is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording.

Council's Response:

- Responses to issues raised in representations include:
  A need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording – A Heritage Impact Assessment has been prepared which informs the policy wording. Development requirement has been added to the policy.

Site Area:

Henry Giles House, 73-79 Chesterton Road, Cambridge

Key Issues Raised:

- Representations advised there is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording.

Council's Response:

- Responses to issues raised in representations include:
  The is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording – A Heritage Impact Assessment has been prepared which informs the policy wording. A Development requirement has been added to the policy.

Site Area:

636-656 Newmarket Road, Holy Cross Church Hall, East Barnwell Community Centre and Meadowlands, Newmarket Road, Cambridge

Key Issues Raised:

- There needs to be assurance regarding delivery.

Council's Response:

- Most of the development site is owned and being brought forward by Cambridgeshire County Council and Cambridge City Council; planning permission (23/04687/FUL) has been approved for part of the site and it is anticipated that this part of the site will be delivered within the next 5 years.

Site Area:

Travis Perkins, Devonshire Road, Cambridge

Key Issues Raised:

- Representations advised there is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording.
- The site promoter is seeking amendments as considers the site is appropriate for a mix of uses and a higher number of dwellings. The site promoter supports the allocation.

Council's Response:

- Responses to issues raised in representations include:
  There is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording – A Heritage Impact Assessment has been prepared and informs the policy wording. A Development requirement has been added to the policy.
  Developer / promoter has asked for site to be allocated for mixed use – full planning permission (22/01982/FUL) was granted in May 2023 for 70 dwellings and a mix of non-residential uses. Mix of uses amended, indicative capacity of homes increased and suitability of site for class uses E (g) (i) / E (g) (ii), F.1 and F.2. added to the policy.

Site Area:

Horizon Resource Centre, 285 Coldham's Lane, Cambridge

Key Issues Raised:

- Landowner requests that the allocation is carried forward and not de-allocated.

Council's Response:

- Responses to issues raised in representations include:
  Landowner requests that the allocation is carried forward and not de-allocated - The site has been proposed to be allocated in the Draft Greater Cambridge Local Plan.

Site Area:

Cambridge Professional Development Centre, Foster Road, Cambridge

Key Issues Raised:

- Landowner requests that the allocation is carried forward and not de-allocated.

Council's Response:

- Responses to issues raised in representations include:
  Landowner requests that the allocation is carried forward and not de-allocated – The site has been proposed to be allocated in the Draft Greater Cambridge Local Plan.

Site Area:

Police Station, Parkside, Cambridge

Key Issues Raised:

- There is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording,

- The Landowner is challenging the Building for Local Interest status and is seeking amendments to allow flexibility for a mix of uses. The Landowner supports the allocation.

Council's Response:

- Responses to issues raised in representations include:
  There is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording – A Heritage Impact Assessment has been prepared which informs the policy wording. A development requirement has been added to the policy.
  The Landowner is challenging the Building of Local Interest (BLI) status - there is no process for removing BLI status and the HELAA and HIA confirm the importance of retaining the Building of Local Interest.
  Landowner is seeking amendments to allow flexibility for a mix of uses – The policy allows for other uses as part of a residential-led scheme.

Site Area:

Land south of Coldham's Lane, Cambridge

Key Issues Raised:

- Concerns were raised about the impact of lorries, traffic and congestion on surrounding roads.
- The Wildlife Trust made an objection as the proposal includes development on a City Wildlife Site.
- A suggestion was submitted that the site should be used to provide accessible green space.
- Concern was raised re the negative impact that development would have on biodiversity and the risk of harm to adjoining land identified for ecological uses.
- There is need for flexibility in the uses proposed to enable complementary uses to be provided.
- There is insufficient information on management and funding of the proposed urban country park.
- The landowner supports the allocation.

Council's Response:

- Responses to issues raised in representations include:

  Concerns about the impact of lorries, traffic and congestion on surrounding roads - The HELAA considered the highways impacts associated with the proposal, including consultation with the Local Highway Authority. It concluded that there could potentially be an impact upon local roads, but these could be mitigated. The policy includes criteria that the developer will be expected to contribute to sustainable modes of transport.

  The Wildlife Trust made an objection as the proposal includes development on a City Wildlife Site - The HELAA considered the impact of prospective development on the site and noted that development of the site might have a detrimental impact on a designated site, or those with a regional or local protection. However, the HELAA also notes that these impacts could be reasonably mitigated. Therefore, a key development requirement of the policy is criteria that future development decontaminates the site and implements ecological enhancements.

  Suggestion that the site should be used to provide accessible green space – Development on the site will enable for the restoration and opening of the wider site.

  Negative impact on biodiversity and risk of harm to adjoining land identified for ecological uses - The HELAA considered the impact of prospective development on the site and noted that development of the site might have a detrimental impact on a designated site, or those with a regional or local protection. However, the HELAA also notes that these impacts could be reasonably mitigated. Therefore, a key development requirement of the policy is to request that development decontaminates the site and implements ecological enhancements.

  The is a need for flexibility in the uses proposed to enable complementary uses to be provided - the uses reflect opportunities provided by the site and the extant planning permission.

  Insufficient information on management and funding of the proposed urban country park - The level of detail regarding the requirement is appropriate to draft local plan policy that includes criteria regarding the land management and maintenance. This can be further refined though the planning application process and a Section 106 legal agreement.

Site Area:

1 and 7-11 Hills Road, Cambridge (E5)

Key Issues Raised:

- The Landowner requests that the allocation is carried forward and not de-allocated.

Response:

- The landowner of 1 and 7-11 Hills Road (E5) has requested that this allocation is carried forward and not de-allocated. However the sites are in existing commercial use, and the Greater Cambridge Employment and Housing Evidence Update (2023) suggested the site should be deallocated. If proposals do come forward, they are capable of being considered through the planning application process.

Site Area:

S/C/BFS: Brookfields

Key Issues Raised:

- There is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording.

Response:

- Responses to issues raised in representations include:
  There is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording – A Heritage Impact Assessment has been prepared which informs the policy wording. A development requirement has been added to the policy.

Site Area:

Clifton Road Area, Cambridge (S/C/M2)

Key Issues Raised:

- There is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording,
- The site promoter would like to work with the Councils to gather evidence of deliverability.
- The landowner supports the allocation.

Response:

- Responses to issues raised in representations include:
  There is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording – A Heritage Impact Assessment has been prepared that informs the policy wording. A development requirement has been added to the policy.

Site Area:

Station Road West, Cambridge (S/C/M14)

Key Issues Raised:

- There is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording.

Response:

- Responses to issues raised in representations include:
  There is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording – A Heritage Impact Assessment has been prepared which informs the policy wording. Development requirements have been added to the policy.

Site Area:

Betjeman House, Hills Road, Cambridge (S/C/M44)

Key Issues Raised:

- There is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording.

- The landowner is seeking amendments so that the allocation is for commercial uses only.
- The landowner supports the allocation.

Response:

- Responses to issues raised in representations include:
  There is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording – A Heritage Impact Assessment has been prepared which informs the policy wording. The HIA has informed the policy.
  The landowner is seeking amendments so that the allocation is for commercial uses only – The policy has subsequently been amended in accordance with the Appeal Decision.

Site Area:

Old Press / Mill Lane, Cambridge (S/C/U1)

Key Issues Raised:

- There is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording.
- The landowner supports the allocation.

Response:

- Responses to issues raised in representations include:
  There is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording – The site has not had a HIA prepared as part of the draft Local Plan making process as it is a carried forward allocation, from the adopted local plan. However, criteria for mitigation measures to ensure heritage assets and their setting are protected have been added to the policy.

Site Area:

New Museums Site, Downing Street, Cambridge (S/C/U2)

Key Issues Raised:

- There is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording.
- The landowner supports the allocation.

Response:

- Responses to issues raised in representations include:
  There is a need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording – The site has not had a HIA prepared as part of the draft Local Plan making process as it is a carried forward allocation from the adopted local plan. However, mitigation measures to ensure heritage assets and their setting are protected have been added to the policy.

In the Cambridge Urban Area, the following sites have been added as new in the Draft Local Plan and therefore received no comments at the draft proposals stage:

- S/PAC/CC: Cambridge City Centre
- S/C/SH: 1-33 Stanton House, Christ Church Street, Cambridge
- S/C/GER: Former Garage Block, East Road, Cambridge
- S/C/HPC: 1-78 Hanover Court, 1-49 Princess Court and Garage at Newtown Garages
- S/C/DR: 2-28 Davy Road and Garage Blocks
- S/C/ER: 1-99 Ekin Road and 1-8 Ekin Walk
- SC/NCA: North Cambridge Academy, Arbury Road
- S/C/SRL: Strangeways Research Laboratory, 2 Worts' Causeway

In the Cambridge Urban Area, the following sites have been removed from the Local Plan at the Draft Local Plan Stage, either as they no longer meet the criteria for a site allocation through the assessment undertaken in preparing the next version of the plan or the development has progressed sufficiently enough that a site allocation is no longer required:

- S/C/R5: Camfields Resource Centre and Oil Depot, 137-139 Ditton Walk

- S/C/U3: Grange Farm, off Wilberforce Road
- S/C/RM1 and Policy H/7: Fen Road
- S/C/M5: 82-88 Hills Road and 57-63 Bateman Street

Table X: First Proposals Edge of Cambridge

Edge of Cambridge Sites

Site Area:

Northwest Cambridge

Issues raised in the representations include:

- The allocation will increase need for full day care provision for pre-school children.
- More primary school places are needed.
- GCSP should encourage the co-location of establishments to promote partnership working.
- GCSP should encourage developers to provide free plots of serviced land or purpose-built buildings.
- Additional infrastructure must also include provision of strategic green infrastructure.
- The development site contains an ancient tree; appropriate measures need to be taken to retain and protect this tree and its root system.
- Recommendations of HIA should be used to inform the policy wording.
- A medical centre and pharmacy should be delivered before consent is given for the next phase.
- There is a need to preserve the ecologically sensitive area within the land parcel known as ‘the 19-acre field’.
- All new developments over a certain size should provide a minimum of 50% affordable housing in line with the Northwest Cambridge Area Action Plan.

The loophole in page 83 of the First Proposals where developers could deliver less than this on the Northwest site should be removed.

Responses to issues raised in representations include:

- This allocation will increase need for full day care provision for pre-school children. More primary school places are needed. GCSP should encourage the co-location of establishments to promote partnership working. This issue will be addressed by other policies in the Local Plan.
- GCSP should encourage developers to provide free plots of serviced land or purpose-built buildings. This issue will be addressed by other policies in the Local Plan.
- Additional infrastructure must also include provision of strategic green infrastructure. This issue will be addressed by other policies in the Local Plan.
- The development site contains an ancient tree, appropriate measures need to be taken to retain and protect this tree and its root system. This issue will be addressed by other policies in the Local Plan.
- Recommendations of HIA should be used to inform the policy wording. This has been incorporated into the policy.
- The medical centre and pharmacy should be delivered on the existing site before consent is obtained for the next permission.
- Need to preserve ecologically sensitive area within the land parcel known as ‘the 19 acre field’. This issue will be addressed by other policies in the Local Plan.
- All new developments over a certain size should provide a minimum of 50% affordable housing in line with the Northwest Cambridge Area Action Plan. The loophole in page 83 of the First Proposals where developers could deliver less than this on the Northwest site should be removed.

Site Area:

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

Key Issues Raised:

Several respondents supported the proposal, with Fen Ditton PC noting that it reflected Cambridge’s specific strengths. However, some respondents added

caveats to their support, for example, the University of Cambridge argued that the proposed growth requirements were too restrictive. Other respondents argued that the site's design needs refinement, and the Wildlife Trust stressed the continuing importance of protecting the city's green edge. One respondent argued that currently on the site there is an imbalance in the availability of facilities for research organisations compared to the general hospital, but they noted that planning gain from the proposal could be used to address this.

Some respondents submitted neutral comments, including citizens who asked for an assessment of whether the expansion was necessary after Covid-19. Other respondents requested for the masterplan to be redrafted to improve matters such as cycle and pedestrian permeability. Several respondents used their feedback to focus upon technical elements of the proposal such as measurements and policy wording. Developers also submitted representations arguing that the proposal necessitated the delivery of additional housing.

Some respondents objected to the proposals. Reasons for opposition included environmental concerns, specifically relating to the perceived threat of flooding, carbon emissions potentially produced by the proposal and the adverse impact that the expansion could have upon red-listed farm birds which currently frequent the site. Other objections were justified on the basis that the proposal would negatively impact green belt land and harm the city's green edge. Some respondents considered that the proposal would be more suitable in other parts of Cambridge, or even if it was in another area of the country.

In addition to these representations, question 5 of the questionnaire was also related to the extension of the Biomedical Campus. Many responses voiced similar concerns that appeared in the representations to the policy, particularly in relation to the proposal's potential impact upon the environment, green spaces, and flooding. Some comments asked for the proposal to improve the layout, traffic flow, and amenities of the Campus as well as the need to provide affordable housing for key workers. There were also different opinions about the types of jobs that should be delivered, specifically whether there should be an emphasis upon healthcare or research.

Response:

Comments in support of the broad policy approach are noted.

Comments highlight the need for improvement of the existing campus. The policy is designed to enable this, and there is a clear case that the existing campus needs to be improved. Release of Green Belt land should assist in achieving this.

Some respondents expressed concern about whether there was enough focus on health provision as opposed to commercial research. Through engagement with the various stakeholders and landowners, the Councils understand that emerging proposals have the future of the hospital and care needs as key to the future success of the campus.

Respondents raise concerns about green belt release and whether the case was justified. As set out in the section above, having considered the case, the Councils consider that exceptional circumstances can be justified to release additional land to support the future needs of the campus. This has to be accompanied by enhancement to the adjoining land which remains in the green belt, including though the provision accessible open spaces, enhancement to the landscape, and biodiversity.

The policy does seek an element of residential development of the site, for a number of reasons. It will help the vitality of the campus, and support meeting needs of people that need to be close to the campus to support its activities. However, this quantity must also be balanced against the need for other uses. The development strategy in the draft local plan would deliver a number of major sites with good access via active travel of public transport to the campus.

Further analysis of the flood risk to the site has been carried out, and mitigation measures have been identified which will address the surface water flood risk for the expansion and the existing campus.

Site Area:

Policy S/WC: West Cambridge

Key Issues Raised:

Issues raised in the representations include:

- Policy doesn’t acknowledge East-West rail route and its consequences.
- Dwelling numbers and density should be included in the policy.

- GCSP should consider joining this policy with the policy for North West Cambridge to make one overarching policy for the area.
- Development must better integrate neighbouring communities and acknowledge the character of the West Cambridge Conservation Area.
- Section 106 Agreements from the 1999 permission to provide a cycle route from the east of the site to Grange Road have not been fulfilled.
- Important to protect remaining green spaces.
- Recommendations of the HIA should be used to inform policy wording. Any policy for the site should refer to heritage assets and the need to conserve and enhance the significance of these assets.

Response:

- Policy doesn't acknowledge East-West rail route and its consequences. The route is not going near the site; therefore, a policy response is not necessary.
- Dwelling numbers and density should be included in the policy.
- GCSP should consider joining this policy with the policy for North West Cambridge to make one overarching policy for the area. GCSP has decided that it is appropriate to keep the policies separate.
- Development must better integrate neighbouring communities and acknowledge the character of the West Cambridge Conservation Area. Development requirements have been added to the policy.
- Section 106 Agreements from the 1999 permission to provide a cycle route from the east of the site to Grange Road have not been fulfilled. Development requirements have been added to the policy.
- Important to protect remaining green spaces. Development requirements have been added to the policy.
- Recommendations of the HIA should be used to inform policy wording. Any policy for the site should refer to heritage assets and the need to conserve and enhance the significance of these assets including any contribution to that significance by settings. Development requirements have been added to the policy.

Site Area:

Policy S/HHR Land between Huntingdon Road and Histon Road

Key Issues Raised:

Issues raised in the representations include:

• access from Cambridge Road is inadequate and being so close to the Kings Hedges junction will cause traffic disruption,

• drainage must be designed so that the existing baseflow is not diminished as this would cause environmental harm, and

• allocation of this area for development results in loss of significant areas of green space that integrate Cambridge with its rural surroundings.

Responses:

Access from Cambridge Road has already been agreed in principle with County Highways. However, detailed proposals including mitigation requirements will be identified at the planning application stage. No change to policy approach.

The draft local plan includes policies to ensure flooding and drainage are appropriately addressed. The environmental impacts of the development and any mitigation requirements have also been considered at the planning application stage

The Green Belt and the Countryside Enhancement Strategy will ensure separation from Girton and Histon & Impington villages. No change to policy approach.

Site Area:

Policy S/EOC: Other site allocations on the edge of Cambridge

Key Issues Raised:

Proposed approach to site allocations:

support from some for the overall approach to allocations on the edge of Cambridge, however suggestions included:

• need to prevent urban spawl,

• exceptional circumstances exist to release land from the Green Belt,

• sustainable villages on the edge of Cambridge should be considered for more growth,

• need to allocate some smaller greenfield sites that can be built out faster, and

• new developments must be sensitive to the landscape and natural environment.
• principle of development of these sites has already been established, however need to consider heritage assets – recommend that a Heritage Impact Assessment is prepared and that this informs the policy wording.
• existing adopted allocations should be reviewed and not automatically carried forward, and assurance provided regarding their delivery and ability to meet housing need.

Responses:

Responses to general issues raised in representations include:

need to prevent urban sprawl: the edge of Cambridge is a highly sustainable location in Greater Cambridge, and sites have been allocated to make the most of its accessibility to existing jobs, services and public transport. A variety of sites have been considered through the Housing and Economic Land Availability Assessment (HELAA) process and assessed against the development strategy for the Local Plan, and those sites identified as suitable and deliverable within the plan period have been allocated. In identifying whether a site is suitable, the HELAA has considered each site in relation to the adopted development plan policies, and also assessed its impact on a range of issues such as landscape, townscape, biodiversity, and the historic environment.

exceptional circumstances exist to release land from the Green Belt: housing needs alone does not provide exceptional circumstances to justify removing non-strategic sites from the Green Belt on the edge of Cambridge, as sufficient supply has been identified from sites in other sustainable locations that will not result in harm to the Green Belt. Non-strategic sites on the edge of Cambridge within the Green Belt have been considered individually to determine whether there are site specific exceptional circumstances to justify their release from the Green Belt.

sustainable villages on the edge of Cambridge should be considered for more growth: a variety of sites have been considered through the Housing and Economic Land Availability Assessment process and assessed against the development strategy for the Local Plan, and those sites identified as suitable and deliverable within the plan period have been allocated. Allocations for new homes and jobs have been identified across Greater Cambridge, taking account of the development

strategy for the Local Plan which seeks to focus growth in the most sustainable locations whilst also recognising the need to support the vitality of our villages.

need to allocate some smaller greenfield sites that can be built out faster: a variety of sites across Greater Cambridge have been included as allocations in the draft Local Plan, including smaller greenfield sites. Together with a range of sites that already have planning permission, and small windfall housing developments that will be brought forward in the future as allowed by other policies in the Local Plan, this collectively results in a diversity of sizes and types of housing sites anticipated to be delivered throughout the plan period.

new developments must be sensitive to the landscape and natural environment: through the Housing and Economic Land Availability Assessment (HELAA), the proposed development for each site has been assessed in terms of its impact on a range of issues such as landscape, townscape, biodiversity, and the historic environment. Any mitigation measures identified within the HELAA site assessment as being necessary to make the proposed development acceptable have been included as site specific development requirements.

need to consider heritage assets: a Heritage Impact Assessment has been prepared for each of the allocations on Worts' Causeway and along Fulbourn Road, and the conclusions have informed the development requirements for each allocation.

existing adopted allocations should be reviewed: all adopted allocations have been reviewed alongside new sites, and those that continue to be identified as suitable and deliverable within the plan period have been allocated.

requests for specific sites to be allocated: new or updated evidence and representations received to the First Proposals consultation have all been considered, and those sites that continue to be identified as suitable and deliverable within the plan period have been allocated.

Site Area:

S/EOC/SWO Land south of Worts' Causeway

Key Issues Raised:

need to ensure that the green hedgerow and tree lined footpath along Worts' Causeway is maintained through this development.

Responses:

Responses to issues raised in representations include:

need to ensure that the green hedgerow and tree lined footpath along Worts' Causeway is maintained through this development – the existing hedgerow and tree lined footbath should form part of the approach to retaining the rural character of the approach to the city along the A1307

Site Area:

S/EOC/BS Bell School

Key Issues Raised:

new student accommodation should be sensitive to the evolving local area and meet the standards of the new plan.

Responses:

Responses to issues raised in representations include:

Any new student accommodation (or any other use) proposal which requires new planning consent will need to conform with the applicable policy framework set out in the new Local Plan.

Site Area:

Fulbourn Road West 1 & 2 (S/EOC/GB3 & GB4)**

Key Issues Raised:

full assessment of traffic impact from this amount of development is needed.

Responses:

Responses to issues raised in representations include:

Full assessment of traffic impact from this amount of development is needed. A development requirement asking for an assessment has been added into the policy.

Site Area:

Fulbourn Road East (S/EOC/E/3)

Key Issues Raised:

• full assessment of traffic impact from this amount of development is needed.

• concerns about further development at Fulbourn Road East on highly productive farmland.

Responses:

Responses to issues raised in representations include:

Full assessment of traffic impact from this amount of development is needed. The HELAA judged there to be an amber rating for 'transport and roads'. This means that the impact to the land has been judged to be not significant, negative effects can be mitigated, and therefore the allocation can be taken forward.

Concerns about further development at Fulbourn Road East on highly productive farmland. Our HIA and HELAA has judged there to be an amber assessment for 'landscape and townscape'. This means that the impact to the land has been judged to be not significant, negative effects can be mitigated, and therefore the allocation can be taken forward.

In the Edge of Cambridge, the following sites have been added new in the Draft Local Plan and therefore received no comments at the draft proposals stage:

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

In the Edge of Cambridge Area, the following sites have been removed from the Local Plan in the Draft Local Plan Stage, either as they no longer meet the criteria for a site allocation through the assessment undertaken in preparing the next version of

the plan or the development has progressed sufficiently enough that a site allocation is no longer required:

- R42a: Clay Farm, south of Long Road
- R42b: Trumpington Meadows
- R42c: Glebe Farm 1 & Glebe Farm 2

Site Area:

Cambourne North

Key Issues Raised:

There were mixed views expressed for an expansion to Cambourne within the representations from across the range of respondents:

- Support for making the most of improved transport connections, the opportunity it presents to make the existing town more sustainable and expanding the employment provision and services and facilities available.
- Agreement that it should be landscape-led and provide a good amount of green space.
- The new development should provide:
    - a swimming pool,
    - more sports facilities and retail,
    - plenty of green space for nature and people including parks and nature trails,
    - improved sustainable transport connections including for active modes both within Cambourne and to surrounding villages.
- Mixed views around transport provision and particularly the relationship with East West Rail (EWR) and the current uncertainty around its delivery.
- Opposition to development before EWR delivery or to EWR itself; some suggest alternatives due to slow delivery of GCP Cambourne to Cambridge scheme.
- Concerns from Parish Councils and developers:
    - questioning the necessity of Cambourne expansion,
    - suggesting development be spread more widely.

- Several site promoters submitted sites near Cambourne and nearby villages.
- Concerns about:
    - potential loss of Cambourne's character from overdevelopment,
    - impacts on neighbouring villages and their separate identity,
    - how Cambourne will function with nearby villages.
- Other concerns included:
    - impacts on landscape, open space, biodiversity, and the historic environment,
    - feasibility of delivering additional employment.

Responses:

- Support noted for maximising improved transport connections and creating a more sustainable town — the draft policy reflects a positive direction and ambition.
- Requirement for the development to be landscape-led with a good amount of green space is a key part of the policy for ecological, landscape and well-being purposes.
- The development must include:
    - community facilities such as a swimming pool, sports, and retail,
    - extensive green space including parks and nature trails,
    - improved sustainable transport connections (walking, cycling) to Cambourne and surrounding villages.
- On East West Rail:
    - Since 2021, government support for EWR has increased, with a non-statutory consultation highlighting project prospects.
- Responding to concerns about development before EWR:
    - The council is working in partnership with infrastructure providers to align development with transport infrastructure delivery.
- On expansion necessity:
    - Council evidence supports this location as a more sustainable option than dispersing development, especially to poorly connected villages.
- Site submissions near Cambourne have been assessed via the HELAA process.

- Concerns about village identity are addressed in the draft policy — it seeks to protect the character of nearby villages.
- Environmental and employment concerns have been addressed in further technical work and integrated into the policy.

Major Areas of Change: Existing New Settlements

Key Issues Raised:

- Broad support for new settlements, with emphasis on:
    - providing services, facilities, public transport, and infrastructure.
- Some site promoters:
    - questioned delivery timelines,
    - proposed allocating more small/medium sites for delivery in the early plan period.
- Cambridge Past, Present & Future suggested:
    - all new settlements should be like Cambourne — well-connected, 21st-century towns with employment and day-to-day services.
- Campaign to Protect Rural England raised:
    - existing issues with current new settlements should be resolved before approving more.

Responses:

- Support for the new settlements approach noted.
- Alternative strategies and delivery rate concerns acknowledged.
    - Housing trajectory includes realistic delivery rates, informed by developer discussions and the Housing Delivery Study.
- Infrastructure importance recognised.
    - Local plan policies aim to ensure high-quality development that addresses environmental and social concerns.

Site Area:

Northstowe

Key Issues Raised:

- Need to focus on completing existing settlements.
- Proposals for additional new settlements were submitted.
- Concerns raised:
    - lack of democratic involvement,
    - environmental impacts,
    - increased density near transport hubs affecting neighbouring villages,
    - flood risks at Oakington,
    - potential strain on surrounding services and infrastructure if development is accelerated,
    - whether diverse housing tenures can be maintained.
- Environment Agency raised ongoing flood risk management needs at Oakington.

Responses:

- Focus remains on completing Northstowe, but other sites are also needed to meet development targets.
- Further new settlement proposals were considered — see strategy topic paper.
- Faster delivery risks addressed:
    - Housing Delivery Study supports delivery rate assumptions as robust.
- Heritage considerations noted — policy continues to reference assets needing protection.
- Surrounding village concerns addressed through policy mechanisms:
    - phased delivery,
    - service and infrastructure provision,
    - transport mitigation plans.
- Strategic flood mitigation is in place, covering Oakington and Longstanton.
- Public involvement is required and ensured through statutory processes.

Site Area:

Policy S/WNT Waterbeach New Town

Key Issues Raised:

- Calls to prioritise completion of existing new settlements.
- Proposals for more new settlements submitted.
- Concerns about:
    - faster delivery affecting infrastructure provision,
    - market absorption and housing mix,
    - capacity to deliver infrastructure at a quicker pace.
- Historic England emphasised protecting heritage assets.
- Waterbeach Parish Council:
    - referenced the Neighbourhood Plan,
    - raised ongoing infrastructure issues.
- Other comments noted transport implications.

Responses:

- Policy supports continued development while acknowledging need for other sites.
- Further new settlement proposals evaluated in the strategy topic paper.
- Delivery rate concerns:
    - Addressed using evidence from Housing Delivery Study.
- Heritage protection:
    - The draft policy references important assets to be preserved.
- Waterbeach Neighbourhood Plan:
    - Has been adopted and forms part of the development plan.
- Transport:
    - Significant infrastructure is planned, including relocation of the railway station.

Site Area:

Policy S/BA: Bourn Airfield New Village

Key Issues Raised:

- Focus on completing current new settlements.
- Proposals submitted for additional new settlements.
- Landowner of employment area:

    - development should be compatible with existing industrial uses.
- Site promoter:
    - potential for higher annual delivery rates.
- Other promoters:
    - flagged transport and infrastructure challenges as barriers to delivery.
- Cambourne Town Council:
    - transport links should align with Cambourne and West Cambourne.
- Historic England:
    - highlighted need to protect heritage assets.

Responses:

- Focus remains on completing existing new settlements, though other sites are needed.
- Additional proposals reviewed — see strategy topic paper.
- Employment area compatibility:
    - Considered through the planning application process and will continue to be in future applications.
- Delivery rates:
    - Housing Delivery Study supports figures used in the housing trajectory.
- Transport and infrastructure:
    - Identified through the Section 106 process,
    - Transport improvements between Cambourne and Cambridge are in progress.
- Cambourne transport alignment noted and considered.
- Heritage assets are addressed in the draft policy and will continue to be protected.

Rest of Rural Area Sites

Site Area:

Policy S/RRA: Site allocations in rest of the rural Area

Key Issues Raised

Proposed approach to site allocations:

- support from some for the overall approach to site allocations in the rest of the rural area, however suggestions included:
    - there are not sufficient allocations and that growth in the more sustainable villages must be part of the development strategy,
    - more employment land should be allocated as need large scale facilities and projections of need for storage and distribution uses are an underestimate,
    - need to take account of paragraphs 69 and 79 of the NPPF 2021 which focus on delivering more small sites to support sustainable development in rural areas and allow homes to be delivered more quickly,
    - need to take account of paragraph 104 of the NPPF 2021 which expects transport issues to be considered at the earliest stages of plan-making,
    - villages should be assessed on their merits rather than through a settlement hierarchy,
    - objections to the release of Green Belt land, and
    - sites should be allocated specifically for self and custom build homes.

Rejected or de-allocated sites:

- support for the rejection of specific sites from individuals and Parish Councils, and
- requests for specific sites to be allocated from site promoters.

Council's Response

- **insufficient allocations identified in the rest of the rural area:** a variety of sites have been considered through the Housing and Economic Land Availability Assessment process and assessed against the development strategy for the Local Plan, and those sites identified as suitable and deliverable within the plan period have been allocated. Having considered a range of alternative strategies, the proposed development strategy focusses site allocations for new homes and jobs to the most sustainable locations of Cambridge urban area, the edge of Cambridge and the new settlements as these have: the least climate impact, active and public transport as the natural choice, and jobs, services and facilities near to where people live.
- **more employment land should be allocated:** responding to up to date evidence on the need for employment land the draft plan allocates a range of sites. In combination with the exiting supply this will deliver a flexible employment land supply to meet needs during the plan period. Responding to the Greater Cambridge Industrial and Warehousing Sector Study (2025) a number of further allocations for industry and warehousing have been proposed as allocations. More information can be found in the strategy topic paper.
- **need to take account of paragraphs 69 and 79 of the NPPF 2021:** allocations for new homes and jobs have been identified across Greater Cambridge, taking account of the development strategy for the Local Plan which seeks to focus growth in the most sustainable locations whilst also recognising the need to support the vitality of villages. Alongside allocations for housing, policies in the Local Plan allow for small windfall housing developments to be brought forward, and therefore the Local Plan will deliver sites to meet the requirements of paragraph 69 of the NPPF 2021 (now paragraph 73 of the NPPF December 2024). Allocations, windfall housing developments, and existing sites with planning permission collectively results in a diversity of sizes and types of housing sites anticipated to be delivered throughout the plan period. More information can be found in the strategy topic paper.
- **need to take account of paragraph 104 of the NPPF 2021:** through the Housing and Economic Land Availability Assessment process, for each site

an assessment has been made in terms of its impact on transport and roads, and any mitigation measures identified as being necessary to make the proposed development acceptable have been included as site specific development requirements. Transport modelling has been undertaken from early within the plan making process, and the transport impacts of the different spatial options have been used to inform the development strategy and the selection of sites.

- **villages should be assessed on their merits:** the settlement hierarchy categorises each village based on its sustainability taking account of public transport links, employment opportunities, and availability of services and facilities. The settlement hierarchy of a village has been used to focus the process for identifying sites to allocate, however, other village specific information has also been considered such as access to public transport, the amount of existing committed development, and community aspirations and support for further development. More information can be found in the strategy topic paper.
- **objections to the release of Green Belt land:** Non-strategic sites in the rest of the rural area within the Green Belt have been considered individually to determine whether there are site specific exceptional circumstances to justify their release from the Green Belt.
- **sites should be allocated specifically for self and custom build homes:** Policy requirements require larger sites to include self and custom built homes, at a level sufficient to respond to identified needs.
- **support for the rejection of specific sites and requests for specific sites to be allocated:** new or updated evidence and representations received to the First Proposals consultation have all been considered, and those sites that continue to be identified as suitable and deliverable within the plan period have been allocated.

Site Area:

The Moor, Moor Lane, Melbourn (S/RRA/ML)

Key Issues Raised

- part of the heritage of Melbourn,
- concerns raised about traffic, particularly High Street/The Moor junction,
- will result in loss of habitats and rare plants, animals and insects,
- site should be fully integrated into proposed greenway and walking/cycling bridge to facilitate active travel,
- lack of infrastructure within the village to support this development, and
- landowner supports allocation.

Council's Response

- **Comments raised concern that the site is part of the heritage of Melbourn.** The HELAA site assessment and HIA evidence confirmed site suitable in heritage terms. HELAA has no heritage concerns with development of the site and HIA has been prepared and informs the policy wording.
- **concerns raised about traffic, particularly High Street/The Moor junction.** The prepared HELAA assessment states that we have engaged with the local highways authority who have confirmed that the site can be safely accommodated, and there is capacity for further growth. No change to policy approach.
- **will result in loss of habitats and rare plants, animals and insects** – the HELAA assessment includes consideration of Landscape and Townscape, Biodiversity and Geodiversity matters. The impacts identified through the HELAA are capable of appropriate mitigation. Additionally, the HELAA identifies the possible impact of development on the existing trees and vegetation within the site. Therefore, a specific requirement on this matter has been included in the draft policy. Development requirement added to the policy.
- **site should be fully integrated into the proposed greenway and walking/cycling bridge to facilitate active travel** – in reviewing the Melbourn Greenway route and proximity to this site, the major additions to connect this site with the greenway to be funded by this small site are not practicable, but in broad terms the site will benefit from the investment in

strategic transport infrastructure provided by the greenway scheme. No change to policy approach.

- **lack of infrastructure within the village to support this development** – Melbourn is a Minor Rural Centre village in the Settlement Hierarchy with the associated range of facilities, and any development of the site would be required to contribute to the infrastructure necessary to make the development acceptable. No change to policy approach.

Site Area

Land at Highfields (phase 2), Caldecote (S/RRA/H)

Key Issues Raised

- East West Rail (EWR) seeking updates to ensure that development of the site does not prejudice the preferred EWR route or its delivery,
- lack of public transport,
- landowner is seeking amendments to landscaping criteria to make it more flexible,
- concerns about coalescence and continuous urban sprawl along the A428 from Caldecote to Cambourne,
- area of flood risk and therefore requires mitigation, and
- landowner is seeking amendments to clarify capacity in the light of extant permissions and completions.

Council's Response

- East West Rail (EWR) sought updates to ensure that development of the site does not prejudice the preferred EWR route or its delivery. On a planning application for the site EWR have indicated no objection to the proposals.
- Lack of public transport was sited. The site is on the transport corridor between Cambourne and Cambridge. The Cambridge to Cambourne transport scheme would provide within walking and cycling distance to the site.

- Comments expressed concerns about coalescence and continuous urban sprawl along the A428 from Caldecote to Cambourne, but a design led approach to the site allows for suitable landscape mitigation.
- Landowner is seeking amendments to landscaping criteria to make it more flexible. However, the landscaping approach required is necessary to ensure no adverse impacts on landscape character and local views. The Landowner also sought amendments to clarify capacity in the light of extant permissions and completions. The site area and capacity has been updated to reflect the remining capacity of the site.
- Representation highlighted flood risk requiring mitigation. There are some areas of surface water risk in the areas, which can be addressed through relevant local plan policies.

Site Area:

Land at Mansel Farm, Station Road, Oakington (S/RRA/MF)

Key Issues Raised

- release of land from the Green Belt is unjustified,
- need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording,
- concern that development will increase traffic,
- will have damaging environmental consequences and destroy village character,
- erosion of gap between Northstowe and Oakington,
- area is repeatedly flooded,
- landowner is seeking to increase the capacity of the site, and
- significant level of development already at Northstowe, and concern that will add pressure to already overstretched infrastructure.

Council's Response

- Release of land from the Green Belt is unjustified - the Cambridge Green Belt Study (2021) identifies that release of land in this area would result in a

moderate high level of harm to the Green Belt. The site was identified due to its access to sustainable transport opportunities. However it is no longer proposed to be allocated.

- Need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording - Heritage Impact Assessment has been prepared and informs the reasoning for not including the site in the draft Local Plan.
- Concern that development will increase traffic – as a group village these are generally less sustainable locations for new development however the site is adequately located to the busway providing excellent public transport access, potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated through design.
- Will have damaging environmental consequences and destroy village character - a Heritage Impact Assessment has been prepared and informs the reasoning for not including the site in the draft Local Plan.
- Erosion of gap between Northstowe and Oakington - as set out above the site is no longer proposed to be included in the draft local plan.
- Area is repeatedly flooded – the HELAA 2021 assessment states the extent of the site 40190a is wholly within flood zone 1 and Surface water flooding only of the site 1% lies in the 1 in 1000 year event extent.
- Landowner is seeking to increase the capacity of the site – the capacity of the site has been assessed at the 35 homes capacity through the HELAA 2023 updated assessments which does not change the overall assessment result. However as set out above the site is no longer proposed to be included in the draft local plan.
- Significant level of development already at Northstowe, and concern that will add pressure to already overstretched infrastructure – HELAA assessment states the site has adequate accessibility to key local services, transport, and employment opportunities and that the proposed development would not require delivery of accompanying key services.

Site Area:

Land to the west of Cambridge Road, Melbourn (S/RRA/CR)

Key Issues Raised

- site should be fully integrated into proposed greenway and walking/cycling bridge to facilitate active travel,
- concern that the employment area will further industrialise the centre of the village,
- concern that residential element is unsustainable,
- Melbourn is already overdeveloped and concern that the infrastructure cannot cope with further growth, and
- landowner supports allocation.

Council's Response

A number of comments supported the allocation, which are noted.

There was concern that the employment area will further industrialise the centre of the village. The site can be designed to respond to its setting, and policy wording has been included to reflect this.

The sustainability of the site was also challenged. Melbourn is considered to be a sustainable location as it is a Minor Rural Centre in the settlement hierarchy. It adjoins significant employment sites. In the wider area there are sustainable transport options including Meldreth station, and the Melbourn Greenway route adjoins the site.

Melbourn Parish Council expressed concern that the infrastructure cannot cope with further growth. As a minor rural centre, it is considered that Melbourn has a range of services and facilities, and relevant contributions will be sought from developers where necessary to mitigate the impact development.

Site Area

Land to the south of the A14 Services (S/RRA/SAS)

Key Issues Raised

- need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording,
- there will be negative impacts on the setting of Boxworth village,
- support for location as regional distribution centre, but does not meet aspiration that “last mile delivery” in Cambridge can be carried out by sustainable modes of transport,
- further information sought on potential transport and economic impacts of this site,
- will create increased traffic and unacceptable traffic impacts, and must be considered alongside other nearby proposals,
- exit from lorry park should be behind hotel as originally proposed,
- should seek provision of cycleway between the Boxworth and the new NMU bridge over the A14,
- support policy requirement for strong landscaping, and new tree belt needed,
- objection to allocation as no natural barrier to prevent further expansion into the wide-open landscape, which has already been damaged,
- needs mitigation measures to ensure no further expansion towards Boxworth Road and to minimise impact on Boxworth,
- development should be restricted to areas south of Cambridge Services and on other side of Boxworth Road that were both previously used as compounds for A14 improvement works,
- density should reflect density and pattern of non-residential uses in Boxworth,
- mitigation measures needed in relation to noise,
- concerns that will create increased foul and surface water flows into Swavesey system, and must be considered alongside other nearby proposals, and
- landowner supports allocation.

Council’s Response

The site allocation includes land in two ownerships. Both landowners submitted representations in support of the proposals.

The site promoters considered that a further area of land should be included within the site. Following consideration of the proposals, and consideration of the need for additional lorry parking, an additional area of land has been included in the draft allocation.

Historic England advised that a Heritage Impact Assessment (HIA) should be prepared for the site. An HIA was therefore commissioned, and did not raise any issues that could not be appropriately addressed through mitigation.

Representations stressed the need for a strong landscaping solution. This has been addressed in the policy.

Objections to the proposal sited the loss of greenfield land, the potential for future expansion, the impact on foul and surface water drainage, and traffic generation. There are no alternative brownfield sites capable of meeting the needs identified in a suitable location. The site provides a suitable location, and appropriate landscape mitigation can be achieved. Restricting the site boundary to land used during the A14 construction would not provide a sufficient site area to help address the need for this type of use. Site impacts have been considered in transport modelling, but would also need to be considered in detail though the planning application process.

Site Area:

Land at Buckingway Business Park, Swavesey (S/RRA/BBP)

Key Issues Raised

- need to consider heritage assets and recommend that a Heritage Impact Assessment is prepared to inform the policy wording,
- further information sought on potential transport and economic impacts of this site,
- objection to allocation as no natural barrier to prevent further expansion into the wide-open landscape, which has already been damaged,
- site promoter highlights that a range of B use classes could be suitable on the site, and
- Cambridgeshire County Council highlights within consultation area for Uttons Drove Water Recycling Area.

Council's Response

Support from Cambridgeshire County Council as landowner is noted. In response to the representation by Homes England a Heritage Impact Assessment has been prepared and informs the policy

Site Area:

Land to the north of St Neots Road, Dry Drayton (S/RRA/SNR)

- **Issues Raised:**
  - Need for Heritage Impact Assessment (HIA).
  - East West Rail (EWR) concerns about development affecting the preferred EWR route.
  - Landscaping should reflect rural character.
  - Objection due to the site being a green buffer between St Neots Road and A428.
  - Site promoter requests boundary amendments.
- **Responses:**
  - HIA prepared and incorporated into policy with heritage and archaeology requirements.
  - EWR route not through site; policy includes requirement to protect EWR delivery.
  - Landscaping mitigation reflecting rural location is included in policy.
  - HELAA assessment finds impacts can be mitigated.
  - Additional site considered but not allocated due to location and suitability.

Site Area:

Old Highways Depot, Twenty Pence Lane, Cottenham (S/RRA/OHD)

- **Issues Raised:**
  - Need for Heritage Impact Assessment.

    - Support for redevelopment limited to Class E(g)(i) and E(g)(ii), opposition to Class B8 use.
- **Responses:**
    - HIA completed and included in policy.
    - Policy maintains mix of employment uses to meet identified needs; no change to approach despite opposition to B8.

Site Area:

Land north of Impington Lane, Histon & Impington (S/RRA/H/1(d))

- **Issue Raised:**
    - No objection if development is small, preserves character, and avoids coalescence with Cambridge or Milton.
- **Response:**
    - Site completed and no longer proposed for allocation.

Site Area:

Norman Way, Over (S/RRA/E/5(1))

- **Issue Raised:**
    - Need for Heritage Impact Assessment.
- **Response:**
    - HIA prepared and informs policy wording.

Site Area:

Fulbourn and Ida Darwin Hospitals (S/RRA/H/3)

- **Issues Raised:**
    - Need for Heritage Impact Assessment.
    - Suggestion to expand site to include Capital Park.
    - Landowner requests de-allocation as planning permission granted.
- **Responses:**
    - HIA prepared and included in policy.
    - Capital Park separate site with different context; no expansion.

- Policy retained to guide future sensitive redevelopment until permission implemented.

Site Area:

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

- **Issues Raised:**
  - Need for Heritage Impact Assessment.
  - Query if policy includes Former Waste Water Treatment Works west of A10.
- **Responses:**
  - HIA prepared and informs policy.
  - Waste Water Treatment Works not included; site is in Green Belt and managed via development management.

Site Area:

Policy S/RRP: Policy areas in the rest of the rural area

- **General Issues:**
  - Support from parish councils.
  - Respect for Neighbourhood Plans.
  - Support to protect Little Linton's identity and Fen Ditton's exclusion from sites.
  - Need for appropriate growth distribution to sustain village services.
- **Responses:**
  - Support noted.
  - Neighbourhood Plans considered.
  - Strategy focuses on sustainable growth options, with some village allocations and support for windfall developments.

Site Area:

Policy S/RRP/IWM: Imperial War Museum, Duxford

- **Issue Raised:**
  - Need for Heritage Impact Assessment.

- **Response:**
    - Heritage considerations central to policy; HIA informs future development requirements.

Site Area:

Policy S/RRP/PH: Papworth Hospital

- **Issues Raised:**
    - Support for flexible, mixed-use approach.
    - Concern about ancient woodland impacts, suggestion for buffer.
    - Request for Heritage Impact Assessment or design guide.
- **Responses:**
    - Uses prioritized for healthcare; other uses allowed if healthcare not viable.
    - No HIA but conservation area appraisal and village design guide available.
    - Buffer and environmental impacts addressed through development management.

Site Area:

Policy S/RRP/FD: Fen Drayton Former Land Settlement Association Estate

- **Issue Raised:**
    - No objection to continuing the policy, with caution on heritage asset impacts.
- **Response:**
    - Comments noted; policy requires heritage considerations to be addressed for any development.

Site Area:

Policy S/RRP/HIS: Histon & Impington Station Area

- **Issues Raised:**
    - Support for the policy, endorsed by the Neighbourhood Plan.

    - Historic England concerned about potential heritage impacts near the site.
- **Response:**
    - Parish Council support noted.
    - Any development will comply with heritage policies in the wider local plan.

Site Area:

Policy S/RRP/L: East of bypass, Longstanton

- **Issues Raised:**
    - General support for new open space and community facilities.
    - Mixed views on housing types: questions about affordable housing needs and suitability of sheltered/older persons housing given distance from facilities.
    - Suggestion of shortage in assisted living.
- **Response:**
    - Some support for development types noted.
    - Site is no longer proposed for allocation.

Site Area:

Policy S/RRP/PWC: Papworth Everard West Central

- **Issue Raised:**
    - Historic England concerns about mitigating impacts on heritage assets in/near the policy area.
- **Response:**
    - Policy requires development to respect and relate well to the character of Papworth Everard, addressing heritage impact concerns.

In the Rest of Rural Area Sites, the following sites have been added new in the Draft Local Plan and therefore received no comments at the draft proposals stage:

S/RRA/SHF Land at Slate Hall Farm, Bar Hill

S/RRA/CH Land at Compass House, Chivers Way, Histon and Impington

In the Rest of Rural Area Sites, the following sites have been removed from the Local Plan in the Draft Local Plan Stage, either as they no longer meet the criteria for a site allocation through the assessment undertaken in preparing the next version of the plan or the development has progressed sufficiently enough that a site allocation is no longer required:

- H1/e: Land off New Road and rear of Victoria Way, Melbourn
- H1/f: Green End Industrial Estate, Gamlingay
- H1/g: Land east of Rockmill End, Willingham
- H1/h: Land at Bennell Farm, Comberton

Site Area:

Policy S/GC: Genome Campus, Hinxton

Issues Raised:

- Development must respect Hinxton's rural setting and history.
- Concern over delivery of suitable affordable housing.
- Early consideration of civic governance, possibly a separate parish council.
- Policy should include importance of historic environment impacts.

Responses:

- Development requirements added to respect rural location and history.
- Affordable housing will be covered by broader Local Plan policies.
- Civic governance issues not addressed in the Local Plan.
- Historic environment impacts included as a development requirement.

Site Area:

Policy S/BRC: Babraham Research Campus

Issues Raised:

- Removing site from Green Belt removes planning constraints; protection needed against overdevelopment.
- Need compensatory improvements to environmental quality and accessibility of remaining Green Belt.
- Adds housing pressure in Babraham.
- Adverse effects on designated/non-designated heritage assets; village's historic importance and rural landscape at risk.
- Potential destruction of wildlife habitats and pressure on River Granta.
- Strong biodiversity enhancements needed.
- New development should be below tree height from Gog Magog Hills and blend with landscape.
- Archaeological findings insufficiently considered.
- Risk of flooding on parts of site.
- Pressure on village amenities.
- Campus should have publicly accessible footpaths.
- Negative impact of some recent buildings noted; retroactive screening requested.
- Historic England requests Heritage Impact Assessment and references to offsite heritage assets.

Responses:

- Cambridge Green Belt Study (2021) finds limited contribution to Green Belt purposes; harm of release low. Policy includes Green Belt enhancement strategy and development requirements.
- Compensatory improvements to environmental quality and accessibility included.
- Residential properties planned to address housing need.
- Heritage protection development requirements added to preserve assets, village character, and rural landscape.
- Wildlife and River Granta protections included as development requirements.
- Biodiversity enhancement emphasized in policy.
- Policy includes requirements to protect key views and blend development into landscape.

- Archaeological investigations required before development.
- Flood risk areas to be avoided or mitigated per local plan policies.
- Infrastructure improvements required to support village amenities.
- Public footpaths and accessibility addressed in policy requirements.
- Retroactive screening for existing buildings cannot be addressed by this policy.
- Heritage Impact Assessment used to inform policy; Historic England's recommendations incorporated.

Rural Southern Cluster

Site Area:

Policy S/RSC: Other site allocations in the Rural Southern Cluster

General Issues Raised:

- Support for overall approach but objections to Green Belt release.
- Need to retain village character and consider Neighbourhood Plans.
- Support for small-scale developments with adequate infrastructure and public transport.
- Desire for more smaller developments to deliver homes quickly.
- Mixed responses on site allocations: support for some rejected sites and requests for new allocations.

Responses:

- Green Belt sites in the Rural Southern Cluster assessed individually; exceptional circumstances required for release due to village locations mostly within Green Belt.
- Village character protected by careful site assessment through HELAA, considering landscape, biodiversity, heritage, and mitigation measures included in policies.
- Neighbourhood Plans incorporated into site assessments.
- Settlement hierarchy and development strategy focus growth in sustainable locations, supporting village vitality.

- Mix of site sizes included in Local Plan with planning permissions and windfall developments contributing to housing delivery.
- Updated evidence and representations considered; suitable and deliverable sites allocated accordingly.

Site Area:

Land between Hinton Way and Mingle Lane, Great Shelford (S/RSC/HW)

Issues Raised:

- Site fails exceptional criteria for Green Belt release.
- Need for Heritage Impact Assessment (HIA).
- Poor access, potential congestion.
- Proximity to railway attracts London commuters over locals.
- Reliance on unapproved transport initiatives.
- Requirement for public open space and Green Belt mitigation.
- Environmental concerns: loss of flora, fauna, arable land.
- Calls to reduce development area.
- Risk of merging Great Shelford and Stapleford and coalescence with Cambridge.
- Impacts on local character, long views, Gog Magog Hills, Wandlebury, rural landscape.
- Infrastructure already overstretched.
- Questioned contribution to overall housing need.
- Landowner supports allocation.

Responses:

- Site location near existing Shelford railway station and upcoming Cambridge South Station provides exceptional circumstances for Green Belt release.
- Heritage Impact Assessment completed; informs policy with development requirements added.
- Highway Authority deems access acceptable, subject to further design and planning review.

- Proximity to railway supports connectivity to Cambridge and employment hubs; public transport use encouraged.
- Existing transport infrastructure supports development independent of unapproved initiatives.
- Policy includes requirements for landscape buffers, open space, and Green Belt mitigation to protect environmental quality and accessibility.
- Biodiversity and heritage protections included through development requirements.
- Site extent balanced to optimize development while minimizing landscape and Green Belt impacts per HELAA and Green Belt assessments.
- Mitigation measures protect against village coalescence and maintain local character and views.
- Infrastructure needs identified in Infrastructure Delivery Plan; will be addressed through planning agreements or CIL.
- Development contributes to housing need as part of a broader strategy with multiple sites.

Here's a concise summary and key points extracted from the detailed policy and representation responses you provided for the Rural Southern Cluster sites:

Site Area:

Land at Maarnford Farm, Hunts Road, Duxford (S/RSC/MF)

- **Issues raised:**
    - Need for Heritage Impact Assessment (HIA)
    - Site within Duxford's Air Safeguarding Zone requiring consultation
- **Response:**
    - HIA prepared, informs policy wording
    - Development requirements include max building heights/design reflecting air safeguarding zone

Site Area:

Land south of Babraham Road, Sawston (S/RSC/BR)

- **Issues raised:**

    - Heritage impact concerns
    - Need for transport infrastructure improvements
    - Negligible green space provision
    - Protection of watercourses needed
    - Housing density questioned
    - Design principles from Sawston guidance to be considered
    - Questioning allocation necessity (application ongoing)
    - Protect soils, woodland, farmland
    - Preserve historic, rural, parkland character; landscape impacts
- **Response:**
    - HELAA found no heritage harm; no policy change
    - Transport improvements considered in policy
    - Open space secured via planning and s106, no change
    - Watercourses protected under existing policies
    - Housing density reflects local character, no change
    - Sawston design guide applies; no change
    - Allocation needed until development complete
    - Development principle already established; mitigation secured
    - Landscape and heritage impacts addressed in current policy

Site Area:

Comfort Café, Fourwentways (S/RSC/CC)

- **Issue:**
    - Need for Heritage Impact Assessment
- **Response:**
    - HIA completed and incorporated into policy requirements

Site Area:

Policy S/SCP: Policy areas in the rural southern cluster

- **General issues:**
    - Support for improved cycling networks
    - Need for appropriate transport policy given limited public transport

    - Suggestion for a standalone Granta Park policy
    - Request to remove Greenhedge Farm from Green Belt
- **Response:**
    - Sustainable travel supported; developments to contribute to infrastructure
    - Granta Park now has its own policy area
    - Greenhedge Farm remains in Green Belt; no exceptional circumstances for removal

Site Area:

Policy S/SCP/WHD: Whittlesford Parkway Station Area, Whittlesford Bridge

- **Issues raised:**
    - Support from landowner and partners for enhanced travel hub
    - Mineral Safeguarding Area constraints noted
    - Request to expand policy area eastwards
    - Opportunities from adjacent sites highlighted
- **Response:**
    - Support noted
    - Other sites tested but not allocated
    - Policy focus remains on existing depot redevelopment

Site Area:

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

- **Issues raised:**
    - Support for policy to protect historic open landscape and settlement separation
    - Concern over environmental resource protection
    - Historic England supports protecting heritage assets and settings
- **Response:**
    - Support welcomed, no policy change
    - Development restricted to protect heritage assets and settings

Site Area:

S/SCP/GP: Granta Park

- **Issues raised:**
    - Concern about traffic impacts and car dependency
    - Support for flexible policies to allow densification/upgrading
    - Support for updated site boundary reflecting recent permissions
- **Response:**
    - Granta Park included as site allocation
    - Policy includes boundary update, densification, and upgrading provisions

In the Rural Southern Cluster, the following sites have been added new in the Draft Local Plan and therefore received no comments at the draft proposals stage:

- S/RSC/FSS: Former Spicers Site, Sawston Business Park, Sawston
- S/SCP/GP: Granta Park

In the Rural Southern Cluster, the following sites have been removed from the Local Plan in the Draft Local Plan Stage, either as they no longer meet the criteria for a site allocation through the assessment undertaken in preparing the next version of the plan or the development has progressed sufficiently enough that a site allocation is no longer required:

- H1/b: Land north of Babraham Road, Sawston
- H1/a: Dales Manor Business Park, Sawston
- E/4(2): Pampisford: West of Eastern Counties Leather, London Road