



Cambridge Past, Present & Future
Wandlebury Country Park
Cambridge CB22 3AE

Draft Greater Cambridge Local Plan for Consultation

1 December 2025 - 30 January 2026

CPPF submitted responses

Policy with hyperlinks to Local Plan. ID number Support/Object/Comment
<u>Development strategy</u> 202897 Comment: CPPF supports the climate-led vision approach to the Local Plan. However, as well as recognising the internationally significant economy, the vision must also recognise the internationally valued heritage and landscapes of Greater Cambridge. The vision should also recognise that there are potential conflicts between economic growth and the climate, physical, environmental and social capacity of the area. The vision should be to explicitly manage and mitigate these conflicting aspirations. In particular, some of the infrastructure that is required to increase capacity to cope with the rapid growth in population cannot be delivered directly through the development process and will require significant additional investment, eg from government, utility companies, etc. For example, infrastructure for water and health care (a replacement for Addenbrookes Hospital may require £2.2billion). There is a great risk that Cambridge delivers economic growth but not the additional capacity, resulting in social and environmental decline, which is unsustainable development.
<u>Policy S/JH: New jobs and homes</u> 202732 Object: The Plan mentions that, in deriving the employment projections and in translating these to housing requirements, there are multiple uncertainties. Some of these are inevitable and we recognise that significant margins of error are unavoidable. However, insufficient attention appears to have been given to the aspirations and plans of neighbouring Districts when estimating commuting flows despite their significant impact on housing need estimates.

One of the challenges for the Cambridge area is high house prices. Prospective buyers cannot afford the type of property they want, and they are choosing to live distant to Cambridge and commute (from places like Bury St Edmunds, Soham, etc). This results in a greater proportion of people commuting long distance and is one of the reasons that despite the current Local Plan allocating significant land for housing, that large sites are not being built out quickly, despite high latent demand. It is unclear how allocating even more land for development overcomes this problem. It also creates the risk that there is an over-allocation for Greater Cambridge and under allocations in neighbouring areas.

CPPF is extremely concerned regarding the scale of growth placing further unsustainable demands on water resources to the detriment of our already depleted chalk aquifer and degraded chalk streams, which are in a poor ecological condition. The proposed Fens Reservoir will not be completed until the late 2030s and the proposed pipeline from Grafham won't be in place until 2032. In the meantime, our chalk streams will not be able to recover (in spite of proposed massive investment through water companies funding) without sufficient supplies of good quality water. It is likely that the Cambridge Water abstraction from the chalk aquifer would have to reduce by half to recover near natural flows. However, the scale of proposed housing and jobs included in the draft Local Plan will only exacerbate the problem without radical and faster solutions, none of which are in place or proposed to support this plan. Therefore, we believe, that the proposed growth will result in the continued poor condition of chalk streams, rather than enabling them to recover.

Policy S/DS: Development strategy

202733

Comment:

While CPPF generally support the focus on a small number of settlements beyond the Green Belt that are of a sufficient size to enable a significant level of self-sufficiency, we wish to highlight several strategic risks and requirements necessary to ensure this growth is sustainable and well-governed.

Governance and Strategic Risks

We strongly believe that local authorities must maintain democratic control over the planning process. The vision for Greater Cambridge should not be lost to or superseded by the Cambridge Growth Company.

The Local Plan development strategy is predicated on future development of a transport strategy by the combined authority CPCA. The CPCA is also now responsible for the production of a Sustainable Development Strategy for Greater Cambridge. Both of these components will have significant influence on content of the new Local Plan and on its delivery, and these implications need to be explicitly set out and accounted for. The absence of a clear transport strategy prepared at the same time as the emerging local plan is a major weakness of the development strategy. Policy S/DS must ensure that the scale of growth remains strictly tethered to the delivery of necessary infrastructure.

The complexity of the above as well as a designated Growth Company in the mix increases the risk of ambiguity and potential for flaws in the delivery of a coherent development strategy for Greater Cambridge.

This applies equally to Sustainable Development. The draft Plan assumes, with no evidence whatever, that the built form, streets, public realm and historic spaces of our historic market town / university city and its hinterland can accommodate the levels of growth, population and traffic being proposed.

These physical capacity issues apply across the whole city and its hinterland, in terms of transport links vs landscape, tall buildings etc.

Claims that proposed levels of “Sustainable economic growth” are truly sustainable are groundless, in the absence of serious analysis of Cambridge and its hinterland’s *capacity* to withstand / accommodate this growth.

Reliance on East West Rail (EWR) and Railway-Led Development

The current strategy exhibits an overdependence on Cambourne North, which is fundamentally reliant on the timely provision of East West Rail. Any delay in the EWR project will directly compromise the delivery of this housing and employment cluster.

Consequently, the strategy must take better account of the government’s presumption in favour of development at existing railway stations. It is inevitable that growth will gravitate toward these travel hubs; therefore, the Local Plan should provide proactive policies to shape this development now, rather than reacting to it later. Bringing forward appropriately scaled developments at some stations could reduce the risks associated with a delay for EWR (in other words, reduce the allocation at North Cambourne (for the plan period) and offset that with station developments). We note that there may be opportunities for station-based development (meeting the governments proposed criteria) at: Foxton, Shepreth Meldreth, and Ashwell & Morden. Such developments would align with the development strategy of directing development to transport corridors. They also have the benefit of existing transport infrastructure and are therefore not at risk of being delayed. Additionally, the developers would not be required to fund new public transport infrastructure, potentially freeing up funds to contribute towards improving community facilities in the villages or providing more affordable housing.

Strategic Infrastructure and orbital route.

A coherent development strategy for growth at the scale which is proposed, must address the long-term capacity of the strategic road network. We recommend that Policy S/DS explicitly references the need to create a functional ring road around Cambridge. This should include adding connections at the following interchanges to create all-ways junctions:

- Girton Interchange (Junction 31/14, A14/A428)
- A14/A11 Interchange
- Junction 9, M11

Collectively these junction improvements would enable traffic to better circulate around Cambridge. As well as increasing connectivity, it would reduce the amount of traffic that is currently using local roads and passing through villages, thereby significantly improving road safety and quality of life. It would also have the advantage of providing better diversions in the event of road closures on the strategic road network, meaning less delays and better productivity.

The Cambourne Cluster and New Settlements

CPPF supports the policy of locating large new settlements beyond the Green Belt to protect the Green Belt, the setting of the historic city, to avoid coalescence with villages and help ensure that Cambridge remains a compact, human-scale city with limited unused land. However, for new settlements to be successful, they must be of a scale and design that fosters a degree of self-sufficiency in employment, schools, retail, health, leisure and community facilities to avoid becoming ‘suburbs in the countryside’. There is also a

requirement to ensure good public transport and active travel (ideally where such infrastructure is already in place, or where it can be provided without conflicting with other planning policies, such as those that seek to protect landscape, ecology and heritage).

The Cambourne cluster is a logical priority for expansion to achieve this self-sufficiency, based on the delivery of East West Rail. However, as noted in our representation on Policy S/CBN, an urgent and comprehensive masterplan is required to unify the existing piecemeal development into a coherent settlement with a defined centre, which include imaginative ways to link development north and south of the A428 so that the road does not become a barrier to close integration.

Regional Context and Employment-Led Growth

As an employment-led plan, the scale of growth is dictated by commercial demand. This strategy must, therefore, look beyond the immediate district boundaries and account for the aspirations and growth of surrounding market towns, such as Royston, Newmarket, Ely, Haverhill, and Saffron Walden.

Looking beyond the current plan period, the eastward progression of EWR toward Ipswich and Felixstowe presents significant future growth potential. We note, for instance, proposals such as "Forest City" between Haverhill and Newmarket, which demonstrate the need for a long-term, cross-boundary perspective on how employment and housing will shift across the region.

Small Sites

CPPF support the Plan's approach to the requirement to deliver a proportion of housing on small sites. CPPF supports a strategy which will deliver sustainable development.

Policy S/SH: Settlement hierarchy

202734

support

Policy S/DE: Defined development extents

202735

Support –

The policy would benefit from supporting information on how to interpret local character. Does it mean density, form, materials, open spaces? How is new development which would equally contribute to the local character dealt with?

Policy S/GB: The Cambridge Green Belt

202736

Support

CPPF strongly supports this policy and the Green Belt purposes a-c. It is important for the Green Belt Assessment to be updated. An up-to-date Assessment is needed to provide a qualitative assessment of the purposes and functions of the Cambridge Green Belt, and given

the current pressures and contexts, demonstrate its relevance to the setting of the historic city. The lack of an up-to-date Green Belt Assessment will undermine the plan.
Attachments:

Site allocations – Cambridge Urban area

Policy S/NEC: North East Cambridge

202739

Object:

The policy is premised on the relocation of the Cambridge Waste Water Treatment Plant (CWWTP). Since the relocation is no longer funded, and unlikely to be viable on the basis of the quantum of housing and commercial space proposed (8,350 homes plus ~350,000 sq.m. of business and industrial space), it is unclear what purpose this policy serves. Most of the allocated housing would be within the “odour zone” of the CWWTP, which therefore requires either the relocation of the CWWTP or a new odour control system. If neither is viable, then it is likely that the landowners will seek to intensify commercial uses in place of housing. This would exacerbate the imbalance between jobs and housing in the city, increasing demand to commute into Cambridge. There is still not a sufficiently ambitious strategic plan to accommodate this, especially as East West Rail is being designed to take people to the Biomedical Campus (via Cambridge South station) and not directly to North East Cambridge

There is a practical and safety need for a new road crossing into Chesterton Fen to replace the level crossing on Fen Road. The Local Plan should include provision of a bridge over the railway line, connecting Cowley Road to Fen Road. The Fen Road level crossing should be replaced by an active travel underpass or more direct connections to the towpath either side of the railway line.

If the Hartree Development were to proceed then CPPF believes that due to the density of the proposed development it will be essential for there to be a significant contribution to off-site strategic green infrastructure north and east of Cambridge. The current policy wording fails to acknowledge the need for this or set out a policy mechanism for the NE Cambridge site to contribute to meeting the GI needs of the new population.

The policy should specify a minimum area of Green Space to be provided. The policy must ensure that development mitigates the impact of increased population on Milton Country Park (which is already at capacity) and Ditton Meadows.

Green space should be useable spaces designed for year-round use and connected across the development by green streets. Green roofs and courtyards must not count towards green space provision. Green spaces must include natural spaces which are large scale natural environments suitable for long walks, runs, escaping urban pressures. Greenspaces must be resilient to changing climate (Impact of hot dry summers on Green roofs and wet winters on SuDS).

The policy needs to require a meaningful landscape buffer on the eastern boundary to soften the transition between urban and river/fenland.

The policy should ensure a diversity of building heights and orientations, with varied roof forms and the elegant integration of rooftop plant, that take into consideration that the site is

adjacent to the countryside (not London, which many of the developers seem to use as their basis for height and design).

Policy S/LAC: Other site allocations in Cambridge

202741

Comment:

Suggested amendment. Supporting text to be similarly amended.

Part 2a of policy says, “all relevant national and local planning policy requirements, including making appropriate contributions towards mitigation measures or infrastructure requirements that are necessary to ~~make the development acceptable~~ achieve an outstanding standard of development. ”

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

202744

Comment:

A proportion of the new housing should be identified as key worker (above and beyond the affordable housing requirements) and linked to North Cambridge Academy staff needs. This allocation is from former playing field land, and the academy should benefit more from the allocation. The new facilities and the community use agreement should be in place before occupation of the first dwelling.

- **Policy S/C/CLT: Clifton Road Area**

202778

Comment:

This policy is tentative about an eastern access to the station (“any possible future new eastern entrance”). An eastern entrance is essential for the continued safe functioning of the station and to open up opportunities to reconfigure the main station forecourt (see comments in the next section).

Figure 39 is inaccurate and too schematic to be helpful in shaping future development. This policy should set out principle and parameters for the components required for an eastern entrance to the station, including detail on pedestrian routes, cycle parking, a taxi rank, bus stops, and traffic management on Clifton Road, Rustat Road, Davy Road and Fanshawe Road.

- **Policy S/C/SRW: Station Road West**

202796

Object:

This policy lacks objectives and parameters to create a primary transport interchange and properly functioning, attractive, legible and future-proof gateway to the city. A detailed vision is necessary to ensure that a large growth in flows of people to and from the station, in particular on foot, cycle and bus, can be accommodated, and that funding for this can be secured from East West Rail (and/or any other rail growth project).

Issues that need to be addressed include:

- a) Avoidance of vehicle-dominated space in front of station
- b) Disconnection between bus stops and station entrance/exit, which encourages taxi use for journeys that could be made by bus
- c) Congestion on Great Northern Road which inflicts pollution on residents living along the street and, if it backs up to Station Road, disrupts bus services
- d) Conflict between cars and pedestrians on the heavily used route between Devonshire Road and the station entrance
- e) Lack of provision for future expansion of cycle parking that is integrated both with the existing cycle parking and better integrated with the station
- f) Narrow and cluttered footway along the north side of Station Road
- g) Slow three-stage pedestrian crossing arrangements at the Hills Road–Station Road junction
- h) Unobvious and inconsistent signage along route to city centre (20 minute walk).
- i) Welcoming facilities for millions of visitors arriving by train.

If the city is to consider seriously a light rail network, it will need a stop at Cambridge station. A design will need to be commissioned, and land safeguarded for its construction.

The policy covers archaeology and building heights but makes no mention of the fact that the bulk of the permitted Block B2 will be a multistorey car park, which will add nothing to the local area or the city's economy. The policy should set out an alternative more sustainable use prefaced with, "If the extant permission is not implemented"

- **Policy S/C/OPML: Old Press/Mill Lane**

202797

Comment:

Generally, we support this policy but have one concern. This site includes the building on the eastern side of the Mill Pond. The building is not listed but is of heritage value, being the last remaining vestige of the mill workings (ie a building associated with the purposes of milling) and, as such, the building helps to tell that history and provide the context as to why there is a lock and a mill pond in this location. We are aware that the building owner was considering demolishing this building in order to create an open space which would allow it to showcase the new buildings that would be constructed on Laundress Lane (including retail outlets). CPPF was opposed to the demolition on heritage grounds, as were others, and we would want to see the building repurposed rather than demolished. We strongly support the policy

wording of 1a and 1b but point out that policy 1c could be used to justify the demolition of the mill building. We would like to see this policy conflict resolved.

There is a conflict in the description of listed buildings between the policy and supporting information. Part 1a of the policy notes the listed buildings within the site yet the supporting information says there are no listed buildings within the site. The Policy says that the Pitt Building adjoins the site but is shown within the policy boundary.

Policy S/PA/CC: Cambridge City Centre

202798

Comment:

We support this policy but would like to see policy 1c revised to make specific mention of the historic skyline, our suggestion would be: “preserve or enhance heritage assets and their setting, the historic skyline, open spaces and the River Cam”. It could be argued that the historic skyline is ‘setting’ but this is not clear and therefore is open to interpretation.

Policy S/AMC: Areas of Major Change

• **Policy S/AMC/AS: Abbey Stadium**

202811

Object:

Revise the wording of Policy 1 j to include the Leper Chapel:
Preserve or enhance the setting of the Grade I Listed Leper Chapel, Grade II Listed Buildings, 529 and Papermills, Newmarket Road and the Riverside, which are opposite the development site, and an Historic Impact Assessment should be submitted with any application.

Revise the wording of Policy 2 to read:
An urban design led approach should be taken to inform the appropriate scale and massing of development proposals, minimising adverse impacts on adjacent residential properties and avoiding adverse impacts on adjacent open spaces.

We believe that the draft policy wording is missing an opportunity for wider environmental regeneration in the area. The stadium is surrounded by land to the south and west that is owned/managed by the city council, and to the northwest by CambridgePPF. All of this land forms part of the Cambridge Nature Network and is an important wildlife corridor and public open space. There are opportunities for improving the biodiversity value of the land in this location. CPPF would like to see policy wording that would enable a redevelopment of the stadium to support the city’s nature recovery ambitions (not least because there is some negative indirect impacts associated with the stadium: large crowds on match day result in increased disturbance to wildlife and some littering and floodlighting can also have an impact on nature).

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

202814

Object:

We are concerned that this policy does not include any reference to heritage (which is why we believe that a Historic Environment Strategy is required as part of the Local Plan). We would like to see an additional policy added: 1d: Protect and enhance any heritage assets and their setting.

- **Policy S/PRIA/EG: Eastern Gate**

202821

Object:

Policies 1b and 2 and highlights how this draft Local Plan is not co-ordinated with transport planning. The transport strategy for Cambridge (as pursued by the councils and GCP) is for bus-based travel, with a reliance on Park & Ride. For this strategy to work, buses need to be able to travel relatively quickly and reliably. One of the factors that reduces speed and reliability is traffic being held at crossings. This is why the Elizabeth Way roundabout has a subway and why a subway was created for the Chisholm Trail. At the same time, we have several new developments along the same stretch of Newmarket Road that are potentially introducing new at-grade crossings. The approach is confused. Either we have bus priority and introduce subways and bridges, or we don't have a bus-based strategy?

We are concerned that this policy does not include any reference to heritage (which is why we believe that a Historic Environment Strategy is required as part of the Local Plan). We would like to see an additional policy added: 1g: Protect and enhance any heritage assets and their setting.

There has been massive frustration in Cambridge (including from the Council) that the redevelopment of the Beehive will not involve a residential element. This area of Cambridge is perfect for new residential development and one of the few remaining places in the city that has potential to meet the city's housing need. The reason that the city was not able to persuade the developer to bring forward a mixed-use development at the Beehive was because there was no policy hook to do so. Please do not repeat that mistake and include a policy which requires any development over a certain size to be mixed use to help meet the city's housing need.

- **Policy S/PRIA/MR: Mill Road**

202824

Comment:

The policy should give guidance on securing a new public use for the Old Library.

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

202840

Comment:

Generally, we support this policy but have one concern. This site includes the building on the eastern side of the Mill Pond. The building is not listed but is of heritage value, being the last remaining vestige of the mill workings (ie a building associated with the purposes of milling) and, as such, the building helps to tell that history and provide the context as to why there is a lock and a mill pond in this location. We are aware that the building owner was considering demolishing this building in order to create an open space which would allow it to showcase the new buildings that would be constructed on Laundress Lane (including retail outlets). CPPF was opposed to the demolition on heritage grounds, as were others, and we would want to see the building repurposed rather than demolished. We strongly support the policy wording of 1a and 1b but point out that policy 1d could be used to justify the demolition of the mill building. We would like to see this policy conflict resolved.

Site allocations – edge of Cambridge

Policy S/CE: Cambridge East

202849

Object:

CPPF supports the policy recognition given to biodiversity and green infrastructure issues. The policy represents a good framework to avoid adverse impacts on nearby high-value nature sites and to provide high quality green infrastructure including off-site strategic natural greenspace.

We note however that the supporting text anticipates that proposals may be brought forward which include development within the Green Belt which runs through Cambridge East. While there may be some flexibility in the precise boundaries of the corridor, it is important that its alignment and width is retained to ensure it continues to function as a key green link, connecting Coldham's and Stourbridge Commons and Ditton Meadows to the surrounding countryside to the east of the city, and serving as one of the city's principal green corridors.

It is a significant oversight that this policy makes no mention of a Cambridge East railway station. Although a station in the vicinity of Coldham's Lane is now part of the plan for East West Rail, it is subject to third party funding ([You Said, We Did Autumn Update 2025 §4.12](#)). S106 contributions are almost certainly necessary to make it viable, so there should be a policy basis for asking for these.

The policy should go further than the EWR plan, which proposes a station in a relatively inaccessible location, surrounded by land that is mostly not suitable for development. It is also only one mile from the main Cambridge station. By comparison, Cambridge North is 2.25 miles from Cambridge station, and Cambridge South, 1.4 miles.

The policy should commit to exploring the best location for the station so that it can better serve Cambridge East.

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

202862

Object:

Land use

CPPF recognise the local, national and international importance of this site and consider that the public benefits arising from the clinical and research investment justify the release of Green Belt land. However, CPPF would challenge further boundary creep every time the Local Plan is reviewed.

The Cambridge Biomedical Campus SPD was adopted in April 2025 and therefore is relevant and should be referred to in the supporting information.

There should be a requirement to update the existing master plan for the entire site to demonstrate where redevelopment opportunities exist so housing and other uses can be accommodated and make efficient use of land, including within the hospital site or outmoded hospital residential accommodation. The masterplan should also identify locations for strategic landscaping to mitigate the impact of large buildings on the open landscape and Gog Magog Hills.

CPPF is concerned that the limited land available for the CBC is not given up for uses which could be provided elsewhere in the Cambridge area, leading to future proposals for further CBC expansion into the Green Belt and Gog Magog Hills in this sensitive location.

CPPF are concerned that residential development will result in the loss of land for biomedical development resulting in the need to release more land from the Green Belt. Residential accommodation must only be built on land which is not suitable for other purposes. If the residential development is to be provided in high rise blocks, they need to be located in areas suitable for tall buildings.

Suggest amending point 8d to include “in locations where the land is not suitable for health and life sciences, commercial and innovation floorspace.’

The housing should be restricted to key worker housing.

Context

CPPF strongly supports policies 14a, b and c.

Built Form

CPPF strongly supports policies 16d, e, f and g.

Nature & Green Space

We welcome the significant greenspace habitat creation being proposed by the policy but believe there could be a different approach taken to development and green space on the south-east boundary of Cambridge, which could deliver even better outcomes for nature and people. We refer you to the response made by the Wildlife Trust BCN and the potential for an enabling development which could better deliver the ambitions of the Cambridge Nature Network by extending new green space and habitat creation from Nine Wells, northeastwards to Cherry Hinton Chalk Pits. We would welcome the opportunity to discuss this in more detail

with officers, where we can also show plans of potential locations for extended green space/habitats and active travel improvements.

In designing the mitigation strategy and planning new habitats, it is important to use the significant data available on red listed farmland birds which use the area south of the Campus. These birds are of high conservation concern because changes to the farmed environment have led to rapid and significant population declines. New habitats should be suitable replacement habitat, such as meadows, and should include areas with no public access to support ground-nesting birds. Or alternatively, mitigation will need to be off-site areas of nature friendly arable farming with a secure long-term future.

Transport

The Transport Strategy (Appendix A) indicates that, by 2050, the number of daily trips to the CBC will reach 93,874 , almost double the number in 2023 (48,096). (CBC Transport Strategy Appendix A Table 4).

This is a staggering level of growth in the context of poor provision for walking onto or around the CBC site, slow and convoluted access for buses, inadequate cycle parking, and persistently severe congestion on Babraham/Hills Road, Hauxton Road and Addenbrooke's Road. It is essential that the strategy for accommodating this growth is scrutinised for realism and robustness, in particular with respect to the mode-shares by train and bus, which will have to absorb most of the growth in trips.

The technical note on the proposed realignment of Granham's Road (Realignment of Granham's Road page 8) is unclear on precisely what options have been tested, and some of the claimed advantages of the Do Something option do not stand up to scrutiny (e.g. that the Do Something provides a "better integrated and connected CBC and P&R" than the Do Maximum, which provides a "physically direct connection").

Consideration needs to be given to services arriving on the A1307 from Haverhill and the Babraham Research Campus. Even with CSET2 built, the most direct route between the Biomedical Campus and the Babraham Research Campus will be via the A1307. The advantage afforded by a continuous inbound bus lane and/or separate busway from at least the Hinton Way roundabout could be significant.

Recommendations:-

Policy needs to refer to Cambridge Biomedical Campus SPD

Policy needs to require the masterplan to be updated.

Consider restricting development to those uses where it is essential to be onsite.

Amend policy to direct housing development to sites not needed for biomedical purposes.

Heavily scrutinise and sensitivity-test forecasts for modal shares for transport to/from the CBC. Test all routes onto and through the Campus for adequate capacity for all modes, recognising that there will be large cohorts of people walking and cycling to and from Cambridge South station.

Revisit the options for providing bus priority between the Babraham P&R and the Biomedical Campus to also accommodate buses arriving on the A1307 from Haverhill via the Babraham Research Park.

Policy S/NWC: Eddington, Cambridge

202982

Object:

In relation to context, we believe that there are two significant omissions in these policies:

i. The need to consider the impact on the strategic viewpoint of Red Meadow Hill, at Coton Countryside Reserve. This is a public viewpoint with a panoramic view over Cambridge and the West Cambridge Campus and is one of the best places to obtain a view of the setting of the historic city. At the current time the building heights at Eddington and West Cambridge Campus are such that they do not break the horizon when viewed from the top of Red Meadow Hill. For further context, CPPF has an ambition to transform its land on the western edge of Cambridge into a large nature reserve to serve the city area. This will result, over time, in a significant increase in people enjoying the views.

ii. CPPF has an ambition to transform its land on the western edge of Cambridge into a large nature reserve to serve the city area. This is adjacent to the West Cambridge Campus and offers an opportunity to provide access to a large area of green space and nature for people working on the campus (eg for walking or running during lunch-break) – this already happens to a degree and will increase as the campus grows, placing a financial burden on our charity to maintain paths, etc and manage visitors to avoid negative impacts on nature. Likewise for the residents of Eddington. Currently there is no funding available for our charity to provide and maintain the visitor facilities and management required to cope with the growing population that will result from development. We would like to see this impact/opportunity reflected in the policy, so that there is a mechanism in place for the development of West Cambridge to support the creation of a large new nature reserve adjacent to the development – this would be in line with the overall vision for the Local Plan and comparable

The policies should consider the impact on the strategic viewpoint of Red Meadow Hill, which offers a panoramic view over Cambridge and Eddington and the West Cambridge Campus, ensuring building heights do not disrupt this view.

The policy should reflect the impact and opportunity arising from the development of Eddington and West Cambridge to support the creation of a large new nature reserve.

Policy S/WC: West Cambridge

202988

Object:

In relation to context, we believe that there are two significant omissions in these policies:

i. The need to consider the impact on the strategic viewpoint of Red Meadow Hill, at Coton Countryside Reserve. This is a public viewpoint with a panoramic view over Cambridge and the West Cambridge Campus and is one of the best places to obtain a view of the setting of the historic city. At the current time the building heights at Eddington and West Cambridge Campus are such that they do not break the horizon when viewed from the top of Red

Meadow Hill. For further context, CPPF has an ambition to transform its land on the western edge of Cambridge into a large nature reserve to serve the city area. This will result, over time, in a significant increase in people enjoying the views.

ii. CPPF has an ambition to transform its land on the western edge of Cambridge into a large nature reserve to serve the city area. This is adjacent to the West Cambridge Campus and offers an opportunity to provide access to a large area of green space and nature for people working on the campus (eg for walking or running during lunch-break) – this already happens to a degree and will increase as the campus grows, placing a financial burden on our charity to maintain paths, etc and manage visitors to avoid negative impacts on nature. Likewise for the residents of Eddington. Currently there is no funding available for our charity to provide and maintain the visitor facilities and management required to cope with the growing population that will result from development. We would like to see this impact/opportunity reflected in the policy, so that there is a mechanism in place for the development of West Cambridge to support the creation of a large new nature reserve adjacent to the development – this would be in line with the overall vision for the Local Plan.

The policies should consider the impact on the strategic viewpoint of Red Meadow Hill, which offers a panoramic view over Cambridge and Eddington and the West Cambridge Campus, ensuring building heights do not disrupt this view.

The policy should reflect the impact and opportunity arising from the development of Eddington and West Cambridge to support the creation of a large new nature reserve.

Policy S/EOC: Other site allocations on the edge of Cambridge

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

202993

Object:

We believe there could be a different approach taken to development and green space on the south-east boundary of Cambridge, which could deliver even better outcomes for nature and people. We refer you to the response made by the Wildlife Trust BCN and the potential for an enabling development which could better deliver the ambitions of the Cambridge Nature Network by extending new green space and habitat creation from Nine Wells, northeastwards to Cherry Hinton Chalk Pits. We would welcome the opportunity to discuss this in more detail with officers, where we can also show plans of potential locations for extended green space/habitats and active travel improvements.

The policy should extend the new green space and habitat creation from Nine Wells, north-eastwards to Cherry Hinton Chalk Pits.

We would welcome the opportunity to discuss this in more detail with officers, where we can also show plans of potential locations for extended green space/habitats and active travel improvements.

- **Policy S/EOC/SWO: Land south of Worts' Causeway**

202999

Object:

We believe there could be a different approach taken to development and green space on the south-east boundary of Cambridge, which could deliver even better outcomes for nature and people. We refer you to the response made by the Wildlife Trust BCN and the potential for an enabling development which could better deliver the ambitions of the Cambridge Nature Network by extending new green space and habitat creation from Nine Wells, northeastwards to Cherry Hinton Chalk Pits. We would welcome the opportunity to discuss this in more detail with officers, where we can also show plans of potential locations for extended green space/habitats and active travel improvements.

The policy should extend the new green space and habitat creation from Nine Wells, north-eastwards to Cherry Hinton Chalk Pits.

We would welcome the opportunity to discuss this in more detail with officers, where we can also show plans of potential locations for extended green space/habitats and active travel improvements.

- **Policy S/EOC/FRE: Fulbourn Road East**

203003

Object

CPPF strongly supports policies 1a-f.

We believe there could be a different approach taken to development and green space on the south-east boundary of Cambridge, which could deliver even better outcomes for nature and people. We refer you to the response made by the Wildlife Trust BCN and the potential for an enabling development which could better deliver the ambitions of the Cambridge Nature Network by extending new green space and habitat creation from Nine Wells, northeastwards to Cherry Hinton Chalk Pits. We would welcome the opportunity to discuss this in more detail with officers, where we can also show plans of potential locations for extended green space/habitats and active travel improvements.

The policy should extend the new green space and habitat creation from Nine Wells, north-eastwards to Cherry Hinton Chalk Pits.

We would welcome the opportunity to discuss this in more detail with officers, where we can also show plans of potential locations for extended green space/habitats and active travel improvements.

Site allocations - new settlements

203007

Comment:

Policies should require new settlement to conform with Garden Town Principles as defined by the tcpa (Town and Country Planning Association)

Policy S/CBN: Cambourne North

203016

Object:

We recognise the potential value of this allocation to achieve critical mass, but we believe the policy must be strengthened to ensure that Cambourne evolves into a cohesive, successful town rather than a fragmented series of developments. The policy should ensure that Cambourne North is not merely an add-on, but a vital component of a well-integrated, economically vibrant, and self-sustaining town, providing a balance of jobs, services and housing.

Comprehensive Masterplan

A masterplan is essential to create a more coherent settlement with a clear, identifiable centre. By adopting such a holistic framework, the Council can ensure that new growth serves to unify the town, providing the vision and infrastructure necessary for Cambourne to finally transition into a successful and well-defined urban place.

Economic Ambition

The growth of Cambourne North should serve as a catalyst for creating a more balanced and sustainable community. By positioning the town as a major employment location, the policy can reduce the reliance on commuting and improve the local jobs-to-homes ratio. Furthermore, there is a distinct opportunity for Cambourne to provide high-level facilities that complement the wider region. By offering services and infrastructure that the city of Cambridge currently lacks, Cambourne can establish a unique sub-regional identity that benefits both new and existing residents.

Garden Town Principles

The expansion represents a unique opportunity for Cambourne to achieve the maturity and infrastructure of a high-performing town. We urge the Council to adopt a comprehensive strategy underpinned by Garden Town principles as defined by the Town and Country Planning Association (tcpa). This vision should move beyond standard residential growth, focusing instead on high-quality design, environmental stewardship, and the delivery of civic infrastructure that fosters a genuine sense of place.

Integration and physical connectivity

A primary concern regarding the expansion is the risk of physical and social severance between the existing settlement and Cambourne North, caused by the A428 dual carriageway. To prevent the new development from feeling like an isolated satellite, Policy S/CBN must prioritise seamless integration. We specifically advocate for the delivery of "wide bridges" over the A428 that incorporate commercial development, active uses and landscaping. By treating these crossings as developable space rather than mere transit corridors, the plan can mitigate the sense of separation and ensure a unified urban fabric. As an example, consider Hatfield, which could be divided by the A1 motorway but isn't because of the A1 cut and fill tunnel – surely something similar should be the aspiration for Cambourne?

Nature & Green Spaces

We support the provision of a significant area of new greenspace/habitat associated with the development. We note that some of this overlaps with RSPB Hope Farm and therefore this development and its policies should be developed in consultation with them to help achieve nature conservation objectives.

We support the response of Wildlife Trust BCN regarding their concerns about this development on the foraging of Barbastelle bats and on the nearby ancient woodlands and that these impacts should be recognised and will require appropriate avoidance/mitigation/compensation.

The policy must be strengthened to ensure that Cambourne evolves into a cohesive, successful town rather than a fragmented series of developments. The policy should ensure

that Cambourne North is not merely an add-on, but a vital component of a well-integrated, economically vibrant, and self-sustaining town, providing a balance of jobs, services and housing.

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

203060

Object:

CPPF is concerned that the scale of this development is wrong and that its size is derived more from the need to meet housing numbers than good planning. On one hand it is too small to be self-sustaining, meaning that it will be a suburb in the countryside and residents will need to travel to meet many of their needs. On the other hand, it is too large to be a village that sits comfortably in its landscape; and its size will place pressures on existing local infrastructure and services. Our view is that it should be scaled back in size and ambition.

This policy presents significant topographical, environmental, and recreational challenges that must be addressed within the policy wording.

Landscape Impact and Built Form

The topography of the Grange Farm site is particularly sensitive, as the land rises relatively sharply from the A1307. We are concerned about the lack of clarity regarding the proposed density and the potential for tall buildings on this elevated ground (for example the inclusion of a last mile distribution centre and taller buildings in the town centre). To avoid a detrimental impact on the wider landscape and the setting of the city, it is essential that any development remains low-rise.

Furthermore, the policy should mandate that built forms are heavily screened and integrated into the landscape, set amongst significant new tree planting to soften the visual profile against the rising skyline.

We are also concerned about the potential negative impacts of the proposed A11 bus/active travel bridge on the landscape north of the A1307 and also the setting of Babraham Village. This infrastructure will require a green belt location. It should be made clear that ancillary development, such as the bridge, is subject to the same policy requirements regarding landscape, heritage and ecology.

Nature/Recreational Pressure on Gog Magog Hills

The impact of 12,000+ new residents on existing local infrastructure is a primary concern. While the policy may include the provision of new open space, such assets take considerable time to mature and become functional for the public and are less attractive than established places nearby. In both the interim and long-term, this development will inevitably place significant pressure on nearby wildlife and heritage sites such as Wandlebury Country Park, where the car park is already operating at capacity during weekends, Magog Down and the Roman Road. Wandlebury and Magog Down are further than 2km from the site and therefore we would like to see policy 11c revised accordingly to ensure they are taken into account. We suggest 11 d is revised to: “Ensuring that appropriate measures are implemented to minimise avoid recreational disturbance and pressures on ecology at nearby SSSIs and other nature and heritage sites”. We note policy 13c but how will the development prevent unofficial access points to the Roman Road being created?

Policies must include specific mitigation strategies and funding to manage the impacts of increased recreational activity on the important ecological, heritage and amenity assets on

the adjacent Gog Magog Hills – so that they continue to contribute to the quality of life of the wider Cambridge population, which is the vision for the Local Plan.

Water Stress and Chalk Stream Protection

Finally, we wish to highlight a significant environmental contradiction regarding the site's sustainability. We understand that a local borehole is currently being shut down specifically to protect the flow and health of the nearby chalk stream (River Granta). Proposing a new settlement in the same location where water abstraction is being actively curtailed for environmental protection appears inconsistent. The policy must provide robust evidence on how the development can proceed without further jeopardizing the fragile local water table and the health of these rare chalk stream habitats.

Transport Infrastructure and viability

The Grange Farm site will require an extension to the CSET busway, which has an estimated cost of £30m (IDP p34 Table 5-1).

The spatial framework in Figure 81 shows the CSET busway extending north over the A1307 and then east over the A11. This would provide direct access to South Cambridge Business Park and the Cambridge Biomedical Campus, but not any other major local employment sites – Granta Park, Babraham Research Campus, Wellcome Genome Campus, IWM Duxford, the industrial area south of Duxford, Chesterford Research Park.

§13(b) requires improvements to walking and cycling infrastructure to most of these destinations. This will require construction of new paths and bridges over the A11 and A505, at considerable cost. Potential land ownership barriers will also make this challenging. There is no equivalent of a DCO or TWAO to compulsorily acquire complete corridors of land to construct active travel ways.

There will also need to be bus links to destinations along the A11 and A505 because, even with good cycling infrastructure in place, the distances and terrain will not be attractive to most people. For people travelling towards London, a bus connection to Whittlesford Parkway would be more convenient, quicker and cheaper than travelling by bus to Cambridge South station. It may even be quicker to travel to London King's Cross and St Pancras via a bus to Royston.

§15 states, "Ensure transport and junction modelling is undertaken to confirm points of vehicular access into the site and the necessary road and junction enhancements required to satisfy the Highways Authority and National Highways." Transport modelling for this site is essential before it can be confirmed as feasible and viable for allocation.

Such a large site will require major interventions to the A1307, A11 interchange and A505, which will come at a high additional cost to the busway bridge.

The development is likely also to trigger the need for new connections at each end of the A11, to the M11 north and the A14 west, without which the A505 and Wilbraham Road could be overwhelmed.

Currently the funding offered by Homes England to construct the CSET busway is in the form of a loan ("recoverable funding") (1). There is no identified means for the County Council to repay this loan. If the intention is for the Grange Farm development to cover the entire cost of CSET in addition to funding the extension over the A11 (i.e. £191m in 2025 prices), it would have to contribute, for instance, £30,000 per dwelling plus £300/sq. m. of commercial space. It is likely that this would make the development unviable, even if it could be argued

successfully that such a large contribution complied with CIL Regulation 122. To pay for the extension alone would require a contribution of close to £5,000 per dwelling (but this would of course be of very limited use if CSET or some other bus priority scheme into the Biomedical Campus is not built).

Costs for upgrading the A1307 and A11 interchange, and building active travel paths to destinations along the A11 and A505 would be additional to this.

For reference, the Bourn Airfield development has outline planning consent for 3,500 dwellings and commercial space, with a condition requiring delivery of a transport scheme before the 500th occupation, will pay £20m in 2024 prices towards the CtoC busway. That works out at £5,700 per dwelling.

Changes to Plan

The allocation should be scaled back in size and ambition.

Policy should restrict development to low rise to reduce impact on landscape.

Policy should mandate that built forms are heavily screened and integrated into the landscape, set amongst significant new tree planting to soften the visual profile against the rising skyline.

Policy to make clear that ancillary development, such as the bridge, is subject to the same policy requirements regarding landscape, heritage and ecology.

Policies must include specific mitigation strategies and funding to manage the impacts of increased recreational activity on the important ecological, heritage and amenity assets on the adjacent Gog Magog Hills – so that they continue to contribute to the quality of life of the wider Cambridge population, which is the vision for the Local Plan.

11 d is revised by relacing 'minimise' with 'avoid' and to take into account Wandlebury and Magog Down by adding 'and other nature and heritage sites : “Ensuring that appropriate measures are implemented to avoid recreational disturbance and pressures on ecology at nearby SSSIs and other nature and heritage sites”.

We note policy 13c but how will the development prevent unofficial access points to the Roman Road being created?

The policy must provide robust evidence on how the development can proceed without further jeopardizing the fragile local water table and the health of these rare chalk stream habitats.

Recommendations regarding transport

Commission detailed modelling of the transport impacts of this development to identify the full suite of transport interventions required to make the development acceptable in planning terms, and to test its viability.

Design supporting bus infrastructure and services to link this development to destinations along the A11 and A505, potentially as far as Royston.

Test the feasibility and viability of this site allocation without CSET, given that scheme is both unfunded and at risk of not securing the order required for its construction.

(1) https://gat04-live-1517c8a4486c41609369c68f30c8-aa81074.divio-media.org/filer_public/be/28/be283c84-a41f-4fcf-a2e2-f7c24db5a3de/cd14-01_letter_from_earmonn_boylan_homes_england_to_peter_blake_gcp_letter_of_support_to_facilitate_cset.pdf

Site allocations – rural southern cluster

Policy S/WGC: Wellcome Genome Campus, Hinxton

203066

Support

Support the occupancy of residential properties being restricted to campus workers.

Support the specific reference to protecting and enhancing the River Cam.

Policy S/BRC: Babraham Research Campus

203095

Object:

To safeguard the dwellings for campus workers, a residential occupancy condition needs to be applied similar to that of policy S/WGC Wellcome Genome Campus.

The Babraham Research Campus's expansion, any development on Grange Farm and improved access to Granta Park can all be achieved with more targeted, lower cost interventions:

- a) A busway between the Cambridge Biomedical Campus and the Hinton Way roundabout via the proposed south-easterly expansion
- a) A bus lane (if and when needed) along the A1307 westbound to Hinton Way roundabout
- b) Signals controls and lead-in bus lanes at the Babraham Research Park access roundabout
- c) Priority measures at the A11 interchange or a new bus and active travel bridge over the A11, linking the A1307 and Newmarket Road

The policy needs to deliver traffic management and bus priority measures on the A1307 to ensure that travel by bus to the Campus from either direction is as convenient and reliable as possible.

Amend policy

Policy to include similar residential occupancy condition as that of Policy S/WGC.

6. Limit development of new buildings to areas of existing development, undeveloped areas of land in the far north of the site, and The Close residential area. Gardens surrounding the Grade I Church and Grade II* Babraham Hall should must be excluded from development.

9. In accordance with the Spatial Framework for the site, require a wide landscape buffer (minimum 20 metres) in/adjacent to any development in the north-west of site in order to satisfactorily mitigate any adverse impacts of new development on the setting of the Cambridge Green Belt and wider landscape character, including views for the higher land to

the north from the Gog Magog Hills and Roman Road, whilst creating an attractive gateway into the campus from the north.

Figure 94/Site plan should identify area of Strategic Enhancement Area

Amend policy to deliver traffic management and bus priority measures on the A1307 to ensure that travel by bus to the Campus from either direction is as convenient and reliable as possible.

a) A busway between the Cambridge Biomedical Campus and the Hinton Way roundabout via the proposed south-easterly expansion

a) A bus lane (if and when needed) along the A1307 westbound to Hinton Way roundabout

b) Signals controls and lead-in bus lanes at the Babraham Research Park access roundabout

c) Priority measures at the A11 interchange or a new bus and active travel bridge over the A11, linking the A1307 and Newmarket Road

Policy S/RSC: Other site allocations in the Rural Southern Cluster

- **Policy S/RSC/CC: Comfort Café, Fourwentways Little Abington**

203099

Comment:

Amend policy

1.b. Development ~~should~~ must have no unacceptable adverse impacts on the setting of nearby Grade II Listed Buildings, the Temple Café and Restaurant;

- **Policy S/AMC: Areas of Major Change in the Rural Southern Cluster**

- **Policy S/AMC/GP: Granta Park**

203112

Comment:

Recent buildings on this site have been very intrusive in the landscape, notably on Site 1 (21/03822/FUL). Our concerns expressed at the time of the planning application that this building is too high have been found correct. The building is visible above the tree line from the A1307 Abington and from the A505 and has a detrimental impact on the landscape. It is especially prominent at night when the top floor lights are on (which appears to be even out of working hours).

Amend policy

1. d. The design, including building heights, massing and materials, responds sensitively and positively to the existing built form and parkland setting with development sitting below the tree-line, maintains and enhances connections with key landscape features, including the corridor of the River Granta, and avoids unacceptable adverse impacts on the Grade II* Listed Abington Hall, the adjoining Great and Little Abington Conservation Area and other nearby designated heritage assets;

Site allocations rest of rural area

Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)

203115

Comment:

We support the explanation given in the Jobs Topic paper that the plan will not support regional and national distribution proposals but will meet the needs for local distribution (paragraph 3.42 page 18). This prominent site in the countryside is being released to meet the shortfall in Greater Cambridge for industrial and warehousing. The policy needs to ensure that it's use is restricted to sub-regional logistics and does not become a national facility. The policy refers to meeting the needs for LOCAL warehousing and logistics, but it is not clear how this can be enforced.

Climate Change

Policy CC/SD: Sustainable development and the climate emergency

203129

Comment:

We object to householder applications being exempt from Sustainability Statement. If this is a matter of being proportionate to the scale of development, then this is covered by paragraph 2.

The policy should encourage the use of pre-fabrication of sections of new buildings for subsequent site assembly.

Add a bullet point in supporting information:

- Use of Modern Methods of Construction (MMC) such as offsite manufacturing, digital tools and advanced materials.

Policy CC/DC: Designing for a changing climate

203133

Object:

Building regulations do not yet specify low-emissivity glass (which reduces solar gain in summer and heat loss in winter). This is especially beneficial for south facing windows that are not shaded in summer.

Similarly, building regulations do not yet mention vacuum glazing, which has higher insulating properties and slower degradation in performance over time. This will come to replace slimline double glazing, which performs poorly over time, as the glazing of choice for retrofitting single glazing in pre-modern windows (e.g. Georgian/Victorian/Edwardian sashes).

The policy needs to give developers flexibility in how they comply with policies CC/DC and CC/NZ. It needs to require or incentivise them to achieve a sustainability target above building regulations by adding from a menu of options, scored appropriately: solar panels, battery, enhanced insulation, enhanced glazing, enhanced water capture/recycling, etc. This could, for instance, be coded as bronze, silver and gold, weighted accordingly in the planning balance.

Require the use of low-emissivity glass for south-facing windows unless they are or can be shaded in summer, e.g. by a brise soleil or shutters. If a blanket requirement is not deemed appropriate, it should at least apply for single-aspect dwellings.

Policy CC/NZ: Net zero carbon new buildings

203144

Object:

Measurability and Enforceability of Energy Targets

In **Part A**, for the energy consumption target range to be measurable and enforceable, it must include a standard reference room temperature. Occupiers will choose their own ambient temperature, and therefore actual measurements of household or commercial energy consumption for space heating are not a reliable indicator of whether the building fabric and heating system is compliant.

Part B is almost entirely unenforceable because it is outside the control of the developer. The energy requirement for space heating is the only element that can realistically be standardised, measured and enforced.

Critiques of Onsite Energy Generation and Storage

Part C is too vague and unrealistic to be enforceable. For instance, to satisfy the requirement to “achieve all energy demands through onsite energy generation” in winter (when solar generation is lowest and heating demand is highest) would require some combination of wind turbines and long term (multi-day to inter-seasonal) energy storage. The “where possible” caveat is presumably intended to engage Part D, but this would be contested if Part C is deemed to be disproportionately onerous.

Part C should include a requirement for battery storage as an addition or alternative to energy generation. Even without energy generation, energy storage can smooth peaks in electricity demand by charging at off-peak times and discharging at peak times (e.g. to power cooking appliances in the evening), thereby contributing to a meaningful reduction in demand from gas-powered generators which increase the carbon intensity of grid electricity.

As a sidenote, heat batteries are an alternative to a hot water cylinder; one of these will be required where water is heated using a heat pump (since the power output of a heat pump is nowhere close to that of an on-demand boiler). Therefore, a heat battery is not an alternative to an electrical battery.

Embodied Carbon and Construction Targets

Achievable, quantitative targets and clear exceptions must be set if the policy is to be priced into pre-development land values.

The paragraph on Net Zero Buildings requires only measurement, and has no binding influence on the embodied emissions of construction, even though these contribute most to the depletion of the atmospheric carbon budget.

Transport Infrastructure and Cumulative Emissions

There should be a policy that covers the carbon costs of transport infrastructure. All transport infrastructure schemes must achieve net negative cumulative carbon emissions by 2050 (at the very latest), including embodied carbon emissions. Schemes should be prioritised on the basis of the scale and rapidity of the carbon savings they will achieve.

Alignment with National and International Climate Targets

Supporting information §4.20 omits the 2030 target of a 68% reduction.(1) The 2035 target is for an 81% reduction on 1990 levels, not 78% as stated (the Nationally Determined Contribution was strengthened at COP29 in 2024).(2)

In the absence of legislation or national guidance on how government departments and local authorities should meet these national targets, local authorities should attempt to estimate what their share of the national carbon budget is and set policies accordingly.

The national Transport Decarbonisation Plan, adopted in 2021, relies mainly on replacing petrol/diesel vehicles with battery-powered models. There is no recognition of, or accounting for, the embodied carbon emissions of new vehicles or new transport infrastructure, even though it is cumulative emissions that are driving climate change, and therefore embodied emissions must be regulated. The Local Plan must not continue to ignore this blind spot.

Part D The policy needs to clarify how the Energy Offsetting will work in practice. Will the Planning Obligations SPD be updated to include Energy Offsetting? An explanation is needed as to how the payment will be calculated, and who will have access to the fund to deliver local projects? The need to deliver offsite projects should not outweigh the policy requirements of CC/RE.

The policy needs to be amended to

Set carbon budgets for construction that are consistent with the UK's Nationally Determined Contributions, as well as its statutory duty to reach net zero by 2050.

Include battery storage as a requirement or option (see recommendations for Policy CC/DC).

Include the embodied carbon emissions of transport infrastructure in the policy.

Include carbon emissions from vehicle movements that are generated by a development when considering operational carbon emissions of the development as a whole.

Clarify how Energy Offsetting will work in practice.

(1)https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1109429/uk-nationally-determined-contribution.pdf

(2) <https://www.gov.uk/government/publications/uks-2035-nationally-determined-contribution-ndc-emissions-reduction-target-under-the-paris-agreement>

Policy CC/WE: Water efficiency in new developments

203152

Comment:

Para 2e: The requirement for sustainability retrofitting of an existing building being developed is commendable, but may not be financially viable, so offsetting contribution instead should be allowed.

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

203161

Support.

Amend policy to ensure SuDS requirements are met in full

1. New development must fully incorporate Sustainable Drainage Systems (SuDS) as part of an Integrated Water Management approach to the design of the whole site.

Policy CC/FM: Managing flood risk

203167

Comment

Support the policy but propose amendment to ensure full information is provided in planning applications as to what has been agreed with which relevant bodies. Amend part f by adding 'and are included as part of the planning application' at the end f. The ongoing maintenance and management of any necessary flood defences or flood mitigation measures have been agreed with the relevant bodies and the necessary agreements are in place and are included as part of the planning application.

- f. The ongoing maintenance and management of any necessary flood defences or flood mitigation measures have been agreed with the relevant bodies and the necessary agreements are in place and are included as part of the planning application.

Policy CC/RE: Renewable energy projects and infrastructure

203175

Support

the Supporting Information which encourages the continuation of agricultural uses. Suggest that the wording is amended to make clear that uses such as grazing can take place onsite, around the equipment, and is not referring to adjacent land.

“Proposals that affect agricultural land are more likely to be supported where applicants demonstrate that agricultural uses, such as grazing, can still operate around the proposed renewable energy development equipment,”

Biodiversity and green spaces

Policy BG/BG: Biodiversity and geodiversity

203194

Object:

We strongly advocate for a policy framework that moves beyond mere mitigation, prioritizing a "nature-first" approach to development within Greater Cambridge.

Mitigation Hierarchy and Space for Nature

The fundamental starting point for this policy should be the strict adherence to the ecological mitigation hierarchy: first avoiding harm, then recreating and enhancing habitats.

Biodiversity Net Gain (BNG) Targets and Flexibility

CambridgePPF strongly supports the Council's aspiration to deliver a **20% BNG target**, exceeding the national mandatory minimum. However, we note that this higher threshold now runs counter to some government advice unless it is site-specific and rigorously justified. To ensure the 20% target remains deliverable and robust against appeal, we suggest a more nuanced mechanism for its application: Specifically, recognizing that meeting the BNG trading rules (delivering "like-for-like" habitats) can be practically and financially challenging, the policy could adopt a tiered approach. For example, the Council could require the first 10% BNG to follow the BNG rules, with the remaining 10% allowed a more flexible approach whereby replacement habitats don't have to follow the strict BNG trading rules, so that replacement habitats could be of other appropriate habitat types (eg hedgerow could be replaced by scub or watercourse by a pond, etc). This would maintain a high overall gain while providing the flexibility to make it more deliverable, especially on-site, and therefore more cost effectively for developers.

BNG plus extras

In addition to Biodiversity Net Gain, biodiversity can also be enhanced by development through the provision of Green Infrastructure such as landscaping, soft edges, play areas, etc and this should also be encouraged, as an example it would not be appropriate to attribute BNG to a roadside verge on a development site, but that does not preclude the verge being planted with a nature friendly seed-mix.

Other benefits of biodiversity

It would be helpful to recognise that improving biodiversity often has other benefits, such as urban cooling, reducing run-off, capturing carbon, filtering pollution and public health and wellbeing.

Biodiversity & Water

The plan should explicitly acknowledge that the health of aquatic biodiversity in Greater Cambridge is dependent on water availability. Therefore, both the Plan and new developments must demonstrate that their water requirements—and the associated impact on local aquifers—will not detrimentally affect the very water-dependent habitats that the BNG policy seeks to protect or create.

Suggested amendments to policy:

Paragraph 3. Conclude with: 'Strategy priority areas and as close to the point of damage as possible.'

Paragraph 5. We welcome the reference to ongoing management and monitoring, which are key to the success of habitat mitigation and any necessary compensation. It might help developers if the detail of this was spelt out, or referenced if contained in other documentation (eg submission and approval Habitat Management and Monitoring Plans, establishing a site baseline, setting habitat condition targets, detailing management prescriptions, including any necessary funding arrangements, and monitoring schedules, incorporating an adaptive management framework with triggers for corrective action, and assigning roles for maintenance and reporting to the Local Planning Authority).

Paragraph 6. Section needs clarification as to whether this applies if the application is subject to EIA.

Paragraph 7. Need to make clear the circumstances when benefits will outweigh adverse impacts, such as no (less harmful) alternative, wider public interest and safety.

7e and 8. The policy needs to be clear that compensation follows when there is irretrievable damage to a site that cannot be mitigated.

Supporting Information:

Paragraph 11: Text on SSSIs should refer to 'adverse' harm to SSSI rather than 'significant' harm.

Final 3 paragraphs: It would be helpful to make clearer, the circumstances when benefits will outweigh adverse impacts (eg such as there is no less harmful alternative; or public safety).

The supporting text would benefit from description of the mitigation hierarchy.

Policy BG/GI: Green and blue infrastructure

203210

Object:

CPPF strongly supports inclusion of a GI policy and the reference to the Building with Nature standards and the incorporation of the Greater Cambridge strategic green infrastructure initiatives. We commend the extensive work undertaken by Greater Cambridge to assess green infrastructure needs. However, we are concerned about several aspects of the policy though acknowledge that it is still a work in progress.

While the policy may help to ensure that most major developments provide high quality GI on-site, there is a significant risk that it will not contribute meaningfully to the delivery of strategic GI across the Greater Cambridge area. We are very concerned that the policy by itself will not deliver strategic GI in the right locations and will fail to match needs without proactive policy and site allocation decisions elsewhere in the local plan. It is simply not clear at present how the policy aspirations will be delivered.

The Cambridge Nature Network sets out a clear vision for where strategic green infrastructure and nature recovery can take place. It identified four areas as the priorities for the provision of strategic green infrastructure and land for nature recovery:

1. To the south and east of Cambridge (Gog Magog Hills to Cherry Hinton downland zone);
2. West of Cambridge (Coton Countryside Reserve);
3. North & East of Cambridge at the southern end of the National Trust Wicken Fen Vision area around Anglesey Abbey; and
4. North of Cambridge (extension to Milton Country Park).

This local plan must facilitate delivery of the strategic GI required through both policy and appropriate site allocations. Accessible natural greenspaces are already at capacity and delivery of additional capacity in all areas north, south, east and west of Cambridge is required immediately to address this issue and remove / avoid damage to nature sites, including SSSIs.

There must be clear funding mechanisms and or enabling development in the right locations to ensure that the Cambridge Nature Network and other strategic green infrastructure is provided to support the proposed population growth. Without a proactive approach, the local plan will not meet the strategic GI needs and will therefore not deliver sustainable development. The best locations to provide strategic GI for Cambridge are on the fringes of the city, and in some cases the landowners are unlikely to make land available for strategic GI unless it is related to their own development proposals. This raises the question whether there may be a case for enabling development to unlock the land in the right locations to meet the strategic GI needs of the growing city and deliver a sustainable local plan.

Some of the proposed locations for major new development are not well located to deliver the strategic green infrastructure Cambridge needs in the right locations. The proposed development at Grange Farm, Abington is a case in point. The development is too small to deliver significant strategic GI but large enough to add to the unsustainable pressures on nature sites and county parks already occurring.

At this stage we believe that the local plan has failed to address the strategic GI requirements of the Greater Cambridge area and will not do so unless land can be secured in the right locations, through a mixture of policy and enabling development. We acknowledge that the Councils are aware of this. However, addressing this missing aspect of the local plan will be critical in determining whether the local plan is sustainable or not.

We need to understand more about how all development will contribute proportionally to the strategic green infrastructure required to support sustainable development within Greater Cambridge area. Unlike other parts of the UK, Greater Cambridge does not benefit from having large areas of publicly accessible downland, forest, coasts, moorlands, etc. Provision of GI across the Greater Cambridge area has fallen well behind that required to support population growth over the past 20 years. This draft local plan needs to make up for these deficits as well as provide sufficient GI for the proposed additional population growth. While most strategic developments have provided sufficient strategic GI to meet their own needs, these have only accounted for approximately 50% of the population growth, and the other 50% of development has not contributed to the needs of the growing population. The development proposals contained in this plan indicate that around 15,000 housing units (+30,000 people) will not contribute to the strategic greenspace requirements of the city. We strongly advocate that ALL development should contribute to strategic GI and therefore the local plan must include strategic GI within a CIL requirement for new developments. While funding for open spaces and sports pitches is often secured through local plans, the natural environment and natural greenspace has traditionally been missed or under-provided for.

We are unclear about the distinctions between Green & Blue Infrastructure and standards and the standards for Policy BG/EO Providing and enhancing open spaces. Our comments apply across both.

Greater Cambridge is perhaps unusual in that much of the open space is not in the control of the public sector (especially on the fringes of and beyond the city), instead much of it is in the hands of charities and institutions (such as the Cambridge Colleges) who often allow defacto access. These sites are often managed differently, and so don't easily fit open space typologies. This situation makes it difficult to correctly classify them for assessment purposes, which in turn has a bearing on trying to understand deficiencies and also set standards. It also creates more of a challenge in bringing forward green infrastructure to

implementation as it requires the involvement of third parties. We feel that it might be helpful to set out this context in the supporting documents/information.

Change to plan:

Reconsider this policy and site allocations to increase capacity for accessible natural green space by policies identifying land in suitable locations and through enabling development. Policy to identify clear funding mechanisms and enabling development to support the Cambridge Nature Network.

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

203211

Support.

Policy BG/RC: River corridors

203216

Comment

CPPF supports this policy but would like to see bullet point (e)i, revised to make clear that a Cam Valley trail should not follow the riverbank, or be located in the floodplain, along the whole length of the river. This is needed to protect river and floodplain wildlife from excessive disturbance. Although the policy refers to the need for balance, there is no supporting text to set out and describe the balance that must be struck between river biodiversity and public access.

The Supporting information should recognise the special historic and cultural interest of the whole of the length of the Cam from Byron's Pool to Baitsbite Lock.

Policy BG/PO: Protecting open spaces

203995

Comment

See CPPF comments on BG/EO

Policy BG/EO: Providing and enhancing open spaces

203339

Object

CPPF strongly supports the direction that this policy is going in, recognising that it is still a work in progress. We commend the extensive work undertaken by Greater Cambridge to assess green infrastructure needs. Below we have provided comments on this work and some of the supporting information.

Green Space Standards

We strongly suggest that a higher amount of green space per 1,000 population within developments should be pursued for higher density residential developments. Parts of Cambridge currently have a generous amount of green space, and we believe this standard should continue to be the case in our new developments, otherwise new developments will be worse than previous generations, in this regard. For example, NE's recommended area for Doorstep greenspace is 0.5h, and Local open greenspaces is 2ha per 1,000 people. When compared with existing spaces such as Christ's Piece (3.5 ha), which could be classified as a Local greenspace, and New Square (approximately 0.78 ha), which may fall within the Doorstep greenspace category, the Natural England standard is worse than what we have in parts of Cambridge.

Human Wellbeing, Resilience, and Functional Scale

New developments must provide access to sufficiently large areas of open green space and public realm. Larger, multi-use areas are far more functional and beneficial than a series of small incidental spaces. Small open spaces, fragmented across a site, may have biodiversity and landscaping benefits, but they often lack purpose and interest for the user and result in areas that are looked at but rarely used. Too often, such spaces lack the generosity required to support basic human comfort and wellbeing, including adequate openness, sunlight, and shade.

Critique of Green Infrastructure Strategy Mapping and Data

Volume 2 Figure D1.1 of the Green Infrastructure Strategy includes a plan showing "accessible greenspaces > 0.5ha" and the area around these that is within 200m. This is misleading because it includes land that is not publicly accessible within the definition provided by Natural England, and access does not take into account physical barriers to access (private land, railway lines, etc). Natural England defines "Accessible Greenspace" as "*greenspace that is specifically provided FOR public access, or one to which the public would usually expect to access (such as a cemetery), or one over which there is a public RIGHT to open access, and deemed likely to be accessible to the public at any reasonable time, free to entry and available for a range of pastimes (although some sites may be closed to the public overnight and there may be fees for parking a vehicle).*" (1)

Accuracy of Designations and Access Modelling

According to this definition, all private land should be omitted, including belonging to St John's, Trinity, Clare, King's, Queens', Magdalene, Newnham, Girton, Botanic Garden, The Perse School, CU Rugby grounds.

School playing fields, such as Milton Road Primary should also be omitted.

Spaces that are smaller than 0.5ha should also be omitted, including at CB1, Cambridge Leisure Centre, and between Davy Road and the railway line.

Coleridge Rec and Romsey Rec should be added.

We have previously advised GCSPS of the need to handle Coton Countryside Reserve appropriately when classifying it, but it looks like our advice hasn't been taken into account.

This is a very large site, but most of it is farmed with permissive footpaths, only a relatively small area is defacto publicly accessible green space. Because of the size of this site, how it is classified has an impact on access modelling. It is CPPF's aspiration to transform the farmland into green space but that is not the case at the current time.

The isodistance access areas should be plotted based on available rights of way.

In relation to our comments, we note the response of the Wildlife Trust, which we support: The following is an extract from the Wildlife Trust's representation.

"The reports identify that there is currently 8.7 Ha of accessible greenspace per 1,000 population across the Greater Cambridge area and set out a policy to maintain this minimum level of provision in relation to future population growth. However, from reviewing the evidence it is unclear where this figure actually comes from, and various maps appear to show some large areas of land as green infrastructure which are neither high quality nature sites nor accessible greenspace. It must include an element of accessible natural / semi-natural greenspace, but from a review of the various linked GI reports I have not been able to find the source reference for this calculation. This is critical to understand whether the figure is accurate and to understand how it was calculated. There is a good chance that the current level of provision is over-stated, which has implications for both policy and funding.

"The reports also refer to the Greater Cambridge area exceeding the Fields in Trust recommended standard of 3 Ha / 1,000 population of natural greenspace. However, this is not an appropriate standard for the Greater Cambridge area. This figure might be appropriate for many other cities and towns that have large areas of high quality, biodiverse, accessible countryside in their hinterland including areas of downland, moorland, forest or coast. These are often designated as National Parks or National Landscapes with good access provision. "However, the Greater Cambridge area has none of these and therefore requires a much higher level of provision of strategic natural greenspace.

"A further consideration is that the provision of accessible natural greenspace is significantly less than required as it is not sufficient to prevent increasing impacts from recreational use of nature sites across Greater Cambridge. The levels of strategic natural greenspace provided over the past 20 years has been insufficient overall (though some individual large development allocations such as Trumpington Meadows, Clay Farm, Cambourne and Waterbeach will meet their own needs, most developments have not).

"Therefore, there is a question as to whether the 8.7 Ha per 1,000 population is either an accurate assessment of quantity or sufficient as the target for the **Overall Accessible Greenspace Area-wide Standard**? Does this need to be increased to address the impacts on nature sites from unsustainable recent growth and predicted future growth? Alternatively, should a set of specific and deliverable new strategic natural greenspace sites be brought forward through the Local Plan process to address and mitigate the damage from recreational impacts at existing nature sites and the capacity issues at Country Parks such as Wandlebury and Milton? Whichever approach is taken, the Local Plan must include proactive measures and deliver the strategic natural greenspaces that is required for place making and sustainable development, in addition to the local and urban green infrastructure to be delivered on-site through new developments.

"The Wildlife Trust welcome and fully supports the inclusion of the proposed **Overall Nature Recovery Area-wide Standard**. The standard and justification are set out in paras 3.2.24 and 3.2.25 of the Emerging GI Strategy & Standards Document. However, we do not support the current wording as it is not clear. We suggest the following revision to the proposed standard, with similar changes to wording in para 3.2.25:

"Target of 100% increase in the ~~proportion of~~ area of natural / semi-natural GI that is designed and managed for nature recovery across the Greater Cambridge area over the Local Plan period."

“The Wildlife Trust welcomes the commitment to undertake further work on a SANGS (Suitable Accessible Natural Greenspace Standard).

“With respect to costs and implementation, it will be essential to factor in the land acquisition costs in calculating the overall figures for provision of strategic natural greenspace. At present only site creation and management costs over 30 years have been taken into account.

“Finally, within the **GI Supporting Evidence Report** Appendix D includes an analysis of how the Accessible Natural Greenspace Standard is met and identifies areas of deficiency. The Wildlife Trust notes the deficiency in the provision of a **Sub-regional Natural Greenspace (500 ha)** for the whole of the Greater Cambridge area and the deficiency in provision of **District Natural Greenspace (100 ha)** across most of the area. The Cambridge Nature Network report identified the opportunities to address these deficiencies in three areas to the south and east, west and north-east of Cambridge. **It is essential that the Local Plan makes specific provision, if necessary allocating land, to deliver the strategic natural greenspace that will meet the identified needs.”**

CPPF, considers that GCSPS need to:

Correct the Accessible Greenspace plans to show all and only qualifying greenspaces and isodistance contours around them based on available walking routes.

Consider higher standards for Cambridge

Explore how the Plan can better deliver off-site green space

Include land costs in estimating contributions

Acknowledge the shortfall in accessible greenspaces in Petersfield ward.

(1) <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Glossary.aspx>

We are unclear about the distinctions between Green & Blue Infrastructure and standards and the standards for Policy BG/BI Green & Blue Infrastructure. Our comments apply across both.

Greater Cambridge is perhaps unusual in that much of the open space is not in the control of the public sector (especially on the fringes of and beyond the city), instead much of it is in the hands of charities and institutions (such as the Cambridge Colleges) who often allow defacto access. These site are often managed differently, and so don't easily fit open space typologies. This situation makes it difficult to correctly classify them for assessment purposes, which in turn has a bearing on trying to understand deficiencies and also set standards. It is also creates more of a challenge in bringing forward green infrastructure to implementation as it requires the involvement of third parties. We feel that it might be helpful to set out this context in the supporting documents/information.

We also note that the Appendices for the Green Infrastructure Strategy Vol 2 are not available in the document library and would ask that this be addressed.

Well being and social inclusion

203999

Comment

Consider whether this section should include a policy on Assets of Community Value.

Policy WS/CH: Cultural and creative hubs

203365

Object

The policy should identify the scale of local need. It does not recognise the need to provide major new cultural attractions and infrastructure to offset the pressures on city centre attractions. The policy should safeguard existing cultural and creative spaces.

Change to plan:

The policy should quantify the scale of need and recognise the need for major new cultural attractions and infrastructure to offset the pressures on city centre attractions. The policy should safeguard existing cultural and creative spaces.

Policy WS/PH: Public houses

203372

Strongly support

Great places

General

203917

Comment

It is unclear how the plan will respond to and deliver Public Art. It is currently unclear whether its preservation and implementation fall under the general design quality standards of GP/QP (landscape and public realm) or the protection of Non-Designated Heritage Assets (GP/ND). Without a specific designation, significant public art installations may lack the necessary protections against removal or decay. Irrespective of how the plan will approach public art, it should emphasise the importance of early collaboration on the appropriate siting and integration of public art in the design of greenspace and/or public realm.

203920

Comment

The governance of Street Lighting requires further definition within the plan. It is presently uncertain whether lighting standards will be dictated by shopfront guidance or broader design policies like GP/QP. Clear policy language is essential to ensure that lighting schemes are sensitive to the historic character of Cambridge and do not contribute to visual clutter or inappropriate illumination of the heritage environment.

Policy GP/PP: People and place responsive design

203927

Comment

Point 1d is a crucial part of the policy and as it relates to point a., it should be given greater prominence and be renumbered as point b.

Policy GP/QD: Achieving high quality development

203946

Comment

Strengthen policy by Amending 2.i and supporting information accordingly

Ensure the layout and design of development successfully incorporates functional needs such as waste storage and collection, recycling and bicycle parking, in a way that does not negatively impact on the environment, heritage or neighbouring amenity.

The policy must be backed by a clear commitment to refuse applications that do not meet the highest possible standards of architectural integrity.

Policy GP/HD: Housing density

203973

Comment

It is important to understand that for development to make efficient use of land does not mean that it should lead to high rise residential development. In 2010 CPPF organised a public meeting on tall buildings. The issues discussed then are still relevant today. The presentation by Sir Richard MacCormac, past president of RIBA, demonstrated that traditional terraces and squares are frequently more effective than tower blocks for residential density. For instance, high-density urban family housing can achieve 100 dwellings per hectare. This matches the capacity of tower blocks while remaining significantly more cost-effective and avoiding the complex management problems inherent in high-rise living. Furthermore, studies confirm that walkable communities can be sustained with 2–3 storey family houses and 4–5 storey flats. Such configurations achieve a gross density of 50 dwellings per hectare, which is more than sufficient to prevent suburban sprawl into the Green Belt without compromising the city's human scale.

Attachment: Tall Buildings in Cambridge Meeting 03032010.pdf

Policy GP/ST: Skyline and tall buildings

204059

Object:

Cambridge Past, Present & Future is really pleased to see that the city is learning from experience and the new tall buildings policies proposed in the latest plan are a significant improvement from the 2018 plan.

However, whilst we recognise the need for a robust policy to manage height as the city grows, we are concerned that the current approach risks creating a permanent "ring" of tall buildings that will fundamentally alter the character of the Cambridge skyline. Why has the Vu-City model, mentioned in 2021 Local Plan documents, or equivalent, not been used to present, assess, and justify the draft Plan's tall buildings proposals? This is a serious omission in communicating a key issue to the public. Once the precedent for tall buildings is established, it becomes a "genie out of the bottle" that is difficult for the planning system to regulate. By prioritizing horizontal density over vertical height, Policy GP/ST can ensure a sustainable, viable, and architecturally appropriate future for Cambridge that protects the unique character of the cityscape.

Cumulative Impact and Strategic Locations

The identification of four equidistant sites—West Cambridge, North East Cambridge, East Cambridge, and the Cambridge Biomedical Campus (CBC)—as suitable for tall buildings suggests a shift in the city's profile. We are concerned that this will result in a cluster of tall buildings being visible from almost any vantage point, whether at ground level or from elevated positions.

While we acknowledge that East Cambridge has a less direct visual relationship with the historic core, the other three sites are highly sensitive. We particularly wish to highlight the view from Red Meadow Hill, a key strategic viewpoint. The policy must ensure that development in these areas does not result in a wall of uniform height that competes with the historic "city of spires."

2. Consistency with Existing Masterplans

We seek clarification on how Policy GP/ST interacts with existing site-specific frameworks, particularly the West Cambridge Masterplan. We question whether tall buildings are truly necessary for the delivery of the West Cambridge site's objectives. Any policy allowing for increased height must be based on a proven functional need rather than a default assumption of density.

3. Architectural Quality and Landmark Buildings

We hold no objection to a tall building policy that delivers genuine architectural excellence. However, the design must be more than a functional exercise in "hiding plant" or maximizing floor plates. To be successful, tall buildings in Cambridge must:

- **Demonstrate Architectural Merit:** They should be elegant in form, avoiding the "bulky box" aesthetic that currently plagues many modern developments.
- **Function as Landmarks:** We suggest the policy should explicitly focus on "Landmark Buildings"—structures that are purposefully designed to be singular, distinct markers that add quality to the skyline, rather than just reaching a maximum height limit.

4. The "Flattening" Effect of Height Limits

We are concerned that setting a "maximum height" often becomes a target for developers. This tends to lead to a "flattening" of large commercial development, where every building rises to the same permitted ceiling, resulting in a monotonous and bulky roofscape. This is especially problematic when many developers are involved, because none of them wants to be the one offering the lower height that is required to create the varied heights and silhouettes that is needed to maintain the "incidental" and textured nature of the Cambridge skyline. This results in proposals for even taller buildings to create the variability. The policy needs to find a way of supporting varied heights and silhouettes and also setting height guidelines in order to avoid overly tall buildings.

5. Capability and Resolve

Finally, a policy is only as effective as its enforcement. We are not yet confident that the Councils possess the necessary resolve to push back on poor or mediocre design when developers reach for maximum heights and floor space. Policy GP/ST must be backed by a clear commitment to refuse applications that do not meet the highest possible standards of architectural integrity.

Change to plan:

The policy should be justified by use of 3D modelling.

The policy must protect sensitive viewpoints like Red Meadow Hill

The policy or supporting text should clarify how the policy relates to site specific frameworks/masterplans.

The policy should explicitly focus on "Landmark Buildings".

The policy needs to find a way of supporting varied heights and silhouettes and also setting height guidelines in order to avoid overly tall buildings.

Policy must be backed by a clear commitment to refuse applications that do not meet the highest possible standards of architectural integrity.

Suggested amendments to policy text (New text in capitals / deleted text in square brackets)

1. Proposals for taller buildings will be supported where they are appropriate to their location and demonstrate a positive response to the IMMEDIATE AND wider setting.

1a. Location, setting and context – applicants must demonstrate through visual appraisals, with supporting accurate visual representations, how the proposals fit within the existing landscape and townscape. [and provide a] A clear assessment of how proposals maintain or enhance the skyline **MUST ALSO BE PROVIDED.**

1b. For Cambridge, **ALL BUILDING** proposals must ensure that the character or appearance of Cambridge, as a city of spires and towers emerging above the established tree line, remains dominant from relevant viewpoints.

1c. Scale and massing – applicants must demonstrate using scaled drawings, sections, accurate visual representations and models, how their proposals [will deliver] **DEMONSTRATE APPROPRIATE PROPORTIONS BETWEEN HEIGHT, MASSING AND CLUSTERING OF BUILDINGS AND HOW THOSE PROPOSALS WILL DELIVER a [high-quality] BENEFICIAL** addition to the skyline.....

1e. Amenity and Microclimate - applicants must demonstrate that there is no adverse impact on neighbouring buildings and open spaces in terms of the diversion of wind, overlooking or

overshadowing THROUGH UNEQUIVOCAL AND APPROPRIATE SUPPORTING INFORMATION, and that there is adequate sunlight and daylight within and around the proposals

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

204101

Object

This policy GP/QP, gives direction on the expectations of the quality of open green space as well as public realm, while Policy BG/EO: Providing and enhancing open spaces (within the Biodiversity and Greenspace) sets the open space standards. The two policies are so interrelated, should they be in the same topic area, i.e. in Great Places or at least cross referenced?

The definitions of different types of external space seem to be interchanged freely adding to a confusion of terminology. A definition and standard description of each different type of space should be provided in the policy as well as in the supporting information. It should also be standard between topic areas and policies.

The policy focusses mainly on greenspaces. It should also give more direction on the design/content of public realm areas, e.g. streets and civic squares.

The content, purpose and wording of this policy is rather muddled and repetitive, particularly the first two sections. We suggest the text is rationalised and made clearer.

An alternative wording is proposed /attached.

1.a. Enabling local communities;

- i. It should be demonstrated that sufficient public realm and greenspace is appropriate in size and composition for the number of people in the local community (new and existing) expected to use them. Depending on the size and complexity of the development this may be a range of greenspace and public realm or just one adequately sized space.
- ii The area(s) should be overlooked (or with natural surveillance), be well located so as to be convenient and well connected to the community they serve, not be dominated by motorised vehicles, have an adequately sized kickabout area, passive areas to read, chat and enjoy the landscape/planting etc., play areas for different age groups, provide a high quality of planting variety and hierarchy.
- lii Wherever possible, sufficient additional greenspace should be made available for an above ground sustainable drainage system separate from the open green space.
- iv Areas of public realm should be of an adequate size and proportion to the buildings that surround them and should be designed to allow adequate sunlight and shade throughout the day and sufficient artificial light to be safe for all users.
- v. Surfacing of the public realm should be of high quality, durable and easily maintained.
- vi. There should be a hierarchy of streets with adequate space allowed for the planting of street trees including large scale trees. Street trees offer shade to buildings as well as shade in streets and squares and help reduce the urban heat island effect. Sufficient space above

and below ground must be provided to accommodate root and branch systems, enabling the tree to reach its ultimate size without the need for pruning.

1.b. Enhancing connectivity;

- i. Ensure new and enhanced existing routes are designed inclusively, prioritising a pedestrian led movement hierarchy including generous and level footways;
- ii. Ensure that new and existing public realm and greenspace seamlessly connects, is accessible for all intended users. Street furniture should not obstruct the public realm or create street clutter;
- iii. Establish streets and greenspaces that are well defined, and which clearly demarcate public and private space;
- iv. Establish a hierarchy of streets that responds to varying levels of use, avoids vehicular dominance in terms of parked cars, and accommodates a corresponding hierarchy of street trees.

1.c.iii. Seek opportunities to incorporate street trees, including large scale species trees such as Lime and London Plane, into the public realm

Spilt 1.d.ii into two sections, creating an additional point to emphasise the importance of space for trees to achieve successful public realm.

ii Ensure that the right growing conditions and future management regimes for landscape schemes are secured as part of any planning permission granted and implemented across the agreed timeframe

iii Ensure that space for trees, especially large scale trees, without the need for canopy or root management, and other planting is incorporated that is appropriate to the scale of buildings.

1.e.iii – Seek to remove any barriers, both actual and perceived through in public realm improvements by minimising barriers to accessibility and inclusion of users including those wheeling and skateboarding.

To avoid risk to skate boarders themselves, pedestrians, wheel chair users and cyclists, skate boarding should be accommodated in separate areas and not encouraged as part of active travel.

Amend 1.f.ii Encouraging walking, ~~wheeling including by skateboard~~, cycling and other forms of active travel

Paving over front gardens

§7.40 supporting this policy states: “To support well designed public realm, the Local Planning Authority promotes the removal of paving in front gardens. When considering paving for front garden, it is encouraged that permeable paving is used.”

This is the only reference in the draft Local Plan to paving over front gardens. *Policy 66: Paving over front gardens* in the current Local Plan has been dropped. This includes three tests for acceptability for paving over a front garden, and important guidance, including highlighting the fact that it is illegal to drain water from private land over a public footway.

The final sentence of §7.40 states, “you can [*should be* may] pave without the need for planning permission if you use porous materials for paving, or provision is made to direct run off water from the hard surface to a permeable or porous area or surface within the curtilage of the dwellinghouse.” Compliance is difficult to monitor, in particular whether a soakaway has been installed, and that its volume is sufficient for the area being drained.

Three factors have increased the number of front gardens converted to driveways:

- a) Competition for on-street parking in residential areas. Some areas of the city have seen an increase in the number of cars per household¹ (Cherry Hinton, Trumpington, Arbury and East Barnwell), and average car sizes have increased, reducing on-street parking capacity.
- b) Avoiding paying for parking permits in Residents’ Parking Zones.
- c) Enabling EV charging at home for convenience and significantly lower charging costs.

Factor (c) in particular will see an accelerating number of front gardens paved over in coming years in the absence of an effective policy in the new Local Plan .

Policy 66 from the current local plan should be Retained and updated. Article 4 Directions, for instance, should be considered to protect front gardens in Conservation Areas.

Monitoring and Enforcement of Landscape Quality

While Policy GP/QP emphasises the importance of well-designed green spaces and high-quality public realms, there remains a persistent gap between the "paper" specifications approved and conditioned at the planning stage and the actual quality of landscapes delivered on the ground. We are aware that the Councils have struggled with the delivery of subpar landscaping in new developments, often due to a lack of resources to monitor and enforce approved landscape conditions, specifications and long-term management plans. Without active monitoring, the visual, social, and environmental benefits of new green spaces are frequently lost to poor planting, ground compaction as well as inadequate soil preparation, or the lack of adequate watering and maintenance regimes.

We propose that the Local Plan introduces a specific financial mechanism to address this resource gap. Currently, mechanisms are being established to cover the long-term monitoring and auditing of Biodiversity Net Gain (BNG). We strongly recommend that this approach be extended to include the monitoring and enforcement of general landscaping works.

By requiring developers to contribute to a landscape monitoring fund—similar to the model used for BNG—the Councils could fund the necessary expertise to ensure that:

- Approved conditions and specifications are strictly adhered to during the construction and planting phases.

¹ <https://www.ons.gov.uk/census/maps/change/housing/number-of-cars-or-vans/number-of-cars-3a/1-or-more-cars-or-vans-in-household>

- Management Plans are being actively followed by the responsible parties post-completion.
- Remedial Action is taken promptly where landscaping fails to meet the conditions and quality standards set out in the permission.

Changes to Plan

See attached alternative wording (also shown above)

Policy 66 (Paving over front gardens) from the City Council adopted local plan should be retained and updated.

Require developers to contribute to landscape monitoring fund.

Attachment: CPPF alternative wording to Policy GP_QP.pdf

Policy GP/LC: Protection and enhancement of landscape character

204113

Support

Strongly support, with some proposed amendments.

Amend policy. Consider whether reference should be made to other documents such as Tall Buildings Baseline, Strategy and Guidance (2025) and perhaps the townscape study.

1.a. protect, conserve and enhance the local landscape character, diversity and natural beauty as set out....

Insert new 1b

SEEK TO ENSURE THAT CHANGE IS APPROPRIATE TO THE RELEVANT LANDSCAPE CHARACTER TYPE AND AREA, AND THE FEATURES AND CHARACTERISTICS THAT DEFINE THEIR LOCAL DISTINCTIVENESS.

Insert new subsection to part 1

IDENTIFY OPPORTUNITIES TO INTRODUCE NEW AND APPROPRIATE LANDSCAPE FEATURES TO COMPENSATE FOR NEARBY LOSS OR DEGRADATION;

The supporting information should request evidence that due regard has been taken of the GC Landscape Character Assessment and its related studies as part of the pre-application/feasibility stage and not simply accompany the planning application, when it is invariably too late to amend.

Policy GP/HE: Historic environment

204163

Object

Cambridge Past, Present & Future expresses profound concern regarding Policy GP/HE, primarily due to the plan's failure to recognise the overarching significance of Cambridge's

heritage and to assess the cumulative and indirect impacts on it of significantly increasing the population.

The city possesses a world-class built environment and historic landscape that attracts over 8 million visitors annually and serves as a primary driver for global investment, student recruitment, and business retention. Despite the city's Outstanding Universal Value being formally acknowledged as far back as its 1980s World Heritage Site nomination, the current draft plan contains no overall Statement of Significance. It fails to recognise the world-heritage significance of the city as a cohesive whole, particularly along the vital river corridor extending from Byron's Pool through Grantchester Meadows to Baitsbite Lock—an area integral to Cambridge's international identity.

A population increase of 100,000+ will result in more people and more transport in the historic city centre. Changes will inevitably be required to the layout, use and fabric of the city centre to accommodate so many more people. That's where there's a risk to our heritage, because this Plan is proposing the growth without adequately considering what changes might follow – indeed the plan doesn't recognise that this is likely to happen, let alone how it might be addressed.

The same problem exists in our countryside. Historic places like Wimpole and Wandlebury are already under visitor pressure, which is having a negative impact on their heritage significance. What will happen when another 100,000+ people want to visit those places? We believe the Plan must recognise these impacts and present a solution to this problem. It is CPPFs view, shared by Historic England, that the solution is to make the existing parks bigger, as well as creating large new attractive green spaces, to take some of the pressure off. This is what is being proposed in the Green Infrastructure and Open Space sections of the Local Plan and can be cross referenced. In the GI/Open Space section it would be helpful to recognise the heritage problem caused by visitor pressure (at present visitor pressure is referenced only in relation to nature reserves) and the need to mitigate heritage impacts.

Furthermore, the proposed Historic Environment Strategy is fundamentally inadequate, serving as little more than a list of existing tools rather than a genuine strategic evaluation. It is essential that a city with such a rich and diverse historic culture that is experiencing increasing development pressures must have a comprehensive Historic Environment Strategy that addresses the cumulative effect of the myriad of different development proposals. The Historic Environment Strategy Diagram, currently labelled as Figure 133, is too static and focused solely on existing tools. To improve its utility, it should incorporate more dynamic elements that reflect the evolving nature of heritage management. This includes highlighting the balance between energy efficiency, durability, and the whole life cycle of assets. Additionally, the diagram should account for the ongoing monitoring of heritage significance, ensuring that changes over time are captured through regular conservation area appraisals.

The 2021 Strategic Heritage Impact Assessment failed to provide a holistic analysis of the city's significance or a baseline for considering the impacts of proposed growth, opting instead for a narrow focus on specific development options. By ignoring Conservation Area Appraisals as a key part of the evidence base, the strategy lacks the necessary depth to assess the cumulative heritage impacts of the planned scale of growth for Greater Cambridge. Individual Heritage Impact Assessments are simply too narrow in scope to address these broad, strategic risks to the historic environment.

The effectiveness of this policy is further undermined by a distinct lack of commitment to essential planning frameworks, specifically the failure to produce the "Making Space for People" Supplementary Planning Document (SPD). Although the previous plan acknowledged the necessity of this work, the Council has failed to complete both this SPD and the Historic Core Conservation Area Management Strategy. These documents were intended to identify and reconcile the intense pressures on the limited spaces within the historic core—pressures that have only become more acute following recent proposals for the Market Square and Civic Quarter. Without a commitment to these strategies and a more dynamic approach to the Historic Environment Strategy Diagram, which currently remains too static and ignores the whole life cycle of assets, the proposed policy remains premature and fails to protect the very heritage that defines our city.

Changes

The policy needs to change from a reactive policy (dealing with buildings one by one) to a proactive, landscape-scale policy that views the entire city and its surrounding countryside as a singular heritage asset.

1. Recognition of Universal Significance

- **Include a Statement of Significance:** The plan must include a formal statement recognising the city's global heritage value as a cohesive whole.
- **Broaden the Scope of Protection:** Policy must explicitly recognise the world-heritage significance of the city,

2. Shift from "Narrow" to "Cumulative" Impact Assessment

- **End the Reliance on Individual HIAs:** Policy should move away from site-specific Heritage Impact Assessments (HIAs) and instead require Cumulative Heritage Impact Assessments.
- **Update the Evidence Base:** Incorporate Conservation Area Appraisals as a core part of the evidence base to understand how small changes across the city add up to a major impact.
- **Address Indirect Growth Impacts:** Policy must account for the "inevitable" changes to the city's fabric (layout, transport, and use) that result from massive population growth, rather than just the physical impact of new buildings.

3. Heritage-Driven Green Infrastructure

- **Mitigate Visitor Pressure:** Planning policy must acknowledge that visitor pressure is a threat to heritage significance at sites like Wimpole and Wandlebury (currently, the plan only mentions this pressure in relation to nature reserves).
- **Strategic Park Expansion:** Policy should mandate the enlargement of existing parks and the creation of large new green spaces specifically to divert visitor pressure away from sensitive historic sites.

4. Reform of the Historic Environment Strategy

- **A Dynamic Strategy Diagram:** Figure 133 must be updated to move away from "static" lists. It needs to incorporate:
 - o The whole life cycle of heritage assets.
 - o The balance between energy efficiency and durability.
 - o Ongoing monitoring through regular conservation appraisals.
- **Focus on Strategic Evaluation:** The strategy must evaluate the city's historic culture holistically rather than just listing existing planning tools.

5. Formal Commitment to Planning Frameworks

- Complete the "Making Space for People" SPD: This Supplementary Planning Document is required to manage the "intense pressure" on the limited space in the historic core.
- Finalise Historic Core Conservation Area Management Strategy:

Policy GP/HA: Designated heritage assets

204168

support

Just as Scheduled Ancient Monuments and Conservation Areas are shown on the Policies Map, It would be useful for listed building to be annotated.

Policy GP/ND: Non-designated heritage assets

204179

support

Policy GP/CC: Adapting heritage assets to climate change

204186

Comment

The policy lacks a clear sequential approach to retrofitting historic buildings. Without a requirement to prioritise less harmful measures first, such as improved insulation, there is a risk of unnecessary harm to heritage assets through more intrusive options like solar panel installations. The plan should explicitly reference standard BS EN 16883, which provides a structured sequential process for energy upgrades in heritage settings. This is seen as a necessary addition because the current reference to PAS 2035 is insufficient for protecting the unique significance of historic fabric.

Policy GP/SF: Shopfronts

204194

Support

Jobs

Policy J/MS: Markets and street trading

204198

Support

The supporting information should state that Cambridge's traditional market possesses a unique historical legacy, having served as a vital community hub since before the founding of

the University. The daily and Sunday stalls providing fresh food and produce represent a living connection to the city's medieval heritage and its enduring relationship with the surrounding agricultural landscape, as well as a sustainable low carbon economy.

Policy J/VA: Visitor accommodation, attractions and facilities

204225

Object

We are concerned with the quantum of visitors and their impact on central areas of the City which are impacted both by the visitors and, particularly for day visitors, the vehicles by which many of them arrive.

Central areas of the city are already unpleasantly congested and the projected population growth in the study area will increase current pressures, even if the ambition to achieve high levels of containment in new settlements is, eventually, achieved. Unrestrained numbers of tourist visitors (we did not find a forecast of day visitor numbers in the documentation) will further exacerbate the problem.

The Plan needs to evaluate the capacities of key areas within the city centre to accommodate visitors, whether local residents or tourists, (a) safely and (b) pleasantly – as seen both for themselves and other users of the centre. A determination can then be made, based on relative costs and benefits associated with different users, as to the quantum of tourism for which the Plan should plan and make provision.

The Plan's development strategy for Jobs is to: *“Encourage a flourishing, dynamic and mixed economy in which includes a wide range of jobs, while maintaining our area's global reputation for education, research and innovation.”* A crucial factor in maintaining this global reputation is ensuring it is an attractive place in which to live, from all its aspects, not least for internationally mobile workers and their families. Tourism should be viewed through that lens.

When estimates have been made of the desired numbers of both day visitors and those staying longer, the Plan should make provision for the soft and hard infrastructure to meet their needs and a strategy for guiding them to suitable (less conflictual) parts of the centre. The money to pay for this and for curating the city centre (information, signage, street cleaning, pavement maintenance etc.) might be sought from a form of tourist tax(es), which should include a modest charge on group tours if possible.

The policy supports visitor accommodation in mixed use development such as Cambridge Biomedical Campus, Science Park and West Cambridge. We support this policy because it has the benefit of discouraging the conversion of houses into short-term lets in surrounding neighbourhoods (some of which are negatively affecting the appearance and character of those neighbourhoods). However, it is important that visitor accommodation on science parks minimises the use of land for this purpose,

to ensure adequate provision for science based development and we would like to see the policy or supporting text reflect this.

Changes

The Plan needs to evaluate the capacities of key areas within the city centre to accommodate visitors

the Plan should make provision for the soft and hard infrastructure to meet visitor's needs and a strategy for guiding them to suitable (less conflictual) parts of the centre.

Policy must ensure that visitor accommodation on science parks is not be at the expense of land needed for science based development.

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

204237

Comment

We find the wording of policy J/FD surprising in that it indicates that Faculty Development, and the development of language schools and specialist colleges will be supported whereas University developments will be permitted. What is the basis for this difference?

In respect of language schools, point (b) needs to be clear as to whether this also only applies to non-local students. Unlike University developments, nothing is mentioned about the location of language schools. We suggest that If a large language school were to be sited in or near to a residential area, there could be significant conflict from a large hostel with noisy youngsters. The policy needs to be worded so as anticipate that eventuality.:

Infrastructure

Policy I/ST: Sustainable transport and connectivity

204296 and 204318

204296

Object

Policy Language

This policy largely restates NPPF policies and is generally sound. However, it relies heavily on statuses that are undefined, unquantified and ultimately subjective: "principles of walkable Neighbourhoods", "high quality public transport", "high-quality new cycle, wheeling, walking and, where appropriate, equestrian routes", "improvement of existing walking, wheeling and cycle routes", "unacceptable transport and highways safety impact", "adequate provision to mitigate the likely impacts", "a vision-led Transport Assessment and Travel Plan"

Delivery Timelines and Policy Strength

The final sentence of §3 gives developers unwarranted flexibility to avoid pre-occupation provision of transport infrastructure and services: "Such measures should be provided to meet the first or early occupation of a site in order to influence travel behaviour from the

outset.” There is already wriggle room in the inclusion of “early occupation”, so it need NOT be further attenuated by using “should” rather than “must”.

Prioritising Sustainable Travel over Road Capacity

Although there is a direction to developers “to demonstrate they have maximised opportunities for sustainable travel,” it is not made explicit that these take precedence over interventions to increase road or junction capacity for general traffic, rather than being additional. It cannot be assumed that developers will interpret “vision-led” in the way intended.

Offsetting Impacts via Mode-Shifting and CIL Compliance

There is no acknowledgment that a development can offset its own transport impacts by mode-shifting some existing and background trips to free up road capacity. However, this may be difficult to justify in planning terms because any interventions to mode-shift trips not directly related to the development do not comply strictly with CIL Regulation 122 (b): “directly related to the development”. Nevertheless, it is accepted that developments must mitigate cumulative impacts, which are also not strictly compliant with that test. From the developer’s perspective, if an investment in mode-shifting existing trips reduces the investment required in road and junction capacity upgrades, it should see either as an acceptable route to mitigating the transport impact of development.

The policy must

Require developers to propose *all* interventions that can realistically shift a significant number of development-generated trips from solo-occupancy car trips to other modes (say, at least 1%) and that are proportionate in cost before proposing interventions to increase road or junction capacity for general motor traffic.

Expand the scope of this requirement where appropriate to include mode-shifting existing and background growth in trips on roads impacted by the development. The objective here is to free up road capacity to absorb some or all of the residual motor vehicle trips generated by the development after all sustainable transport interventions have been taken into account. This forms the basis of the trip budget mechanism, discussed in the next section.

Cite a specific framework governing street design principles, such as the Healthy Streets Indicators. (1)

Define or exemplify what constitutes an appropriate “vision”, “unacceptable” impacts, and “adequate” mitigation.

Define what “high quality” means in different contexts, either within the Local Plan or by reference to other policy documents. For instance, dwellings in an urban area should be within 400m walking distance of at least one bus stop served by an all-week service, operating at least hourly from 6am to 11pm on weekdays, and at least half-hourly at peak times.

Strengthen the “should” in the final sentence of §3 to “must”.

Object

Trip budgets (Policy I/ST and site-specific policies)

§10.13 of the supporting information for Policy I/ST states, “there will likely need to be a vehicular trip budget applied to mitigate the transport impacts of the strategic site allocations”, but this is not part of the policy.

Trip budgets are quantified in site-specific policies, or a mechanism for quantifying them is. However, an explanation of how trip budgets will be enforced is provided only for Policy S/NEC (North East Cambridge), and there the policy only asserts without any details, “Conditions or Planning Obligations will ensure any breaches are corrected or restricted to bring trips back in line with the applicable trip budget.”

The IDP refers to a “range of technological measures to allow access to and from the Campus to be monitored, managed and enforced” (2) at each of the eight strategic development sites in the draft Local Plan.

There are no powers in the Traffic Management Act 2004 or Road Traffic Regulation Act 1984 that could be used to enforce trip budgets (directly), so enforcement would be entirely a planning matter. The role of technology would be to monitor traffic trip rates, but not to limit them or enforce exceedances.

A planning condition may prevent or delay later phases of development if the evidence of exceeding a trip budget is clear and, in the case of an appeal against the condition, the Planning Inspectorate agrees that the Trip Budget condition meets the prevailing tests. If this mechanism is to be relied upon, the Local Plan should set out how the mechanism will work and why it is legally sound.

Planning obligations may include in-reserve mitigations to be delivered only if a trip budget is, or is likely to be, exceeded. However, these mitigations must be identified and agreed with the applicant up-front. They must also comply with CIL Regulation 122. The statutory tests are assessed based on evidence available at the time of agreeing the obligations, and do not explicitly allow for the consideration of uncertainties that may arise in the future. This limits the range of mitigations that are likely to be considered compliant, in particular with respect to being “reasonably related in scale and kind to the development.” If, once all the agreed mitigations have been implemented, the trip budget is still exceeded, the Planning Authority has no powers to demand further mitigations.

We recommend the policy is amended to

Set out a framework mechanism, in line with draft NPPF Policy HO3 §3(b), for calculating trip budgets, identifying mitigations that cover a reasonable range of scenarios, monitoring trip generation (excluding any through-traffic), and enforcing trip budgets through planning conditions and obligations.

Explain in what circumstances increasing road or junction capacity is an acceptable mitigation, rather than expanding or enhancing provision for sustainable transport modes.

Ensure that this mechanism is legally sound and capable of dealing with wide ranges of uncertainty over long build-out periods.

Is there a role for financial penalties in the event of trip budgets not being met, even once all S106 mitigations have been implemented?

(1) <https://www.healthystreets.com/what-is-healthy-streets>

(2) [Infrastructure Delivery Plan Table 5-4](#), page 52

Policy I/TH: Travel hub facilities

204343

Object

There is inconsistent use of the terms “mobility hub” and “travel hub”: for instance, the policy is about travel hubs, but the definition is of “Mobility (travel) hubs”. Smarter Cambridge Transport coined the term “travel hub” to convey the sense that, from the perspective of a traveller, it is a node on a journey, rather than a destination. The term “mobility hub” is promoted by CoMoUK, and is more widely used, but to a lay audience it suggests that its purpose is connected to disability (think “mobility scooter”, “mobility aids” or “limited mobility”). For clarity and consistency, the preferred term is probably “Travel (mobility) hub”.

Paragraph 2(c) of Policy I/ST is a good definition of a mobility/travel hub. It should, however, be more explicit that it does not include traditional Park & Rides, which are designed and primarily used for interchanging between private car and another mode (bus, cycling or walking). Their contribution to modal shift is limited; they are an inefficient use of land, most in the green belt; they are carbon-intensive to construct and contribute little to decarbonising transport.

- a) The number of ‘last-mile’ legs that can be mode-shifted is capped by the number of parking spaces. In the context, for instance, of 72,016 daily trips to the Cambridge Biomedical Campus in 2050, (1) a 2,000-space car park at the A11, occupying 20 hectares, can accommodate only around 3.3% of all trips to the Campus (assuming an average of 1.2 people per car).
- b) Many people drive out of their way to use a P&R, adding miles to the driven part of the journey, increasing total carbon emissions and localised congestion.

The quantity of parking provided at a Travel Hub should match an assessed need, rather than likely demand. The assessment would seek to identify which dwellings are within the catchment area, the quality of the active travel infrastructure and bus services between those dwellings and the Travel Hub.

Demand is likely to exceed a level of provision based on need, so an appropriate level of parking charges should be levied to manage demand and ensure those who need a parking space are able to get one.

The definition of a travel hub provided on page 718 confuses transport users with modes. A suggested definition is as follows:

Travel (Mobility) hub

“A dedicated space that facilitates interchange between Sustainable Modes of Transport. If the main inbound mode of travel is car it is a Park & Ride rather than a Travel Hub. Essential facilities include secure cycle parking, bus stops with shelters and seating, real-time information displays, and free Wi-Fi. Depending on the scale of the Travel Hub, other facilities may include a climate-controlled waiting room, public toilets, a Changing Places toilet, kiosk, café, parcel lockers, cycle/scooter hire station, club car bays, taxi rank, private car drop-off/pick-up bays, Blue Badge parking bays, general parking bays, and public EV charge points.”

The definition of Sustainable Modes of Transport is copied from the NPPF, which unhelpfully brackets electric cars, including hybrids, with cycles and buses. It also mentions car-sharing, though there is no definition of this or any clear justification why a car carrying two work colleagues is more sustainable than a car carrying four family members. It may therefore be sensible to redefine Sustainable Modes of Transport or create and define a new term. It may also be useful to have a definition that covers multi-occupancy vehicles, as some policies should prioritise provision or access to these.

Sustainable Modes of Transport or Sustainable and Efficient Modes of Transport

“Walking, wheeling, cycling, bus, tram and train.”

High Occupancy Vehicle

“A private vehicle carrying at least two people including the driver, or a taxi carrying at least two people excluding the driver.”

We recommend the policy is amended to

Use the term Travel/Mobility Hub consistently.

Prescribe maximum and recommended numbers of parking spaces at Travel/Mobility Hubs, based on objectively determined need rather than forecast demand.

Acknowledge the need to charge for parking in locations where more sustainable and space-efficient travel options are available, ensuring that usage is matched to need rather than demand.

Define Sustainable Modes of Transport to include only modes that also make efficient use of public highway (i.e. not private electric cars).

(1) CBC Transport Strategy Table 7

Policy I/ID: Infrastructure and delivery

204360

Comment

CPPF strongly supports the use of CiL to enable the delivery of the green and blue infrastructure policies in the Plan.

CPPF welcomes recognition in the supporting text (para 1) of the need to provide parks, open spaces and land for biodiversity. Whilst we note that the text makes clear the list is not

exhaustive, we feel it would be advisable to explicitly include ‘strategic green infrastructure’ or ‘natural greenspaces’ to support the biodiversity and green infrastructure policies.

We note that work on Green Infrastructure and Public Open Spaces is ongoing, once that is finalised and changes in standards, etc must be copied across into the relevant section of the IDP. There are inconsistencies across the various Green Infrastructure documents (Green Infrastructure Emerging Strategy, Standards & Evidence Reports, the Infrastructure Delivery Plan and the Draft Planning Obligations SPD) regarding the costs of providing strategic green infrastructure. We share the concerns of the Wildlife Trust, that in some instances these are too low, e.g. the Planning Obligations SPD quotes a price for agricultural land as £20k per hectare, when our own experience is that this can be £25-30K/ Ha in the Cambridge area. Likewise, the quoted capital costs while appropriate for many types of habitat creation, do not cover provision of surfaced paths or other such facilities where these may be required. It is essential that the GI policies and Infrastructure policies, including the final Planning Obligations SPD are consistent and secure sufficient financial contributions from all new development to meet the strategic natural greenspace needs of the area.

The current iteration of the Infrastructure Development Plan (IDP) has used the Fields in Trust standards whilst a bespoke standard is being worked on. We share the concerns of the Wildlife Trust that the FiT standards may not be appropriate or adequate for our area.

The IDP Table 17.2 lists a suite of strategic green infrastructure projects, that if delivered would contribute towards sustainable development and nature recovery. CPPF strongly supports inclusion of the initiatives identified in table 17.2 within the IDP. These must be delivered which will require sufficient financial contributions secured from new developments.

Policy I/CM: Construction management

204380

Object

As highlighted by the University Arms extension, the recently-approved Christ’s College Library proposals, and the Council’s current Civic Quarter proposals, all significant construction proposals within the historic core may have major impacts on the public realm, space available to the public, and in particular accessibility. These potential impacts should be fully assessed and detailed as part of planning applications.

Section 59 of the Highways Act 1980 gives the Highway Authority powers to recover from a developer the cost of repairing road damage “as may be proved to the satisfaction of the court having cognizance of the case to have been or to be likely to be incurred by the highway authority by reason of the damage arising from the extraordinary traffic.”

This requires the Highway Authority to be in possession of evidence that the damage was caused by the developers’ vehicles. Given the generally poor state of roads now, it cannot be assumed that damage identified after construction starts was caused by construction vehicles. Therefore, all development above a certain scale should be accompanied by pre-commencement planning condition that requires the developer to record the state of roads used by construction vehicles to travel to and from the site.

Section 59 only covers provable damage; it does not cover accelerated wear. The additional long-term maintenance cost (i.e. road or footway resurfacing or rebuilding works having to be scheduled earlier than would otherwise be the case) should also be borne by the developer, rather than the taxpayer.

It would be prudent to include in the Local Plan the principle that developers will contribute towards those increased long-term maintenance costs. The Highway Authority should provide a formula for calculating this based on the total weight of machinery and materials carried on and off site. The developer should be required to record and report this to the Highway Authority, so that it may calculate and invoice the sum on completion of the development.

We recommend the policy is amended to

Include in the policy a requirement

- For applications to include a full assessment of impact on the public realm during construction.
- For developers to repair damage and compensate the Highway Authority for accelerated wear of the public highway.
- Set (in agree with the Highway Authority) a formula for calculating the cost of accelerated wear so that developers can estimate it in advance, and price it in.