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Cambridge Past, Present & Future
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Dear Sir/Madam

Greater Cambridge Local Plan - The First Conversation (Issues and Options 2020)

Cambridge Past, Present & Future is Cambridge's largest civic society. We are a charity run by local people who are passionate about where they live. We operate in the greater Cambridge area and working with our members, supporters and volunteers we:

- Are dedicated to protecting and enhancing the green setting of Cambridge for people and nature.
- Care about Cambridge and are an independent voice for quality of life in the strategic planning of Greater Cambridge.
- Are working to protect, celebrate and improve the important built heritage of the Cambridge area.
- Own and care for green spaces and historic buildings in and around the city for people and nature, including Wandlebury Country Park, Coton Countryside Reserve, Cambridge Leper Chapel & Barnwell Meadows, Bourn Windmill and Hinxton Watermill.

Cambridge Past, Present & Future has considered the consultation material and we have set out below our responses to the questions that were posed.

We are pleased to see a joint plan being proposed, and one that aims to place a greater emphasis on landscape, biodiversity and the environment. We have set out some of our views on how we think that can be achieved and we welcome further dialogue with the councils as the plan process progresses.

We are also pleased to see the councils make greater efforts than previously to engage with the community at the start of the process, and to try and make this more accessible to a wider range of people. We hope that this will continue throughout the process.

We have already written to you (6 Dec 2019) to raise some concerns about the consultation material prior to its release and we hope that you will bear our comments in mind for future consultation material.

I trust that you will take our comments into consideration when developing the Local Plan further. If you would like to discuss any of the responses we have made, please do not hesitate to contact me.

Yours faithfully

James Littlewood

James Littlewood
Chief Executive

CambridgePPF Responses to Greater Cambridge Local Plan - The First Conversation, February 2020

Some Key Issues Not Addressed by the Consultation:

In seeking to formulate our responses, Cambridge Past, Present & Future believes that certain fundamental issues have either been ignored or assumed. As these have an influence on the strategic thinking behind any responses, we feel the consultation is deficient in that it gives little or no recognition to the importance of these issues.

1. **Lack of any Clear Vision of the Future:** The consultation fails to set out any clear vision for Greater Cambridge for 2040 and beyond. What sort of place do the Councils want Greater Cambridge to grow into over the next two decades? How do they envisage Greater Cambridge looking for residents at the end of the Plan period? Without any vision of the future, it is difficult to judge the merits, or failings, of the various options for the spatial development of the area. For example, how can we assess the relative merits of development around the City fringe as opposed to development along Transport Corridors or beyond the Green Belt in South Cambridgeshire if there is no clear statement of what sort of city Cambridge is expected to grow into?

   It is our belief that the consultation should have opened with a question about what sort of future the respondents want, rather than inferring this indirectly through the responses. A question asking whether Cambridge should continue as a compact city or significantly expand into a much larger urban area, would help the Councils determine their spatial strategy. Instead, responses are being solicited in a strategic vacuum. The statements presented in Section 2.4 are not visions so much as political slogans which provide little context for spatial planning.

   One way of provoking debate about a vision would be to publish for consultation the Centre for Science and Policy's report "Visions of Cambridge in 2065". This report (referenced by the City Council in the draft "Making Space for People" consultation) has never been subject to the public consultation which was originally mooted.

2. **Lack of any clear understanding of Cambridge's national and international significance as a historic city** and "one of the loveliest cities in Western Europe" (David Attenborough). Cambridge meets four of the Outstanding Universal Value criteria for World Heritage Site designation (see our response to question 22), and its historic environment should be valued accordingly. It is this historic environment (man-made and natural in combination) which makes Cambridge such an attractive place to live, work, study in, and visit. "Cambridge" in this context includes the historic riverside setting all the way from Byron's Pool through Grantchester Meadows and the city to the course of the rowing races out past Fen Ditton to Baits Bite. This Plan is an unprecedented opportunity to consider Cambridge and its historic landscape setting together, but this is totally unrecognised in this consultation.

3. **The Environmental Limits to Growth:** The document gives the impression that Greater Cambridge has the capacity to absorb a massive increase in human population and housing with little or no enhancement of the resources and services on which the additional people will depend. The belief that up to 66,000 more homes can be built in the area over the next two decades, an uplift of some 50% on the current housing stock, without a massive investment in infrastructure and resources is, in our opinion, highly irresponsible. Yet the document gives no indication of any awareness that resources might very soon limit the capacity of the area for further growth.

Take, for example, our water resources: in May this year, the River Cam recorded its lowest flows for that month since records began in 1949. Our chalk streams are in crisis, they are drying up because the water in the chalk aquafers is declining due to a combination of climate change and increasing abstraction caused by a growing population and economy. Yet, without any recognition of the water crisis we currently face, the Councils seem to be proposing that up to 66,000 more homes can be built in the area. Unless the document shows awareness of the issue and what might be done at the regional level to mitigate it (like a new reservoir), the public will feel that the whole exercise lacks credibility.

Similarly, what provision is to be made for upgrading the electricity supply and the waste management system? Presumably the Councils are aware of these potential limitations and have therefore commissioned research to analyse the limits to growth of the Greater Cambridge area, in which case we would like to see the evidence-base that some of the levels of growth proposed in the consultation are genuinely achievable in a sustainable way.

4. **Impact on Quality-of-Life:** Inevitably, the document focuses mainly on the planning of future developments, so what's in it for existing residents? Residents are understandably worried that their quality-of-life is likely to be negatively impacted by the massive scale of new development but this is largely ignored. People are worried about issues like education and the availability of places at schools of their choice, medical services and the ready access to see a doctor, or be able to book a recreational activity without it being over-subscribed – all these are fundamental to the quality-of-life and need to be given greater recognition.

5. **Investment Deficit:** It is clear that infrastructure investment in the UK lags behind the growth of housing and business. By infrastructure we mean utilities, medical facilities, schools, green infrastructure, etc as well as transport. This means that rapidly growing areas such as Cambridge are constantly lacking sufficient infrastructure. By the time new infrastructure is provided more is already needed. This situation would only get significantly worse with some of the growth options proposed in the consultation. Potentially doubling the number of dwellings over the next two decades cannot be seriously considered without a substantial investment in the local infrastructure – or it will have an unacceptable impact on the quality-of-life of residents. Yet there is no obvious awareness in the document of this problem. Where is this investment to come from, especially now that Government has turned its attention to the North?

Question 1. How do you think we should involve our communities and stakeholders in developing the Plan?

The Councils should make every effort possible to get people involved in the process – the lack of public awareness was a serious failing of the 2018 Plan. Clearly Councils do not have unlimited resources, so we suggest some options that might be given priority:

- It is essential to manage people's expectations if they are asked to contribute. Too often people are consulted, they give their views, but their views are not acted upon. This can leave people feeling angry/ignored/cynical/suspicious rather than involved or engaged (that often includes us!). Consultation and engagement activities ought to make clear the extent to which people's views will (or will not) be acted upon. The nature and types of questions asked should allow people to genuinely influence an outcome. It is also essential that people who do make the effort to respond have this effort recognised by a letter of thanks and by keeping them actively engaged by email in the process as the Plan evolves.

- The Local Plan is a large, complex, and legalistic piece of work. As a result, much of it is impenetrable to anyone but a planner. We feel that the majority of people will only be interested in a small number of key policies and spatial issues, as well as spatial issues that directly impact their neighbourhood. We feel that identifying these issues is vital as the basis for wider public engagement, which could then be carried out in user friendly ways (for example the use of easy to understand language, images, etc). We are pleased to see the use of images on the website that has been set up for the Local Plan.

- The use of 'planning for real' and other hands-on public friendly engagement techniques can be a good way of engaging the wider public in the complex issues associated with planning and we would support the use of these in Cambridge.

- Exhibitions or consultations in communities that will be directly affected by new plans, especially those locations where new development is earmarked.

- Efforts should be made to engage with "hard-to-reach" groups. We would suggest through door-door research in certain neighbourhoods, as well as through face-face discussions with the representatives of these groups.

- At the other end of the spectrum, there are well informed community groups and stakeholders, such as CambridgePPF, that will want to examine the detail. For these groups, getting easy access to information is important. We are pleased to see a website specifically for the Local Plan and that this has a "further reading" section. We would like this developed further so that it pulls together all the published documents and evidence-base relating to the Local Plan, including decisions/minutes from relevant Council meetings (or at least web-links to them). We need a one-stop-shop – as will Councillors and officers.

- The relationship between the Local Plan and Neighbourhood Plans (NPs), both adopted and emerging, needs clarifying. Neighbourhood Plans have to comply with the Local Plan. Therefore, it is possible that changes to the Local Plan could require consequent revisions to a Neighbourhood Plan. Neighbourhood Plans are usually heavily consulted upon and have been created by the community. We would recommend that the Council engages at an early stage with those communities that have created, or are in the process of creating, Neighbourhood Plans.

Question 2. Please submit any sites for employment and housing you wish to suggest for allocation in the Local Plan.

- Within Cambridge there are significant areas that are currently wasted as surface-level car parking. At a time when efforts should be made to reduce car use and improve air quality, we suggest that some of these car parks should be re-used for development.

- Cambridge Retail Park on Newmarket Road. This area includes some 25 acres of surface parking. If a multi-storey car park was built on a small portion of this land, some 20 acres could be released for development. CambridgePPF submitted an outline proposal for the re-development of the car parking area on both sides of Coldhams Lane during the public consultation for the 2018 Local Plan. This showed how the site could accommodate 1200 dwellings with only a marginal loss of car parking space through the provision of a multi-storey facility and by allowing parking beneath the residential blocks which were raised on columns. Because Cambridge has such a dearth of possible brown-field development sites, we believe

this site could provide valuable residential use, and must therefore be given serious consideration.

Question 3. Please submit any sites for green space and wildlife habitats you wish to suggest for consideration through the Local Plan.

- CambridgePPF owns and manages land in and around Cambridge, some of which we would like to put forward for consideration. These sites include:
  - Wandlebury Country Park
    This 60ha country park has been expanded over the decades by converting agricultural land into meadows and woodlands with public access. It is a County Wildlife Site that provides a green lung for Cambridge, with over 60,000 visits a year. As the population of greater Cambridge is growing, so is the pressure on the park, its habitats, heritage and infrastructure. We would like to explore opportunities for further expansion of the park as part of a Nature Recovery Network for the Gog Magog Hills.
  - Coton Countryside Reserve
    We own over 100ha of farmland and semi-natural habitats around Coton village, which makes up Coton Countryside Reserve. We would like to include the farmland for consideration as part of a Nature Recovery Network.
  - Land at Balsham
    We own c15ha of farmland to the southeast of the village of Balsham, close to Balsham Wood SSSI. We would like to include the farmland for consideration.

- In our answer to question 12 we have proposed the creation of 5 nature recovery networks (NRN). We will be carrying out work through 2020 to identify land that could become future habitats or green spaces within these NRNs. We intend to submit these to you later in the year for consideration.

Question 4. Do you agree that planning to 2040 is an appropriate date in the future to plan for? If not, what would be a more appropriate date and why?

- **Strongly agree**
- **Agree**
- **Neither agree nor disagree**
- **Disagree**
- **Strongly disagree**

- CambridgePPF would not want to see the Local Plan go beyond 2040. The 2018 Local Plan has proposed a significant amount of new development and a substantial increase in population. It will not start to become clear until 2025 and beyond what impacts this growth will have – for example, traffic congestion, overcrowding in Cambridge City Centre, or water shortages in our chalk streams. Therefore, it would seem to us to be unwise to continue to extrapolate growth to 2040 (or beyond) until the impacts of the 'in-pipeline' growth are better understood.

- Any future Local Plan must be flexible and allow for continuous review in response to changing circumstances. Advances in technology and the effects of climate change are two obvious factors that could have a profound impact on Greater Cambridge, even in the relative short-term. A fixed and rigid Plan could become a hindrance in addressing future change. It would also be very difficult (maybe even impossible) to suggest that growth levels be lowered if it turns out that significant growth cannot be achieved without unacceptable adverse impacts.

How is the necessary flexibility to be built into a Plan that has a 20-year horizon? It is much easier to increase housing targets than to reduce them because it could have serious financial implications. This should argue in favour of the "precautionary principle" in target setting and our preference would be for the new Plan to provide housing requirements to 2035 and to give only an indication of future growth beyond that date.

- In the UK we are reliant on census data to inform us of changes in our society and to inform future planning. The last census was nearly 10 years ago, yet Cambridge is changing rapidly. The next census will take place in 2021 with data available in 2022/23. This will clearly create a problem for the creation of the greater Cambridge Local Plan – with the possibility that census data could require changes to the plan once it is at an advanced stage. Has this been considered by the Councils? If so, is the proposed timetable sensible or would it be wiser to put back the process in order to be able to plan, based on new census data?

- Any future Local Plan must also take account of National Statutory and Interim Climate Change targets (2050 Net Zero and 2030 Clean Growth Strategy respectively) including those for all existing buildings.

Question 5. Do you think we have identified the right cross-boundary issues and initiatives that affect ourselves and neighbouring areas?

- **Strongly agree**
- **Agree**
- **Neither agree nor disagree**
- **Disagree**
- **Strongly disagree**

CambridgePPF disagrees:

- London is the elephant in the room. Although the London Plan sets out that housing needs can be met, in reality high land values, house prices, and rental rates mean that a substantial number of new London workers will commute from outside. Cambridge already has a significant number of London workers and has been identified as providing opportunities for outward migration from the London area. This situation will be exacerbated by the opening of Cambridge South Station and new development close to Cambridge North Station. In London there is no political appetite to build on the Green Belt in order to address this situation. To what extent should Cambridge provide housing for London commuters, especially if this means building on Cambridge's Green Belt? It would seem unacceptable to us if Cambridge were to sacrifice its Green Belt because London refused to build on its own. This is an issue that we feel should be given much greater prominence in the Local Plan and discussed with local communities.

- Anecdotally, we are aware that many people moving into housing around Cambridge which was previously green belt, such as Nine Wells and Great Kneighton, are London workers. If the Councils have not already commissioned research into the scale of London workers occupying new Cambridge developments then we suggest that this should be done as part of the evidence-base for the Local Plan as it has a critical bearing on who we are providing housing for.

- Cambridge now has a very large commute-to-work area, which extends beyond the neighbouring Cambridgeshire districts. We believe that the commute-to-work area should

form the basis of cross-boundary engagement. As an example, one of our employees commutes from a new development in Norfolk.

- The Local Plan must identify where there are cross-boundary planning issues and incorporate the tools and mechanisms within the Plan to deal with them if they arise during the Plan period. This will avoid a repeat of the situation which has emerged in the A1301 corridor where the planning authority has been largely powerless to manage large-scale piecemeal development (Agritech at Hinxton Grange, Wellcome Trust expansion, Great Chesterford Business Park, and the Uttlesford 'Garden Village'). The Local Plan should also have the flexibility to require Area Action Plans/Masterplans/Supplemental Planning Documents when unplanned cross-boundary issues arise. This could be achieved through policy wording to that effect.

Question 6. Do you agree with the potential big themes for the Local Plan?

- **Strongly agree**
- **Agree**
- **Neither agree nor disagree**
- **Disagree**
- **Strongly disagree**

- CambridgePPF give a qualified agreement to the themes. The matrix provided by the four big themes with the three main cross-cutting planning elements produces a useful framework within which to develop the Plan. We feel that this is a significant improvement on the approach to the 2018 Plan

- However, CambridgePPF believes that the theme 'Wellbeing and Social Inclusion' is drawn too narrowly. We would like to see this theme widened under the broader heading 'Quality-of-Life' which would cover not just the issues of public health and social inclusion but also the wider factors that people need to enjoy a high quality of life – education and training, adequacy of local medical services, environmental issues like air quality, local retail facilities, opportunities for sport and recreation etc. These items are essential for people's quality-of-life and happiness yet they risk being overlooked in the proposed big theme structure. It is appreciated that some of these issues could be covered within the Great Places theme, but Great Places seems to be primarily orientated towards new developments and incoming occupiers rather than on facilities and opportunities for current residents.

- The historic environment, which is one of Cambridge's most outstanding and most widely-valued features, is largely overlooked within the 4 key themes. E.g. Cambridge's most significant green spaces are historic spaces, considering them only as green spaces fails to recognise their full value. We suggest a fifth key theme: how to reconcile growth pressures with keeping Cambridge special, in effect, how to avoid killing the goose that lays the golden eggs!

Question 7. How do you think we should prioritise these big themes? Rank the options below 1-4 (1 = Most Preferred 4 = Least Preferred). Allocate 10 points across the following four themes:

- **Climate Change**
- **Biodiversity and Green Spaces**
- **Wellbeing and Social Inclusion**
- **Great Places**

- All the elements of sustainability are important and we don't believe that prioritising them in a generic way is an appropriate approach. It seems to us that ranking the four themes is a meaningless exercise that trivialises a highly complex multi-dimensional reality.

- The Sustainability Assessment for the draft 2018 Local Plan did not tackle key issues including environmental capacity. It is vital that the Sustainability Assessment for the new Local Plan takes these issues very seriously indeed.

- The priority between themes in any given situation will inevitably depend on the circumstances of specific issues and the local context. For example, it would not be appropriate to attach solar panels to the roof of Kings College Chapel – which is the type of perverse outcome that could arise if any one theme was pre-dominant. The Sustainability Assessment is the document that should present a suite of criteria for prioritising conflicting themes in trade-off situations – but does it do so?

Question 8. How should the Local Plan help us achieve net zero carbon by 2050?

- We question whether high levels of growth are compatible with addressing climate change. The most effective way the Local Plan can help achieve net zero carbon is to limit growth to sustainable levels. As a society, until we are able to build and sustain carbon neutral communities, high levels of growth will result in higher levels of carbon and make it harder to achieve net zero carbon by 2050.

- Building on greenfield sites or farmland will reduce the capacity for carbon sequestration and should thus be avoided. The loss of quality agricultural land means more food has to be imported into the UK, or more intensive farming techniques will need to be employed to make up the shortfall – both of which would increase carbon emissions.

- The consultation emphasises the need for new development to be "carbon-neutral". This can be misleading in that it implies some equality in carbon input in energy supply with carbon emissions. However, the creation and maintenance of a new development can have carbon consequences just as great as energy efficiency. What is needed is a Total Carbon Budget for a development, including the embedded carbon captured in materials, transport and construction emissions. All new developments should be required to provide a Circular Economy Statement as has recently been introduced to the London Plan, in order to address the embedded carbon within existing buildings and ensure that new buildings could be easily recycled in future.

- Proposals for adaptation and retrofit of the existing building stock should also be on a "whole life" basis, minimising embedded carbon. The Local Plan's 2040 horizon is 10 years beyond current Government Clean Growth Strategy targets for retrofitting dwellings to Band C. There are serious practical issues as well as major townscape implications involved in trying to meet these targets, plus skills and knowledge issues in relation to buildings of traditional construction (almost all pre-1919 buildings, and many between 1919 and 1939). There have been well-documented cases across the UK where well-intentioned but inappropriate measures have led to waste of money (and carbon). Balances need to be struck between short term measures and longer term "deep retrofits" (which may require costly undoing of previously installed measures. The Plan needs to take a strategic approach to these challenges.

- Carbon sequestration will obviously be an important mitigation factor in Greater Cambridge yet it receives little consideration. Sequestration is more than just tree planting as there are

other carbon sinks, like soil. Natural grassland is actually a better carbon sink than most forms of woodland because of the substantial below ground storage.

- Electricity charging points for electric vehicles should be mandated for all new developments. Utility gas should not be installed in new developments.

- New developments should be conceived so that residents can if they choose be car free. This involves consideration of the location of development, provision of services and infrastructure for walking, cycling and public transport.

- For large developments either ground source, air source, or communal heating should be prioritised.

- In the spatial planning of new developments, the Councils seem to feel that there is an inherent need to minimise the movement between jobs and homes so as to reduce vehicle emissions, but this is very difficult to resolve in a highly mobile society. Our view is that co-locating housing and employment may be a useful theory in determining spatial planning but in practice it has relatively limited relevance. It may work in certain situations, such as in large new high-density mixed developments in the urban area, where employment uses would help to support community services such as shops. An example would be Cambridge North East Fringe or Cambridge Airport. However, research into the Cambridge Phenomenon found that workers change jobs regularly, but not their housing – this means that even if workers live close to their employer initially, over time they would commute elsewhere to work. Therefore, in our view, the availability of good public transport or cycle infrastructure is more important for determining new housing and employment locations.

- Supporting working from home is one way that the need for travel can be reduced, and this can also support more vibrant communities. We would like to see policies in the Local Plan that encourage home working, for example new houses to be designed so that home offices can be created by occupants.

- The Local Plan is constrained by national planning policy, guidance and regulations. It is clear that many of these are not capable of delivering net zero carbon by 2050. We believe that it would be politically difficult for national government to prevent a local authority from proposing local policies or targets that could achieve net zero carbon – even if they are not supported by national policy. We would encourage the councils to be brave and show leadership, and if necessary, challenge national government.

Question 9. How do you think we should be reducing our impact on the climate? Have we missed any key actions?

- Over the next decade, new approaches and technologies will be developed that will enable developments to better reduce their climate impact. It is also likely that national targets for this will become more stringent. Given that the Local Plan is proposed to cover the period to 2040, the Plan will need to be flexible enough to be able to encourage these new features as and when they become available. This could be achieved by continually updating SPDs (such as the Sustainable Design & Construction SPD, which we support) or alternatively, policy wording could refer to “best practice” or “highest standards”. As a centre for research and new thinking, we feel that Greater Cambridge should be at the forefront of adopting such practices and therefore we want to see a Local Plan that will encourage the Greater Cambridge construction industry to test new ideas and be early adopters.

- All new public buildings should be developed and constructed to achieve the BREEAM Certification of Excellence. The Government is currently undertaking a Consultation on Future Homes Standards, and the relevant high standard arising from this exercise should be applied initially.

- Food security and reducing carbon emissions is a priority that requires quality farm land to be retained as farm land. Building on productive local farm land can result in more food imports and carbon emissions through transportation. Release of the most productive farm land for construction should be avoided.

- We would like to see large new developments laid-out in ways which prioritise cycling, walking and public transport rather than private vehicles. There are examples from the Netherlands of housing estates laid out in this way, such as Houten (https://itdpdotorg.wpengine.com/wp-content/uploads/2014/07/22.-092211_ITDP_NED_Desktop_Houten.pdf). Such developments are also usually much more community-oriented. Most developers do not want to include measures to reduce car use as they see easy car access as a selling-point for their properties, so how can the Local Plan bring about change in this regard?

- Adapting to climate change cannot be achieved without co-ordination of planning across many areas. Transportation and utilities infrastructure must be joined up with buildings and construction.

- Consideration needs to be given to existing housing stock and commercial premises, which make up the majority of buildings. How can the Local Plan or the Councils support property owners to retro-fit their buildings so they can use electricity and be more energy efficient?

- Discouraging the use of gardens as development sites would assist carbon sequestration. Urban greenspace, including gardens, are important for urban biodiversity, water absorption, urban cooling, and carbon offsetting (trees and vegetation). Gardens and allotments are important for the health and wellbeing of residents. The Councils' policy to prevent "garden grabbing" needs more rigorous enforcement, and the provision of more allotments associated with major new developments should be encouraged.

- Consideration needs to be given to existing housing stock and commercial premises, which make up the majority of buildings, and which will be subject to Government retrofit targets. Current 2030 Clean Growth Strategy targets for as many buildings as possible to reach EPC Band C by 2030, and Minimum Energy Efficiency Standard requirements for all private rented sector buildings could have a massive impact on the character of Greater Cambridge's buildings and places. The choices made on what measures to take, and how, will be crucial to minimising harm to valued places, streetscapes and buildings. The Plan needs to tackle these issues.

- The Local Plan should seek appropriate balances between heritage significance and climate change mitigation and adaptation. Building owners should be encouraged to keep their buildings in good repair, and to improve their efficiency as far as is compatible with their character and their fabric. There will be many and sometimes very difficult choices, which need to be made on well-informed basis with a clear assessment of the issues and balances involved. Some recent cases (New Court, Trinity College, and 1 Regent Street) highlight an urgent need for owners, agents, Planning Committee members and the public to be more informed about the issues at both individual building level, and in terms of the cumulative impacts on the character of Cambridge.

- The Local Plan and the Councils will need to support and help guide these choices. While helpful free guidance to private sector Landlords is available (at https://www.gov.uk/guidance/domestic-private-rented-property-minimum-energy-efficiency-standard-landlord-guidance, and similarly for non-domestic), the Government's guidance on the vast majority of the work is only being published through the British Standards Institute, at exorbitant cost. Government advice on domestic retrofits is given in PAS (Publicly Available Specification) 2035:2019.

- Consideration needs to be given in the Plan to both requiring projects to comply with these standards, and publicising their advice and requirements in accessible, user-friendly form. See also advice available from the Sustainable Traditional Building Alliance stbauk.org.

- A vital aspect of PAS 2035, and the forthcoming PAS 2038, is that they promote and define high-quality retrofit that supports, among a range of criteria, "p*rotection and enhancement of the architectural and cultural heritage as represented by the building stock*". Appropriate balances have to be struck between energy efficiency improvements and preservation and enhancement of the heritage. We commend the principles set out in Parts L1B and L2B of the Building Regulations, which promote energy efficiency actions, insofar as they can be achieved without damage to the character or fabric of buildings of historic or breathable construction.

{FULL EXTRACT FROM PAS 2035:2019:

"0.1 Context

0.1.1 *Statutory national targets for the reduction of greenhouse gas emissions in response to the threat of climate change imply that very significant improvements need to be made in the energy efficiency of the UK's building stock, including nearly all its 27 million domestic buildings. ….. This PAS supports work towards those objectives by promoting and defining technically robust and responsible "whole-building" domestic retrofit work, i.e. high-quality work, that supports:*

- *improved functionality, usability and durability of buildings;*
- *improved comfort, health and well-being of building occupants and visitors;*
- *improved energy efficiency, leading to reduced fuel use, fuel costs and pollution (especially greenhouse gas emissions associated with energy use);*
- *reduced environmental impacts of buildings;*
- *protection and enhancement of the architectural and cultural heritage as represented by the building stock;*
- *avoidance of unintended consequences related to any of the above;*
- *minimization of the "performance gap" that occurs when reductions in fuel use, fuel cost and carbon dioxide emissions are not as large as intended or predicted.*

0.1.2 *The requirements and guidance presented in this PAS are intended to apply to improvement measures in the context of a holistic approach to retrofit that takes the points listed above into account. The holistic approach considers the building as a system of elements, interfaces and occupants that interact, and not as a set of elements that are independent of each other or of occupants' practices and lifestyle. "}*

- Further key guidance for work to older buildings is provided in British Standard BS 7913:2013: " *The most effective way of ensuring energy efficiency and sustainability is to keep historic buildings in good repair so that they last as long as possible, do not need replacement and do not suffer from avoidable decay that would require energy and carbon to rectify……. Elements such as walls can be over a third less energy efficient if damp…"*

- Buildings of traditional solid wall construction (pre 1919, and many pre 1939) will require a different approach to more modern (cavity wall) construction. Retrofit measures suitable for modern buildings may be wholly unsuitable for these older buildings which perform very

differently in terms of moisture. Ill-chosen retrofit measures can waste both money and carbon on both the original and subsequent remedial works (see, e.g., FIshwyck, Preston.

- There are very serious shortages of traditional building repair and refurbishment knowledge and skills, due to the construction industry's long-term failure to provide training in them on the scale needed. This skills shortage now seriously risks compromising retrofit efforts, and the Local Plan should seek to encourage local development and dissemination of the skills needed. The Colleges and other owners of historic building estates could play a part in a strategy for developing skills. What is equally urgently needed is increasing the capacity and availability of conservation staff to provide vital impartial advice.

- Whole life carbon is a key issue for both new buildings and retrofits, and repairs, e.g. using cement mortar prevents re-use of carbon-intensive fired and quarried materials. A circular economy approach should be encouraged, with whole-life audits for retrofit projects as per BS EN 15978:2011.

Taking all these factors into consideration, a baseline assessment of the implications, for Cambridge's historic environment, of current Government retrofit targets is urgently needed.

Question 10. Do you think we should require extra climate adaptation and resilience features to new developments?

- **Yes, strongly agree**
- **Yes, somewhat agree**
- **Neither agree nor disagree**
- **No, somewhat disagree**
- **No, strongly disagree**

CambridgePPF strongly agrees that additional resilience features for new developments are essential if climate change is to be tackled.

- The Local Plan must be sufficiently flexible that it can accommodate the latest technologies and mechanisms to improvements in resilience to climate change – see our response to Q9. Greater Cambridge should be at the forefront of adopting such practices and therefore we want to see a Local Plan that will encourage the construction industry to be early adopters.

- Water resource use will be critical for Cambridge if our rivers and wetlands are to support wildlife. We would like to see the highest standards of water efficiency and grey water recycling in all new developments with the aim that water use be reduced to below 80 litres per day per person. We would like the standards set at Eddington to become the new normal for Greater Cambridge.

- The Local Plan should encourage a standard of building design and layout that provides efficient insulation to minimise the need both for excessive use of air conditioning in summer and central heating in winter. The provision of large trees can shade buildings, pavements and gardens.

- If sea level rises and extreme weather events occur, as some scientists are predicting, then it is likely that new areas may become prone to flooding. This in turn means that the flood zone maps will need to be re-drawn in the coming decades. The Environment Agency will be responsible for this future modelling and its latest information must be incorporated in the Councils' planning decisions. If this is not possible then the Councils should carry out a future modelling assessment of the flood risk for all new large development sites proposed for the

Local Plan. The Plan should include a Policy requiring applicants for all new developments (even in flood zone 1) to submit a statement of possible flood risk based on future climate predictions. Land identified as at risk of future flooding could be considered for biodiversity creation, woodland planting, etc

Question 11. Are there any other things we should be doing to adapt to climate change? We want to hear your ideas!

- All new developments should as part of their planning application include a full Carbon Budget. This should cover not just the annual emissions following completion, but also the embedded carbon in the materials, transport, and construction. The master-planning of major developments must include data on the carbon savings and emissions that can be expected from the scheme over its lifetime. A Red/Amber/Green rating should be allocated by officers based on the carbon budget to alert Councillors to the carbon implications arising from the proposal

- Major schemes should produce Whole-Life Carbon Assessments that address all impacts associated with the construction, operation, and demolition of buildings and infrastructure. The UK construction industry, a sector known for its resistance to change and for poor collaboration, has seen the recent introduction of several important climate initiatives, such as the London Energy Transformation Initiative (LETI) Energy Design Guide. This sets out the practical steps for the built environment to achieve net zero-carbon by 2050. LETI has also just released its Climate Emergency Design Guide which presents targets for new buildings to achieve net zero by 2030. The Councils should strive to incorporate these standards and targets into all new building design. However, they cannot be considered in isolation but as a core part of the Whole-Life Carbon approach. Many leading construction companies have now committed to either the Better Buildings Partnership or the UK's industry-wide campaign, Advancing Net Zero. Developers supporting these initiatives should be favoured.

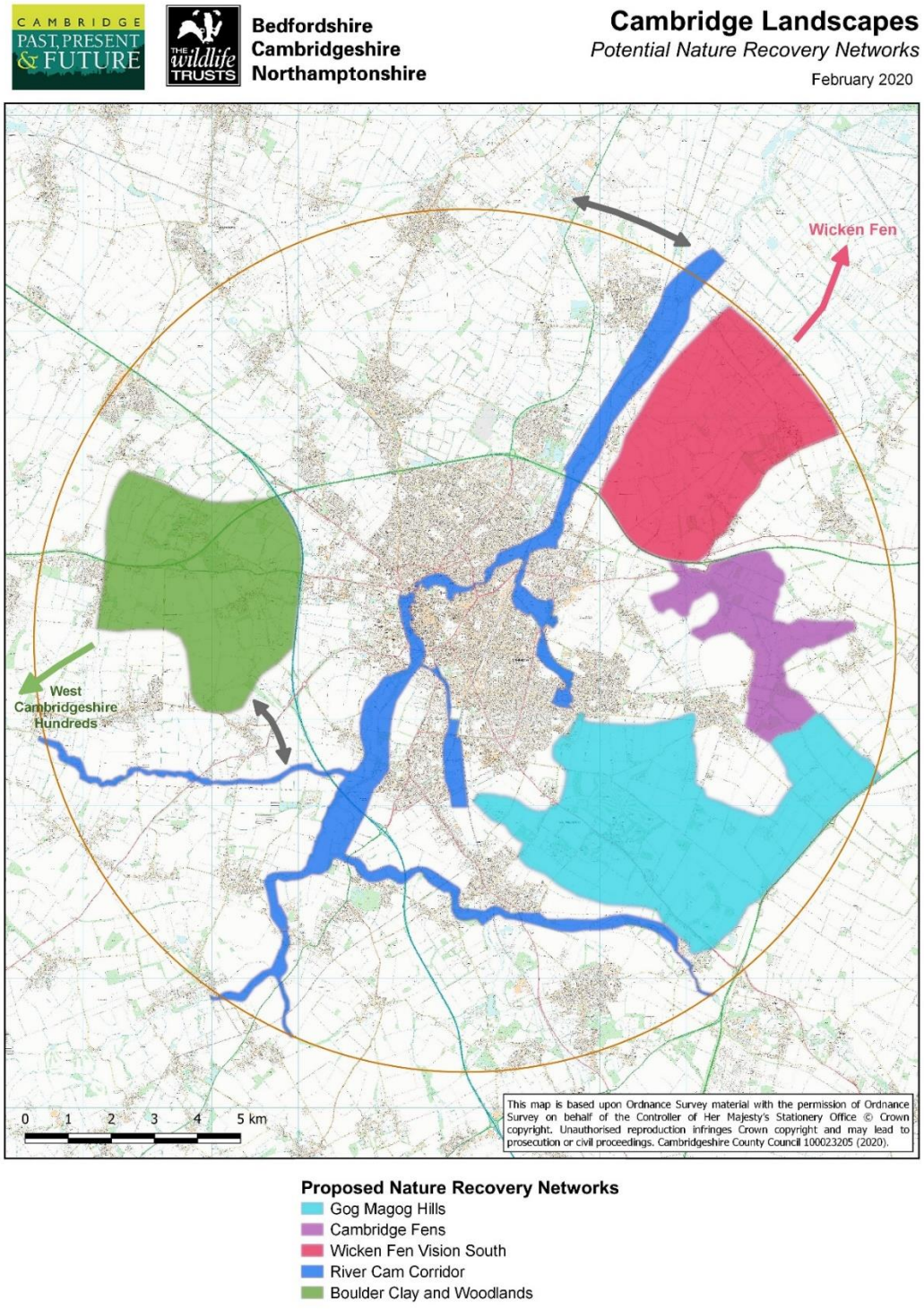
- Carbon savings can be achieved by maximising use of existing developed areas before commencing development in new locations. There are several science, technology, and commercial parks in the areas around Cambridge which are not fully developed or where densification is practical.

Question 12. How should the Local Plan help us improve the natural environment?

We believe that the Local Plan should identify, describe and map a nature recovery network, which is of sufficient scale and scope that it would be capable of delivering a doubling of nature and meeting the informal green space needs of current and future populations. Such a network would also deliver the wider benefits described in the Issues & Options First Conversation document, namely ameliorating the worst effects of flooding, drought, high temperatures; improving health and well-being; absorbing carbon; planting trees; increasing prosperity by making our area an attractive place to live, learn or do business; etc. A nature recovery network would create inspirational landscapes in and around Cambridge which will continue to support its global reputation and image.

Working with the Wildlife Trust and other conservation organisations we have started to pull together an evidence base for such a network in and around Cambridge. Following the principles of the Lawton Report and the government's 25 Year Environment Plan (places for nature that are "Bigger, Better, Connected") our approach is based on identifying areas on a 'landscape scale' that already have a core

of habitats and/or where land is being actively managed for nature. This is still a work in progress and we will be sharing the interim and final outputs of this work with the Councils and submitting it as an evidence base for the Local Plan. However, our initial work has identified 5 priority areas that would form the basis for a "Cambridge Landscapes – Nature Recovery Network", these are illustrated and described below:



Nature Recovery Network – Priority Areas (NRN)

The survey of the green assets around the Cambridge area forms an evidence base on which five areas of focus for potential Nature Recovery Networks (NRN) within a 10km radius of Cambridge have been defined. Each is different in character and may ultimately produce very different opportunities in terms of the two strands of (1) creating habitat and biodiversity in order to enhance our landscape and combat the effects of climate change, and (2) providing natural greenspace for the residents of Cambridge and surrounds to engage with nature and receive benefits in terms of physical and mental well-being.

The broad areas have been defined by studying landscape features such as the topography, underlying geology (both solid and drift), current habitat and land use, and past habitat and land use. Ownership of land has not been taken into account, but inevitably some land use follows ownership boundaries.

1. Gog Magog Hills

This large area of approximately 25 Km2 south-east of Cambridge is defined by where the underlying chalk geology comes to the surface, which corresponds well to the 25m contour line. The southern boundary is marked by the A11, with the urban areas of Cambridge defining the northern boundary and the River Granta and riverside villages the western boundary. The area directly connects with both the Cambridge Fens and River Cam NRNs. It includes the chalk grassland SSSIs of Cherry Hinton Chalk Pits, Fleam Dyke, Gog Magogs golf course and Roman Road, as well as other Wildlife Sites and accessible natural greenspaces such as Wandlebury Country Park, Magog Down and Beechwoods LNR.

2. Wicken Fen vision

The National Trust has a long-term vision to extend its Wicken Fen reserve southwards to the edge of the city of Cambridge, covering an area of 50 Km2. The southern part of this vision area provides a gateway from the city. This area has been defined by geographical constraints, with the A14 to the south (marking the northern edge of the city), the River Cam to the west (its own NRN area), the B1102 to the east and an approximate distance of 10km from the city centre to the north. While the boundaries are geographical, the area itself is characterised by wet, clay soils. It lies beneath the 10m contour and the underlying geology is Cretaceous marly chalk. Quy Fen SSSI lies within the area showing the potential for the type of habitat which could be restored across it. Quy Water and the Bottisham Lode flow through this area. Further north, the fen peats come to the surface, forming a direct link to the core, northern part of the Wicken Fen vision area.

3. Cambridge Fens

East of Cambridge, Fulbourn, Teversham and Wilbraham Fens mark the edge of the Fens landscape character area. Three SSSIs, Fulbourn Fen, Wilbraham Fen and Great Wilbraham Common form the core of this area, which connects then. The area is mainly defined by the 10m contour line in the north and 15 m contour line to the south. It comprises both peat and Holocene river terrace gravel surface geology. The A14 forms the northern boundary, separating this area from the Wicken Fen vison south, while the villages of Teversham, the Wilbrahams and Fulbourn also form discrete boundaries being located on the higher ground.

4. River Cam corridor

The River Cam, its floodplain and catchment tributaries including Bourn Brook, Cherry Hinton Brook, River Granta and the River Rhee. The corridor around these has been defined by both the topography

of the adjacent land, including the floodplain and broadly following the 10m contour line, as well as the Holocene river deposits surface geology. The underlying geology is predominantly Cretaceous gault clay, though the River Granta from Babraham flows down on the Cretaceous marly chalk. The river itself is a Wildlife Site and it links a number of local wildlife sites, green spaces and historically important green spaces including Grantchester Meadows, the college Backs, many of Cambridge's commons and Ditton Meadows. This area is also significantly important in terms of providing natural greenspace for health and wellbeing.

5. Boulder clay and woodlands

This large area of approximately 18 Km2 covers the higher ground (over 25m) to the west of Cambridge and sits upon the recent boulder clay deposits, which overlay the Cretaceous marly chalk and gault clay. Madingley Wood SSSI (an ancient woodland) lies on top of the hill and the ground conditions are conducive to woodland cover. The area extends down to the A428 and M11 in the north and east. The area includes or adjoins the Coton Country Reserve (CPPF), Burwash Manor Organic Farm and Lark Rise Farm (Countryside Restoration Trust), all of which are farms not only demonstrating wildlife-friendly practices, but also engaging with the public through a series of permissive footpaths. Thus, there is a great opportunity here to extend this network of wildlife-friendly farming practices, increasing the quantity and quality of the hedgerow network. The Bin Brook passes through the area, and the Bourn Brook lies to the south. These connect this local landscape area to the strategic West Cambridgeshire Hundreds NRN to the west.

In addition to the five above we are also looking at whether there could be an "opportunity area" to the north-west of Cambridge:

Fen-edge orchards and droves

The area of approximately 15km2 between Cottenham and Histon is completely devoid of any Public Rights of Way. In the past the area was a major producer of fruit, and was covered in orchards, a small number of which remain. This area is underlain by Jurassic and Cretaceous clays and sands, is mostly beneath the 10m contour line and is well drained by a series of ditches and drains, including Beach Ditch, a County Wildlife Site. This is a strategic area to provide residents of Cottenham, Histon, Oakington, Rampton and Landbeach an area of countryside to explore by a series of newly created pathways along ditches and old droves, which could be widened to provide wildlife corridors through the area for the benefit of the aquatic plants and animals. As such it could be considered as a "stepping stone" for nature between Cambridge and the wildlife rich areas in the Ouse Valley. It also connects to Northstowe and could provide an area of accessible countryside beyond the relatively constrained urban greenspaces of the new town. The condition of the remaining orchards would need to be assessed, but allowing public access into some of these would provide a link to the heritage of the area. Alternatively, there would be scope to create a number of community orchards, combining wildflower areas and orchard trees, including local varieties of which there are many that were developed in this area.

Within each of these landscape scale areas further work is now being carried out to identify more specific opportunities to create, expand and connect habitats and to ground truth these. We believe that these opportunities should provide the focus for the future creation/investment in green infrastructure because they will deliver the maximum benefits for nature and people.

Work will also be looking at the connections between these landscape areas and with adjacent or smaller scale green infrastructure. This work will be submitted to the Councils later this year.

The nature recovery network areas would not be giant parks or nature reserves. They would consist of groupings of individual parks, nature reserves and natural habitats that are linked together by wildlife friendly habitat. The majority of the land in these areas is farmed and is likely to stay that way during the period of the Local Plan, however there will be opportunities through the new Agriculture Bill to create areas of new habitat on farmland that can buffer, connect or provide stepping-stones between existing habitats.

There will be the possibility to create new nature areas and green spaces in each of these landscapes through philanthropy, fund-raising and carbon-offsetting; and the development process/Local Plan should also play an important role in supporting this network, for example through developer contributions/biodiversity net gain and by ensuring that any green spaces being created by new developments link to and support the Nature Recovery Network wherever possible.

In addition to the Nature Recovery Network we also propose the following measures to help improve the natural environment:

- All new development should achieve a measurable 20% net gain in biodiversity. New habitats should be created in places that help deliver the nature recovery network (see above).
- Policies which ensure the highest standards of water efficiency and minimise use of water from the chalk aquifer.

Question 13. How do you think we should improve the green space network? Please add any comments and ideas. We would also like your views on sites that could be suitable for new green infrastructure.

The Issues & Options consultation identifies many of the issues and we are supportive of what the Councils are already doing and strongly support the Local Nature Partnership's vision to double the area of rich wildlife habitats and natural greenspace by 2050.

However, Cambridgeshire and the Greater Cambridge area has a deficit in strategic accessible natural greenspace, not having any large areas of open access, downland, moorland or coast. The Wildlife Trust has estimated that since 2001, taking into account completed developments and current Local Plan allocations, there will be an accumulated deficit in strategic natural greenspace provision in the county in the order of 600 ha. This is without considering any further growth beyond 2040 (or above current growth rates). This calculation is based on applying the Natural England standard for Suitable Alternative Natural Greenspace of 8 Ha per 1000 population to growth since 2001.

Major developments (large urban extensions and new settlements) have generally been providing sufficient green spaces for their developments, however, this has not addressed the historic accumulated deficit. Unfortunately, small and medium sized developments are not providing sufficient strategic open space and so cumulatively they are exacerbating the deficit.

Whilst it is essential for people to have green space close to their homes it is inevitable that when they want to take a longer period of well-being activity (such as a walk, cycle ride, picnic with family, nature watching, etc) that they will need/want access to large open spaces which Cambridgeshire is deficient in.

This deficit also has implications for biodiversity and may help explain why Cambridgeshire has one of the lowest amounts of land in the UK that is rich wildlife habitat and natural greenspace. Indeed, doubling the amount would only bring Cambridgeshire up to the average for the UK.

This deficit also has other implications, one of which is visitor pressure and disturbance at those sites that already exist. This is causing damage to natural and built heritage at some of these locations.

The deficit will also be impacting on health and well-being because people find it harder to access, because it is further away or because when they get there it is full (there are several times a year when we have to turn people away from Wandlebury Country Park because it is full).

The Local Plan needs to find a mechanism to deliver sufficient strategic natural green spaces to address the current deficit and cater for the growing population. Without this the current damaging human recreational pressures being recorded on a number of nationally and internationally important nature sites will be exacerbated. Would it be possible to use a CIL to ensure that all new developments contribute towards creating more strategic natural greenspace capacity?

In terms of where this strategic natural greenspace should be, we believe that this should form part of the Nature Recovery Network that we have proposed in our answer to Question 12. This would ensure that limited resources achieve the maximum benefits for both people and nature.

Question 14. How do we achieve biodiversity net gain through new developments? Please add any comments and ideas

- We would like to see the Local Plan support greater use of the *Developing with Nature Toolkit*. Could planning applications be required to include a completed toolkit score sheet? Or could those applicants that complete the toolkit and achieve a high score be looked upon favourably?

- We believe that Greater Cambridge should set a policy requirement for a minimum of 20% biodiversity net gain from new development (excluding householder applications). This is required for two main reasons:

    i. the way that biodiversity metrics operate, a 10% net gain is within the 10% margin of error for creating replacement habitat, meaning that in reality there may be no actual gain when it is delivered. This is the main reason why there has been a change in National Planning Policy because the previous “no net loss” policy was in some cases delivering a 10% loss. In effect, a 10% net-gain policy does not guarantee an actual 10% gain in biodiversity. In order to guarantee a 10% net gain would require a 20% net gain policy.

ii. because of the general impoverishment in biodiversity of the Greater Cambridge area, caused largely by the intensive agriculture, but also as a result of past development. Cambridgeshire has a much lower percentage of natural habitats than most lowland counties. In order to deliver the vision to double nature that has been adopted by the local councils a 20% net gain will be required to make a measurable contribution.

- The Greater Cambridge planning authority will need to identify a Nature Recovery Network within the Local Plan but should also prepare a Nature Recovery (or Biodiversity & Green Infrastructure) Strategy that supports this (either as a full Development Plan Document or a Supplementary Planning Document).

  We have suggested a nature recovery network for Cambridge in our answer to question 12. The development process/Local Plan should play an important role in supporting this network, for example through developer contributions/biodiversity net gain and by ensuring that any green spaces being created by new developments link to and support the Nature Recovery Network wherever possible.

- There is a debate to be had about whether better biodiversity gains could be achieved through off-site biodiversity off-setting versus delivering them on-site. For example, evidence has shown that on-site habitat creation for Great Crested Newts has often been unsuccessful and as a consequence a new system is being introduced that will use developer contributions to create new habitat off-site. The well-being benefits to the new residents of on-site biodiversity provision (which also makes more attractive developments which uplift sales prices) needs to be weighed-up against off-setting nearby where greater biodiversity benefits can be achieved. This is likely to be more of an issue for small/medium sized developments that often find it difficult to include suitable space on the development site.

- One problem of biodiversity offsetting is that the results are often not known for years (think how long it takes a tree to mature) and sometimes fail (ponds without water for example). There is no mechanism for redressing this and therefore no incentive (other than a moral one) for developers to get it right. The Local Plan should include a mechanism to record and monitor implementation of the biodiversity net gain system and the delivery of both on-site and off-site habitat creation.

- We would encourage the Local Plan to promote landscape design that supports greater biodiversity. This requires a culture change within the development sector and also from the house-buying public in order to accept such changes. For example, to recognise that meadows or rough grassland have much greater benefits than amenity grassland, even if at certain times of the year that means they look 'untidy'. That gaps in garden fencing are essential for the movement of animals such as hedgehogs. This is already changing but we would encourage the Local Plan to do what is possible to make this mainstream. Not only is this better for wildlife but it should be much more cost-effective to have a meadow which is cut once or twice a year than amenity grassland which is cut regularly.

- There are some trends that we are seeing in new developments which are not helpful to biodiversity and which it would be helpful if the Local Plan could address:

  i. The provision of bird and bat boxes without consideration of whether there is already sufficient provision of these in the neighbourhood or whether there is suitable habitat to support the species that these boxes have been put up for. We have seen developments/applications where this is not the case. Boxes do not provide the habitat that species need to survive (ie food). If there is not sufficient habitat or there are already boxes in place then putting up boxes on new developments is a waste of time/money. We would like to see the Local Plan (or any associated SPD) place greater emphasis on habitat creation.

  ii. Sustainable Urban Drainage Schemes are moving away from being ponds (ie holding permanent water) to becoming swales (ie not holding permanent water). We suspect this is because swales are easier to create and maintain and have lower health & safety risks. However permanent ponds provide much richer wildlife diversity and are increasingly important in helping species during extreme weather (especially heat and drought). We would like the Local Plan to support SUDS that include at least some permanent water.

  iii. The creation of habitats on developments sites that are surrounded by roads or buildings, making it dangerous or very difficult for creatures to get to, or leave. Habitats should be linked within and through development sites for ecological connectivity – or located on the edge of the development site if they are adjacent to green space/countryside.

Question 15. Do you agree that we should aim to increase tree cover across the area?

- **Yes, strongly agree**
- **Yes, somewhat agree**
- **Neither agree nor disagree**
- **No, somewhat disagree**
- **No, strongly disagree**

CambridgePPF agrees with this proposal but with some caveats:

- Tree planting must be in selected locations and should not be adopted as a blanket approach across the landscape – we need the right trees in the right places. For example:
  - tree planting should not take place on natural grasslands and other important ecological habitats. Meadows have declined by over 97% in the past 100 years and are a more threatened habitat than woodland. Natural grasslands are just as effective as woodland in fixing carbon through underground storage.
  - tree planting should be targeted at locations where it can expand or connect existing woodlands to provide wildlife corridors. This will achieve the biggest benefit for wildlife and is line with both the DEFRA 25 Year Environment Plan and the findings of the Lawton Report.

- Biodiversity opportunity mapping is currently being undertaken by a consortium of local environmental organisations, including CambridgePPF, to identify locations where planting

would improve woodland connectivity and generate a landscape more resilient to climate change. The Councils should use this approach as a basis for targeting new woodland creation. See our answer to Question 12.

- The high values of productive farmland will mean that there are limited opportunities in South Cambridgeshire to convert agricultural land unless public funds are invested. The main opportunities arise in relation to new developments, both on-site and off-site, small copses for wildlife habitat, road verges, hedgerow trees and field margins. House owners should be encouraged to plant trees in their gardens and employees in their workplaces.

- When planting new woodland, consideration should be given to:
  - avoiding the creation of large isolated blocks
  - using native and wildlife friendly species
  - using species that may prove to be more resilient to climate change
  - using a provenance of tree species that has demonstrated resistance to known species-specific diseases.

- Carbon offsetting through tree planting will be needed to make a significant contribution to the net zero-carbon target. Tree planting will also contribute to the creation of green public space, gain in biodiversity, improvements to air quality, potentially flood alleviation, and improvements to water quality.

Question 16. How should the Local Plan help us achieve 'good growth' that promotes wellbeing and social inclusion?

- CambridgePPF believes that "wellbeing" is too narrowly health-focused and that "quality-of-life" would have been a better term to use because it covers a broader range of community requirements which contribute towards wellbeing, such as access to good schools, medical services, green spaces, and sports facilities – see our response to Q6.

- All large developments should be required to meet the standards set out in the revised Cambridgeshire Quality Charter for Growth.

- A key requirement for any major new development is to ensure that the essential infrastructure and services to support a viable community are in place when the first properties are occupied. Adding services and facilities in a piecemeal way in the later phases of the development will create a beleaguered community that precludes wellbeing and social harmony – ie don't repeat what happened at Cambourne.

Question 17. How do you think our plan could help enable communities to shape new development proposals?

- Set out expected requirements or standards of community engagement at the pre-application stage to encourage public engagement. The standards would be scaled according to the size of the development.

- Look favourably upon applications where the developer can demonstrate they have met pre-application engagement requirements. Applications that can demonstrate that they have responded to the feedback from the community in a significant way should also be favoured.

- Applications should conform with Design Guides and plans which have been created by the local community, such as Village Design Guides and Neighbourhood Plans. Introduce a

programme for all villages/parishes/neighbourhoods to produce a design guide, neighbourhood plan or Conservation Area Appraisal if relevant.

- Policy statements in the plan should afford sufficient weight to design guides or neighbourhood plans that have been created by the community (eg by considering them as SPDs), such that applications that do not conform can be turned down without risk of appeal.

- Changes should be introduced to the planning process that will encourage greater community engagement. For example:
  - community groups being allowed to speak at planning committee for longer - the current 3 minutes in total for all community representatives is quite frankly ridiculous and is the kind of thing which makes communities feel that the system is stacked against them.
  - the on-line system should be improved to make it easier for residents to be made aware of applications and to understand them. Community groups do not have the resources to wade through hundreds of documents and thousands of pages of technical information. For every application we would like to see a summary document produced by planning officers which includes location, drawings, summarises the development, highlights potential planning issues, and signposts to those documents which may be of particular relevance to the community.
  - introduce an automated notification system that would enable community groups to check-list criteria and receive email notifications of any applications which match that criteria (eg location, size, type, etc).

- For large developments requiring a masterplan we would like to see public-friendly, planning-for-real style workshops take place. These should seek to engage the types of people who would be likely to move into the new development.

Question 18. How do you think we can make sure that we achieve socially safe and inclusive communities when planning new development?

- The impression that a community can be 'created' is misleading. A safe and inclusive community will emerge only in the presence of the correct ingredients to enable it to evolve. We believe that these ingredients should include:
  - a high quality of design and house construction,
  - plenty of green space with attractive landscaping,
  - community rooms and meeting places,
  - play areas for children and kick-about/hang-out space for the young,
  - good public services and facilities.

- Good design will encourage the growth of socially inclusive communities. The intention should be to create a place where people are proud to live rather than just a soulless housing estate.

- The Cambridgeshire Quality Charter for Growth was revised by the Combined Authority in 2019 with a fifth theme, Community Cohesion, added. We believe that all developers wishing to build in Greater Cambridge should be required to sign up to the Charter.

- All large new developments should have some form of Community Forum or Resident's Association that can represent the interests of the community to the developer and Council. Sites like Eddington or Marmalade Lane provide a model that ought to be achieved by all, rather than being the exceptions.

Question 19. How do you think new developments should support healthy lifestyles?

- This can be achieved by creating a well-designed network of green open space provision, both through a development and connecting to green spaces or countryside outside it. Depending on the scale of the development this ought to include a variety of types of open space to cater for different healthy lifestyle needs: play areas, sports areas, hang-about areas, cycle paths, footpaths, natural greenspace for quiet contemplation (de-stressing), allotments and public realm that encourages social interaction (seating, picnic tables, BBQ areas). Spaces should be well designed in order to ensure that they feel secure and discourage anti-social behaviour.

- A growing population will put further pressure on limited existing green spaces (see our response to question 13). All developments, especially those for housing, should therefore set out how they will contribute to increasing the quantity and quality of green infrastructure in our area. This must include strategic green infrastructure beyond the development site because Cambridgeshire has a defecit of such space. New green infrastructure provision should be based on green infrastructure priorities, such as the Nature Recovery Network which we have suggested in our answer to question 12. This emphasises the need to create a joined-up network of green infrastructure, in particular expanding and linking existing green spaces.

- We would like to see large new developments laid-out in ways which prioritise cycling, walking and public transport rather than private vehicles. There are examples from the Netherlands of housing estates laid out in this way, such as Houten (https://itdpdotorg.wpengine.com/wp-content/uploads/2014/07/22.-092211_ITDP_NED_Desktop_Houten.pdf). Such developments are also usually much more community-oriented. Most developers do not want to include measures to reduce car use as they see easy car access as a selling-point for their properties, so how can the Local Plan bring about change in this regard?

- To facilitate greater cycling, we would like the Local Plan to support the provision of appropriate cycle storage. A family of four could well need four cycles, including a cargo bike. It is therefore important that new developments are designed so that a large number of cycles, or large cycles can be stored securely. This might mean that there is sufficient space to install a shed in a garden and that it is easy to get to it (eg without having to take the cycle through the property). Ideally, we would like to see the secure storage provided by the developer to encourage cycle take-up (rather than the property owner being required to install their own).

- We should be aiming for cleaner, greener, and safer communities where children can play in the street without fear of traffic or corrosion of their lungs. Car access in the immediate vicinity of sensitive areas like schools and play areas should be restricted.

- Community facilities should include opportunities for indoor sports (this can be informally, for example badminton or basketball in a community centre).

- Large developments should include buildings which are designed to accommodate gyms or exercise classes and developers should be encouraged to attract these uses. As part of their sales package perhaps a developer could include one-year membership of a local gym as part of the welcome pack to owners of new houses or business premises? Could the Local Plan support such initiatives?

- The issues of mental wellbeing, social isolation, and loneliness can all be tackled by designing new communities so as to encourage greater social interaction and mobility. A local church, community centre, café, pub, etc are all important facilities that promote community integration and should be operational when residents move in.

- Gardening is a valuable means of improving personal fitness and wellbeing. For people living in apartments that have no gardens, space should be set aside in the development so residents can engage in communal gardening. New allotments should be provided in areas where there is a high proportion of apartments.

- Ensuring that all new houses can be easily adapted for whole-life use can ensure that infirm or vulnerable people can live in their homes for longer.

- Larger developments need to include houses designed for all demographics, so that people have the option to move locally and remain in their neighbourhood as they age and their needs change. In other words, more housing for older people.

Question 20. How do you think we should achieve improvements in air quality?

- The Local Plan is limited in the measures it can introduce to address this issue. For example, it does not cover transport nor can it propose congestion alleviating measures. The obvious means of tackling air pollution in the city is through some form of Pollution Charge, but this lies outside the remit of the Plan. We feel that this should be made clearer so that people are not misled about what the Plan can achieve or influence.

- In areas of poor air quality, new development should not be permitted unless the developer can demonstrate that their development will not contribute to a worsening of air quality.

- The design of new homes should limit the exposure of occupants to air pollution. For example, not locating windows close to queuing traffic or the inclusion of ventilation systems that allow clean air flows.
- Reducing the amount of car parking in developments, especially those that have good local access to shops, services and employment.

Question 21. How should the Local Plan protect our heritage and ensure new development is well-designed?

[This is two separate questions. "Ensuring new development is well designed" is Q23: our response to Q21 focuses on the heritage issue and the impact of new development on the heritage]

- an Historic Environment Strategy must be prepared before extensive additional development is approved. It should be a key document in Cambridge's future. In our view, a major failing of the 2018 Cambridge Local Plan was the lack of an Historic Environmental Strategy, despite the fact that Paragraph 185 of the NPPF requires LPAs to prepare such a document. For a city like Cambridge, with a world-renowned historic core and at the same time one of the fastest growth rates in the UK, not to have an Historic Environmental Strategy would seem irresponsible. The strategy should also seize the unprecedented opportunity, in considering Cambridge and South Cambridgeshire together, of considering the historic city of Cambridge in conjunction with its wider historic and cultural landscape setting. The 2018 Local Plan's collection of related planning documents that touch tangentially on the historic heritage is not an adequate substitute for a properly structured and comprehensive Strategy. based on a

thorough understanding of significance and issues. First steps in preparing such a strategy include preparation of a baseline city-wide assessment of current issues, building on those identified in Conservation Area Appraisals and Management Plans. Conservation Area Appraisals should be explicitly and individually included in the evidence base for the Local Plan.

- Fig 17 "Greater Cambridge's heritage and design successes" is wrongly captioned and misleading in relation to the heritage. The numbers of Conservation Areas and Listed Buildings are the number of designations: as such, they are an indication of the quality of the historic environment, but NOT of "successes". This diagram provides no meaningful indication of current issues affecting the heritage, of the successes or failures of current and past policies in managing it. We feel that the text is complacent in relation to the pressures on the existing heritage and its capacity to accommodate change on the scale being contemplated.

- With its rapid growth, the old medieval city centre with its narrow streets and cramped buildings is poorly adapted to the demands of today with the massive footfall, international tourism, and congested traffic. The threats to the heritage need to be identified as soon as possible, as a key part of baseline evidence for the Plan, and assessing capacity for change. Adequate measures need to be developed to mitigate the cumulative effects of change, in conjunction with the Local Plan process, and implemented before further growth is approved. In this context, what has happened to the Historic Conservation Area Management Plan, included in the 2006 Historic Core Appraisal but omitted from the 2016 revision? We feel that this vital Management Plan should have been prepared and put into effect before the recent consultation on "Making Space for People". NPPF Para 185 states that Local Plans should include 'a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In Cambridge's case, not only are individual buildings at risk (the former Mill Road Library) but the historic city, its skyline and its setting are seriously threatened by the quantum of growth being contemplated and the cumulative impacts of new development.

- Greater protection should be given to Conservation Areas, Listed Buildings, Buildings of Local Interest, and other non-designated heritage assets. This is especially critical for non-designated heritage assets – all too often planners have little idea of the impact on the historic environment of their planning decisions, greater consideration must be given to the advice from their own conservation officers.

- In an historic city like Cambridge, Conservation Areas should be given greater respect in urban planning. Protection should be given not just to buildings Listed by English Heritage but also to buildings characteristic of the local vernacular and Buildings of Local Interest (BLIs). The priority for such buildings should be restoration rather than demolition, which should be allowed only when there is a clear and manifest gain to the public and not just the developer. Both Councils are at fault in not maintaining an up-to-date listing of their BLIs and not carrying out Conservation Area Appraisals.

- CambridgePPF has been working with the City Council for several years using volunteers to assist the Council in carrying out some of this conservation work. We believe that there is scope for local communities to play more of a role in identifying the buildings and heritage assets that they would like to see protected in their community. These will not always be designated assets such as Conservation Areas or listed-buildings but rather buildings, streets, views or green spaces that provide character. We would like to see a policy within the new plan that enables communities to identify such heritage assets and for these "designated community heritage assets" to be a material consideration in the planning process. Local

communities should be supported to identify such assets if they produce a Neighbourhood Plan.

- The role and status pf the Design & Conservation Panel and Cambridgeshire Quality Panel should be strengthened. As a member of the Cambridge Design & Conservation Panel, we have seen how effective this can be at helping developers to significantly improve their schemes in relation to their impact on heritage. We would like to see this operating across both Council areas and more developments going before the Panels. Could it be made compulsory for all large developments that could have an impact on heritage to go before the Panel?

- Through the preparation of Design Guides or Neighbourhood Plans – these should be the mechanism to minimise the negative impact of new developments on heritage assets. Such documents need to be given sufficient weight in the Local Plan so that applications can be refused if they are not compliant.

- Both Councils should make a long-term commitment to support their conservation teams so they are adequately resourced to carry out their work, in particular to monitor the threats to heritage assets and to enforce what limited protection measures are already available.

- We would like to see both Councils appoint Heritage Champions (refer to Historic England's Heritage Champions Handbook, 2016 and updated HE Heritage Champions support and guidance dated 12-11-2019). SCDC appears not to have a list of 'local heritage assets'. A list of these or Buildings of Local Interest (BLIs) should be set-up, and local communities should be encouraged to put forward their heritage assets or BLIs in accordance with Historic England Advice Note 7.

Question 22. How do you think we should protect, enhance and adapt our historic buildings and landscapes?

(We feel that t*his question is seriously flawed, it should refer to 'historic places, buildings and landscapes'. It is also two separate questions, so we have split our response between to historic buildings (Question 22A) and historic landscapes (Question 22B)*

22 A: How do you think we should protect, enhance and adapt our historic buildings?

Cambridge meets 4 of the Outstanding Universal Value criteria for World Heritage Sites (i) "to represent a masterpiece of human creative genius" (King's College Chapel); (ii) "to exhibit an important interchange of human values….on developments in architecture or technology…or landscape design" (the Colleges, University buildings, the best modern buildings, the Backs); (iv) "to be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates significant stage(s) in human history (e.g. King's College, the Old Schools, Senate House and Gonville and Caius as the living focus of one of the greatest universities in the world; the Backs; Downing as a ground breaking built representation of the early c19 neo-Classical ideal).

- An Historic Environment Strategy that builds on the Conservation Area Appraisals, considers Cambridge in its landscape setting, identifies risks to the historic heritage and sets out full mitigation measures is of fundamental importance. This needs to consider the whole landscape associated with historic Cambridge, including the upper Cam as far as Byron's Pool

and the lower Cam along the length of the Lents and Mays course as far as Baits Bite. The lower Cam section, although fully covered by Conservation Area designations, has been threatened by growth-related transport proposal; so have the West Fields. The arguably more significant cultural landscape between Cambridge and Grantchester and beyond have no such protection, with the Grantchester Conservation Area boundary narrowly drawn and no Appraisal. While Grantchester Meadows are owned by Kings' College, this ownership neither provides direct protection from developments beyond their boundary, nor has any force in planning terms. The need for such protection is highlighted by the impacts on the Meadows of the combined height and bulk of the CB1 development.

- Air pollution damages the fabric of old buildings and not just people's lungs: the vibrations from heavy vehicles will over time weaken the structure of historic buildings. We must keep polluting buses/vehicles out of the historic core.

- It is important for planners to appreciate that protection should extend to the setting and curtilage of an historic building and not just the physical structure: also views which may include distant views.

- More Conservation Areas, active management of Conservation Areas and preparation of enhancement proposals, and up-to-date listing of Buildings of Local Importance. Buildings listed by English Heritage are generally well protected – the problem is with locally significant buildings that contribute to the local character but do not warrant listing. This produces a strong polarity between buildings considered important to protect and others that can be dismissed.

- Adaptation, especially energy efficiency to minimise carbon emissions, is problematic in old heritage buildings. Heritage significance should be assessed, as required by BS 7913:2013, before proposing retrofit measures. As a general principle, and as required by PAS 2035, the heritage features, fabric, and significance of a building should not be impacted or reduced in a zealous drive to minimise emissions. This may mean offsetting measures elsewhere.

- The introduction of safety and security measures, like barriers, cameras, and fencing to prevent entry, can all have a detrimental effect on the public enjoyment of our heritage. Planners must be alert to the possibility of over-reacting with invasive security measures to the perception of potential threat rather than to an actual threat.

- Planners also need to be alert to the trend for the 'Disneyfication' of the heritage especially in areas of high tourism.

- What can be done to promote the heritage outside the central core? Can tours be encouraged to less visited parts of the city – like along the Cam or the Leper Chapel/Museum of Technology/Abbey Church? In the mind of the planners, 'heritage' is becoming increasingly zoned as a concern just of the central core area.

22B: How do you think we should protect and enhance our landscapes?

- A **Landscape Character Assessment for Greater Cambridge** should form part of the Local Plan. The historic and cultural significance of landscapes, where applicable, should be given full weight.

- Local Plan policy should require developments to be in keeping with the landscape character assessments.

- Local Plan site allocation should seek to discourage any development in those landscape character areas that are identified as being of highest value or at highest risk.

Question 23. How do you think we could ensure that new development is as well- designed as possible?

- There is a need to review successes and failures, and to learn lessons from them. CB1 is an example where historic environment considerations were given lower priority than claimed public benefits, which have not been delivered. Lessons need to be learned from past successes and failures.

- One problem is that it is difficult for the local planning authority to refuse an application because of poor design – because it is all too likely they will lose on appeal. Developers know this and so, for some, there is very little incentive for them to invest heavily in quality architecture. If it is possible, we would like to see a policy in the Local Plan that makes it easier for the Councils to refuse schemes that are not well designed. The Plan should use the Building Better, Building Beautiful Commission's report "Living with Beauty" as a basis for securing better quality design. The criterion – "does this scheme meet the standards set out in the Cambridgeshire Quality Charter for Growth?" – should be applied as the basis for assessments.

- "Blandscape" is becoming the scourge of Cambridge. These are developments which are not necessarily ugly or badly designed but neither are they interesting or well-designed. Typically, they are block shaped with flat roofs and are almost identical to new developments in any other European city because they form part of the developer's standard architectural portfolio. Outside of the historic core such developments, collectively, are eroding the character of the city into "anywhereville". CB1 and the developments around Cambridge Central and Cambridge North station are examples of this. It seems that the planning authorities are powerless to stop it but we would welcome any policies within the new Local Plan which could support better architecture, especially in prominent locations such as major roads.

- Applications should conform with Design Guides and plans which have been created by the local community, such as Village Design Guides and Neighbourhood Plans. Policy statements in the plan should afford sufficient weight to Design Guides or neighbourhood plans that have been created by the community (eg by considering them as SPDs), such that applications that do not conform can be turned down without risk of appeal.

- We would like to see the Councils provide clear frameworks and guidance to enable and enthuse local communities and residents' associations to become involved in preparing village design guides, neighbourhood plans and updated Conservation Area Appraisals. Once these are adopted, they should be material considerations in assessing planning applications.

- Insist that any significant developments in very visible locations have to go before the Design & Conservation Panel or the Cambridgeshire Quality Panels.

Question 24. How important do you think continuing economic growth is for the next Local Plan?
Very Important
Somewhat agree
Neither agree nor disagree

Somewhat unimportant
Not at all important

- This is a question of the greatest importance, and it is regrettable that this simplistic tick-the-box approach leaves it open to a variety of interpretations. In consequence the single answer format in the consultation document is unhelpful. Obviously continued economic growth is desirable but it cannot be at the expense of the environment or social cohesion. We need growth that is genuinely sustainable rather than an unbalanced rapid dash for growth just to meet a Government target.

- CambridgePPF takes issue with the crude objective of doubling GVA of Greater Cambridge over 25 years. This could mean doubling the area's population along with an unchanged GVA per capita. Equally it could mean doubling GVA per capita through gains in productivity along with an unchanged population. We can see little evidence that consideration is being given to increasing productivity per caput which could take some of the heat out of the development pressures.

- Over recent years, national policies have given strong encouragement and support for economic growth in and around Cambridge, but the current emphasis on rebalancing the UK economy may lessen such support in future. Sustainable growth, taking into account economic, social, and environmental issues, will only be achievable if public investment in our green, grey and social infrastructure is commensurate with the dynamism of the knowledge-based sectors. If the necessary investment in green, grey and social infrastructure is not forthcoming, growth aspirations must be reduced.

- The consultation refers to the many other sectors that provide job opportunities for local people and we agree that these need to be given full consideration in the Plan. However, we urge that a more sophisticated approach be developed towards the tourism sector to recognise that whilst longer-stay visitors may bring economic benefit to restaurants, hotels, pubs and the like, many short-term visitors generate little benefit yet their increasing numbers damage the functioning and amenity of Cambridge city centre.

- We strongly support the provision of employment land in new settlements such as Northstowe not only to provide opportunities for their own residents but also to provide lower cost sites and premises for businesses that provide essential services across the sub-region but cannot afford the high rents in Cambridge. Continued vigilance will be required to ensure that higher-value housing development is not allowed to crowd out employment uses.

Q25.What kind of business and industrial space do you think is most needed in the area?

- Over-reliance on inward investment is a high-risk strategy. To support indigenous growth through knowledge-based firms, the Plan should encourage development of incubator and innovation developments in prime locations. Cambridge needs to do more to support its own "home-grown" commercial opportunities

- The departure of Marshalls from their East Cambridge site will significantly disrupt the balance of employment opportunities and training opportunities in the Plan area. Manufacturing should be recognised as contributing both to the range of employment opportunities and in capturing value from scientific and technological innovation. The Plan should ensure that any major new developments allocate land for manufacturing enterprises.

Question 26. Do you think we should be protecting existing business and industrial space?

- CambridgePPF would support the protection of industrial sites unless they are poorly located in terms of their impacts on the environment and provision of public transport.

- The major shifts in the retail sector may make it appropriate, in certain locations, to allow re-development of retail sites and premises for a mix of other uses.

Question 27. How should we balance supporting our knowledge-intensive sectors, with creating a wide range of different jobs? What kind of jobs would you like to see created in the area?

- CambridgePPF recognises the need for a range of different jobs but, in view of likely pressures from growth arising from knowledge-intensive sectors, we suggest that it would be inappropriate to actively encourage inward investment from sectors unrelated to the knowledge cluster through specific land allocations in the Plan.

- Cambridge's reputation is that of a fast-growing centre of high-tech so these are the sorts of employers it is likely to attract. It is therefore important that sites are allocated for jobs that support knowledge-intensive sectors and their associated services. Because of the high rental costs within the City, it is likely that employment opportunities in other sectors, like construction or warehousing, will be located outside the City, preferably this should be in one of the new settlements where the necessary services and infrastructure can be provided or in existing but under-used science and business parks.

- We are concerned about the proliferation of science/business parks dotted around the rural fringes of Cambridge. Collectively they are having a significant impact on travel patterns (exacerbated because some of them are poorly located for public transport or cycling) and the previously rural character of the area.

Question 28. In providing for a range of employment space, are there particular locations we should be focusing on? Are there specific locations important for different types of business or industry?

- Rather than scattering employment sites across Greater Cambridge, they should be concentrated as far as possible into clusters which are served by public transport. Clusters within Cambridge are likely to attract knowledge-based employment with service and ancillary sectors mainly outside the City, where rents are lower.

- A number of science, technology, and business parks in South Cambridgeshire, like Melbourn Science Park, Granta Park and Cambridge Innovation Park, currently have available space or the potential for further growth. Appropriate new employment should be focused in such sites before creating new commercial parks.

- In our response to Question 24, we stressed the importance of employment space being provided in the new settlements. This is not just in order to help them achieve a degree of containment, but also because they should have environmentally sound transport access to Cambridge. More generally we believe that accessibility by walking/cycling and public transport should be a major consideration in deciding locations for employment space.

Question 29. How flexible should we be about the uses we allow in our city, town, district, local and village centres?

- **Very flexible**
- **Somewhat flexible**

• **Neither flexible nor inflexible**
• **Somewhat inflexible**
• **Very inflexible**

- To achieve some form of balance between the often-competing pressures facing Cambridge and the surrounding villages, there will be a need for the Councils to exercise a strong degree of control through the planning system. Market forces, if left unchecked through an open flexible approach, will encourage the creation of high density, high profit, developments at the expense of other uses. The level of flexibility must therefore be determined by the vision of the Plan as a whole and the wellbeing of its residents – this dictates a 'Somewhat Inflexible' approach.

- The rapid rate of change in the retail and technology sectors dictates the need for flexibility in Plan making and implementation, especially in the later parts of the plan – see our response to Q4. Tourism is another area where flexibility may be necessary.

- The need for flexibility emphasises the requirement for the continuous review of the Plan and its policies. NPPF Paragraphs 31 and 32 stresses that all policies in the Plan should be kept under review and up-dated as new evidence emerges. A Policy to this effect must be included in the Plan.

Question 30. What approach should the next plan take to supporting or managing tourism in Cambridge and the rural area?

- The rapid increase tourism in Cambridge has become a contentious issue with residents. Clearly it is an issue that requires effective management, although the Local Plan has limited ability to address this matter, which could be better dealt with through other Council departments.

30A. Managing Tourism in Cambridge

- Avoid policies or new developments in the Plan that will exacerbate issues of mass tourism in the city centre. These might include:
  - developments that would increase crowding in already over-crowded locations.
  - developments which negatively impact on residential areas, such as budget hotels.
  - restrictions on the use of much needed local housing as short-term holiday letting (AirBNB). Councils elsewhere have proposed a licencing/registration scheme for AirBNB-type lets with a restriction of a maximum of 30 days per annum.
  - Developments which would encourage additional "day-tripping": proposals that encourage longer-term stays and greater dispersal of tourism should be encouraged

- Coaches should be discouraged from entering the City with parking facilities provided at P&R sites: tourists can then be transferred to the City Centre using electric shuttle services. The SW sector of the City Centre around Queen's Green is being degraded because of its use as a drop-off/pick-up site by coaches, and this must be stopped.

- A sustainable tourism plan/strategy should be produced to which developments must be in alignment. The potential to disperse tourism through tours to less visited parts of the City should be explored

- Serious consideration should be given to the introduction of a tourism charge to fund the measures proposed in the strategy. Several cities, like York, Bath, and Edinburgh, are

proposing a “tourism tax” to be applied through the tour operators or overnight accommodation.

- Tourism not only erodes the enjoyment of the City by residents but also has a direct impact on the heritage assets themselves. This threat and appropriate counter-measures must be covered by the Historic Environment Strategy. It may, for example, be necessary to limit entry to assets only to guided parties whose numbers and frequencies can be controlled.

30B. Supporting tourism in rural areas

- Most “tourists” visiting attractions in rural Greater Cambridge will be local people – for example, Wandlebury Country Park has over 60,000 visitors per year almost all drawn from within Greater Cambridge. Rural attractions include places such as Wandlebury, Wimpole Estate, Wicken Fen, Anglesey Abbey, Denny Abby and Fen Drayton Lakes. All of these locations are experiencing visitor pressure caused by a rapidly increasing local population, rather than tourists from further afield. Most of these attractions provide quality-of-life benefits to local people.

- If the Greater Cambridge population continues to grow, then new visitor attractions will need to be created or existing attractions expanded. The expectations of visitors for high quality facilities are also rising, so attractions must be able to provide top-class interpretation and information, together with toilets, paths and ramps suitable for disabled visitors, refreshments, and vehicle parking. This also means that associated operational buildings may be needed, for example for storing machinery, work vehicles, and staff facilities. It may even be necessary to have staff permanently on-site for security or other operational reasons. The Local Plan policy should recognise these pressures and be supportive of measures to address them – within the historic and environmental constraints often present at visitor attractions.

Question 31. How should the Local Plan help to meet our needs for the amount and types of new homes?

- The policy of 40% affordable housing must be continued and rigorously enforced by the Councils. The use by developers of Viability Assessments as a justification to reduce the proportion of affordable must be resisted, and all viability appraisals must be transparent, publicly available, and subject to independent scrutiny. We don’t feel that the current system works and would suggest that this is an issue that needs to be addressed through an independent expert body that could act on behalf of the local authorities.

- Developers have now had long enough notice that they are required to provide 40% affordable that this should have been factored into the land-value and therefore, going forward, viability assessments should not be used to avoid 40% affordable. If developers over-paid for the land then why should that impact those who can least afford housing?

- Large developments should include housing provision for key workers. As well as those people who work in the public sector in roles that are vital to the infrastructure of the community, such as teachers, police officers, armed forces personnel and National Health Service, we believe that key workers for Cambridge should also include care workers, laboratory technicians, low paid public service workers and support workers (cleaners, porters, etc).

- Large developments should provide a variety of housing options for different markets in order to achieve faster rates of completion - for example, the inclusion of private rented, social rented, retirement, self-build, etc, as recommended in the Letwin Report.

- ‘Affordable housing’ is still unaffordable to those on the Councils’ housing list, so both Councils should explore with central government mechanisms to maximise the proportion of Council-owned new housing for affordable rental and other types of tenure.

- The Local Plan should adopt the recommendations of the Building Better, Building Beautiful Commission when it reports in 2020.

Question 32. Do you think we should provide plan for a higher number of homes than the minimum required by government, to provide flexibility to support the growing economy?

- **Yes, strongly agree**
- **Yes, somewhat agree**
- **Neither agree nor disagree**
- **No, somewhat disagree**
- **Not at all important**

- CambridgePPF strongly disagrees with this suggestion (we are curious as to why “strongly disagree” was not an option). We should not be planning to provide housing at a level above the requirement set by Government.

- The Government’s minimum ‘standard method’ target of 41,000 by 2040 is realistic in terms of land availability and capacity to deliver, especially with the Cambridge Airport and the North East Cambridge sites coming forward during the Plan period. However, just to reach this minimum target will mean raising the annual target for home completions from 1,675 to some 1,800. At the moment, the Councils are failing to deliver even the current targets by a substantial margin so raising the targets will require a significant step-up in performance.

- The 2018 Local Plan has proposed a significant amount of new development and a substantial increase in population. It will not start to become clear until 2025 and beyond what impacts this growth will have – for example, traffic congestion, overcrowding in Cambridge City Centre, or water shortages in our chalk streams. Therefore, it would seem unwise to continue to extrapolate growth to 2040 (or beyond) until the impacts of the ‘in-pipeline’ growth are better understood. This in turn would argue that a ‘precautionary approach’ should be adopted to the housing targets. If the continuous review process shows insufficient housing coming forward, then it is much easier to increase than to reduce targets during the course of the Plan – see our response to Q4

- The ‘Objectively Assessed Housing Needs (OAHN)’ will, as always, be the most contentious issue in this Plan’s preparation with the developers arguing for more and the residents’ organisations for less. In the absence of any clear Vision as to how the Councils envisage the Greater Cambridge area evolving over the next two decades, it is impossible to determine the ‘correct’ balance.

- The question also raises the issue as to what are the resource restrictions that will eventually limit growth. Are these being assessed? Simply assuming that more and more housing can be loaded into Greater Cambridge is ludicrous without some examination of the capacity of the area to accommodate such growth.

- To accommodate the doubling of the economic growth rate as set out in the CPIER, the Councils suggest that the OAHN target may need to be increased to around 66,700 by 2040, equivalent to a completion rate of some 2,900 each year. This represents an increase of some 75% over the current target which the Councils are failing to meet. It also represents an

increase in the Greater Cambridge housing stock of more than 50% in just two decades. Is this realistic, deliverable or indeed desirable?:

- are there sufficient sites that have the necessary transport and infrastructure in place without having to remove high quality agricultural land from food production or cause damage through new transport schemes?
- is the water supply adequate for this scale of development? Electricity supply? How will the waste management be handled?
- our large green spaces such as Wandlebury are already starting to reach capacity, where will the funds come from to provide additional large green spaces or expand the existing ones in order to have sufficient to accommodate such an increase in population?
- what impact would such a massive and rapid increase in population have upon local services like education and healthcare?
- how can the already overloaded infrastructure accommodate such an expansion? What effect will it have on traffic congestion, or crowds in Cambridge?
- what impact would this growth have on the quality-of-life of current residents?

- To absorb such a disruptive short-term increase would require a massive programme of capital investment – for example, a new reservoir in the East Anglia region to ensure adequate water supply, new waste incineration and sewage treatment works, additional capacity for the electricity supply, and the like. It would be folly to assume that the current infrastructure could accommodate such a massive surge in demand with just a little tweaking here and there. There is already a substantial infrastructure deficit just to accommodate the much smaller current growth projections, so where is this additional investment coming from? Central Government? Until and unless the investment funds are forthcoming, any increase over the Government's figure of 41,000 should be resisted.

- Even if the necessary infrastructure was forthcoming (which would seem improbable with the Government's focus on the North), do we want to see Cambridge transformed from a compact, green city with its world-class historic core into a sprawling metropolis? The irony is that such a rapid rate of growth would do serious damage to the character and ambience of Cambridge such that its international competitiveness would be impacted, resulting in a drop in the demand that was driving the unsustainable growth in the first place. We cannot afford to trash a lovely historic city in an unsustainable dash for growth.

- CambridgePPF is concerned that rapid housing growth together with a fast train service would simply attract more London commuters and that Cambridge could be providing London over-spill. Does the Council have data that show the proportion of new build within and around Cambridge that is already housing London commuters? Cambridge South Station will increase the London commuter pressure and we won't know the impacts of this until the late 2020s.

- Some employment (and related housing) growth should be encouraged to disperse from greater Cambridge in order to reduce pressure on the over-heated local economy. Until pressures are relieved, we believe such growth would best be located in towns and cities that have good public transport connections to main centres (London, Cambridge) such as Ely, Peterborough, St Neots, Huntingdon, Bedford, Milton Keynes, etc.

Question 33: What kind of housing do you think we should provide?

- The types of housing set out in the Plan should be influenced by the allocations proposed in the SHLAA.

- The Letwin Review identified the low rates of house building on some large sites as being partially attributable to the lack of diversity of housing type in the housing offer. This must be addressed with a determination by the Council to ensure much greater diversity in the housing mix.

- Cambridge needs more affordable housing but the 'affordability crisis' dictates that a wide range of affordable options must be pursued – affordable rents of Council owned properties, community-led housing (especially in villages where priority should be given to first-time buyers with a proven affinity to the neighbourhood), HMOs and shared-ownership models. Greater provision should be made for self-build which is an attractive method for young people to gain their independence.

- Unfortunately, within the current development and planning framework the housing mix will largely be determined by the developers in response to market forces. The Councils will need to take a stronger stance if models like Eddington are to become the standard.

- Greater provision should be given to accommodating an ageing population. New builds should have the structural flexibility for easy conversion to enable the elderly to remain in their own homes. Retired people whose children have left the family home may in principle want to down-size but in reality, baulk at the practical implications of leaving their home. Greater opportunity should be made to allow family homes to be subdivided with part of the property rented.

- Greater Cambridge should also give consideration to expanding its definition of key workers. Essential local employment to support the high-tech sector includes relatively low-paid laboratory technicians, research assistants, ancillary support staff, cleaners, porters, and the like, and these categories should be included in 'affordable' housing schemes.

- The register of empty properties needs up-dating and maintaining by both Councils. Bringing empty properties back into use would help alleviate some of the pressures on residential development.

Question 35. How should we ensure a high standard of housing is built in our area?

- Developers who wish to operate in the Greater Cambridge area must sign up to the Cambridgeshire Quality Charter for Growth. Other quality initiatives, like Building Better, Building Beautiful, include recommendations for ensuring high standards, and these should be adopted by the Councils.

- Many leading construction companies have now committed to either the Better Buildings Partnership or the UK's industry-wide campaign, Advancing Net Zero, as part of their response to climate change. Developers supporting these initiatives should be favoured.

- Introducing high standards at the planning stage is meaningless unless they are enforced during implementation. This raises the problem of the resourcing of the Councils' Planning Departments, and their capacity to handle a near doubling of the house completion rates. It is appreciated that Local Authorities are grossly under-resourced for the scope of activities expected of them, but priority in budget allocations must be given to ensure adequate supervision and enforcement of planning policies at a time when pressures will inevitably increase.

Question 36. How should the Local Plan ensure the right infrastructure is provided in line with development?

- This question is the wrong way round – it is the development that needs to be in line with the infrastructure, especially transport, rather than visa-versa. The location of new development must be influenced largely through the capacity of the local infrastructure to support the development – rather than through the wishes of land-owners or developers.

- To ensure that the right infrastructure is in place, two models are possible – either the Local Planning Authority provides the infrastructure itself, or the granting of planning permission is made conditional on the developer providing it. The issue for the first option is whether the Community Infrastructure Levy or Section 106 funding is sufficient to cover the Authority's costs – for new roads or busways, this is unlikely to be the case, so where is the funding to come from? For the second option, there is the risk that making the CIL too demanding would trigger a claim by the developer that the burden would render the development unviable – and this is turn would result in a reduction in the affordable allocation.

- Whatever the funding model, the fundamental necessity is that the infrastructure has to be in place and operational by the time the development is complete and ready for occupation.

Question 37. How should we encourage a shift away from car use and towards more sustainable modes of transport such as public transport, cycling and walking?

- The Local Plan is limited in how it can address this issue. For example, it does not cover transport nor can it propose congestion alleviating measures. We feel that this should be made clearer so that people are not misled about what the plan can achieve or influence.

- New developments should be required to provide sufficient secure cycle parking for every occupant of the dwelling. For example, a standard family house should have sufficient space for at least 4 cycles. The cycle storage needs to be large enough to accommodate a cargo bike or trailer to transport children, especially if new developments are too far to walk to school but within easy cycle distance.

- New developments should be required to be laid out in ways which prioritise walking and cycling and public transport. Too often developments are laid out for cars and then walking, cycling and public transport are made to work around this layout. This nearly always results in a development that works well for cars but not for other modes of transport. Also see our answer to Q19.

- Many Transport Plans created by developers tick all the boxes but do not deliver. What evaluation is carried out of these plans to assess whether they are successful? Can lessons be learnt about what works and what does not? If we know what fails then future Transport Plans would need to find alternative solutions rather than being able to repeat past failures.

- It is now well researched that once a person's commuting and travel behaviour is established it is very difficult to persuade them to change, so we would like to see more targeted effort go into working with new households during the first few weeks of their occupation - to motivate and support them to use more sustainable modes of transport. For example, cycle buddying.

Question 38. What do you think the priorities are for new infrastructure? Please add any comments and ideas

- New water infrastructure is a necessity for Greater Cambridge if the levels of growth proposed in the consultation are to be delivered. Summer 2019 has shown that in dry periods there is insufficient water in the chalk aquafer to meet the needs of a growing population, to allow abstraction for economic uses, and to leave sufficient water to sustain the ecology of our rivers and streams. It will be impossible for the Local Plan to be considered sustainable, and thus compliant with the NPPF, without new water management infrastructure for the region. It will also be impossible to achieve aspirations for doubling nature or making our environment better for future generations without new water management infrastructure for the region. We understand that a new reservoir and/or open water transfer from wetter regions of the country are required. New development, above the level already set in the current Local Plan, should not be permitted until this water management infrastructure is in place. As well as protecting the environment, such a policy would provide an economic case for the financial investment that will be required.

Q39. Should we look to remove land from the Green Belt if evidence shows it provides a more sustainable development option by reducing travel distances, helping us reduce our climate impacts?

- **Yes**
- **No**

- CambridgePPF strongly disagrees with this proposal. The NPPF Para 144 makes it unambiguously clear that development in the Green Belt can be regarded as appropriate only under 'very special circumstances'. We do not see that 'very special circumstances' exist in Greater Cambridge given the large areas of land beyond the Green Belt. The arguments for Green Belt development were comprehensively debated before the Planning Inspector at the Examination in Public of the 2018 Plan and then rejected, and we can see no reason why the situation two years later should be any different.

- Green Belts are important because they can provide opportunities for exercise and wellbeing, they can help to improve air quality, reduce flooding, capture carbon, and provide habitats for wildlife. They can also encourage the recycling of previously developed land within the city. And they give city residents access to countryside and informal greenspace on their doorstep. One of the reasons that Green Belts have popular support is because they improve the quality-of-life of people. Building on the Green Belt would be incompatible with the Big Themes suggested for the Local Plan.

- The evidence-base for the 2018 Plan included a detailed review of the importance of the Inner Green Belt Boundary in meeting the stated objectives of the Cambridge Green Belt. This review identified a small number of sites where land might be released without causing unacceptable harm to the Green Belt. These sites were all included in the 2018 Plan and will be carried over into the 2023 Plan. The rest of the inner boundary was regarded as being of high importance and was accepted as such by the Planning Inspector. We can see no grounds for any change in this position.

- Previous Local Plans allowed the development of Cambourne, which has proved to be largely a suburb of Cambridge located in the countryside with poor public transport/cycle connections to employment sites and central Cambridge (even car travel is not good due to the Girton Interchange not being 4-ways). Greater Cambridge is still grappling with the consequences of this, and it is not a model that we feel should be repeated. The 2018 Plan has already made the commitment to two large new settlements outside the Green Belt – Northstowe and Waterbeach. Both of these have the advantage over Cambourne of having

pre-existing public transport infrastructure (guided busway/cycle and railway) and Waterbeach is also closer and therefore will be more cycle-able. Both settlements are planned to be larger than Cambourne and therefore will hopefully be more self-sustaining communities, less reliant on Cambridge. Such communities could prove to be no less sustainable than building on the Green Belt. We are concerned that the council's thinking on new settlements is influenced by what happened at Cambourne rather than what will hopefully happen at Northstowe and Waterbeach.

Question 40. How flexible should the Local Plan be towards development of both jobs and homes on the edge of villages?

- **Highly flexible**
- **Somewhat flexible**
- **Keep the current approach**
- **Restrict further**

- The dispersal of both employment and housing across the villages of South Cambridgeshire should be avoided, especially as such village developments are likely to become dormitories for Cambridge and reliant on car use. Whilst locally such impacts may be modest, the cumulative impacts, for example on traffic, could be significant.

- Development should not be permitted which would cause the merging of two villages, there should remain an intentional and deliberate separation between them that is sufficient to retain their individual characters.

Question 41. Do you think the Local Plan should be more flexible about the size of developments allowed within village boundaries (frameworks), allowing more homes on sites that become available?

- **Highly flexible**
- **Somewhat flexible**
- **Keep the current approach**
- **Restrict further**

- A modest scale of growth depending on the size of the village might be acceptable. This should be located within the Village Framework with priority given to housing people from the local community.

- As a general principle, growth should not be scattered across the villages of South Cambridgeshire but concentrated in a few of the larger villages where the necessary infrastructure and support services can be provided. Growth of villages should be a low priority in the Development Sequence – see response to Q42

Question 42. Where should we site new development? Rank the options below 1-6 (1 = Most Preferred, 6 = Least Preferred) Allocate 20 points across the following six locations:

- **Densification of existing urban areas**
- **Edge of Cambridge: Outside Green Belt**
- **Edge of Cambridge: Green Belt**
- **Dispersal: New Settlements**
- **Dispersal: Villages**
- **Public Transport Corridors**

- CambridgePPF believes that a 'Development Sequence' should be established and we suggest that the order of priority for development should be as follows:
    1. brownfield sites
    2. densification of employment sites within the city, like the Science Park
    3. major new sites within the city boundary, like Cambridge Airport and North-East Cambridge
    4. other sites in South Cambridgeshire outside the Green Belt that already have good public transport connections, including new settlements
    5. villages that already have good services and which can accommodate a modest level of new building within the village framework
    6. city fringe sites in the Green Belt – the option of last resort when the above options have been exhausted

- Significant areas of Cambridge are currently wasted as surface car parks. At a time when efforts should be made to reduce car use and improve air quality, some of this land should be re-used for development – see our response to Q2

Question 43. What do you think about densification?

- Densification has a useful role to play in the low density, mainly older, employment clusters where there is currently an excessive amount of surface car parking. CambridgePPF supports this.

- Where entirely new neighbourhoods are created, we support a higher density of dwellings which through good design can be compatible with high quality communities. High density development may mean taller and larger buildings but these should be appropriate to their context and must take into account the historic setting of Cambridge, its villages and views. We do not support high rise building close to the city's historic core nor emergent high-rise buildings scattered across the city. Cambridge has a sound Tall Buildings policy which should be enforced.

- It is difficult to see how densification can play a significant role in existing residential areas without compromising the quality-of-life of residents and the character of local neighbourhoods. We are strongly against 'garden grabbing', and against the demolition of sound family homes and their replacement with blocks of flats.

Question 44. What do you think about developing around the edge of Cambridge on land outside the Green Belt?

- CambridgePPF would not object in principle to the development of Cambridge Airport and North East Cambridge if it meant that the green belt was protected, as per national planning policy.

- There are very few other locations around the edge of Cambridge that are not in the Green Belt. Whether they are suitable for development will depend on the characteristics of each site.

Question 45. What do you think about developing around the edge of Cambridge in the Green Belt?

- We strongly oppose this option. The NPPF Para 144 makes it unambiguously clear that development in the Green Belt can be regarded as appropriate only under "very special circumstances". We do not see that 'very special circumstances' exist in Greater Cambridge given the large areas of land beyond the Green Belt. The arguments for Green Belt

development were comprehensively debated before a Planning Inspector at the Examination in Public of the 2018 Plan and then rejected, and we can see no reason why the situation two years later should be any different.

- The 2016 Review of the Inner Green Belt Boundary showed that other than a few small areas that were incorporated in the 2018 Plan, there were no sites around the edge of Cambridge that could be developed without causing unacceptable harm to the objectives of the Cambridge Green Belt. This review was extensively debated at the Examination in Public in front of the Planning Inspector whose final conclusions endorsed the findings of the review. CambridgePPF can see no reason why this decision should now be overturned.

- Green Belts are important because they can provide opportunities for exercise and wellbeing, they can help to improve air quality, reduce flooding, capture carbon, regulate heat and provide habitats for wildlife. Their protection helps prioritise the recycling of previously developed land within the city. And they give city residents access to countryside on their doorstep. One of the reasons that Green Belts have popular support is because they provide quality of life to people. It would seem to us that building on the Green Belt would be incompatible with the Big Themes suggested for the Local Plan.

Question 46. What do you think about creating planned new settlements?

- CambridgePPF believes that new settlements must be of a large enough size to promote sufficient employment, retail, education, and leisure opportunities so as to reduce travel and dependence on Cambridge. We therefore believe that the priority must be to complete and to consider expanding the settlements approved in the 2018 Plan rather than create more.

- The viability of any new settlement will depend on the transport infrastructure, and particularly on the availability of high-quality public transport linking with the main centres of employment and leisure facilities. We do not support the development of residential suburbs in the countryside isolated by the lack of good transport links (ie a repeat of Cambourne).

- The wider implications of new settlements should be fully considered, understood, explained, and agreed in advance as part of the planning process, such as any requirements for transport or services infrastructure. For example, it is not sufficient to vaguely say that public transport will be provided – more detail needs to be provided so that communities can understand the full implications of planning decisions at the point when that planning decision is being made – not years later when that vague public transport turns out to be a new busway or railway that is damaging to the landscape, heritage and communities.

Question 47. What do you think about growing our villages?

- A modest scale of growth depending on the size of the village might be acceptable. This should be located within the Village Framework with priority given to housing people from the local community – see our response to Q31

- The dispersal of both employment and housing across the villages of South Cambridgeshire should be avoided, especially as such village developments are likely to become dormitories for Cambridge and reliant on car use. Whilst locally such impacts may be modest the cumulative impacts, for example on traffic, could be significant.

Question 48. What do you think about siting development along transport corridors?

- There seems to be some confusion about the concept of 'transport corridors'. We have heard them described as both a series of nodes along a public transport route (such as distinct villages around rail stations) as well as ribbon development (development alongside a transport route which coalesces into a contiguous, or near contiguous strip of development, such as Trumpington/Shelford/Stapleford along the A1301). Because this is unclear, we feel that this question is flawed from a consultation point of view and that the Council should not use responses to this question to inform its policy thinking.

- We have serious concerns that a 'transport corridor', such as a busway or CAM line, will inevitably attract development because of the improved transport opportunities, and will thus quickly become a 'development corridor'. We strongly oppose ribbon development radiating out from Cambridge which would divide the Green Belt into isolated wedges that would be steadily eroded away by more development as the corridors expanded. However, we would not object in principle to nodes along public transport routes such as rail lines, provided a policy is enforced to prevent such nodes from coalescing into contiguous ribbon development

Question 49. Do you have any views on any specific policies in the two adopted 2018 Local Plans? If so, what are they?

- Policy 61: the lack of any Historic Environment Strategy should be a source of embarrassment for an historic city like Cambridge that is facing such profound change. It is also in breach of the NPPF.

- The abuse of economic Viability Assessments by some developers to reduce the proportion of affordable housing agreed in the planning permission. Councils will need to develop policies that ensure much tighter regulation of the use of such assessments

- It is CambridgePPF's view that there are sound policies in the 2018 Plan that are becoming ineffectual because of inadequate enforcement and because of the government's relaxation of permitted development rights. To address these the Councils need to invest in more resources. For example, South Cambs does not have a list of Buildings of Local Interest and Conservation Area Appraisals are non-existent or not up-to-date. This means there is a risk that heritage is not being adequately protected even though there are adequate policies in the Local Plan to protect heritage.

Question 50. What do you think should be in the next Local Plan? Are there issues, ideas or themes that you don't feel we have yet explored?

- The 2018 Plans from both Councils included a strong and clear statement of their future Vision of the Greater Cambridge area. This is lacking in this consultation. The Plan must include a comprehensive overview of the sort of place we want Greater Cambridge to be in 20, 30 or even 50 years' time.

- An assessment must be made of the environmental capacity of Great Cambridge to absorb the scale of growth proposed in the consultation as a key document in the supporting evidence-base. Simply adding additional housing to an already stretched resource capacity is plain bad planning.

- Greater Cambridge already faces a massive infrastructure deficit. If the level of the Objectively Assessed Housing Needs is determined by the Councils at a level greater than the minimum proposed by the government, then it must first show how the extra infrastructure is to be

funded. Lacking any such financial analysis, including an assessment of the willingness of the private sector to take up the challenge, then the Plan will lack any sense of reality

- The impact of London on Greater Cambridge's development must be assessed. To what extent are housing pressures for the Greater Cambridge area being driven by increasing demand by London commuters, and the market's ambition to make profit by meeting that demand? This trend will accelerate with the opening of Cambridge South station (see our response to Q4). To what extent can the Councils influence this issue?