Regulation 22
Consultation Statement



Greater Cambridge Local Plan

Regulation 22 Consultation Statement
(November 2026)

GREATER CAMBRIDGE
SHARED PLANNING

Regulation 22 Consultation Statement

Table of Contents

..... 1

Regulation 22 Consultation Statement 2

Table of Contents 2

Introduction and purpose 4

Background to the Greater Cambridge Local Plan 4

Overview of the Regulation 18 Plan Preparation Stage 5

Call for Sites 5

Note about Duty to Cooperate 6

Overview of consultation process and Compliance with the Statement of Community Involvement 6

The North East Cambridge Area Action Plan 7

The Greater Cambridge Local Plan Regulation 18 Stage 8

Workshops and early-stage stakeholder consultation (2019) 8

First Conversation - Issues and Options (Regulation 18) Public Consultation 9

First Proposals - Preferred Option (Regulation 18) Consultation 11

Draft Local Plan - Regulation 18 Consultation 14

Proposed Submission Local Plan - Regulation 19 Consultation 21

List of Appendices

Appendix 1 - Statement of Consultation for Proposed Submission North East Cambridge Area Action Plan (published in November 2021)

Appendix 2 - Report on workshops held in summer 2019 (as published in the 2021 Consultation Statement)

Appendix 3 - Sustainability Appraisal Scoping Report – Statutory Consultee Comments (as published in the 2021 Consultation Statement)

Appendix 4 - Report on the First Conversation consultation 2020 (as published in 2021 Consultation Statement) (as published in the 2021 Consultation Statement)

Appendix 5 - Report on Autumn 2020 stakeholder workshops (as published in 2021 Consultation Statement) (as published in the 2021 Consultation Statement)

Appendix 6 - Report on the First Proposals Consultation published in 2022 (as published in Greater Cambridge First Proposals Consultation Report June 2022)

Appendix 7 - Representations received on First Proposals consultation 2021 (reported to Joint Planning Advisory Group in 2022/3, and published in Greater Cambridge Local Plan Regulation 18: Draft Local Plan Consultation Statement October 2025)

Appendix 8 - Greater Cambridge Local Plan Consultation Statement – Development Strategy Update (as published in 2023)

Appendix 9 - Responses to First Proposals Representations (as published in Greater Cambridge Local Plan Regulation 18: Draft Local Plan Consultation Statement October 2025)

Appendix 10 – Draft Local Plan Consultation Background Documents (December 2025)

Appendix 11 - Greater Cambridge Local Plan: Proposed Submission Local Plan Consultation Statement (August 2026)

Appendix 12 – Regulation 19 - Additional Information (August 2026)

Appendix 13 - Regulation 19 Representation Summaries and Responses (November 2026)

Introduction and purpose

1.1 This Statement sets out how Cambridge City Council and South Cambridgeshire District Council have involved residents and stakeholders in preparing the Greater Cambridge Local Plan in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

1.2 This statement meets Regulation 22 (1)(c) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the adopted Statement of Community Involvement (SCI). The SCI document sets out how the Councils will consult and involve the public and statutory consultees in planning matters.

1.3 The statement sets out the various stages of consultation that were undertaken as part of the Regulation 18 plan preparation stage between 2019 and 2026, including who was invited to make representations and how, summaries of the main issues raised, and how representations were taken into account. A range of appendices are included in this statement, which were published in consultation statements accompanying the various stages.

1.4 The statement also captures how consultation on the Regulation 19 Proposed Submission Local Plan in summer 2026 was carried out, the number of representations made, and a summary of the main issues.

Background to the Greater Cambridge Local Plan

1.5 Cambridge City Council and South Cambridgeshire District Council began preparing a new Local Plan for Greater Cambridge shortly after adoption of the previously adopted local plans in 2018. The Greater Cambridge Local Plan will replace the adopted South Cambridgeshire Local Plan 2018 and Cambridge Local Plan 2018 that currently form the development plan, as well as adopted Area Action Plans.

1.6 The Greater Cambridge Local Plan will set out the strategic vision, objectives and spatial strategy for the area, as well as the planning policies which will guide future development. The Plan will now look ahead to 2045, and identify the main areas for sustainable development growth to meet development needs.

1.7 The Local Development Scheme (LDS) sets out agreed programme for the preparation of the Local Plan. Since plan making commenced it has been updated several times to reflect the evolving programme and in response to events which have impacted on the programme. The latest Local Development Scheme was published in July 2026.

Overview of the Regulation 18 Plan Preparation Stage

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

1.9 The following main stages of consultation were carried out during the Regulation 18 stage:

- Workshops and early stage stakeholder consultation (2019) - Engagement with key stakeholders to identify approaches to the start of the plan making process.

- First Conversation - Issues and Options Public Consultation (Regulation 18) - (January 2020) - Public consultation on issues the plan needs to address and options for addressing them.

- First Proposals - Preferred Option Consultation (Regulation 18) - (November 2021) - Public consultation on direction of policy including the preferred option for policy direction for specific policy areas and sites.

- Draft Local Plan - Regulation 18 Consultation (December 2025) - Public consultation on a complete draft version of the Local Plan.

Call for Sites

1.10 Alongside and as part of the consultation stages, there were a number of opportunities for people to submit site suggestions for consideration through the plan making process. A ‘call for sites’ is a way for landowners, developers and individuals to suggest sites that might be available for development in the future, so they can be considered and tested by the Councils. It is a normal part of plan making.

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

- An Initial ‘Call for Sites’ issued was issued 2019;
- A Call for Sites and Green Sites issued as part of the First Conversation consultation in 2020;
- A Call for Sites and Green Sites issued as part of the First Proposals consultation in 2021;
- An ‘Site Submissions Update’ consultation was issued between February and March 2025, to ensure we had the most up to date information about available sites in the lead up to the draft plan consultation.
- A Call for Sites and Green Sites as part of the Draft Local Plan Regulation 18 Consultation in 2025-26;

1.12 In total almost 1,000 sites were considered during the preparation of the Plan. All sites received were published on an interactive map, as well as a site register and in Appendix 2 of the Housing and Economic Land Availability Assessment, these can all be found on the Greater Cambridge Shared Planning Service website.

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

Note about Duty to Cooperate

1.14 The duty to cooperate was a legal test that requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans. Whilst the formal requirements of the duty were removed in 2025, Local Planning Authorities should continue to collaborate across their boundaries and with statutory bodies.

1.15 The Councils have published separate Greater Cambridge Local Plan Duty to Cooperate Statement of Common Ground to set out the main areas of common and uncommon ground with relevant partners on strategic cross-boundary matters. This can be found in the local plan document library.

Overview of consultation process and Compliance with the Statement of Community Involvement

1.16 The Greater Cambridge Statement of Community Involvement (SCI) sets out how South Cambridgeshire District Council and Cambridge City Council will involve communities on a wide range of planning matters throughout the planning process. The SCI was adopted in March 2024. The SCI sets out how

plan making and development management processes will consult and engage with local communities and stakeholders.

1.17 The SCI sets out that for local plans at the Regulation 18 stage of plan making, which focuses on engagement and shaping the plan, there will be one or more consultations undertaken for a minimum 6 week period each.

1.18 The methods used for consulting on the Greater Cambridge Local Plan include:

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

1.19 Further detail on the consultations carried out at each stage is set out in the remainder of this statement, with more detailed records provided in the appendices of this statement.

The North East Cambridge Area Action Plan

1.20 Alongside the new Local Plan, Cambridge City and South Cambridgeshire District Councils were also preparing an Area Action Plan for North East Cambridge. This is the area is situated between the A14 to the north and west, the Cambridge-King's Lynn and Peterborough/Birmingham railway line to the east, and the residential areas of Chesterton and King's Hedges to the south.

1.21 The adopted 2018 Local Plans identify the area and that a separate Area Action Plan would be prepared to guide development. An Issues and Options (Regulation 18) Consultation was held in Spring 2019. This was followed by consultation on a Draft North East Cambridge Area Action Plan in 2020. A report on these consultations and how issues were taken into account can be found in Appendix 1. A Proposed Submission North East Cambridge Area Action Plan was agreed by the Councils in January 2022 but not published for consultation.

1.22 In March 2019, the government announced that the Cambridgeshire and Peterborough Combined Authority and Cambridge City Council (as part landowner) had been successful in securing £227 million from the Housing Infrastructure Fund (HIF) to relocate the Waste Water Treatment Plant off-site, to enable the Area Action Plan area to be unlocked for comprehensive

development. The relocation project was led by Anglian Water, who submitted a Development Consent Order application.

1.23 The Area Action Plan strategy was predicated on the relocation of the Waste Water Treatment Plant, and proposed submission consultation stage was held back awaiting the outcome of the DCO process. In April 2025 Anglian Water's application for a Development Consent Order was approved by the Secretary of State. In August 2025 the Government announced that it would not be funding the relocation of the Cambridge Waste Water Treatment Plant through its Housing Infrastructure Fund.

1.24 For the Draft Local Plan consultation in 2025 the Councils decided to address North East Cambridge in the Local Plan, and the Area Action Plan was not taken forward. Policies in the Greater Cambridge Local Plan responded to these changing circumstances, including the Waste Water Treatment Plant remaining onsite, and the Proposed Submission Local Plan includes a policy framework for the area.

The Greater Cambridge Local Plan Regulation 18 Stage

Introduction

1.25 The Greater Cambridge Local Plan Regulation 18 stage included multiple stages between 2019 and 2026. For each main stage this section of the statement provides the following:

- Introduction – An overview of the stage
- What was consulted on?
- Who was consulted and how?
- What were the main issues that were raised?
- How were representations taken into account?

Workshops and early-stage stakeholder consultation (2019)

Introduction

1.26 This was the first phase in engagement on the first joint Local Plan for Greater Cambridge. Officers worked with lead Cabinet Members for Planning from Cambridge City and South Cambridgeshire District Councils to deliver workshops with key stakeholders to explore approaches at the start of the plan making process.

What was consulted on?

1.27 Specific workshops with key stakeholders were held to involve various stakeholder groups to inform preparation of the Local Plan via open and explorative engagement in line with Greater Cambridge Shared Planning Statement of Community Involvement (2019). The workshops were held on 4

July 2019, 16 July 2019, 17 July 2019, 22 July 2019, 4 September 2019, 5 September 2019, and 28 September 2019.

Who was consulted and how?

1.28 Each workshop involved different interest groups from Greater Cambridge to enable a wide variety of thoughts and ideas to be heard including elected members from both councils, statutory consultees, service providers and other interest groups, landowners, developers and agents, Residents' Associations and Parish Councils, internal officers from both councils, and local businesses.

What were the main issues that were raised?

1.29 While the comments showed some consensus as to the key challenges facing the area, diverging views were shared on a number of potential solutions and the implications of different priorities. In particular, issues around the growth and strategy choices highlighted the need to discuss many issues in greater detail as the plan progresses.

1.30 A record of the main issues raised can be found in Appendix 2.

How were representations taken into account?

1.31 The discussions and comments raised at this stage informed the First Conversation consultation.

Sustainability Appraisal Scoping Report – Statutory Consultee Comments

1.32 Also in 2019, in order to meet the requirements of the Strategic Environmental Assessment (SEA) Regulations, the views of the three statutory consultees (Environment Agency, Historic England and Natural England) were sought in relation to the scope and level of detail to be included in the Sustainability Appraisal Scoping Report. A report on this consultation can be found in Appendix 3. The issues raised were considered to inform the Sustainability appraisal at the First Conversation stage.

First Conversation - Issues and Options (Regulation 18) Public Consultation

Introduction

1.33 This stage was the first main public consultation on the Greater Cambridge Local Plan. The First Conversation consultation introduced the seven key overarching themes with issues and options identified for each one. The purpose of the consultation was to invite responses about what should be in the Local Plan from residents and businesses as well as stakeholders and other organisations.

What was consulted on?

1.34 The consultation invited comments on the main First Conversation (Issues and Options) 'document'. Consultation was also held on supporting documents including the Sustainability Appraisal of the First Conversation document, the Sustainability Appraisal Scoping Report, the Habitats Regulations Assessment Scoping Report, and included Call for Sites and Call for Green Sites questions.

Who was consulted and how?

1.35 The First Conversation Consultation ran for six weeks from Monday 13 January 2020 to Monday 24 February 2020. This was a full public consultation.

1.36 The consultation was advertised in line with our Statement of Community Involvement including a public notice, news releases, social media campaigns, posters and handouts at consultation events. Individuals, Organisations, Statutory Consultees, Community Groups across Cambridge and South Cambridgeshire were notified of the consultation by email or letter and invited to submit representations, including those bodies identified in the Statement of Community Involvement and those who registered to be notified.

1.37 A range of methods of notification were used to inform the public about the consultation including:

- Public notice in the Cambridge Independent;
- Joint Cambridge City Council and South Cambridgeshire District Council news releases;
- Email and letter notifications.
- Articles in Cambridge Matters & South Cambs Magazine, and wider local media engagement;
- Social media campaign including paid and organic posts across social media channels and into local groups;
- Promotion on our website using the Greater Cambridge Shared Planning consultation platforms including our website, Cambridge City Council and South Cambridgeshire websites.
- Posters (available to download, paper copies available on request, distributed to venues such as libraries);
- Provision of hard copies at identified offices, libraries and events
- Online and in-person presentations and drop-in events.

1.38 We also held a 'Big Debate' on the evening of 18 February, where local groups were invited to present their ideas for the new Local Plan. The event was free to attend and attracted a capacity audience of over 300.

1.39 Appendix 4 provides a detailed report on the First Conversation consultation, including details of who was consulted and who responded.

What were the main issues that were raised?

1.40 7,874 individual answers were received to questions (representations) asked in the consultation (this excludes submissions to the Call for Sites and Call for Green Sites). Of these:

- 1,020 were submitted through the Greater Cambridge Shared Planning website as 'quick comments';
- 6,588 were received through the online portal or via email;
- 226 comments were taken on postcards at events.

1.41 Engagement was also undertaken with higher and further education institutions, specialist schools and, colleges in Cambridge. A total of 28 responses were received; 24 of these were from University of Cambridge Colleges, three from specialist/language colleges, one from higher education 15 institutions.

1.42 Appendix 4 provides a summary of the main issues raised.

How were Representations taken into account?

1.43 The feedback from the First Conversation consultation directly influenced the development of the First Proposals Plan published for consultation in autumn 2021. The feedback received on each policy area, and how it was taken into account, was outlined in the introduction to each policy in the First Proposals Consultation Document.

1.44 More details of issues raised and how they were taken into account can be found Appendix 4.

1.45 Additional workshops were held in Autumn 2020,similar to those held in 2019 prior to the First Conversation consultation, to explore the findings and understand the views of different interest groups. This can be found in Appendix 5.

First Proposals - Preferred Option (Regulation 18) Consultation

Introduction

1.46 The First Proposals consultation built on the responses received at the First Conversation stage and the submissions from Call for Sites to propose the

preferred option for site allocations, and the approach to specific development management policies.

What was consulted on?

1.47 The Greater Cambridge Local Plan First Proposals document was subject to consultation, accompanied by a Sustainability Appraisal and Habitats Regulations Assessment.

1.48 A suite of supporting documents were also published, including topic papers for each theme.

Who was consulted and how?

1.49 The First Proposals consultation was open for six weeks from 9am Monday 1 November 2021 to 5pm Monday 13 December 2021. This was a full public consultation.

1.50 The consultation was advertised in line with our Statement of Community Involvement including a public notice, news releases, social media campaigns, posters and handouts at consultation events. Individuals, Organisations, Statutory Consultees, Community Groups across Cambridge and South Cambridgeshire were notified of the consultation by email or letter and invited to submit representations, including those bodies identified in the Statement of Community Involvement and those who registered to be notified.

1.51 A range of methods of notification were used to inform the public about the consultation including:

- Public notice in the Cambridge Independent;
- Joint Cambridge City Council and South Cambridgeshire District Council news releases;
- Email and letter notifications.
- Articles in Cambridge Matters & South Cambs Magazine, and wider local media engagement;
- Social media campaign including paid and organic posts across social media channels and into local groups;
- Promotion on our website using the Greater Cambridge Shared Planning consultation platforms including our website, Cambridge City Council and South Cambridgeshire websites.
- Posters (available to download, paper copies available on request, distributed to venues such as libraries);
- Provision of hard copies at identified offices, libraries and events
- Online and in-person presentations and drop-in events.

1.52 Appendix 6 includes further details on how the First Proposals consultation was carried out.

What were the main issues that were raised?

1.53 The main consultation received 4131 comments (representations) from 628 respondents. In addition, 5,551 answers or comments came in through a quick questionnaire from 598 unique respondents.

1.54 Additionally, 21 events were held during the consultation period, including events online on specific sections of the plan, with Community Forums, at community centres, South Area Committee, East Area Committee and West Central committee. A series of additional events were held to assist and encourage participation from underrepresented groups including gypsy and traveller issues and issues for young people with Cambourne Soul Youth Club and Milton Youth Club.

1.55 A report on the reach of the consultation can be found in Appendix 6.

1.56 Summaries of the consultation comments received can be found in Appendix 6.

How were Representations taken into account?

1.57 The issues raised in representations were reviewed and helped to inform preparation of the Draft Local Plan. A summary of these responses was reported to the Local Plan Advisory Group through a series of meetings in 2022 and 2023. These summaries can be found in Appendix 7.

1.58 Initially comments were considered at an interim stage, the Development Strategy Update 2023. This was not a public consultation, but drew on consultation findings, to inform some key decisions by members that would inform the next stage of the plan, in particular the need for jobs and homes, the objectively assessed need, development strategy principles and the development principles for strategic sites North East Cambridge, Cambridge East and Cambridge Biomedical Campus.

1.59 The Consultation Statement that accompanied the Development Strategy update report in 2023 can be found in Appendix 8. This includes summary of main issues raised in the development strategy and responses to those issues.

1.60 A complete summary of main issues and how those issues were responded to was included in the consultation statement which accompanied the Draft

Local Plan consultation in 2025. This can be found in Appendix 9 of this statement.

Draft Local Plan - Regulation 18 Consultation

Introduction

1.61 The Draft Local Plan consultation provided the opportunity to comment a draft version of the Greater Cambridge Local Plan and Policies Map, including a detailed set of allocations and policy proposals. The purpose of the consultation was to invite responses to these draft documents in order to help shape the Proposed Submission Local Plan which would follow.

What was consulted on?

1.62 The focus of consultation was on a Draft Local Plan and Policies Map, and accompanying Sustainability Appraisal and Habitats Regulations Assessment. They were accompanied by a suite of evidence, including topic papers on each plan theme.

1.63 The Draft Local Plan set out draft policies and site allocations, including the approach to the level of growth that should be planned for, and where it should be planned. Moving on from the previous stages of consultation that sought views on issues and then proposed approaches for the plan, this consultation proposed an actual draft plan with the detailed wording of the planning policies that will shape development and guide planning decisions.

Who was consulted and how?

1.64 The Draft Plan consultation was open for 9 weeks from 1 December 2025 to 30 January 2026. This was a full public consultation.

1.65 The consultation was advertised in line with our Statement of Community Involvement including a public notice, news releases, social media campaigns, posters and handouts at consultation events. Individuals, Organisations, Statutory Consultees, Community Groups across Cambridge and South Cambridgeshire were notified of the consultation by email or letter and invited to submit representations, including those bodies identified in the Statement of Community Involvement and those who registered to be notified.

1.66 The consultation was advertised using a range of methods, including:

- A public notice in the Cambridge Independent.
- Email and letter notifications.
- Promotion on our website using the Greater Cambridge Shared Planning consultation platforms including our website, Cambridge City Council and South Cambridgeshire websites.

- Social media including Facebook, X, LinkedIn and Instagram.
- Provision of hard copies at identified offices, libraries and events
- Posters in a range of location including offices, community centres, community notice boards and colleges.
- Press releases and e-bulletins
- Printed material distributed to homes through resident magazines
- Promotion to businesses through business newsletter and social media
- Online and in-person presentations and drop-in events.
- A continuously updated FAQ document on the Greater Cambridge website.

1.67 Copies of the Public Notice and the representation form can be found in Appendix 10 of this report.

1.68 Other innovative methods included:

- Youth Engagement sessions with children from schools in Greater Cambridge and encouraging their participation in the drawing competition. Appendix 11 sets out a Report, showing their engagement during this session;
- A Lego building competition was also held during the consultation with a range of submissions provided by children and young people in the area;
- Engagement with stakeholders and groups and engaged through presentations held at the University of Cambridge;
- Discussion at the Joint Design Review Panel (Cambridgeshire Quality Panel & Greater Cambridge Design Review Panel).

1.69 Overall, the consultation resulted in a significant amount of engagement with our local communities and stakeholders. As a result of the communications programme, we distributed over 3,000 leaflets, at 32 in-person public facing events, carried out 27 leaflet drops and hand out sessions, attended 15 markets including the Market and Mill Road Fair and held 15 non–public facing events, including with parishes, and a drop-in session with the Gypsy and Traveller community. A summary of the events held during the consultation are set out in Appendix 11 including a summary of main discussion points.

What were the main issues that were raised?

1.70 8,415 representations were received from 1,285 individuals and organisations. Representations can be viewed in full on the Greater Cambridge Shared Planning website and our consultation platform.

1.71 Appendix 11 of this statement includes a full breakdown of these representations by policy and a summary of and response to the representations.

1.72 A brief summary of the main issues raised in representations is provided below:

- Development Needs: Some considered this was too high. Others considered the plan's approach conservative and not reflective of the opportunities of the Greater Cambridge economy;
- Development Strategy: A wide range of views were submitted, with many supporting this approach, but others arguing there should be alternative or additional sites in villages, or release of green belt land on the edge of Cambridge;
- North East Cambridge: representations highlighted the need for a revised approach to this area given that the Housing Delivery Funding for relocation of the wastewater treatment works was withdrawn by the government shortly before the Draft Plan consultation;
- Cambridge Biomedical Campus: received a wide range of comments, expressing support for campus expansion or objecting to green belt release. Many comments highlighted transport and infrastructure concerns, and the impact of the campus on surrounding areas;
- Cambridge East: Comments were received on a range of topics, including those concerned about transport impacts and also concern about the availability of the Airport site. Comments were concerned about landscape and ecological impacts, effect on nearby communities, transport and traffic impacts, and East West Rail;
- Cambourne North: Comments were concerned about landscape and ecological impacts, effect on nearby communities, transport and traffic impacts, and East West Rail;
- Land adjacent to A11 and A1307 (Grange Farm): generated the largest number of comments from the consultation, with wide ranging concerns expressed regarding the impact on the area and surrounding communities, impact on ecology and heritage, and the sustainability of the location;
- Logistics sites on the A1307/A14 corridor: Comments were concerned with potential impacts of logistics sites in this area, particularly with the number of proposals being promoted;
- Climate change: There was support by many for the climate aspirations set by the policies, although some considered they did not go far enough. There were challenges, particularly from developers, that the plan should not be setting higher standards than national policy requirements;

- Biodiversity and green spaces: Proposal to require 20% net gain received support on the basis of the benefits it would provide to nature, but others challenged whether it was justified or deliverable. Other comments focused on the proposed protection of open spaces of different types;
- Great places: Comments received offered a wide variety of opinions on what constituted good design. Design policy updates include further measures to address community safety, counter-terrorism, and consider the impacts from the design of building and the public realm on mental health, wellbeing and neuro-divergency. Support for enabling active travel and opportunities to improve Public Rights of Way;
- Wellbeing and social inclusion: Comments highlighted opportunities to optimise other healthy options and food growing for local communities. A lot of comments on this theme raised the issue of cultural infrastructure provision, seeking to ensure investment in cultural and community facilities accompanied development;
- Jobs: Most representations challenging the policies sought greater flexibility, but policies are considered to seek the right balance between enabling development and ensuring it is sustainable. There was support for policies which seek to ensure employment spaces that are supported by accompanying services and facilities. The biggest change for this plan was the inclusion of a policy which would require large scale employment sites to include an element of affordable employment space. This drew support from many, but also challenge as to whether it was necessary, viable, and whether requirements were clear;
- Homes: Challenges made to housing supply too heavily dependent on allocating large strategic sites which are more complex and take longer to deliver. Residential sites promoted and challenges made to five year housing land supply. Concerns raised about Homes of Multiple Occupancy and the omission of a definition of overconcentration and a quantified standard;
- Infrastructure: Comments on the Draft Plan infrastructure theme policies reflect widespread desire across Greater Cambridge for a wide range of necessary supporting infrastructure to be delivered at the right time to support development. There was broad support for most policy approaches, and various suggestions for how the policies could be enhanced, particularly around securing sustainable transport.

How were Representations taken into account?

1.73 Following the Draft Plan consultation, the Councils sought to respond appropriately to the representations received. This also involved extensive discussion and joint working with statutory consultees and key delivery partners. Where necessary, further evidence was produced to ensure that

issues raised were satisfactorily addressed. Further Topic Papers were also produced for each chapter, providing details of new or updated evidence, and how and why policies had been amended.

1.74 For each policy, a summary of the comments received, a table summary of the representations received, and the Councils' responses to these representations have been provided in Appendix 11.

1.75 A brief summary of how the main issues were addressed is provided below:

- Development Needs: Comments were considered, however, need is based on our economic evidence base and is considered to provide a sound evidence based approach to the plan. Minor updates were made to reflect the updated standard method, and to update the student housing need based on further engagement with the Universities and Colleges.
- Development Strategy: The development sequence identified remains the best approach for meeting development needs, reflecting the relative sustainability merits of different locations, and opportunities to focus development where development can be accompanied by infrastructure improvements. It is considered that there continues to be no exceptional circumstances for green belt release to meet the general needs identified in this plan, with releases only proposed at Cambridge Biomedical Campus and Babraham Research Campus responding to specific site circumstances.
- North East Cambridge: As the site can no longer be relied upon for large scale housing development, a new policy framework was developed, which will support suitable uses that can be accommodated while the treatment works remains in-situ, responding to opportunities of this highly accessible and economically successful area whilst reflecting its characteristics and constraints. Milton Road Garages was returned to being a standalone allocation.
- Cambridge Biomedical Campus: The release of an area of Green Belt land to meet the specific needs of the campus remained the proposed policy approach. The policy was refined to clarify requirements for infrastructure to accompany development, and to make clearer the requirement for a masterplan.
- Cambridge East: A number of amendments were made to refine the policy, to make requirements clear, with regard to infrastructure and delivery, and to support integration with the proposed rail station to the south of the site.
- Cambourne North: Further work was done to evolve the vision, including through engaging with local stakeholders and statutory bodies, and a number of additional evidence studies, including on transport, ecology,

heritage and landscape. This work led to the refinement of the allocation, including boundary amendments and updates to the Spatial Framework.

- Land adjacent to A11 and A1307 (Grange Farm): The representations, and additional evidence were carefully considered. The site capacity was refined from 6,000 to 4,500 homes, and site boundary and spatial framework was amended in response to comments along the eastern and southern edge to mitigate impacts on landscape, heritage and ecology. The policy has been strengthened to secure key supporting transport infrastructure in tandem with development.
- Logistics sites on the A1307/A14 corridor: The Proposed Submission Plan continued to propose two sites (Slate Hall Farm and Land to the South of the A14 Services). Further engagement has taken place with adjoining authorities, agreeing that regional logistics needs to be explored through future strategic plans.
- Climate change: Comments were carefully reviewed, and policy requirements refined to ensure they are robust. Officers consider the policies are an appropriate response to our responsibilities to respond to climate change, and reflect the Councils' climate emergency declarations. In addition to the policies included in the draft plan, a new policy was added to address building retrofits where planning permission is required.
- Biodiversity and green spaces: Officers consider there is a strong case for requiring the higher level as it reflects local needs. Viability evidence also demonstrates that it can be delivered. The Draft Plan highlighted that further work was being undertaken on green infrastructure and open space standards to respond to the Natural England's Green Infrastructure Framework. This work has now been completed. The revised policies collectively set quantity, accessibility and design standards for different types and scales of spaces, along with applying an Urban Greening Factor (rather than a tree canopy coverage percentage requirement), to secure onsite provision or contributions that will enable high quality green infrastructure and open spaces to be available to residents and to deliver multiple benefits including for human health, wildlife, and our climate. A revised list of open spaces is proposed based on further evidence review, to support the protecting open spaces policy.
- Great places: Policy was amended to strengthen the opportunity to enhance Conservation Areas and the skyline of the city, with consideration of the experience and perception of coalescence between the city and surrounding villages for taller buildings. The housing density policy was clarified so that site potential is optimised whilst being responsive to surrounding local character and contexts. Heritage policies have been amended to improve clarity and consistency with national

policy and statutory guidance. Active travel was further addressed in other policies in the plan.

- Wellbeing and social inclusion: Further evidence on Allotment and Food Growing Space, Community Infrastructure, and Cultural Infrastructure where commissioned to inform the Infrastructure Delivery Plan. Policies regarding meanwhile uses and employment and skills plans were updated to make their delivery more effective.
- Jobs: A further study on affordable employment space was commissioned to test the case for provision and clarify the implementation requirements. This confirmed the need for a policy and informed the Proposed Submission policy approach.
- Homes: The Draft Local Plan considered approaches to addressing potential negative impacts of concentrations of Housing in Multiple Occupation (HMOs), but acknowledged further work was needed to explore the issue including its role in meeting housing needs. A new study (included in the background documents) explores the number and distribution of HMOs within Greater Cambridge, the role of HMOs in meeting the housing needs of Greater Cambridge, the impacts of HMOs, and the potential solutions. Amendments to the proposed policy focus on ensuring HMOs are of a suitable quality, amenity impacts are managed, and requiring appropriate management arrangements to be demonstrated. Whilst some local planning authorities have planning policies restricting HMOs where the concentration goes above a certain threshold, this would restrict HMOs from areas where they may be suitable, and could have unintended consequences regarding knock on impacts for other areas, and on the affordability of accommodation. The policy on Co-Living was also significantly refined since the Draft Plan, particularly to ensure schemes are of a suitable quality.
- Infrastructure: Changes to the policies focused on making them more enforceable to ensure the right infrastructure can be secured in a timely way to a good standard, involving extensive engagement with the local highways and transport authorities.

Proposed Submission Local Plan - Regulation 19 Consultation

Introduction

1.76 At the Regulation 19 stage consultation focuses on the Local Plan that the Councils are proposing to adopt. The consultation allows people to comment on the whether it is sound, and whether it its legal. The representations received at this stage will be considered by the independent planning inspector appointed to examine the plan when it is submitted.

What was consulted on?

1.77 Representations could be made on:

- Proposed Submission Greater Cambridge Local Plan
- Proposed Submission Policies Map
- Sustainability Appraisal
- Habitats Regulations Assessment

1.78 The consultation was accompanied by a suite of evidence.

Who was consulted and how?

1.79 The Regulation 19 Greater Cambridge Proposed Submission Local Plan consultation ran from 3 August 2026 to 25 September 2026.

1.80 The consultation was advertised in line with our Statement of Community Involvement including a public notice, news releases, emails to mailing lists, social media campaigns, posters and handouts at consultation events. Individuals, Organisations, Statutory Consultees, Community Groups across Cambridge and South Cambridgeshire were notified of the consultation by email or letter and invited to submit representations, including those bodies identified in the Statement of Community Involvement and those who registered to be notified.

1.81 A range of methods were used to advertise the consultation, including:

- A public notice in the Cambridge Independent;
- Email and letter notifications;
- Promotion using the Greater Cambridge Shared Planning consultation platforms including our website, Cambridge City Council and South Cambridgeshire websites;
- Social media including Facebook, X, LinkedIn and Instagram;
- Provision of hard copies at named offices, libraries and events;
- Posters in offices, libraries and members were encouraged to put posters up in their wards;
- Press releases and e-bulletins;

- Printed material was distributed to homes and businesses through resident and business magazines.
- 13 in-person public facing events, and held 2 non–public facing events, including with parishes and a drop-in session with the Gypsy and Traveller community;
- An online webinar introducing the Local Plan consultation.

1.82 A summary of the events held during the consultation, and other information relating to the consultation is included at Appendix 12.

What were the main issues that were raised?

1.83 2,871 representations were received from 778 individuals and organisations. Representations can be viewed in full via the on the Greater Cambridge Shared Planning website and our consultation platform.

1.84 Under Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012, a local planning authority (LPA) must submit a Consultation Statement alongside its Local Plan for independent examination. While Regulation 20 sets strict baseline deadlines for the formal publication of representations, LPAs retain final legal discretion over whether to accept and account for late representations. If an authority exercises this discretion to accept a late submission, it must be formally document within the Regulation 22 submission. The following late representations were received and accepted:

- Representations 214675 and 214691 from CODE Development Planners Ltd on behalf of G W Balaam & Son at 4.33pm on 29 September 2026. The representations were made against Policy S/DS: Development strategy and Chapter 2: Development strategy.
- Representations 214532, 214534 and 214536 from Huntingdonshire District Council received at 5.59pm on 29 September 2026. The representations were made against Chapter 1: About the plan, Policy CC/WE: Water efficiency in new developments and Policy S/RRA/SHF: Land north of A3107, Bar Hill (Slate Hall Farm).
- Representations 214865, 214867 and 214868 from Avison Young on behalf of National Gas Transmission on 23 October 2026. The representations were made against Policy S/RSC/FSS: Former Spicers Site, Sawston Business Park, Sawston, Policy S/RSC/BRC: Babraham Research Campus and Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm.

1.85 A breakdown of the late representations received are set out in Appendix 12. They are shown by chapter and policy, the number of respondents and number of representations received, and the nature of those representations.

1.86 Appendix 13 provides a summary of the number of responses and objections received and provides a summary identifying the main issues.

1.87 A high-level overview of main issues raised is provided below:

Plan-making process (legal compliance test)

1.88 Main issues raised relating to the plan-making process:

- Concerns that the Councils have not followed appropriate plan making processes, including the consultation process and procedural requirements for meaningful engagement, and has not considered all needs in the Equalities Impact Assessment (EqIA); and
- Concern that the plan does not reflect the most recent National Planning Policy Framework (NPPF) that was adopted in August 2026.

Development strategy

Identifying and meeting Greater Cambridge's employment land needs

1.89 The main issues raised relating to identifying and meeting Greater Cambridge's employment land needs include:

- Concerns that the Local Plan's employment provision is too low, and that it does not reflect the Councils' evidence for higher jobs growth, regional growth aspirations, or the Development Corporation's ambitions for Greater Cambridge;
- Comments stating there is evidence of an immediate need for floorspace for Mid-tech uses and for industry and warehousing that is not satisfied by the Local Plan's allocations and strategy;
- Concerns that the Plan is overly restrictive in seeking to limit large warehousing units and needs to allocate more sites to unlock the area's wider employment potential; and
- Comments noting that the strategic locations must accommodate the full ecosystem necessary to commercialise innovation, generate economic value, and avoid a narrow interpretation of appropriate economic uses where complementary activity is required for successful clusters.

Identifying and meeting Greater Cambridge's housing needs

1.90 The main issues raised relating to identifying and meeting Greater Cambridge's housing needs include:

- Comments suggesting the Local Plan's growth assumptions are too conservative given the Government's commitment to accelerating growth;

- Concerns that the Local Plan is not consistent with national policy as it does not identify sufficient housing land to meet housing needs;
- Comments suggesting that the strategy is too reliant on windfall development to meet Greater Cambridge's housing needs, giving rise to delivery uncertainty; and
- Comments suggesting that the Councils cannot currently demonstrate a five-year supply and that the buffer used to calculate the Local Plan's housing numbers should respond to the latest Housing Delivery Test results.

Distribution of development

1.91 The main issues raised relating to the development strategy's distribution of development include:

- Concerns raised that the Local Plan relies too heavily on strategic sites and new settlements to deliver on local housing needs;
- Comments suggesting that the Local Plan does not allocate enough development in villages or the rest of the rural area; and
- Concerns that the Plan focuses on Cambridge and that the settlement hierarchy is not a robust enough basis for determining relative suitability of rural settlements or scale of growth they should accommodate.

Infrastructure impacts and infrastructure needs

1.92 The main issues raised relating to the infrastructure needs and impacts of the development strategy include:

- Concerns that the Councils and the Water Scarcity Group have not provided sufficient certainty that there will be adequate water supply, and that the Plan relies heavily on major water projects with delivery risks;
- Concerns that there is insufficient certainty that adequate wastewater infrastructure will be delivered to sustain proposed levels of growth;
- Concerns that the strategy is too reliant on uncertain transport schemes that are not supported by an adopted Combined Authority Transport Strategy; and
- Comments suggesting that the Local Plan fails to reconcile growth with critical constraints, including healthcare and green infrastructure deficits.

Green Belt and grey belt

1.93 The main issues raised relating to the development strategy's consideration of Green Belt and grey belt include:

- Concerns that the Green Belt and grey belt land has not been assessed appropriately, with comments citing changes to national

planning policy since the publication of the Greater Cambridge Green Belt Assessment (2021);
- Comments suggesting exceptional circumstances exist for the development of Green Belt land in the Greater Cambridge area and suggesting that Green Belt release on the edge of Cambridge or villages is needed for more sustainable development; and
- Comments suggesting that it is unclear how grey belt has been weighted to inform the Local Plan's development strategy and approach to the site allocations.

Greater Cambridge's settlement hierarchy

1.94 The main issues raised relating to the Local Plan's settlement hierarchy include:
- Concerns that, when combined with the development strategy's site-selection methodology, lower tier village classifications can exclude sustainable small sites from allocation consideration;
- Concerns that the settlement hierarchy limits growth in rural locations and smaller villages;
- Concerns that the Plan focuses on Cambridge and that the settlement hierarchy is not a robust enough basis for determining relative suitability of rural settlements or scale of growth they should accommodate; and
- Comments suggesting the Policy S/SH is ineffective as it does not represent a comprehensive assessment of settlement roles and inter-relationships.

Defined development extents

1.95 The main issues raised relating to defined development extents include:
- Concerns that the boundary alignments for settlements are not a logical or defensible settlement edge, have not been updated, and absent of an evidenced extent; and
- Concerns that village boundary extents mean housing and affordable housing needs are not met.

Other development strategy matters

1.96 The main issues raised relating to other development strategy matters include:
- Concerns that proposed growth will have significant harm on the area's special character, with some suggesting the Plan lacks environmental and spatial capacity testing for the city and immediate hinterland;
- Concerns that the proposed approach to monitoring is reactive and therefore prohibitive of an effective approach to accelerating housing supply or addressing deficiencies in wider delivery; and

- Comments suggesting amendments to policies and the strategy to facilitate collaboration with working partners and other third parties during decision making.

Site allocations and policies in the Plan

Cambridge urban area

1.97 Summary of the main issues raised relating to these policies:

Site Allocations

- Policy S/C/LCR: Land at Clifton Road (including Cambridge Junction and Cambridge Leisure) – Support for the opportunity the site can provide, and recognition of the value of the Junction, but also comments that the policy should increase provision of community spaces. Concern was expressed that detailed policy requirements could delay individual developments coming forward. Other comments sought greater specificity regarding building heights and expressed concern whether the range of uses could be achieved without compromising the character of the area;
- Policy S/C/NCA: North Cambridge Academy, 108 Arbury Road – comments submitted regarding the impact of development on the school and playing field;
- Policy S/C/MRG: Milton Road Garages and Policy S/C/SRW: Station Road West – site promoters seek greater flexibility regarding future uses; and
- Detailed comments on a number of sites sought refinements to the site capacity, boundary, proposed uses, or to references to local heritage assets, or to specific policy requirements.

Areas of Major Change

- Policy S/C/AMC: Cambridge Areas of Major Change - imposes overly prescriptive and unjustified requirements for implementation plans, masterplans and phasing strategies;
- Policy S/AMC/NEC: North East Cambridge Area of Major Change – some support for the approach, but also objections to the allocation being turned into a policy framework. Anglian Water confirmed their intention to invest in the current wastewater site. Other comments were concerned that policy is too long, complex and prescriptive, and should be more flexible regarding quantity of development. Transport impacts, use of the trip budget, impact on parking in the local area, and impact on the highway network were also raised. Need to address heritage

assets and their setting and impacts on the wider landscape and key views;

- Policy S/AMC/AS: Abbey Stadium Area of Major Change – Cambridge United request that the plan acknowledge the future potential relocation of the Club.
- S/AMC/BC: Beehive Centre Area of Major Change – Network Rail supports the strategic objectives and delivery of the Cambridge East Station. Concern from another respondent about the loss of retail uses; and
- S/AMC/SCL: South of Coldham's Lane Area of Major Change - Policy should recognise that the proposed station at Cambridge East is a step change in public transport connectivity.

Public Realm Improvement Areas

- Policy S/PRIA: Public Realm Improvement Areas (PRIA) in Cambridge – concerns about overarching policy requirements and how they would be implemented;
- Policy S/PRIA/MC: Mitcham's Corner – comments considered it should do more to support active travel, and others that measures should not restrict the flow of vehicles;
- Policy S/PRIA/MR: Mill Road – More should be done to widen pavement and improve usability for residents. Another comment said the bus gate should be removed; and
- Policy S/PRIA/OPML: Old Press/Mill Lane – Comments consider policy should be more flexible, and others that it should be more specific around retention of specific historic buildings.

Edge of Cambridge

1.98 Summary of the main issues raised relating to these policies:

- Policy S/CE: Cambridge East – Many comments focus on infrastructure provision, with support for inclusion of facilities like a swimming pool, but also some requests for reference to other facilities. Other comments considered the policy should be more flexible, including that the policy should be flexible around the boundaries of the green corridor. The site capacity should be set as a minimum rather than as an approximate figure reflecting the opportunities of the site. The policy wording should better reflect the opportunities that the new East West rail station offers;
- Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital) - Some comments supported the policy proposals and considered that the need for further campus

development had been demonstrated. Other comments object to the policy on the basis that the case for exceptional circumstances had not been made for green belt release. Concern from site promoters that the policy was overly prescriptive. Clearer mechanisms were requested for the master planning requirements and how joint working would be achieved. The importance of healthcare should be emphasised. Greater Clarity needed around what is required form the Strategic Enhancement area. Some comments seek greater specificity regarding key views, building heights, and approach to heritage assets. Comments also reference the need for specific infrastructure improvements, such as specific facilities and transport measures, and that the plan should be clear about developer contributions to achieve this;

- Policy S/ED: Eddington and Policy S/WC: West Cambridge – comments sought changes to reflect recent planning consents and to not introduce new requirements; and
- Other sites: various comments seeking clarifications, such as on references to nearby heritage assets.

New settlements

Policy C/CBN: Cambourne North

1.99 Summary of the main issues raised relating to Policy C/CBN Cambourne North:

- A number of comments relating to the transport evidence and proposed policy approach, including mitigation measures. Comments suggested gaps in the evidence and questioned deliverability and phasing of transport interventions. Some comments noting the need for community engagement through future planning application processes;
- Some comments relating to direct and in-direct ecological impacts of the proposal, including on designated sites and habitats and species. Some support for policy amendments and evidence undertaken since draft (Regulation 18) Local Plan consultation;
- A number of comments regarding the Strategic Enhancement Area including the red line boundary, its deliverability including how it is linked to the phasing of development, long term management, how it will achieve visual separation from the villages, flood risk and the proposed uses within it;
- A limited number of comments on heritage impacts, mainly focused on archaeological considerations and the setting of the conservation areas of the nearby settlements;

- Comments relating to housing types and delivery including around the location of Gypsy and Traveller pitches and how a flexible approach is required for specialist accommodation;
- Support for employment uses in order to reduce commuting and make Cambourne a business location;
- Concerns about the timely provision of services and facilities and wider infrastructure including retail, health, water supply and energy;
- Detailed comments from the site promoters seeking refinements to the site capacity, boundary, proposed uses and greater flexibility for the Spatial Framework; and
- Site promoters identified alternative sites or identify that their sites should have been allocated instead of those included in the plan.

Policy C/CB: Cambourne

1.100 Summary of the main issues raised relating to Policy C/CB: Cambourne:

- Broad support for the allocation, noting that Cambourne and Cambourne North should be considered and planned holistically and include community engagement with young people;
- Some comments on the protection of employment land and that new homes should be designed for all stages of people's lives;
- Comments relating to the need for an infrastructure first approach and some clarification around the wording in the policy related to health and emergency services provision;
- Comments related to movement, related to rights of way, connections over the A428 and the Cambourne to Cambridge project.
- Comments on the Cambourne North Strategic Enhancement Area, including the need for it to be multi-functional and that its long-term management and maintenance need to be considered; and
- Site promoters identified alternative sites or identify that their sites should have been allocated instead of those included in the plan.

Policy S/GF: Land Adjacent to A11 and A1307 Grange Farm

1.101 Summary of the main issues raised relating to Policy S/GF: Grange Farm:

- Objections to the overall principal of development at Grange Farm and its allocation in the Local Plan;
- Objections to the location of the site and identification of other alternative locations that are suitable for development, including North East Cambridge;
- Concerns raised about the assessment of the site and its suitability for development, including transparency of the HELAA process;

- A number of objections raised about impacts on the local road network and congestion, particularly along the A1307, Fourwentways roundabout and A11;
- Objections to the connection to and deliverability of the Cambridge South East Transport scheme (CSET), and the phasing of this development and impact it may have on the local road network;
- Objections to the impact on the River Granta and the chalk stream and chalk aquifers, including depletion of water and contamination;
- Concerns raised around managing flood risk and run off from the new development with risk to surrounding settlements;
- Objections to the construction impacts on roads and existing settlements;
- Objections raised to the impacts on the landscape topography, impact on local landscape character, local and long distance views and the skyline across the wider countryside;
- Concerns raised around housing density and the quantum of development;
- Objections to the impact of development on the rural village identities, character, community cohesion and physical separation of Little Abington, Great Abington and other surrounding villages;
- Concerns raised around impacts on heritage assets including listed buildings, Scheduled Monuments and Conservation Areas in Great and Little Abington;
- Objections to the loss of high quality agricultural land and farmland resulting in loss of food security;
- Concerns for the purpose and limitations of the Strategic Enhancement Area with the green infrastructure not providing enough of a buffer to existing surrounding settlements;
- Objections to the impacts of development on ecology, wildlife, and the wider recreational impacts particularly on SSSIs and nature sites near to the site;
- Objections to the potential impacts on archaeology on the site and nearby and protection of the Roman Road to the north of the site;
- Objections raised to availability of utilities including water supply and waste water with objections to the phasing and delivery that is dependent on external delivery mechanisms that should be determined before development can proceed;
- Objections to the transport assessments and reliance on the Cambridge South East Transport phase 2 scheme;
- Concerns for the capacity of existing infrastructure, services and amenities in nearby settlements that would not cope with additional

pressure of new residents and that phasing and delivery will not provide in a timely manner; and

- Concerns around employment provision at Grange Farm with existing campuses not at capacity and no guarantee that people will live and work in the same place.

Existing new settlements

Policy S/WNT Waterbeach New Town, Policy S/BA Bourn Airfield New Village and Policy S/NST Northstowe New Town

1.102 Summary of the main issues raised relating to these policies:

- Concern from the landowners/promoters that the policies sought to introduce additional policy requirements that are not consistent with the approved planning applications, notably the requirements for Gypsy and Traveller pitches and specialist accommodation. They were also concerned about the rigidity of the policy, the quantums of development proposed and the differences between the approved outline applications and the spatial frameworks set out in the Local Plan;
- Some support for the proposed Strategic Enhancement Areas for these sites from a range of stakeholders but some wording amendments suggested to address matters relating to ecology;
- For Policy S/WNT Waterbeach New Town, there were comments made regarding the retention of the existing Waterbeach railway station as well as concerns about the proposed wastewater strategy.

Rural southern cluster

1.103 Summary of the main issues raised relating to these policies:

- Concerns regarding the cumulative impacts of growth in the area, including on transport and congestion;
- Policy S/RSC/WGC: Wellcome Genome Campus - Expansion Land, Hinxton and Policy S/AMC/WGC: Wellcome Genome Campus, Hinxton Area of Major Change – comments noted that the policy is overly prescriptive and concerns about landscape mitigation measures;
- Policy S/RSC/BRC: Babraham Research Campus and Policy S/AMC/GP: Granta Park Area of Major Change – refinements sought around site mitigation measures, and the management of landscape impacts;
- Policy S/RSC/FSS: Former Spicers Site, Sawston Business Park, Sawston – Policy needs to address active travel connections, and to secure protection and access to the open space on the site. There

were also objections from the landowner regarding the policy approach to protecting the Scheduled Monument and its setting;
- Policy S/AMC/WHD: Whittlesford Parkway Station Area, Whittlesford Bridge Area of Major Change – Provide greater clarity about how station enhancements will be secured;
- Policy S/AMC/IWM: Imperial War Museum, Duxford (inc. AvTech 1) Area of Major Change – There was a request to recognise the existing masterplan that had been prepared for the site, and calls for both more flexibility and greater specificity in the policy. Concerns about the transport impacts of development proposals were also raised; and
- Site promoters identify alternative sites, or identify that their sites should have been allocated instead of those included in the plan.

Rest of rural area

1.104 Summary of the main issues raised relating to these policies:

- Policy S/RRA/SHF: Land north of A1307, Bar Hill (Slate Hall Farm) – objections raise concerns regarding the environmental impacts of the site, including on landscape, flood risk, loss of agricultural land, and the cumulative impact with other sites, including transport impacts. The mix and scale of units was also raised in comments, seeking greater flexibility;
- Policy S/RRA/SCS: Land to the South of Cambridge Services, A14 – the promoter highlights the need for lorry parking, and seeks a number of policy amendments. Comments also noted that transport impacts need to be resolved;
- Policy S/RRA/ML: The Moor, Moor Lane, Melbourn – an objection that the site not well related to Meldreth Station and that there is known flood risk associated with this site;
- Policy S/AMC/PH: Papworth Hospital, Papworth Everard Area of Major Change – should have greater flexibility to allow residential uses.
- A range of comments received on the other allocations seeking policy amendments or greater flexibility.
- Site promoters identify alternative sites, or identify that their sites should have been allocated instead of those included in the plan; and
- Policy S/AMC/GT: Optimisation of Gypsy and Traveller sites – Objections noted that the policy needs to be clearer on what is being sought, why only Smithy Fen and Chesterton Fen have been identified and no other sites, and the need for stronger mitigation measures.

Climate change

1.105 Summary of the main issues raised relating to the Climate Change policies:

- Broad support for the policies and the ambitions of the chapter;

- Comments suggesting the Climate Change chapter's policies depart from the plan-making policies in the NPPF (December 2026);
- Policy CC/SD: Sustainable development and the climate emergency – Concerns that sustainability statement requirements are either excessive and exceed national requirements, or they do not go far enough and should make reference to the natural environment and sustainable transport;
- Policy CC/DC: Designing for a changing climate – Broadly supported but some comments consider the requirements are unclear, not sufficiently flexible, and go beyond national policy requirements;
- Policy CC/NZ: Net zero carbon new buildings – Concerns regarding flexibility, impact on viability, policy justification, and that the policy duplicates or departs from national standards;
- Policy CC/WE: Water efficiency in new developments - Support for approach, including from the water companies and Environment Agency, but objections from some developers, particularly to the higher standard for larger developments which would require water recycling measures;
- Policy CC/IW: Integrated water management, sustainable drainage and water quality - Support for approach, but also concern from some developers that it is putting responsibility on developers to demonstrate wastewater capacity;
- Policy CC/RE Renewable Energy - Suggestions that mitigation requirements should be strengthened; and
- Policy CC/CE: Supporting a circular economy and sustainable resource use – concerns regarding excessive information requirements, and that presumption against demolition risks preventing sustainable redevelopment.

Biodiversity and green spaces

1.106 Summary of the main issues raised relating to these policies:

- Policy BG/BG: Biodiversity and geodiversity - Support for the 20% biodiversity net gain target, but also objections on the basis that it goes beyond the national 10% requirement, would impact on viability, and had not been justified. Objections to the onsite requirements. It should have greater specificity regarding monitoring and enforcement;
- Policy BG/GI: Green infrastructure - Support for the Green Infrastructure policy ambitions. Concerns regarding the impact on viability, and that it should have allocated more specific green infrastructure sites rather than relying on securing funding to ensure the Green Infrastructure initiatives are delivered. It should do more to protect public rights of way and equestrian routes,

- Policy BG/UGF: Urban Greening Factor - The use of the urban greening factor was supported by some, but concerns were also raised about the impact on viability, whether it duplicated other standards like biodiversity net gain, and how it would be enforced.
- Policy BG/TC: Tree canopy cover and the tree population - Whether the plan was specific enough on how tree canopy cover would be measured and enhanced. Some considered the policy needed greater flexibility, while other comments consider that the requirements need to be strengthened.
- Policy BG/RC: River corridors - Support for the policy on river corridors and protection of chalk streams. Views ranged from seeking strengthening and clarifying the role of river corridors, through to seeking greater flexibility.
- Policy BG/PO: Protecting open spaces - generally supported, but some comments consider it should be strengthened.
- Policy BG/EO: Providing and enhancing open spaces - standards too high, namely for accessible open space, which will impact on deliverability and viability, and standards not justified. Objection to requirements being placed on employment developments.

Wellbeing and social inclusion

1.107 Summary of the main issues raised relating to the Wellbeing and Social Inclusion policies:

- Policy WS/HD: Creating healthy new developments – Broadly supported, but some concern that policy would need to be applied flexibly, and challenge to the thresholds for when health impact assessments are required;
- Policy WS/NC: Meeting the needs of new and growing communities - Objection to the assessment requirements placed on developers, and to some of the standards which it includes, including to the requirements for community and sports provision from large commercial developments;
- Policy WS/IO: Creating inclusive employment and business opportunities through new developments - supported in principle but calls for clarification regarding implementation and greater flexibility at both the construction and operational phases;
- Policy WS/HS: Pollution, health and safety - some comments that it was overly prescriptive, particularly in relation to light pollution and air quality, and other comments saying it did not go far enough on setting air quality requirements.

Great places

1.108 Main issues raised relating to the Great Places policies comprise:

- Broad support for the policies but some comments about duplication between policies in this chapter;
- Policy GP/HD: Housing density – calls for flexibility to be able to respond to specific site circumstances, to recognise the need for differing levels of parking in different locations, and to changes to national policy regarding development near railway stations;
- Policy GP/ST: Skyline and tall buildings – comments that height limits should be applied more robustly, but also views that the policy needs to be applied flexibly to recognise a changing skyline;
- Policy GP/QP: Establishing high-quality landscape and public realm – Comments that public art requirements should be applied flexibly, the policy should do more to support active travel, and meet the needs of equestrians;
- Policy GP/LC: Protection, conservation and enhancement of landscape character – some comments argue policy should be strengthened around requiring developments to consider local landscape character, other comments consider the policy goes beyond national policy as that focuses on valued landscapes. Comments seek removal of some important countryside frontages and the addition of others;
- Policy GP/HE: Historic environment – Historic England welcome the positive strategy for the historic environment, but other comments consider the plan does not provide the positive heritage strategy which recognises the international heritage significance of Cambridge.

Jobs

1.109 Main issues raised relating to the Jobs policies comprise:

- Policy J/NE: New employment development proposals - The plan should offer greater support to meeting unmet regional needs for warehousing and logistics;
- Policy J/RE: Supporting the rural economy - Plan should provide more support for rural equestrian and other land-based businesses;
- Policy J/AL: Protecting the best agricultural land - Views that the plan is both overly restrictive and not restrictive enough on the use of agricultural land to meet development needs;
- Policy J/AW: Affordable workspace and creative industries - Objections to the policy requirements, including views that it is not justified in the Cambridge context, the policy requirements are too high or not viable, it is not appropriate on all sites, it should exclude some types of use, and it should be applied more flexibly;

- Policy J/RC: Retail and other complementary town centre uses - Should be more flexible on requirements related to loss of retail; and
- Policy J/VA: Visitor accommodation, attractions and facilities - Plan should be more flexible regarding the loss of visitor accommodation sites. A more comprehensive tourism strategy is needed.

Homes

1.110 Summary of Main issues raised relating to the Homes policies:

- General support on a range of the housing policies, including for delivering affordable housing;
- Policy H/AH: Affordable housing – Some comments consider that requirements should be strengthened, such as by increasing requirements for affordable rent tenures. Other comments seek greater flexibility to allow for developments to respond to a variety of circumstances, including local demand, site-specific constraints, and viability;
- Policy H/ES: Exception sites for affordable housing – Broad support for the approach, comments on allowance for market homes responding to viability, eligibility criteria, and objection to the requirement to name Registered Providers in S106 agreements;
- Policy H/HM: Housing mix – comments objecting to the policy seek greater flexibility;
- Policy H/SS: Residential space standards and accessible homes - Concerns that requirements for accessible and adaptable homes standards and external amenity space standards are overly onerous on developers;
- Policy H/SH: Specialist housing – Representor considers that more specificity needed in relation to accommodation for disabled adults, particularly a delivery mechanism to ensure that this type of accommodation is provided;
- Policy H/CB: Self and Custom Build homes - Objections to requirement for provision, and requests that the number of custom and self build plots required on a single development should be capped, and that unsold self and custom build plots should not be required to be transferred to a Registered Provider;
- Policy H/BR: Build to Rent homes, Concerns raised about impacts of harmful concentration and need to be responsive to local housing need.
- Policy H/CO: Co-living Similar concerns were raised about harmful concentrations, and querying the rationale for the threshold for co-living development;

- Policy H/MO: Houses in Multiple Occupation (HMOs) – A specific definition of harmful concentration or over concentration is needed. Representations considered that policy should impose a 10% limit on HMOs in a defined area, similar to the approach taken in a number of other cities. Greater clarity was also needed on how the policy would be applied; and
- Policy H/GT: Gypsy and Traveller pitches and Travelling Showpeople plots - Need to safeguard existing traveller sites and consider all sources of pitch and plot supply in meeting our identified needs. Request to meet some of Uttlesford District Council's (UDC) un-met need for traveller sites.

Infrastructure

1.111 Summary of the main issues raised relating to the Infrastructure policies:

- Policy I/ST: Sustainable transport and connectivity - Support for strong objectives and policies around active travel, public transport and sustainable movement, and comments identified the need for continued cooperation with transport bodies and neighbouring authorities. Some comments seek to strengthen the policy requirements to support delivery and funding or public transport and active travel measures. The effectiveness of trip budgets was also challenged. Comments identify other transport infrastructure that should be identified in the plan;
- Policy I/CV: Cycle and vehicle parking – Support for cycle provision, with detailed comments on how the policy could be amended to better achieve this. Some respondents considered car parking standards should be more specific or set as minimum standards, as there is a risk it could lead to inadequate provision. Others considered there should be more flexibility in the policy.
- Policy I/SI: Safeguarding important infrastructure – support for safeguarding important infrastructure from a number of providers, who also noted their safeguarded area may need to be updated as schemes develop;
- Policy I/EI: Energy infrastructure masterplanning – Concerns about the importance of power infrastructure, and developers highlight statutory responsibilities of National Grid and DNOs; and
- Policy I/ID: Infrastructure and delivery – Representors highlight the need for significant infrastructure investment to deliver the strategy, but there was objection from some developers regarding impact on viability and the cumulative burden of standards set by the plan alongside infrastructure requirements. Comments expressed concern about lack of funding for infrastructure to support growth, and also about the reliance on third parties to deliver necessary infrastructure, including in

relation to water infrastructure. There was a need for greater clarity around transport infrastructure delivery, particularly south of Cambridge. Timely delivery of infrastructure, and the need to monitor its delivery were also raised. Some infrastructure providers, such as emergency services, consider that their infrastructure needs have not been adequately reflected. Highways England raise issues around impacts on the strategic road network that need further assessment.

Appendices to the Plan

1.112 A number of representations were also made against the Appendices of the Proposed Submission Local Plan. Broadly, the comments relate to matters that have been addressed in earlier sections of this report, including the proposed housing trajectory and the application of Policy GP/ST: Skyline and tall buildings in relation to Appendix H.

Sustainability Appraisal

1.113 Summary of the main issues raised relating to the Sustainability Appraisal (SA) of the Local Plan:

- Concerns that the SA has failed to consider higher growth level alternatives;
- Comments suggesting the SA should give further consideration to the social and economic implications of different levels of growth within the villages;
- Comments suggesting that a site should be allocated because it has scored positively in the HELAA and the SA;
- Comments noting that sites have been tested and allocated despite negative assessment outcomes in the HELAA; and
- Comments suggesting that the SA should be updated to appraise various scenarios of delay to large sites, account for market absorption rates and model the impact that would have on the Local Plan delivering against objectives.

Habitat Regulation Assessment (HRA)

1.114 Summary of the main issues raised relating to the Habitat Regulation Assessment of the Local Plan:

- The Appropriate Assessment for the Eversden and Wimpole Woods Special Area of Conservation (SAC) fails to address the in-combination effects of the housing development in the Local Plan with East West Rail (EWR) on the SAC's barbastelle bat colony and does not meet legal requirements; The Local Plan should recognise which sites may have particular sensitivities to EWR in-combination effects;

- Natural England consider that wording about residual in-combination effects and mitigation for these should be included before they can agree with the conclusion of no adverse effect on integrity on Eversden and Wimpole Woods SAC. Additional consideration of water issues is also needed. Natural England anticipate these HRA matters will be able to be resolved and believe the Plan itself to be sound;
- The HRA needs to include air quality assessment identified as being required in the HRA accompanying the Regulation 19 Local Plan;
- The HRA must not rely on surveys or mitigation deferred to at the application stage;
- The HRA must consider other in-combination effects relating to rail freight and traffic associated with proposals at Cambourne;
- The HRA should be updated to consider impacts on Hardwick Wood in relation to barbastelle bats and the shared foraging area with the SAC;
- Legal duty on competent authorities to ensure plans will not adversely affect European protected sites and sensitive watercourses. Unsustainable water abstraction risks breaching these statutory environmental limits unless non-abstractive supply solutions are guaranteed prior to occupation; and
- The safeguards for environmental protection are not sufficiently policed by the council who should outsource the outcomes of the policy to a more neutral observer.

How were Representations taken into account?

1.115 Representations are being reported to:

- Cambridge City Council Cabinet and South Cambridgeshire District Council Cabinet on 17 November 2026
- Cambridge City Council Full Council on 26 November 2026
- South Cambridgeshire District Council Full Council on 8 December 2026

1.116 Officers have reviewed the representations and recommend that the Councils submit the Proposed Submission Local Plan to the Secretary of State for examination. A review and response to the issues has been set out in Appendix 13.