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## Response to Greater Cambridge Local Plan – First Proposals

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.

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The following response was submitted to the Greater Cambridge Shared Planning Service.

### Vision and development strategy

#### Vision and aims

We support the vision statement “for the well-known characteristics of the historic core of Cambridge to be complemented by active, compact neighbourhoods – new and old. This means providing opportunities to regenerate areas that aren't yet reaching their potential, and creating new city neighbourhoods which have the critical mass of homes, jobs and services to create thriving communities, making best use of brownfield and safeguarded land.”

We support the vision that the New Towns agreed in the 2018 plan must develop into great places to live and work. However, this vision should also recognise the essential role that cultural and leisure activities play in creating great places (we suggest the inclusion of the word “play”). This will also be essential in order to take pressure off of Cambridge, which will not be able to cope if it is to serve the leisure needs of the additional 73,000 population created by this plan.

We appreciate that this is not a draft plan and we very much hope that the draft plan will set out an inspiring vision for what greater Cambridge will become - and that this vision recognises the importance of landscape, heritage and nature in continuing to ensure that Cambridge is a special place to live, work, study and visit.

We very much welcome and support the efforts to make this a much greener plan than those that have come before it and there is much that is to be commended. However, large scale new development is not yet zero-carbon or genuinely sustainable and therefore the more of it you have the more harm you inflict upon the environment, heritage and local communities – and the greater the challenges and costs of addressing those problems. There seems to us, to be a contradiction between the scale of development proposed and the aspirations for the environment, heritage and local communities.

If the councils are to proceed with such a significant level of development (equivalent to building two Bury St Edmunds in 20 years) it is essential that the policies in the plan are as strong as they can possibly be in order to protect and benefit the environment, heritage and local communities. The draft plan will also need to put in place the mechanisms to ensure that development results in the financial investment that will be needed to protect and benefit the environment, heritage and local communities. We are concerned that currently there are not sufficient mechanisms to achieve this. For example ensuring that all development contributes towards increasing the provision of large-scale green spaces so that the amount of this essential resource keeps pace with population growth. Significant investment is needed in environmental infrastructure such as water supply, sewage treatment and waste treatment.

### **S/JH: New jobs and homes**

We object to the scale of growth proposed due to the lack of available water supply to support human needs without damaging the River Cam and its tributaries, including chalk streams. This includes impacts on water quality. We welcome that you have recognised this as an environmental limit to growth and that if it is not resolved the plan will not be found sound. Even if the water industry plans are put in place to address this problem prior to the Local Plan going for public examination, there will remain the risk that the water industry plans are delayed or not fully delivered. Therefore, you will need to set out in the draft plan how you intend to deal with this scenario.

Following the designation of our area as “water stressed” and the new evidence that has been obtained through your work, we are very concerned that the level of growth already in the 2018 Local Plan is beyond the environmental limits of our water supply. Water industry plans include reducing household consumption, and whilst this is in theory achievable it may not be achieved in practice. We would like to see policies or mechanisms within the draft Plan that set out how development approvals will be aligned to improvements in water supply, and what will happen if those improvements are not achieved. This is to avoid development running ahead at a faster pace than water supply improvements.

Accurately predicting future jobs and employment space, and their relationship to housing at the current time is incredibly difficult:

- The impact of Brexit on the local economy is not yet known. Many scientific and research projects were part funded by the EU.
- Some large employers are leaving Cambridge (Marshalls and the County Council).
- Hybrid/home-working will change the dynamic between where people work and where they live, this is likely to have a number of consequences for planning:
  - hot-desking will increase in offices meaning that individual office buildings will support larger numbers of workers/jobs, this could decrease the amount of floor space required.
  - People will commute fewer days per week and therefore will tolerate longer commutes in order to take advantage of cheaper housing (eg to afford home office space and/or garden space). On one hand this may make it harder for new housing in greater Cambridge to compete with cheaper housing further away. On the other there may be additional demand close to Cambridge for London commuters. Either way, it is unlikely that the aspiration to co-locate jobs and housing in Greater Cambridge will be achieved.
- The 2021 census might have given some answers but unfortunately this was carried out during the pandemic, meaning that an important source of planning information will not help as it should have.

Given such uncertainty, it is unlikely that the objectively assessed needs will be accurate. Therefore it is essential that there is ability within the plan to review and make adjustments over time to reflect reality. One danger is that employment land allocated for new towns is unused and applications are made for residential development instead, meaning that these settlements become residential dormitories contrary to the vision set out in the plan. As an example, we are aware that employment sites in Haverhill are now being used for residential, placing greater commuting burden on our area.

In 2019 we met with senior planning officers from East Cambs District Council. They were clear that housing provision in their district was providing housing overspill for Cambridge. They also want to create liveable communities that include employment but they reported that they were struggling to bring forward employment sites for development in places like Ely because of supply and demand provision in Cambridge. There is clearly a strong relationship between greater Cambridge and East Cambs and other market towns in terms of housing and employment provision and we would like to better understand what work has taken place to co-ordinate planning for this.

### **S/DS: Development strategy**

Broadly we support the spatial strategy for locating new development:

The policy of development in a relatively small number of large new settlements, rather than green belt release or a scatter-gun approach across all the villages of South Cambs is supported.

The policy of seeking to keep Cambridge a compact city through support for its green belt against city fringe expansion is supported, however we object to two areas of green belt release.

The sustainability of this strategy will depend on the adequacy of the transport links between the new settlements and the main centres of employment. Northstowe is served by the guided busway (both public transport and active travel), Waterbeach New Town will be served by rail and a new greenway and 'greater Cambourne' will be served by East-West Rail and a new greenway. Some of the plans by the Greater Cambridge Partnership to provide busways to these settlements and employment sites would be damaging to the green belt, landscape, ecology and heritage and are not supported.

The transport modelling for the Preferred Option assumes that Cambridge would need to increase the number of Park & Ride parking spaces from just over 7,000 now to over 26,000 in 2041 (Table 41 in the Transport Evidence report: 20,687 Park & Active trips plus 32,239 Park & Ride trips). This is acknowledged nowhere in the draft Local Plan policies, despite it potentially harming the landscape and ecology of the green belt far more than the proposed new and extended settlements.

### **S/SH: Settlement hierarchy**

The settlement hierarchy is generally supported.

We know that a number of sewage treatment facilities upstream from Cambridge are unable to cope during periods of high rainfall (discharging raw sewage) and they are also contributing towards failing water quality by discharging pollution into water courses with low volume flows. We would like to see a policy that ensures that further development in any villages served by such sewage treatment works should be conditional upon improvements to those facilities, so that new development is not making the present situation any worse.

### **S/SB: Settlement boundaries**

We support this approach in general.

In relation to "Outside settlement boundaries, we propose that no development would be permitted except for - development for agriculture, horticulture, forestry, outdoor recreation and other uses that need to be located in the countryside". Changes to permitted development rights mean that some of these uses could subsequently be converted into residential or other employment uses, effectively circumventing the policies within the Local Plan. We would like to see a policy within the Local Plan that requires any such permissions to be conditional that they cannot be subject to a permitted change of use and that any change of use would require a planning application.

## Cambridge urban area

### Cambridge urban area - general comments

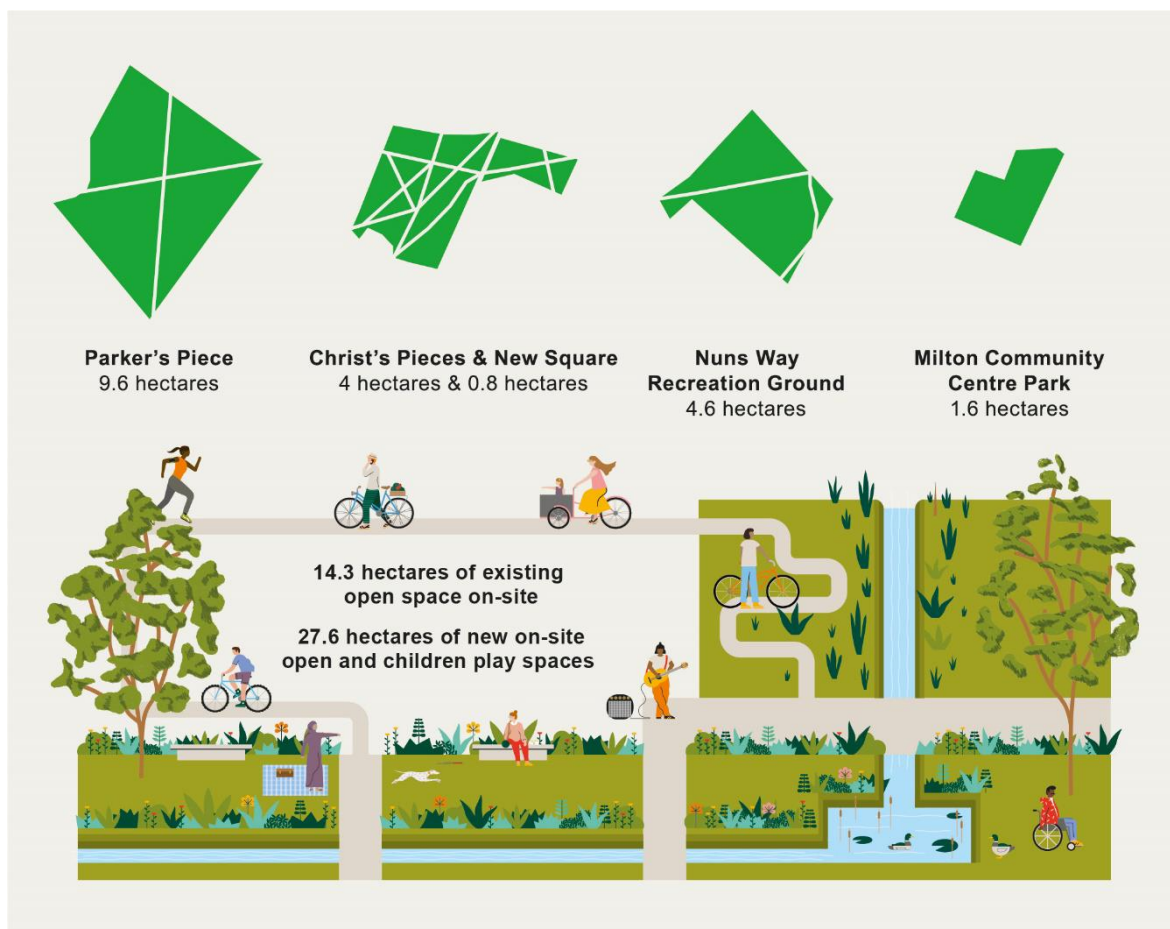
Cambridge Past, Present & Future is concerned about the capacity of the Cambridge Urban area to accommodate the scale of proposed growth, an additional 73,000 people. We are particularly concerned about the inadequate space in the historic city streets and city centre public realm to cater for existing people movement (vehicular, cyclists and pedestrians) – and of the ability of the complex local government system to deliver effective solutions (City Council, Cambs County Council, C&P Combined Authority and the Greater Cambridge Partnership). The 2018 Local Plan included a requirement for an SPD to address this problem but at the start of 2022 limited progress has been achieved.

### S/NEC: North East Cambridge

There are many things to commend in the environmental aspirations for this development but disappointingly the provision on natural greenspace is not one of them.

The amount of informal green space meets the minimum amount required by the council's policies but two thirds of this is provided on a business park, described on p26 of the NECAAP Open Spaces Report as "these green spaces aren't perceived as being accessible to the wider public". Would you want to visit a business park for your leisure and recreation? It should be noted that the green space on the business park already exists, so it is not new space.

Only a third of the green space is provided in conjunction with the housing. Most of this is provided as linear green space or pocket parks, in other words small areas of green space that are loomed over by high-rise buildings. There is one larger park but the size of this is not provided in any of the documents. Extrapolating from the plans, we estimate this to be around 3.5 ha in size. Fig 20 in the AAP report includes an infographic which aims to compare the amount of open space in the AAP with other Cambridge parks, the comparison is misleading because the parks which are used for comparison are just that, parks. A better comparison would be the main park proposed for the new development. At 3.5ha this is small in comparison to the other parks, given that it is to cater for 16,000 people.



At a bare minimum the proposals for the AAP might possibly just provide for the day-day open space needs of the new residents: play space for children, somewhere to walk the dog or kick a ball about. But what it won't do is provide the kind of green spaces that people in high density developments need access to – which is large natural greenspace: somewhere they can go for a long walk or run, experience nature, and escape the pressures of urban life.

There is of course somewhere for them to do that, it is Milton Country Park and a subway is proposed under the A14 so that residents can get to it. And that is exactly where the 16,000 people will go. That would be great if it were not for the fact that the Country Park is already at capacity and cannot cope with 16,000 more visitors.

In the hundreds of pages of text for the NECAAP there is almost no mention of Milton Country Park at all, let alone of it meeting the needs of the development. There has been no assessment of whether the country park has the capacity to cope and what mitigation might be required to enable it to do so. We could see no requirement for S106 contributions to support the park to cope only this rather vague paragraph on p54 of the NECAAP Open Spaces & Recreation Topic Paper:

*There is a need to build in community resilience and capacity into the existing open space provision for NEC. Alongside any on-site provision, opportunities to use S106 contributions outside the city on large-scale green infrastructure should be*

*considered. This will avoid pressure building up on existing parks, open spaces and cycleways, which might otherwise lose their biodiversity and other qualities. For example, undertaking negotiations for specific S106 contributions, for growth sites straddling the Cambridge/South Cambridgeshire boundary. These could explore opportunities for improving existing or creating new parks beyond the city which are easily accessible by foot and cycle, in order to avoid over-investment in, and over-use of popular or environmentally sensitive sites.*

Natural England's Accessible Natural Greenspace Standards would require the NECAAP development to have a large 100 hectare site of accessible natural greenspace within 5km. Especially as this development is to be largely car free. But there isn't one. To make matters worse, the north of Cambridge will also see 20,000 people at Northstowe and 22,000 at Waterbeach. Where will these 58,000 people go to meet their green space needs?

This is an area which has been highlighted in the Green Infrastructure evidence base for the Local Plan as already suffering from a deficit of green infrastructure and recreational pressure. This report highlights North East Cambridge to Waterbeach as a priority area for green infrastructure with its enhancement marked as of 'critical importance'.

The only option for providing that critical greenspace is through the North East AAP and therefore it is essential that s106 contributions are secured towards this.

Failure to do so will result in increased recreational pressure on European Protected Sites/Habitats Directive (ie Wicken Fen Special Area of Conservation). Please see our response to the Local Plan Habitats Regulations Assessment.

### **S/OA: Opportunity Areas in Cambridge**

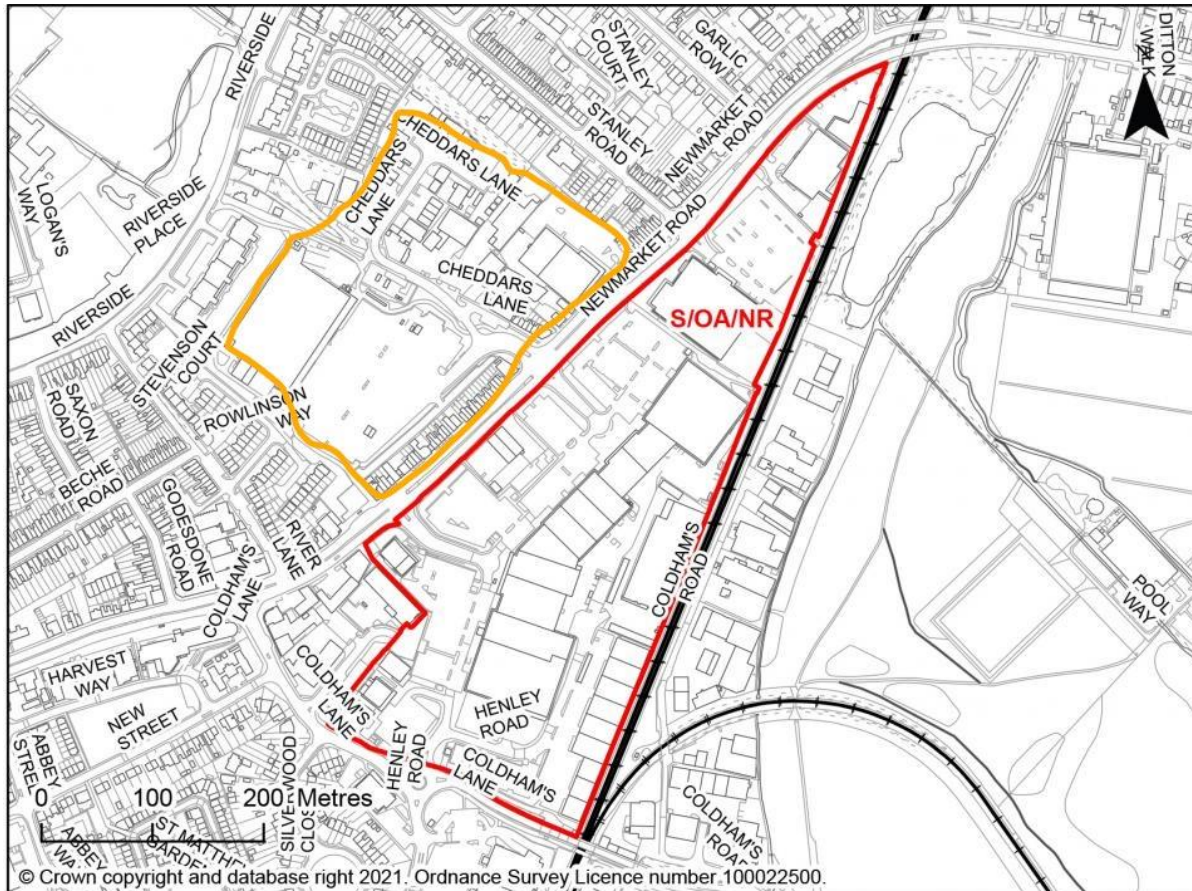
#### **S/OA/NR Newmarket Road Retail Park**

#### **S/OA/BC Beehive Centre**

Cambridge Past, Present & Future strongly supports the inclusion of these two new opportunity areas. Combined, they include 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. Cambridge Past, Present & Future 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.

When progressing the development opportunities for these sites, access to green space must be included in any schemes.

We also request that you include an adjacent area as part of these two New Opportunity Areas and this is marked in orange on the diagram below:



There are two reasons for requesting for this inclusion:

1. It is a similar land use to the other two areas and in the same location and therefore the same principles apply.

2. We have seen a number of planning applications coming forward in this area. These are being dealt with on a piecemeal basis with all the associated problems of piecemeal development. This is not an area of high quality design and is negatively impacted by Newmarket Road. A strategic planning approach is required to ensure that any planning applications contribute towards improving public realm and the overall improvement of the area.

## Edge of Cambridge

### Edge of Cambridge – general comments

As the Local Plan is progressed, the evidence supporting it and the resulting policies must take a holistic view of the combination of different elements, including the historic and natural environment, which make up the character of Greater Cambridge. This is particularly important when considering the edge of Cambridge and the Green Belt. When identifying land for development, how highly land performs against the functions of the green belt must also be considered against the value of the land for its built and natural heritage.



## **S/CE: Cambridge East**

In relation to the following points

- *To retain a green corridor through the development to link the countryside with Coldham's Common and the heart of Cambridge, that lies within the and has a landscaping, biodiversity and recreation function whilst also maintaining the individual identity of Teversham village.*
- *within the site, and green infrastructure within and adjoining the area, including providing additional wildlife habitat land surrounding the designated nature sites to the east of Cambridge, as part of the Eastern Fens green infrastructure initiative.*

Whilst we strongly support this approach in general, the relationship between the Cambridge Airport site, the adjacent countryside, future green space provision and future transport provision is complex. There is significant risk of recreational disturbance (harm) to nationally important species and designated nature conservation sites and this does not appear to be recognised. There are also differing ideas on where future "country park" type provision should be made in order to divert pressure from ecologically sensitive sites and also to tie in with plans of environmental NGO's. In our view, significant work is still required in order to resolve these challenges and we are concerned that the best solution should not be constrained by over-simple policy statements and over simple maps included in the Local Plan. We are attaching a letter that we sent to Marshall's in 2020 which sets out some of our views in relation to the future development of this site. We would welcome continued dialogue on this matter as the draft Local Plan is prepared.

We also believe that the future of the S/AMC/Policy 16: South of Coldham's Lane should be linked to Policy S/CE: Cambridge East. It is our view that the challenge (and costs) associated with bringing Coldham's Lakes into public use as a park is only likely to be viable as part of the Cambridge Airport development. Indeed, one of the main user groups of a new Coldham's Lakes Park would be the future residents of the airport. The lakes could also divert recreational pressure from other more sensitive ecological sites.

## **S/CBC: Cambridge Biomedical Campus**

Whilst Cambridge Past, Present & Future appreciate the international significance of the Cambridge Biomedical Campus and the benefits of a centre of medical excellence on our doorstep, we nevertheless have reservations about the continued expansion of the CBC and OBJECT to this policy because it would cause a high level of harm to the green belt, loss of biodiversity (see attached report from John Meed) and increase flood risk.

Future growth of the Campus is constrained by the Gog Magog Hills. The hills are arguably the most important landscape area on the city fringes and it is generally agreed that any development of the slopes would be unacceptable. Not only that but building right up to the slopes will also have significant detrimental visual impacts. This raises a fundamental question about the longer term.

If the campus does continue to expand then where will it expand if there is no acceptable land adjacent to the Campus? The answer is a new campus in a different location. If that is the long-term future, then why not address it now rather than encroaching on an important part of the green belt? Has that option been considered as part of the plan making process?

Given that future land for the campus in this location is likely to be highly constrained we challenge whether any residential provision should be made and we would also argue that a more rigorous set of criteria should be agreed so that new enterprises and activities have to demonstrate why co-location within the Campus is absolutely essential for their operation. Co-location would be desirable for any biomedical company, but is it crucial to the effective operation of that company?

Notwithstanding our objection in principle to this policy, we comment specifically on the proposal:

- *Significant Green Belt enhancement in adjoining areas of White Hill and Nine Wells will be required, to provide green infrastructure and biodiversity improvements supporting the objectives of the Strategic Initiative 3: Gog Magog Hills and chalkland fringe. These areas would remain within the Green Belt and are included in the Area of Major Change to highlight that future proposals for built development on the allocated areas must also include green infrastructure and biodiversity improvements within its adjoining open area.*

We welcome this approach. Some of the previous attempts to mitigate the impacts of development through green infrastructure and public access improvements through Area Action Plans and similar have failed because they have been considered aspirational rather than contingent. Policy drafting must ensure that:

- i). Any development is contingent on green infrastructure and biodiversity improvements in the adjoining area.
- ii). The scale and type of improvements are spelt out clearly so that both the developer and community understand what is expected.

We are attaching with our submission a report by John Meed who has been studying farmland birds on this land for the past ten years. He reports that “At first sight the area I study may appear unlikely to support high levels of biodiversity. However, in practice it is home to remarkable populations of threatened farmland birds, all red-listed species of high conservation concern, as well as the equally endangered water voles, brown hare, and a good range of other birds, mammals, arable plants, butterflies, dragonflies and other invertebrates.” John’s report highlights that many of these species would be impacted not just by the development but potentially by future landscape and biodiversity plans. He proposes that in addition to the land identified at White Hill and Nine Wells that additional work would be needed on adjacent farmland to mitigate the impact on farmland wildlife.

In relation to the statement:

- *No development will be permitted south of Granham's Road. However there may be potential to realign the eastern end of Granham's Road to a point no further south than the southern boundary of the Wort's Causeway development to the east of Babraham Road, subject to achieving an acceptable junction arrangement, with the Green Belt boundary following the line of the road. The additional area that may be created by realigning Granham's Road is shown as a separate area at this stage, and will be explored further, with the boundary to be defined in the draft Local Plan.*

We note that the realignment of the road would result in further loss of 5-6 acres of greenbelt to development because Granham's Road (the green belt boundary) would effectively be moved south.

## New settlements

### S/CB: Cambourne

We support the proposed policy direction. To meet the identified role of Cambourne it is suggested that the policy include:

- Safeguarding of employment and services and facilities within the settlement and to prevent gradual loss of sites to residential.
- Supporting text/policy could set a modal shift from private cars to public transport, walking and cycling.
- The design concept of walkable neighbourhoods.

### S/NS: Existing new settlements

Northstowe AAP is now 14 years old. Is the Local plan an opportunity to replace any out of date policies?

These settlements need to deliver the same role as identified for Cambourne

☑ Well-connected place through high quality public transport, cycling and walking facilities

☑ South Cambridgeshire town for the 21<sup>st</sup> century

☑ growing employment centre to provide local opportunities for its residents and nearby communities

☑ place that meets the day to day needs of its residents.

Therefore the policy needs to include

- Safeguarding of employment and services and facilities within the settlement and to prevent gradual loss of sites to residential.
- Supporting text/policy could set a modal shift from private cars to public transport, walking and cycling.
- The design concept of walkable and cyclable neighbourhoods.

## Rural southern cluster

### S/BRC: Babraham Research Campus

The same principles should be applied to this green belt release as for Policy S/CBC: Cambridge Biomedical Campus, namely that “National Planning policy requires that the impact of removing land from the Green Belt to be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”.

The Preferred Options documents do not seem to recognise that this site is located within the Cambridge Nature Network ([www.cambridgenaturenetwork.org](http://www.cambridgenaturenetwork.org)) and that it is adjacent to two strategic green infrastructure areas making it an important site (Green Infrastructure Strategic Initiatives: Gog Magog Hills (3) and River Cam Corridor (2c)). We would expect the proposals in the policy area to reflect this with a very strong emphasis on biodiversity enhancement within or adjacent to the grounds of the campus combined with better public access/benefits. We note that google earth seems to show an area of exposed chalk in the south-west corner which could provide an opportunity for ecological restoration of priority calcareous grassland habitat.

The proposals for this policy area must recognise that the area identified for development would be on much higher ground than those buildings that have already been built on the campus (which are sunk into the hillside). This location is sensitive in landscape character terms, being visible from the higher ground of the Gog Magog Hills, including from the Roman Road Schedule Ancient Monument. There is a potential conflict between the development of this site and policies designed to protect landscape character. To be acceptable in planning terms, any new buildings would need to be below tree height as viewed from the Gog Magog Hills (including any chimneys or rooftop plant), they should also be designed to blend into the landscape when viewed at distance.

One of the newer buildings on the campus has already had a very negative impact on landscape which is contrary to planning policy and, in our view, should not have been granted permission (see photos taken from a public right of way on the Gog Magog Hills). We request that before any future development of the site takes place there is a requirement for retrospective action to screen this building and/or better blend it into the landscape when viewed at distance.



### **S/RSC: Village allocations in the rural southern cluster**

#### **S/RSC/HW Land between Hinton Way and Mingle Lane, Great Shelford**

Cambridge Past, Present & Future OBJECTS to this policy because it would cause a moderate high level of harm to the green belt. We see no evidence that 100 houses could not be provided outside the green belt and therefore this site does not pass the “exceptional circumstances” test. We do not believe that being close to a rail station qualifies for “exceptional circumstances” either.

It is obvious that the development of this site would lead to increased development pressure on the other fields in this location and therefore it undermines the green belt. Indeed, it seems that the longer-term intention of the Planning Department is for further green belt release in this location, this is evidenced by: *“open space to be provided to the east of the built development to help provide compensatory improvements to the environmental quality and accessibility of remaining Green Belt.”* There is also green belt to the north (indeed that is the longer boundary and the one viewed from higher ground) and therefore if the intention was to contain the development there would be a requirement for public space/green belt mitigation for both the northern and eastern boundaries.

The justification for this site seems to be that it is close to Great Shelford station. However, this means that the new dwellings will appeal to London commuters and therefore there is a high risk that the new housing does not support the new jobs creation set out in the Plan, but instead further exacerbates local housing shortage.

## Rest of the rural area

### S/RRA: Allocations in the rest of the rural area

S/RRA/SAS Land to the south of the A14 Services

Support Policy requirement to ensure that strong landscaping is provided to help the site fit into the surrounding rural countryside character.

Notwithstanding our comment above, whilst this is a good location for a regional distribution centre it cannot meet the aspiration that “last mile delivery” in Cambridge can be carried out by sustainable modes of transport (smaller electric vehicles, cargo bikes, etc). This would not be possible from this location.

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

Support policy requirement to ensure enhanced landscaping on its open boundaries and avoidance of any impact on the settings of the Grade 1 listed church and the conservation area.

## Climate change

### Climate change - general comments

As the plan progresses, you need to ensure that it references and is based on the latest government targets. Technology, standards and targets will continue to change rapidly during the period of the plan and so the plan will need to include mechanisms to ensure that policies and supplementary policies can keep pace.

Agree that development should be located so that low carbon transport links can be accessed. However, such locations should not be chosen based on proposed busways – the

delivery of these is uncertain and their construction generates carbon emissions through the embodied carbon in the building materials, tree felling reducing carbon capture, maintenance and serving works, and lighting, contrary to the Council's net zero carbon agenda. The majority of the busways are also in the green belt.

### **CC/NZ: Net zero carbon new buildings**

Policy should reference that the targets prioritise a fabric first approach which involves maximising the performance of the construction components and materials making up the building fabric before the use of mechanical and electrical building systems. This can help reduce capital and operational costs, improve energy efficiency and reduce carbon emissions. The fabric first approach minimises the need for energy consumption through air-tightness, super high insulation, solar gain, natural ventilation, the thermal mass of the building fabric, using energy from occupants, electronic devices etc. Focussing on the building fabric first, is generally considered to be more sustainable than relying on energy saving technology, or renewable energy generation, which can be expensive, can have a high embodied energy and may or may not be used efficiently by the consumer.

We support a policy which aims to achieve more than Building Regulations and Future Homes/building standards.

We support a policy direction which recognises embodied carbon. However, it is noted that embodied carbon is not included in all of the findings of the evidence base (Net zero carbon study (2021)). This undermines the claims made about the sustainability of new development and raises questions about the claimed sustainability credentials of the preferred growth option.

Cambridge Past, Present & Future strongly supports the proposals to require, by planning condition, whole-life assessment of carbon, including embodied carbon, construction, and building disposal through circular economy.

Cambridge Past, Present & Future welcomes the proposals in the LUC supporting report, to require limitations in terms of planned kWh/m<sup>2</sup>/day; we particularly welcome the detail given for different types of development. Clearly these requirements can only be guidelines in the assessment of building design at Detailed Planning Application stage but they are valuable in themselves and as markers to sustainability requirement.

### **CC/WE: Water efficiency in new developments**

We support policy which recognises the level of water stress in our area and which is achieving more than building regulations.

Our members questioned whether low water use targets can be met through design and construction methods alone, given that there are no restrictions on how much water people can use.

## **CC/DC: Designing for a changing climate**

We support the proposals.

BREEAM excellent should be required for all public buildings.

## **CC/FM: Flooding and integrated water management**

Regarding “The plan will set out the approach to runoff rates, including that peak runoff rate should be no greater for the developed site than it was for the undeveloped site.” Whilst we support this, there may be cases where flooding is already a problem and the development provides an opportunity to reduce flood risk, in such cases we would hope that there would be a policy requirement to reduce runoff rates from pre-development levels. For example, a development in the upper water catchment that is subject to flash flooding.

Policy should recognise the value of SuDS for the provision of natural green space and biodiversity and encourage above ground SuDS for this reason. We have seen a number of development proposals where SuDS have been located surrounded by roads, this is problematic because it encourages semi-aquatic wildlife to cross the roads and risk being crushed (eg spawning amphibians) and it fails to recognise ecological principles of connecting habitat (not isolating it with roads). We would welcome wording in the draft Plan that discourages this type of design.

Policy needs to meet requirements of Environment Agency, Lead Local Flood Authority and water companies

## **CC/RE: Renewable energy projects and infrastructure**

Policy must clearly protect the character and appearance of the landscape.

Need clear guidance on where wind and solar farms and energy infrastructure is acceptable.

## **CC/CE: Reducing waste and supporting the circular economy**

We support the proposals.

Where possible existing buildings should be reused. Planning policy should prioritise reuse of buildings over demolition and rebuild. There is a growing body of evidence that the ‘greenest building is one that already exists’. (Carl Elefante quoted in the Architect’s Journal Retrofirst campaign <https://www.architectsjournal.co.uk/news/opinion/the-greenest-building-is-the-one-that-already-exists> and <https://www.architectsjournal.co.uk/news/opinion/join-our-retrofirst-campaign-to-make-retrofit-the-default-choice> ).

The climate change section should include policies covering retrofit. This will become increasingly important as higher energy efficiency standards are required. These targets



present serious challenges now and will get ever more serious during the Plan period, with both major impacts on individual buildings and townscapes, and high risks of carbon (and money) being wasted on inappropriate works.

Retrofit will be within the direct scope of the Plan (guiding planning decisions) whenever it involves works which could potentially require planning permission or listed building consent. There will be difficult decisions to be made regarding retaining traditional features which contribute positively to the heritage, character and public realm (which is part of what makes Cambridge a great place) versus changes to those buildings to improve their energy efficiency. It is important that the policies in the Plan recognise this and provide guidance on how this should be assessed, so that good decisions are made.

A high proportion of the buildings in Greater Cambridge will be of traditional solid wall construction. The Climate Change section of the Plan should quote key principles and guidance from PAS 2035 and its non-domestic counterpart PAS 2038 (and reference other freely available advice including from the STBA and IHBC as well as the Government's own guidance to Private Sector Landlords) in sufficient detail to ensure that people dealing with all traditional buildings (not only heritage assets) have access to the appropriate advice and skills to ensure that their buildings are put in good repair, and then suitable retrofit measures are applied as appropriate. See <https://stbauk.org/whole-house-approach/>. This is essential to achieve the aims of the PASs and to minimise unintended consequences.

### **CC/CS: Supporting land based carbon sequestration**

Strongly support.

Policy needs to link to Biodiversity and Greenspaces policies and policies achieving high quality design.

## **Biodiversity and green spaces**

### **Biodiversity and green spaces - general comments**

A significant amount of development will come forward through windfall (or outside the development plan) and the potential impacts of this on biodiversity will need to be dealt with on a case-case basis, therefore it is essential that policies for biodiversity and green spaces are as strong as they can be and that the plan policies protect existing nature rich areas by strongly emphasising the mitigation hierarchy: avoid, minimize, restore and offset.

The overall policy direction is supported and welcomed. However, Cambridge Past, Present & Future consider that future plan policies should be prioritised with the protection of existing interests as the first principle. As the Biodiversity and Green spaces Topic paper 3 indicates at para 3.2 (emphasis added):

*The National Planning Policy Framework (2019) paragraphs 174-188 relate to Conserving and enhancing the natural environment. Particularly relevant to biodiversity and geodiversity is paragraph 179b, which sets out that **local plans should promote the***

*conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*

Thus, the starting point for future policies should be the protection of existing sites of both biodiversity and geodiversity importance. This will give a clear statement of intent from the outset for any future developments. Future policies should also give some detail of what is expected with regard to development affecting these interests; we comment further on this below.

### **Linkage to wider GCLP Policies**

Future GCLP policies for development must not put the protection and enhancement of biodiversity at risk. This means that all of the consequences of any new development or infrastructure for these interests must be assessed fully before being incorporated in the new plan. This is also likely to require action by other statutory bodies to ensure the delivery of new development without causing further harm to existing interests.

Water supply is a good example. Planning decisions that provide for future development can influence the quantity and quality of water with further potential effects on biodiversity in a number of ways. For example, the use of streams and rivers to carry the outfall from sewerage treatment could have critical effects on wildlife. In addition, whilst water availability is, of course, a relevant constraint that the planning system should consider, the capacity of our watercourses to dispose of treated water waste is likely to be a more binding one. Furthermore, consideration must also be given to the climate-change-induced, greater frequency of storm events. Without increased investment by the water authorities the frequency of storm events leading to raw sewerage being discharged is likely to increase, even at current levels of development. It should not be assumed therefore that water authorities will simply be able to accommodate the extra demands of new development. Another potential consequence of planning decisions is the demand for increased abstraction of better quality water from aquifers leading to more pressure on vulnerable wildlife dependent on it. Impacts on wider catchment areas beyond the GCLP area is another issue that will require cooperative working between statutory bodies and adjoining Local Authorities.

### **BG/BG: Biodiversity and geodiversity**

Cambridge Past, Present & Future strongly support 20% Biodiversity Net Gain.

The overall intention of this policy direction is welcomed and supported. However, the detail of how the policy is worded to guide and enhance development will be critical and it is likely to require more than one policy to achieve this. It is, of course, appreciated that plan policies have to be developed further - some important issues are touched upon already and this is welcomed. As referred to in our general comments however, the first priority must be the protection and conservation of existing biodiversity and geodiversity interests. With this in mind we have a number of specific comments regarding the principles to underpin this objective. These should be reflected in future policies and/or supporting text in the GCLP:

- **Assessment of impacts**

All development affecting sites of biodiversity and geodiversity importance and interest should be subject to thorough assessment of impacts based on all relevant information and recent surveys.

- **Mitigation and Compensation**

The mitigation hierarchy should be followed for any development proposals. We are pleased to note that this has been referenced at section 3.5 of Topic Paper 3, i.e. *'whereby harm should be preferably avoided, adequately mitigated, or compensated for as a last resort'*. Acceptance of proposed mitigation as a way of making a development must be based on proof that it will work and should not be confused with compensation for irrevocable damage to an important site or interest. The distinction between mitigation and compensation is also important as the latter must require justification as an exception. Finally, all mitigation and compensation work should be properly secured in perpetuity if necessary. This is particularly important with regard to compensation. Compensation for permanent damage requires permanent recompense.

- **Approach to harmful development**

Any development that has an adverse effect (or risk of such effect applying the precautionary principle) should normally be refused. The supporting text with the current first proposals consultation indicates that exceptions will only be made where the public benefits significantly outweigh any adverse impacts. However, more clarity will be needed on how this will work in practice. Again, it is appreciated that the policy wording has still to be written. However, this is such an important issue that a clear statement of intent should be made now. If developments are proven to have an adverse effect or applying the precautionary principle, a risk of an adverse effect, then they should only be normally permitted when clear tests are applied. Arguably this should also include being satisfied that applicants have demonstrated that there are no less damaging alternatives they could pursue.

It is noted that the supporting text with respect of policy BG/BG states (emphasis added):

*'The policy will state that development proposals adversely affecting sites of biodiversity or geological importance will not normally be permitted. **Exceptions will only be made where the public benefits significantly outweigh any adverse impacts.**'*

Clarification will be needed of what tests will be used to determine whether public benefits outweigh adverse impacts on important sites, because an approach solely on a case by case basis could risk a lack of consistency and consequent serious harm to biodiversity interests without sufficient justification. The level of public interest that would need to be demonstrated will also need to be commensurate with the level of interest affected. This

level of test may be very high if for example, an internationally or nationally important interest is at risk.

The supporting text also goes on to say:

*'In such cases where development is permitted, we will require that the intrinsic natural features of particular interest are safeguarded or enhanced.'*

Presumably the intention here is to safeguard or enhance any *remaining* features of interest after a damaging development is allowed.

- **Biodiversity Net Gain**

We strongly support a level of 20% Biodiversity Net Gain for the following reasons:

- Cambridgeshire is one of the most nature depleted counties in England, which is one of the most nature depleted countries in the world.
- Doubling nature in Cambridgeshire would only bring the county to the average for the UK.
- Cambridge Nature Network Report identified that existing habitats within 10km of Cambridge are too small and too fragmented to form a functioning ecological network. To achieve a functioning ecological network sustained effort and investment will be needed over the long term to make habitats better, bigger and more connected.
- Creating new habitats to replace those lost is not an exact science, meaning that some biodiversity offsetting will produce less biodiversity gain than expected. This variability is considered to be around 10%. Therefore a 10% BNG requirement does not guarantee that any individual development would actually achieve a net gain. Only a higher level of BNG, such as 20% has the prospect of achieving this.
- It should be noted that 20% BNG will not achieve the aspiration to double nature unless it were at 50%.

We have two additional comments at this stage. First, that biodiversity net gain must take account of the full value of an affected site including any interests that may have been deliberately damaged prior to a development occurring. Second, the use of planning conditions and obligations to secure the effective long-term management of any on or off site habitat creation referred to the policy supporting text is vitally important and is welcomed. Long term monitoring to ensure that any proposed biodiversity net gain delivers what it seeks to do is also critical. The Defra Biodiversity Metric focuses on the provision of habitat. This may be used to mitigate effects or secure enhancement for species directly affected by a development. However, to ensure that species affected will benefit from habitat provision requires careful monitoring - simply creating new habitat will not necessarily mean the species affected will use it.

We also look forward to seeing more detail on how the proposed policy will seek to secure wider environmental gains.

Cambridge Past, Present & Future welcome the recognition that “Designated biodiversity sites within and close to Greater Cambridge are being impacted by increasing numbers of visitors – an issue that needs to be addressed to protect these vulnerable habitats and the species they support. For nationally designated sites, Natural England have identified Impact Recreation Zones and recommend the application of Suitable Alternative Natural Greenspace standards to inform the quantity of green space provision required for people, to lessen the impacts on these nature sites. Greater Cambridge has relatively few nationally designated nature sites, but many locally designated sites. Ahead of the draft plan we will explore how we can best measure and mitigate the impact of development on these local sites.” In Cambridge Past, Present & Future’s research for the Cambridge Nature Network (<http://cambridgenaturenetwork.org/> ) we identified that the creation of new accessible green space in Cambridgeshire has not kept pace with the increase in population over the past 20 years and this has been one of the main drivers of recreational impact on wildlife sites. In addition, many green space sites in Cambridgeshire are wetlands, meaning that although they might cover a large area, the amount of land that can actually be used by the public is often small or limited to paths. Unlike other counties Cambridgeshire does not have large areas of public access woodlands, downland/moorland/heathland or coastline. Our research also identified that generally, larger scale development (such as Cambourne) was providing larger areas of new greenspace but smaller developments were not and therefore it is these that are contributing most towards the problem as they have made up around 50% of the development in Cambridgeshire over the past 20 years. If the Local Plan is to be sustainable (ie not increase recreational impacts more than has already occurred) then ALL new development will need to make a contribution towards creating new Suitable Alternative Natural Greenspace (if none is created through the development). The Local Plan should set out how these contributions are to be collected and the amount that would be required per person. We refer you to the submission by the s106 Officer for South Cambridgeshire District Council who has calculated that this should be £498 per dwelling.

### **BG/GI: Green infrastructure**

The overall intent and policy direction of this policy is welcomed and supported. The need for development plans to take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure is of critical importance. This objective is a core part of the ‘Cambridge Nature Network’ which is supported by both South Cambridgeshire and Cambridge City Councils and we are pleased that this document has also been referred to. We also agree that green infrastructure initiatives must be included in the development plan rather than a supplementary planning document to provide the strongest possible support.

It is noted that views are sought on the adoption of standards for the provision of green infrastructure such as those set out in ‘Building with Nature’. Adoption of a set of key objectives and principles for the provision of green infrastructure is welcome - although the detail of these would need careful consideration. As we commented with regard to policy BG/BG, the protection of existing sites must be the first priority. As the explanatory text for standard 11 (Delivers Wildlife Enhancement) of the Building with Nature document notes:

*'This standard emphasises the requirement to follow the Mitigation Hierarchy and create Net Positive benefits for wildlife. The standard reiterates the need to protect any existing ecological assets as a necessary first step in the development process.'*

Any application of standards should also, of course, not simply be used as a green 'tick list' or applied to try and make developments acceptable when these would cause permanent harm (or risk of harm) to important biodiversity sites or interests.

We strongly agree that "Opportunity Mapping has identified a number of strategic green infrastructure initiatives which have the potential to enhance the existing network. This policy will require all new development to help deliver or contribute to support delivery of the green infrastructure strategic initiative objectives. Contributions will include the establishment, enhancement and the on-going management costs." In our research for the Cambridge Nature Network (<http://cambridgenaturenetwork.org/>) we identified that the creation of new accessible green space in Cambridgeshire has not kept pace with the increase in population over the past 20 years and this has been one of the main drivers of recreational impact on wildlife sites. In addition, many green space sites in Cambridgeshire are wetlands, meaning that although they might cover a large area, the amount of land that can actually be used by the public is often small or limited to paths. Unlike other counties Cambridgeshire does not have large areas of public access woodlands, downland/moorland/heathland or coastline and as a consequence there is poor access to countryside. Our research also identified that larger scale development (such as Cambourne) were providing larger areas of new greenspace but smaller developments were not and therefore it is these that are contributing most towards the problem as they have made up around 50% of the development in Cambridgeshire over the past 20 years. If the Local Plan is to be sustainable (ie not increase recreational impacts more than has already occurred) then ALL new development will need to make a contribution towards creating new strategic greenspace (if none is created through the development). The Local Plan should set out how these contributions are to be collected and the amount that would be required per person. We refer you to the submission by the s106 Officer for South Cambridgeshire District Council who has calculated that this should be £498 per dwelling.

We have noted the Greater Cambridge Green Infrastructure Opportunity Mapping Final Report (2021). We have been trying to arrange a meeting with officers to discuss this and will submit additional comments once we have been able to do so.

### **BG/TC: Improving Tree canopy cover and the tree population**

The overall intent and policy direction of this policy is welcomed and supported. Protection of existing trees and hedgerows, particularly those of special quality, is especially important.

It is important that the draft Plan or supporting information highlights that trees and woodland are NOT priority habitats in a number of locations in Greater Cambridge, as set

out in the Cambridge Nature Network (<http://cambridgenaturenetwork.org/>). In these locations other habitat types should be prioritized over woodland in the first instance. This includes meadows, fens, wetlands and scrub. The area where woodland creation is prioritised is mainly to the west of Cambridge.

We support retaining existing hedgerows but when creating new habitat it is important to consider that hedgerows are not necessarily better than other linear habitat types in helping to provide ecological connectivity, and therefore in certain locations creating alternative types of linear habitat may be more beneficial – for example a series of ponds or a linear wildflower meadow. This should be reflected in the draft Plan.

The significant amount of space that is required to enable large tree species to reach full maturity, as well as arboricultural costs associated with large trees, means that most new developments now plant tree species which are much smaller when they reach maturity (eg rowan, birch, whitebeam, etc). The benefits of these trees is much lower in terms of urban cooling, urban flooding, sequestering carbon and public amenity (and possibly biodiversity). There is a risk therefore that the benefits of trees within developments is overstated compared to what is actually being delivered. We would like you to consider how this can be addressed (for example a requirement to plant more trees if they are of smaller varieties; or a requirement that a % of new trees are of larger species).

We also note that the supporting text indicates that *'We recognise that in some instances felling of existing trees or hedgerows may be necessary to meet wider placemaking objectives.'* and look forward to more detail and discussion on how and when the latter will be applied to justify tree and hedgerow removal.

### **BG/RC: River corridors**

The overall intent and policy direction of this policy is welcomed and supported. We reiterate however, the importance of ensuring that any policies aimed at protecting and enhancing rivers are not undermined by consequential effects of other development that will be brought forward in the new Local Plan, for example the likely demands on water supply and effects on water quality.

The River Cam and its tributaries are the subject of flooding. Natural flood management techniques applied to ditches, drains and streams in the catchments can contribute towards reduced flooding and also have other positive benefits for biodiversity, public amenity and water quality. In order to encourage this approach we would like to see this added to the list of items that could be supported by development proposals.

Planning applications are likely to be required for large scale schemes that can improve water quality or tackle flooding, such as treatment wetlands. There should be an assumption in favour of such applications in the draft Plan.

The river corridor is not just an environmental asset but also an important heritage asset, in landscape terms and in the setting of the historic city. This heritage can also be damaged

and sometimes different ways to environmental harm. We would like to see this recognised within the wording of the draft Plan.

### **BG/PO: Protecting open spaces**

The overall intent and policy direction of this policy is welcomed and supported.

However we note that “It will also need to continue to recognise that in some cases development on open space may be appropriate if it has limited qualities and would lead to overall quality or quantity improvements.” We do not support this approach where applied to private benefit. More green space is needed, as identified elsewhere. We do not believe that a circumstance can exist whereby the only way to improve the quality of an open space is by allowing private development on it. There are other ways of raising funds to support open space improvements. The draft plan should include a policy that any loss of open space to private development must be offset by the provision of at least an equal amount and quality, within the adjacent neighbourhood.

Raising funds or the stewardship of the ongoing maintenance of open spaces is a challenge and an issue of national concern. One of the ways that funds can be raised for this work is through offering the public a service, for example a café in a park. The wording of this policy should allow for developments that would provide a public benefit and support the ongoing maintenance of the open space (eg café).

The supporting text notes:

*‘Access to a range of open spaces for different activities, for all ages is an essential part of sustaining healthy communities, supporting the local environment, and encouraging social interaction with local people.’*

Open space also performs a valuable function in reducing recreational pressure on other vulnerable sites, especially where there is sensitive wildlife. We comment further on this in respect of Policy BG/EO and the provision and enhancement of open spaces.

Many open spaces also have an important heritage function, either directly or as a contribution to the setting of the historic city and/or individual heritage assets. We would like to see this recognised within the wording of the draft Plan.

### **BG/EO: Providing and enhancing open spaces**

The overall intent and policy direction of this policy is welcomed and supported.

The supporting text notes a number of reasons why this policy is required and the many benefits it can deliver. We also believe there is a direct link between the provision of open spaces to ensure easing the recreational pressure on other sensitive areas of countryside such as important wildlife sites.



Recreational pressure on sensitive wildlife sites is only likely to increase and it is vital that other adequate alternative greenspace is provided and secured to avoid any adverse effects. The use of Suitable Alternative Natural Green Space (SANG) is discussed in the recent Greater Cambridge Shared Planning Biodiversity Supplementary Planning Document - Consultation Draft July 2021. In our comments on that document we stated (emphasis added):

*Whilst it is appreciated that current Local Plan policies do not set out requirements in respect of SANG, **Local Authorities should also take the lead in future development plans with clear overarching policies that provision of SANG may be required for certain residential developments.***

This comment applies equally to the current First Proposals.

In our research for the Cambridge Nature Network (<http://cambridgenaturenetwork.org/>) we identified that the creation of new accessible green space in Cambridgeshire has not kept pace with the increase in population over the past 20 years and this has been one of the main drivers of recreational impact on wildlife sites. In addition, many green space sites in Cambridgeshire are wetlands, meaning that although they might cover a large area, the amount of land that can actually be used by the public is often small or limited to paths. Unlike other counties Cambridgeshire does not have large areas of public access woodlands, downland/moorland/heathland or coastline and as a consequence there is poor access to countryside. Our research also identified that larger scale development (such as Cambourne) were providing larger areas of new greenspace but smaller developments were not and therefore it is these that are contributing most towards the problem as they have made up around 50% of the development in Cambridgeshire over the past 20 years. If the Local Plan is to be sustainable (ie not increase recreational impacts more than has already occurred) then ALL new development will need to make a contribution towards creating new strategic greenspace (if none is created through the development). The Local Plan should set out how these contributions are to be collected and the amount that would be required per person. We refer you to the submission by the s106 Officer for South Cambridgeshire District Council who has calculated that this should be £498 per dwelling.

It is important to consider that some public open spaces are not green spaces, such as the Market Square or Quayside but they should still be subject to similar policies that seek to protect and enhance their important features.

## Wellbeing and inclusion

### Wellbeing and inclusion - general comments

Protecting and enhancing the Historic Environment is not only key to creating and providing Great Places but a vital part of Wellbeing.

## Great places policies

### Great places – general comments

We agree that creating Great Places intersects with other themes. This must also include: A great place is somewhere which sits well within its landscape (as covered by policy GP/LC).

The Great Places paper refers to Heritage Assets, but does not adequately recognise that the city of Cambridge is a heritage asset of worldwide significance which meets UNESCO's Outstanding Universal Value criteria for World Heritage status. This significance derives from the combination of its built and natural heritage. We would like the draft Plan to recognise the vital role which this special character plays in making Cambridge a great place to live in, work, study, and visit.

The structuring of the consultation creates a separation between Landscape and Townscape (Objective 6) and Historic Environment (Objective 7), which for Cambridge creates a risk that there is not adequate consideration and valuation of the historic city in its historic landscape setting, with historic landscape and open spaces considered as green infrastructure but not as historic environment.

Cambridge's special character (which is what makes it a great place) will be put under significant pressure by the scale of growth proposed (73,000 extra residents). Cambridge Past, Present & Future is very concerned about the "limits to growth" capacity in trying to accommodate the 21<sup>st</sup> century demands this will create within the built fabric and spaces of a medieval market town. The fundamental conflicts between growth on the one hand and environmental capacity and special character on the other must be recognised as a key challenge for the draft Local Plan. We are concerned that the evidence base does not include an assessment of the cumulative impacts on the historic centre and what the likely impacts of this might be – without this it is impossible to reach a judgement. Para 3.2.4 of the Strategic Heritage Impact Assessment: baseline includes the statement that "3.2.4 Future growth in Cambridge has the potential to strengthen and reinforce these characteristics, enabling the City to meet contemporary environmental, economic and social drivers without undermining its economic identity" but we could not find any evidence to support this statement.

### GP/LC: Protection and enhancement of landscape character

We strongly support this.

One of the challenges is that trees are needed to screen developments and maintain the green edge to Cambridge and its villages. It will typically take at least 30 years for them to grow large enough to achieve any meaningful screening. As Cambridge is growing rapidly there is a risk of significant cumulative impacts. For example, the developments at Trumpington, Cambridge Biomedical Campus and Wort's Causeway mean that nearly the entire south eastern fringe of the city will lose its screening for 30 years. Add to this

Cambridge East and the developments at west and northwest Cambridge and the impact is clearly significant. We would argue that previous policy has not been effective at protecting the setting of Cambridge from the cumulative impacts of development. As a minimum we would like the policy to require the planting of large trees so that the time taken for them to provide screening is reduced. As a good example we would highlight the trees planted in the courtyard at the new Astra Zeneca head quarters.

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

Cambridge Past, Present & Future strongly supports the green belt purposes.

We also support the Greater Cambridge Green Belt Assessment but raise concerns that some historic buildings were omitted during the assessment despite the fact that they could potentially contribute towards the historic setting of Cambridge.

### **GP/QD: Achieving high quality development**

The proposed policy direction is supported. The policy should be linked to policy CC/NZ and buildings designed with climate mitigation in mind such as the orientation of buildings, window sizes etc.

### **GP/HA: Conservation and enhancement of heritage assets**

Cambridge is a city of international heritage significance. It is therefore considered that the historic environment has been considered in the local plan far too narrowly. This policy needs to be linked to the wellbeing policies WS/HD as safeguarding and enhancing the historic environment is a key part of Wellbeing and creating healthy developments.

The definition of sustainable development must be broadened to include Culture (since 2010 the UN has included culture as the 4<sup>th</sup> pillar of sustainable development). Cambridge's historic environment is a cultural asset of worldwide significance which must be recognised when developing sustainable policies and development.

Concerns are raised on the Heritage Impact Assessment (2021). There is considered to be a flaw in the Baseline Study which does not assess and record the SIGNIFICANCE, as opposed to weighting, of the City as a whole or of any undesignated areas within and around it. This is a direct consequence of the study's approach to the Historic Environment in terms of considering only the setting of designated heritage assets, rather than taking a holistic strategic view.

It appears that the study has only taken a superficial look at the baseline information.

- The baseline study confines itself to stages 1 ("identify the historic assets" and 2 ("define and analyse the settings") of Historic England's "Settings of Heritage Assets: Good Practice Guide", without considering the dynamic of the city as a whole: what has been happening in its recent years?, and what are the potential impacts of the large scale growth that is planned? It is almost as if the Council asked for an updated

version of the 1971 publication “Cambridge Townscape”, whilst completely disregarding the award-winning conservation plan approach of the 2006 Historic Core Appraisal which sought to understand not just the physical character of Cambridge but its dynamic, and threats and opportunities, as part of shaping policies.

- The HIA identifies Conservation Area Appraisals as data to inform the assessment. However, not all the conservation areas have a CAA (indeed the majority of Conservation Areas in South Cambs District do not have up-to-date CAA) and therefore there is a gap in the available data.
- The Baseline study does not mention the Suburbs and Approaches Studies.
- The Baseline study does not consider the strategic extent, or lack of, designations for example the extent to which Cambridge’s historic or cultural landscape (including the river corridor from Byron’s pool to Baits Bite Lock) is or is not protected.

We feel that the study fails to assess the significance of Cambridge as a whole. Dennis Rodwell’s “Conservation and Sustainability in Historic Cities” puts Cambridge on a similar level of international significance to Venice.

The “Strategic Heritage Impact Assessment” references a “Vu-City” model for assessing the impacts of tall buildings. We request that this modelling is made available for the public to see and assess both proposals, and the credibility of the Vu-City approach.

Concerns are raised on the failings of the “view” photos within the study, and that they don’t show the “eye-catching” impact on a viewer’s perception of a contrasting feature such as a tall building in a landscape.

Cambridge’s special character (which is what makes it a great place) will be put under significant pressure by the scale of growth proposed (73,000 extra residents). Cambridge Past, Present & Future is very concerned about the “limits to growth” capacity in trying to accommodate the 21<sup>st</sup> century demands this will create within the built fabric and spaces of a medieval market town. The fundamental conflicts between growth on the one hand and environmental capacity and special character on the other must be recognised as a key challenge for the draft Local Plan. We are concerned that the evidence base does not include an assessment of the cumulative impacts on the historic centre and what the likely impacts of this might be – without this it is impossible to reach a judgement. Para 3.2.4 of the Strategic Heritage Impact Assessment: baseline includes the statement that “3.2.4 Future growth in Cambridge has the potential to strengthen and reinforce these characteristics, enabling the City to meet contemporary environmental, economic and social drivers without undermining its economic identity” but we could not find any evidence to support this statement.

A third-party, holistic overview is recommended, to identify and try to resolve some of these key strategic issues and balances. In relation to heritage, growth is seriously threatening what makes Cambridge Special. It is recommended that Historic England’s

Historic Places Panel are invited to visit Cambridge and provide strategic recommendations which can inform the Local Plan.

Moving from strategic issues to safeguarding individual heritage assets and their settings, there are serious questions in relation to the effectiveness of existing policies which are proposed to be carried forward. A case in point is the former Mill Road Library, a grade II listed building of high public significance, which was recognised to be “at risk” but excluded during the development and approval of the adjacent City Depot site. This was an excellent opportunity to protect and enhance a heritage asset, which would not have been missed had the City complied with its own Local Plan policy regarding heritage assets. While the County has belatedly refurbished the former Library, it has not been integrated as a public building within the new development. It appears that the County may now be offering this public building, built for the public, for private sale!

### **GP/CC: Adapting heritage assets to climate change**

This is supported but should relate to all buildings of traditional construction, and needs some updating. Needs direct read-across to CC/NZ.

It would be useful for the policy and/or supporting text to provide clear policy on the appropriate location of solar panels on heritage assets / on buildings within conservation areas.

### **GP/PH8: Protection of Public Houses**

To help safeguard public houses in the villages the supporting text to the policy could encourage nominations as assets of community value.

## **Jobs policies**

### **J/NE: New employment development proposals**

Recognise preference for brownfield land but such land can have high biodiversity value which needs to be mitigated.

### **J/RE: Supporting the rural Economy**

If proposals relate to solar or windfarms need to relate back to CC/RE and protection of landscape.

### **J/RC: Retail and centres**

The policy direction includes establishing a hierarchy of centres across Greater Cambridge. This must also include the centres in the new settlements and new communities. The policy needs to support the provision and safeguarding of new centres in the new settlements to

enable the residents to be able to walk or cycle to services and not have to use their car and travel to other centres.

With the increase in permitted development rights, it is becoming increasingly difficult to control the retention of shops and services. Consideration should be given in the policy saying that shops and services which provide a vital service will be protected through a condition removing permitted development rights or serving an article 4 direction.

### **J/VA: Visitor accommodation, attractions and facilities**

We would like to see recognition that some natural and cultural visitor attractions have a carrying capacity beyond which they will be harmed. This is a common and recognised problem around the world as tourists damage the thing that they came to see. This can be direct harm, such as the wearing of physical fabric, or indirect harm, such as the impact of visitor facilities or sometimes the sheer number of people. What assessment has been carried out to understand the carrying capacity of some of Cambridge's attractions, such as the historic centre and the River Cam? How does this carrying capacity relate to any increase in provision of visitor accommodation/facilities? Should there be a financial contribution from new accommodation development towards mitigating some of the impacts (eg supporting visitor management to disperse visitors from overcrowded locations)?

Regarding "New visitor attractions in Cambridge City Centre and South Cambridgeshire's countryside will be supported subject to criteria such as sustainable travel." This seems to contradict with "Proposals for new or extended tourist facilities and visitor attractions (excluding accommodation) in the countryside of South Cambridgeshire should utilise and enhance the area's existing tourism assets, and show an identified need for a rural location.". It is also unclear what would be classed as a visitor attraction, in theory this could include something like a new country park? The location of rural attractions may be determined by a natural or cultural asset, which can't be located anywhere else. This might be located where there is no reliable public transport and we would be concerned that policy wording for visitor attraction did not conflict with policy wording regarding the delivery of green infrastructure.

## **Homes policies**

### **H/ES: Exception sites for affordable housing**

Support that first home exception sites not allowed in greenbelt.

### **H/GL: Garden land and subdivision of existing plots**

The proposed policy direction is supported; however the policy needs to be strongly worded and vigorously applied to prevent any detrimental impact on existing neighbours through changes to the character of the area and massing of structures and through loss of trees. Under the current Local Plan, Cambridge Past, Present & Future has witnessed

approval of developments which have resulted in significant loss of trees. E.g. 21/00537 Chesterton was approved, which will result in the loss of trees and impact on conservation area and listed buildings contrary to advice from the council's Conservation Team.

### **H/DC: Dwellings in the countryside**

Supporting text to explain what is meant by a replacement dwelling in the green belt not being materially larger.

## **Infrastructure policies**

### **Infrastructure – general comments**

The document provides a list of new technologies but does not address the supply of utilities. The Local Plan document comments on the need for grid reinforcement but there are no comments for example in the Local Plan regarding continuing use of Natural Gas or conversion to hydrogen. Water supply and sewage handling does not appear to be considered although they are an essential part of infrastructure provision, the same is true of “green infrastructure”.

### **I/ST: Sustainable transport and connectivity**

We support this, however one of the greatest challenges is that house builders still consider that providing space for two cars per household is necessary to maximise sale price/volume. This results in (large) developments being laid out to accommodate those cars through the development, leading to a development form that supports car use. Active and public transport are then fitted around that layout (eg provision of cycle or bus lanes). A sea change in the industry is required to design differently and we would like to see policies that would be strong enough to refuse applications that have not taken active travel and public transport as the starting point for the layout of their schemes.

### **I/EV: Parking and electric vehicles**

Paragraph 5.5, “Vehicle parking should include electric charging infrastructure (with appropriate grid reinforcement)”. Vehicle parking **must** include electric charging infrastructure if Government targets for electric vehicles are to be met.

There must be a clear way forward developed for grid reinforcement in the Greater Cambridge Area if sufficient power is to be available for vehicle charging points and for example domestic heating systems using air source pumps.

A minimum of 7KWatts is required for charging points. For communal points, a minimum of 20 KWatts is necessary to accommodate short term parking.

EV reflect emerging nation policy.

Need to be mindful of Making Connections consultation and proposal for congestion charging and the provision of parking within potential charging areas.

## I/EI: Energy infrastructure masterplanning

It is good that the Local Plan recognises the need for grid reinforcement.

### “6 Further Work and Next Steps

At this stage, while we know that grid capacity is a potential constraint for new development, much of the evidence that already exists is on the basis of the current development plan set out in the 2018 Cambridge and South Cambridgeshire local plans”.

Whilst however there is recognition of the need for strategic electrical energy supply planning, there appears to be no committed way forward. Without adequate power, the Local Plan will not succeed. The issue must be addressed.

## I/ID: Infrastructure and delivery

This should include all infrastructure, including water supply, sewage handling and green infrastructure.

## I/DI: Digital infrastructure

The extensive comment related to digital infrastructure is welcomed. It is disappointing however that developers are not required to consider Gbit connections at all sites:

“That housing developers are obliged to provide a gigabit-capable connection unless the cost to the housing developer of providing connectivity exceeds £2,000 per connection, or the network operator declines to provide a connection.” The UK Government has invested heavily in the OneWeb company to provide gigabit connections in remote areas. Cambridgeshire needs to support similar ventures to deliver gigabit connections in areas where fibre connections are not cost effective.

## Supporting documents

### Habitats Regulations Assessment: General comments

We welcome the publication of the Greater Cambridge Local Plan: First Proposals 2021 (GCLP) Habitats Regulations Assessment Report (The HRA Report) and the opportunity to comment on it. Cambridgeshire contains a number of sites of international importance for biodiversity that must have the highest level of protection. We also welcome and support the recognition at Para 1.10 that the HRA report is based on the precautionary principle and the statement that *‘where uncertainty or doubt remains, an adverse effect should be assumed’*.

Cambridge Past, Present & Future has also commented on the Biodiversity and green spaces policies in the GCLP First Proposals consultation and our comments on the HRA report should be read in together with these. Whilst it is appreciated that the focus of the



HRA report is necessarily on European sites, it also raises fundamental issues and concerns that apply to sites of national and local biodiversity importance too.

Although the publication of the HRA report is welcomed, there are however, some concerns that we discuss in further detail below. This applies especially to potential recreational impacts and the consequences of increased water supply and quality issues arising from the implementation of the future GCLP. We also note the caveat that the HRA report indicates that (on a precautionary basis) a conclusion of no adverse effect on the integrity of European sites cannot be reached without further work on issue of water quantity and quality - both key concerns.

### **Assessment of in combination effects**

Chapter 3 of the HRA report refers to the assessment of potential in combination effects and the identification of other Local Authority plans that could contribute to these. The scope of this is welcomed. It should be noted though that broader projects such as the Oxford-Cambridge Arc still require more work and detail to enable potential in combination effects to be identified. This also applies to any other site allocations and development that have yet to be defined or that may emerge in future versions of the GCLP.

### **Screening Assessment**

It is noted that para 4.3 indicates a list of policies that will not result in development and will contribute to ensuring the safeguarding of European sites. This intention is welcomed but much will depend on how these policies are worded and framed. For example, we would refer to our comments submitted in respect of the First Proposals for biodiversity and green spaces. Whilst the overall intention and policy direction of these policies is welcomed, the detail will be critical. We have commented on the need to prioritise policies to ensure that the protection of all sites of biodiversity importance is the first principle - this should also provide clear guidance for future developments on the standards and process that will be required. This includes the assessment of projects, the application of the mitigation hierarchy and justification and compensation for harm to sites where an unavoidable adverse effect might happen. Similarly, water quantity/quality and recreational issues are key concerns and we comment on these further below.

Table 4.8 provides a summary of the screening assessment and whether potential likely significant effects (LSEs) will occur. We note that potential LSEs are identified regarding possible off site physical damage and loss and non physical disturbance for Eversden and Wimploe Woods SAC and for water quantity and quality in respect of European wetland sites. It is also noted that a potential significant effect from recreational impacts has been identified for Wicken Fen Ramsar site and the Fenland SAC - the latter overlapping the former. The reason for this appears to be because of specific visitor survey work carried out at Wicken Fen. As para 4.60 of the HRA report indicates:

*'No zone of potential risk was identified for Wicken Fen Ramsar. However, in line with a precautionary approach and following the completion of the visitor surveys within Wicken*

*Fen Vision Area, a Zone of Influence has been applied. The survey data that was collected at the Wicken Fen Main Entrance and found that the majority of visitors travelled between 10km and 20km to visit these sites. Based on these findings and in line with a precautionary approach a ZOI of 20km was applied in this assessment.'*

Recreational pressure arising from future development as a consequence of development planned for in the GCLP could have a serious impact on existing European sites and those of national and local importance that are, of course, not covered by the HRA Report. It is also evident that the potential effect on Wicken Fen and the related Fenland SAC has only been identified because of specific survey work. With this in mind, we are concerned with the confidence that can be placed on a finding of no LSE for other European sites based on a zone of potential risk for recreational pressure based on a 2Km and 5km distance. We comment further on the implications of the findings of the HRA Appropriate Assessment with regard to potential recreational impacts on Wicken Fen and the Fenland SAC further below.

### **Appropriate Assessment (AA) - overall approach**

Para 5.5 summarises the LSEs indicated in Table 4.8. That table indicates no LSE from Air Pollution on any European sites. Para 5.5. however indicates to the contrary - we assume this is an error as the subsequent AA does not address this issue.

Paras 5.34 to 5.37 refer to mitigation in respect of non physical disturbance and Eversden and Wimpole Woods SAC. It is noted that paras 5.35 and 5.36 state (with reference to overall biodiversity policy) :

*'The policy will state that development proposals adversely affecting sites of biodiversity or geological importance will not normally be permitted. Exceptions will only be made where the public benefits significantly outweigh any adverse impacts. In such cases where development is permitted, we will require that the intrinsic natural features of particular interest are safeguarded or enhanced.'*

and:

*'It is recommended that this wording is further strengthened to explicitly state that the level of protection provided should be appropriate to the international, national or local significance of the site. In addition, the policy should be updated to reflect the safeguard measures detailed above'.*

We commented on this issue specifically with regard to the biodiversity and green spaces policies in this First Proposals consultation. The supporting text quoted at para 5.35 above indicates that exceptions will only be made where the public benefits significantly outweigh any adverse impacts. However, more clarity will be needed on how this will work in practice. Again, it is appreciated that the policy wording has still to be written. However, this is such an important issue that a clear statement of intent should be made in the GCLP now. If developments are proven to have an adverse effect or, applying the precautionary

principle, a risk of an adverse effect, then they should only be normally permitted when clear tests are applied. Arguably this should also include being satisfied that applicants have demonstrated that there are no less damaging alternatives they could pursue.

Clarification will also be needed of what tests will be used to determine whether public benefits outweigh adverse impacts on important sites, because an approach solely on a case by case basis could risk a lack of consistency and consequent serious harm to biodiversity interests without sufficient justification. The level of public interest that would need to be demonstrated will also need to be commensurate with the level of interest affected - this is likely to be very high if for example, an internationally or nationally important interest is at risk.

### **AA - Impacts of Recreation on Wicken Fen Ramsar site and Fenland SAC**

We have already flagged our concern with the approach to the treatment of recreation effects in respect of the approach to screening for LSEs above. The AA identifies the potential impacts of increased recreational pressure on the Wicken Fen Ramsar site and Fenland SAC and paras 5.43 to paras 5.49 set out proposed mitigation. Para 5.46 states:

*'It is however recommended that the policy is strengthened further by providing a commitment in the plan that any development proposed within 20km of the European site to provide alternative natural greenspace that is specifically designed and managed to alleviate visitor pressure on the European sites. In addition to this, it is recommended that that (sic) the policy outlines the quantity and quality of open space provision and how delivery and management in-perpetuity will be secured'.*

This overall commitment is welcomed and we are pleased to see that it concludes the need to manage alternative natural greenspace in perpetuity. However, the success of any mitigation (and ultimately any finding of no risk of any adverse effects) will all depend on alternative green space being delivered in a timely fashion to serve new development in the Cambridge Area. At this point in time that assumption is questionable.

Specifically, proposed new development at Waterbeach, North East Cambridge and Cambridge East will result in a substantial population within approximately 10 miles of these highly sensitive sites. Existing recreational green spaces such as Milton Country Park are already at capacity. Our recent understanding is that the relevant local authorities do not propose to create any new large scale greenspace for North East Cambridge. Whilst the need for such space is accepted, as yet the local authorities have no mechanism to deliver it. Failure to secure and deliver the required open space would thus place the Wicken Fen Ramsar site and Fenland SAC at considerable risk from increased recreational pressure and could not support a HRA finding of no adverse effect.

### **AA Water Quantity and Water Quality**

We have already commented on these issues in respect of the biodiversity and green spaces policies because planning decisions in respect of the supply of water and waste disposal

can have a number of profound impacts on both European sites and other important biodiversity interests.

With regard to water quantity it is noted that HRA report indicates potential issues regarding the impacts on European sites within the area and, with respect to mitigation, refers to work of Water Resources East (WRE) and the development of a long-term integrated water management plan (IWMP) for Eastern England.

It is also stated (para 5.60) that:

*'The purpose of this IWMP is to understand the future demand for water in this region, available water supplies, and the options available that will be required to balance supply and demand'.*

The HRA also states with regard to the future GCLP at para 5.64 that:

*Any new development as part of the GCLP will need to demonstrate water neutrality to ensure no adverse effect on the integrity of European sites susceptible to impacts from water. In part this will be achieved through reduced water demand within specific proposed development. However, this will largely be reliant on the actions of Cambridge Water with support from WRE. To address this, there should be a commitment in the GCLP that new development will need to demonstrate that there will be no adverse effect on the integrity of European sites. This will need to include demonstration that water will be supplied without increasing abstraction beyond the existing agreed rates in the most recent Water Resource Management Plan or reducing the current available headroom, which could result in further detrimental impacts.'*

The AA then concludes at para 5.68 (emphasis added):

*Subject to the findings of the Greater Cambridge IWMS and WRE IWMP being confirmed and delivered a conclusion of no adverse effect on integrity can be reached. **However, in the absence of these studies and in line with a precautionary approach, a conclusion of no adverse effect on integrity cannot be reached in relation to the effect of water quantity on Ouse Washes SAC, SPA and Ramsar site, Wicken Fen Ramsar site, Chippenham Fen Ramsar site, Fenland SAC and Portholme SAC either alone or in-combination until further detail is provided and presented in the GCLP.***

We are concerned that potential harmful effects on European sites have yet to be resolved. This also has implications for effects other sites of national and local biodiversity and must be addressed as a matter of urgency if the GCLP is to proceed.

Whilst water availability is, of course, a relevant constraint that the planning system should consider, the capacity of our watercourses to dispose of treated water waste is likely to be a more binding one. Furthermore, consideration must also be given to the climate-change-induced, greater frequency of storm events. Without increased investment by the water

authorities the frequency of storm events leading to raw sewerage being discharged is likely to increase, even at current levels of development.

Again it is noted that para 5.71 of the HRA report states:

*'An increase in demand for wastewater treatment as a result of development in the GCLP in combination with neighbouring boroughs and districts in the region has the potential to adversely affect the integrity of European sites that are susceptible to impacts from water.'*

The report goes on to highlight three particular areas of concern - increased volumes of treated waste water, overloading of the combined sewer network during storm events with potential for further flooding and contamination and a potential for contaminated surface run off from an increase in the area or urban surfaces and roads.

Mitigation is proposed to address potential water quality impacts through upgrades to Water Reuse Centres (WRC) and relocation of the existing Cambridge WRC. However the HRA report also states at para 5.74 (emphasis added):

***At this stage, it is unclear whether there is sufficient capacity available within existing infrastructure and as part of upgrades to WRC to support the increase in wastewater treatment as part of proposed development in the GCLP. It is recommended that exact mitigation measures are informed by the findings of the Greater Cambridge IWMS, including Outline Water Cycle Study and upcoming Detailed Water Cycle Study.***

The HRA report continues to note that there is currently limited mitigation in the plan policies that will provide for increased demands in wastewater treatment in the Greater Cambridge area. It is recommended that there is a specific inclusion of wording that outlines that any development will only be permitted where there is sufficient capacity within the WRC infrastructure. As advised by English Nature, the HRA report then indicates there should be specific detail in the GCLP on the mechanism and timescale of delivery for mitigation that will be implemented, also informed by other work on upcoming water plans. The HRA then again concludes at para 5.76 (emphasis added):

***Subject to the findings of the Greater Cambridge IWMS being confirmed and delivered a conclusion of no adverse effect on integrity can be reached. However, in the absence of this study and in line with a precautionary approach, a conclusion of no adverse effect on integrity cannot be reached in relation to the effect of water quality on Ouse Washes SAC, SPA and Ramsar site, Wicken Fen Ramsar site, Chippenham Fen Ramsar site, Fenland SAC and Portholme SAC either alone or in-combination until further detail is provided and presented in the GCLP.***

Again, as with the water quantity issue, we are concerned that potential harmful effects on European and other important biodiversity sites have yet to be resolved and that this must be addressed as a matter of urgency if the GCLP is to proceed.

## **Next Steps**

Finally we note and appreciate the point made regarding next steps at para 6.6 that the HRA is an iterative process and is expected to be updated. We will of course comment on further information when this is available. We still remain concerned however, that fundamental issues such as the impacts of recreation and water as described above are still to be resolved.