

Planning Policy Consultation Team,
Planning Directorate – Planning Policy Division,
Ministry of Housing, Communities and Local Government,



By online portal

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Response to National Planning Policy Framework: proposed reforms and other changes to the planning system

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

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

Cambridge Past, Present & Future is dedicated to the sensitive stewardship of Cambridge's historic and natural environment, we hold significant concerns regarding the proposed reforms, particularly their impact on local democracy and community involvement, the integrity of the Green Belt, and the efficacy of environmental and biodiversity protections.

The following comments were submitted on the online portal

PM1: Spatial Development Strategies

Q6, Do you agree with the role, purpose and content of spatial development strategies set out in policy

PM1? Partly Disagree. Public awareness and participation in Spatial Development Strategies (SDS) face a significant 'democratic deficit.' Because SDS set the broad locations for Green Belt release and strategic growth before Local Plans are even drafted, communities are often disenfranchised before they realise the implications. Evidence from other Mayoral initiatives is that they are poorly communicated and poorly understood by local people. We argue that the Government must mandate a simplified, highly visible communication and consultation strategy for SDS. The current system requires communities to be 'very smart and on the front foot' just to be heard; the guidance should instead place the burden on the SDS authorities to demonstrate meaningful, accessible consultation that avoids high-level technical obstacles.

Q10 Do you think that local plans should cover a period of at least 15 years from the point of adoption of the plan?

: No. We strongly object to the proposed 15-year life for Local Plans and urge a return to a 10-year cycle, particularly for high-growth areas like Cambridge. Even with a requirement to review every 5 years, a 15-year horizon is far too static for a city experiencing such rapid economic and physical transformation; it risks locking in outdated policies. A 10-year cycle ensures that planning remains agile and that the community has a regular, meaningful voice in the evolution of their city.

PM7: Initiating plan making for local plans

Q12, Do you agree with the approach to initiating plan-making in PM7? Partly disagree. CPPF holds significant reservations regarding the 30-month timeline and the shift toward 'front-loaded' community participation. While we support the ambition for up-to-date plans, CPPF is concerned that a combination of these two changes means that unless communities are incredibly smart and on the front foot at the very beginning, they will find it difficult to influence plans for their area.

This 'democratic deficit' is further exacerbated by the move towards increasing officer delegation and the reduced role for elected planning committees. We urge the Government to recognise that community engagement is not an 'obstacle' to be streamlined. On the contrary, it is a vital mechanism that helps local authorities identify the most appropriate land and shape higher-quality development. Removing this input risks a return to poor-quality, contentious development that lacks local consent.

PM13: Setting env standards

Q18, Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015? Strongly disagree CPPF strongly objects to the restriction preventing local authorities from setting higher environmental and water standards than those mandated nationally. In high-growth, environmentally sensitive areas like Greater Cambridge—which are already meeting housing and economic targets—there is no justification for forcing the acceptance of lower 'fallback' standards.

It is illogical to impose a policy that makes developments 'worse and not better' simply to achieve national uniformity. The proposed National Development Management Policies (NDMP) threaten to render redundant the pioneering work of local councils in brokering exceptional standards for water scarcity and biodiversity. We argue that national standards must act as a minimum 'floor' rather than a 'ceiling.' Local authorities should retain the autonomy to require higher standards where there is local evidence of environmental necessity and where such standards do not demonstrably prevent the delivery of required housing.

DM5: Development Viability

Q25, Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed? Partly agree. We strongly support the proposed baseline for viability assessments, particularly the move to set Benchmark Land Value based on Existing Use Value plus a limited premium. This is a vital step in curbing the land-value speculation that is particularly acute in high-demand areas like Cambridge. For too long, inflated 'price paid' for land has been used as a tool to negotiate away essential community infrastructure.

However, we maintain a serious caution regarding the potential for financial contributions (commuted sums) to be traded against on-site delivery of affordable and social housing. The NPPF must explicitly state that off-site contributions are a last resort, and not a 'default' flexibility for developers to avoid building mixed-tenure schemes.

S3: Presumption in Favour of Sustainable Development

Q36: Do you agree with the revised approach to the presumption in favour of sustainable development? Strongly disagree. CPPF strongly objects to the revised 'presumption in favour of sustainable development' where it allows National Development Management Policies (NDMPs) to override locally-derived environmental protections. These local policies are not obstacles; they are the result of rigorous community engagement and evidence-based responses to the local context.

We are particularly concerned that the revised presumption, combined with the ambiguous phrase 'significant adverse effect,' will lower the threshold for development on locally-valued sites. This creates a loophole where developers can dismiss impacts on local biodiversity or heritage setting as 'insignificant' to trigger the tilted balance. We argue that the presumption should never override specific local policies designed to protect the unique character of a historic city and its green setting. To do so would render the entire Local Plan process—and the community's role in it—meaningless.

S5: Principle of Development Outside Settlements

Q40: Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?

Strongly disagree. CPPF strongly objects to the ambiguous allowance for 'limited infilling within groups of houses.' Without a strict, nationally-verified definition of 'limited,' this policy risks a return to the unsustainable 1930s-style ribbon development that modern planning was designed to prevent. Once sporadic development is 'infilled,' it inevitably leads to further pressure for expansion, creating a cycle of suburbanisation that erodes the character of the countryside.

Furthermore, while we support densification around railway stations, we are gravely concerned by the lack of clarity regarding 'well-connected' infrastructure. Extending this presumption to 'express bus routes' or 'mobility hubs'—which can be created with relatively low investment compared to rail—could be used as a 'Trojan Horse' for high-density, unsustainable development in rural contexts.

Finally, we argue that the national presumption should not override the local plan. Local authorities may have considered and dismissed development near specific rail stations for legitimate reasons, such as landscape or heritage impact, or lack of social infrastructure. A national 'one-size-fits-all' mandate for high density ignores these vital local constraints. We believe this is a decision that is best made locally, not one determined by Westminster.

GB1 Establishing new Green Belts

Q130/131: Do you agree that policy GB1 provides appropriate criteria for establishing new Green Belts?

Partly disagree. CPPF argues that National Policy must be expanded to explicitly support the designation of new Green Belt land to compensate for losses and to maintain the long-term protection of historic settings. The special nature of Cambridge's Green Belt is already enshrined in local plans, yet we have seen its extent continually diminish as development is justified through successive plan rounds.

We are particularly concerned by the 'Gray Belt' proposals, which risk creating a self-fulfilling cycle of erosion. Once the current 'poorest quality' land is developed, the next tier of Green Belt becomes the 'new' poorest quality. Without a mechanism to add new Green Belt land, the historic setting of Cambridge will eventually be entirely compromised. National policy should recognise that in high-growth areas, the Green Belt must be a dynamic tool capable of expansion to protect the 'necklace' of villages and the unique character of the historic core for future generations.

GB2 Assessing Existing Green Belt Land

Q132: Do you agree policy GB2 gives sufficient detail on the expected roles spatial development strategies and local plans play in assessing Green belt land?

Strongly disagree. CPPF strongly objects to the proposed 'Grey Belt' designations and the revised assessment criteria in Appendix E. We find the shift toward a quality-based assessment fundamentally flawed; the primary purpose of Green Belt is to prevent urban sprawl and maintain settlement separation, regardless of the land's perceived aesthetic or agricultural quality.

The prescriptive focus on very small parcels of land encourages a 'fragmented, incremental loss' of protection. This 'nibbling' effect fails to account for the cumulative impact on the historic setting of cities like Cambridge. Furthermore, we face a 'downward spiral' logic: once the current 'poorest quality' land is developed, the next tier is reclassified as the 'new' poorest quality.

We also explicitly object to Appendix E's focus on the separation between *towns* while excluding *villages*. In a landscape like Greater Cambridge, the separation between the city and its 'necklace' villages is the defining feature of the region's character. If national policy does not protect the gaps between towns and villages, these distinct identities will be lost through inevitable coalescence. If this policy is introduced unamended, it will be to the detriment of Cambridge's countryside, historic villages and the setting of the historic city. It is hard to understand how this will make Cambridge a more attractive place for people to live, study, work and

invest in. Policy must instead reinforce the permanence of the Green Belt and recognise that sustainable growth requires the proactive addition of new green space, rather than the erosion of existing protections.

GB8: The Golden Rules

Q139: Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances? Partly agree. We strongly support the 50% affordable housing target for Green Belt releases, recognising its vital role in delivering key worker housing for sectors such as the NHS and our local universities. However, it is imperative that national policy mandates this be delivered on-site.

We object to any provision that allows this requirement to be 'traded' for a financial contribution (commuted sum). In high-growth areas like Cambridge, land is the primary constraint; providing a financial contribution merely shifts the burden of land acquisition onto the local authority, which is often unable to compete in the open market. Furthermore, as a charity committed to sustainable placemaking, we believe that 'on-site' delivery is essential for social cohesion and creating truly mixed-tenure communities.

Guidance and Glossary

Q145: Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas? Strongly disagree. CPPF strongly objects to the inclusion of sensitive designations—currently protected under Footnote 7 of the NPPF (Dec 2024)—within the new 'Grey Belt' definition. Including assets such as Local Nature Reserves, non-designated heritage assets, and ancient woodland within a category that carries a presumption in favour of development is dangerously contradictory.

By 'pre-classifying' these areas as Grey Belt, the policy bypasses the essential first step of planning: a site-specific impact assessment. We must fully understand the environmental and heritage value of a site *before* inviting development interest. Placing these assets in the Grey Belt 'shop window' will inevitably lead to speculative applications that undermine the long-term protection of Cambridge's historic setting and biodiversity. We argue that any land containing 'Footnote 7' assets should be explicitly excluded from the Grey Belt definition to maintain the integrity of our most valued landscapes.

P3: Living Conditions and Pollution

Q167: Do you agree with the criteria set out in proposed policy P3 as a basis for securing acceptable living conditions and managing pollution? Partly agree. CPPF strongly supports the explicit mention of chalk streams within the guidance. As one of the world's rarest habitats, with a significant concentration located in the East of England, their inclusion is a vital step toward recognising their global ecological importance.

However, we argue that 'explicit mention' must be backed by robust, non-negotiable protections within the National Development Management Policies. In the context of Greater Cambridge, chalk streams are under acute pressure from over-abstraction and pollution. We urge the Government to ensure that this policy provides a clear mandate for local authorities to refuse development that would lead to a 'significant adverse effect' on the flow, water quality, or biodiversity of these unique ecosystems. Support for chalk streams should be intrinsically linked to local water scarcity standards to ensure their long-term survival.

N1: Identifying environmental opportunities and safeguards

Q179: Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery? Strongly disagree. CPPF strongly disagrees with the proposal to limit the ability of local authorities to set Biodiversity Net Gain (BNG) requirements above the 10% statutory minimum. In ecologically denuded areas like Greater Cambridge, local authorities must retain the autonomy to set higher standards (such as 20% BNG) to meet local nature recovery targets. National policy should provide a 'floor,' not a 'ceiling.'

We specifically object to the restriction that higher BNG targets can only be applied to specific sites allocated in a development plan. This is an unnecessarily narrow approach that ignores 'windfall' sites and incremental developments which, collectively, have a significant impact on local nature networks. Nature recovery does not stop at the boundary of an allocated site; it requires a landscape-scale approach. Imposing national 'ceilings' hinders local environmental imperatives and prevents communities from brokering the 'better, not worse' development outcomes they deserve.

N2: Improving the natural environment

Q182: CPPF objects to the use of the term 'significant' in relation to environmental harm without a robust, objective definition. This will inevitably lead to protracted disputes and inconsistent decision-making.

In practice, this ambiguity allows developers to downplay the impact of a proposal on locally valued habitats—such as Local or City Wildlife Sites—by claiming the harm is not 'significant' in a national context. We argue that the framework should either provide a clear threshold for significance or, preferably, defer to Local Nature Recovery Strategies (LNRS). Without this clarity, the policy fails to provide the 'certainty' the planning system requires and risks the incremental loss of essential local biodiversity through a series of 'insignificant' impacts.

N6: Areas of particular importance for biodiversity

Q183: Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them? Partly disagree. The wording of Policy N6.1.a., with respect to internationally important sites does not reflect the full requirements of The Conservation of Habitats and Species Regulations 2017, which states at Regulation 64 (emphasis added):

64.—(1) If the competent authority is satisfied that, THERE BEING NO ALTERNATIVE SOLUTIONS, the plan or project must be carried out for imperative reasons of overriding public interest (which, subject to paragraph (2), may be of a social or economic nature), it may agree to the plan or project notwithstanding a negative assessment of the implications for the European site or the European offshore marine site (as the case may be).

The alternative solutions test is very important to ensure that developments that adversely affect the most important wildlife sites in the UK are fully justified.

The term 'significant adverse effect' is used frequently in Policy N6 1c. We consider that this policy wording is too ambiguous. The lack of a definition of what constitutes significant harm and on what grounds the benefits of a development can be considered to 'clearly outweigh' the impact on a site of local importance, allows developers to downplay impacts on local sites and ignores the "cumulative nature" of small adverse effects

Yours sincerely

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