

Greater Cambridge Local Plan First Proposals Consultation
Response by Cambridge and South Cambridgeshire Green Parties, December 2021

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VISION AND DEVELOPMENT STRATEGY

Section	Our comments
Vision and aims	<p>We broadly support the vision and aims as set out in the First Proposals. However, as explained in later sections of our response, we do not believe this plan can achieve them.</p> <p>For example, “<i>We want Greater Cambridge to be a place where a big decrease in our climate impacts comes with a big increase in the quality of everyday life for all our communities.</i>” This very laudable aim would only be achieved through a strategy that took as its starting point the challenges experienced in our <u>existing</u> built environment - for example energy inefficient buildings and congestion in Cambridge city centre. It is nonsensical to claim that “a big decrease in our climate impacts” can be achieved through building thousands of new homes.</p>

<p>How much development, and where – general comments</p>	<p>We accept that development has a part to play in ensuring the people of Greater Cambridge have suitable homes and employment, and recognise that our area hosts jobs with national and international significance. However, we think that the specific number of jobs needs to be revised to take account of the potentially huge repercussions of Brexit and COVID. These are likely to have implications for the amount, type and location of land needed. Specifically, we strongly believe that the ‘predict and provide’ approach being taken to determine “how much development” is flawed and will lead to highly negative outcomes.</p> <ul style="list-style-type: none">● This approach fails to take environmental constraints as its starting point. The carbon budget referred to previously is one such constraint. Water supply, and the ability to process wastewater, is another. The Planning Authority has emphasised that “<i>delivery of the proposals in the plan is contingent on water supply being adequate without causing further environmental harm</i>”. They have said that the planned reservoirs and improvements to supply will likely be delivered too late in the planned period to meet the preferred development trajectory. Interim measures are being investigated by the water industry but there are no firm plans yet. The Draft Regional Water Plan for Eastern England is not expected until next year. Given these considerations, it is clearly premature to proceed on the assumption that it will be possible to deliver the ‘desired’ level of development. We understand that the ambitious new standards set out in the First Proposals (for example on energy and water efficiency) cannot be applied to the major developments that have already been granted outline permissions. Furthermore, building that takes place under Permitted Development Rights cannot be required to comply with these policies. This only serves to strengthen the point that the level of development planned for our region will have massive environmental consequences which cannot be fully mitigated through efficiency standards, however ambitious.● The justifications for seeking continued high growth of the Greater Cambridge economy are flawed. The language used, suggesting the Greater Cambridge economy is special or unique, echoes the government’s rhetoric about the OxCam Arc, which has been pulled apart by commentators including Smart Growth UK [1]. Furthermore, as the Planning Authority acknowledges, our booming economy has come at the cost of a huge housing affordability problem. We do not see evidence that any attempt is being made to learn from the failures of previous policies. For example, how will the Local Plan ensure that new developments are for local people, not dormitories for London commuters or merely
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opportunities for investors? What evidence is there that the proposed growth will address the problems faced by the poorest people in our society or reduce inequality within the region? Furthermore Cambridge is a city with the highest level of inequality in the UK. So our present high growth has not been good for all Cambridge citizens.

- **The approach places too much emphasis on modelled growth in employment.** The high uncertainty levels involved in making such forecasts, particularly in light of Brexit and COVID-19, are acknowledged. It therefore seems inappropriate that the Local Authority is using these figures to argue for a higher housing allocation than that calculated by central government. Furthermore, given environmental constraints, the most likely growth forecast is not necessarily the most desirable. The Planning Authority should be looking to manage growth, not anticipate and stoke it.
- **The approach does not take account of the changing national policy context.** Current Local Authority housing allocations were calculated using an algorithm that measures housing demand based on market growth, prioritising house building in areas that are already booming. New Secretary of State Michael Gove has expressed his intention to review this approach with a view to achieving “a fairer and more equitable distribution of need across the country” [2].

During the First Proposal webinars, the Planning Authority indicated that the proposed levels of growth are necessary, and that their aim with the Local Plan is to deliver this growth in as sustainable a way as possible. Based on the above points, we contend that the proposed level of growth is neither necessary nor desirable.

[1] [https://smartgrowthuk.org/wp-content/uploads/2021/09/The Overheated Arc Part 3 September 2021.pdf](https://smartgrowthuk.org/wp-content/uploads/2021/09/The_Overheated_Arc_Part_3_September_2021.pdf)

[2] <https://www.planningresource.co.uk/article/1734830/we-want-fairer-distribution-housing-need-across-country-says-gove>

S/JH: New jobs and homes

Our view is that the number of planned new homes should be significantly lower. The 31,500 homes already provided for in the adopted Local Plans are more than sufficient for a 5-year housing supply according to objectively assessed needs (see notes below). Given the exceptional circumstances we are living through, it makes sense to keep housing demand under review rather than committing to build according to high forecast growth.

We note the statement made by the Planning Authority during the webinars that *“If we don’t have enough certainty about water supply, we will have to look at a stepped trajectory or reducing the amount of housing we plan for”*. Officers also noted that *“Quick and decisive action [is] required by central government and the water industry – this is out of our hands as a Local Planning Authority”*. We agree and would support the Planning Authority in any attempt to reduce or at least delay house building from the central government allocation. Based on conversations we have had with Cambridge Water, we believe that while there might be ideas on supplying more water in the future we can see no achievable commitment. We note Natural England’s Position Statement for Applications [1] within the Sussex North Water Supply issued in September, which states that, *“Developments within Sussex North must therefore must not add to this impact and one way of achieving this is to demonstrate water neutrality ... As it cannot be concluded that the existing abstraction within Sussex North Water Supply Zone is not having an impact on the Arun Valley site, we advise that developments within this zone must not add to this impact.”*

Notes: For an objective assessment we quote household projections by the Office for National Statistics. We note that the more recent the assessment the lower the number projected (Table 1). In the most recent projections (2018 based) the projected increase between 2020 to 2041 is 7,900. Since this projection was calculated there have been two hugely significant events: Brexit and COVID-19. The National Planning Policy Framework allows that “any other method [other than use of 2014 based projections] will be used only in exceptional circumstances”. We hold the view that leaving the EU, COVID, together with climate change are exceptional circumstances and would welcome a plan based on these.

It is worth noting that the 2014-based household projection for 2020 for Greater Cambridge was 119,400 households. In the 2018 based projections the estimate for 2020 is 108,500, so in four years the 2014-based projections have over-projected by around 10,000 households.

Table 1: Projected household change, Cambridge and South Cambridgeshire, 2020-2041

Projection	Number of households 2020-2041
CLG 2014 based	c. 23,600
ONS 2016 based	12,200
ONS 2018 based	7,900

Source: CLG and ONS household projections. 2014 based ends at 2039, so the 2041 figure is from a simple assumption of continuing change.

The number of houses built over the last five years (2015/16 to 2019/20) averages 1,750 a year. While need is not as simple as applying that to the future, 31,500 homes would last for more than 15 years at that rate.

[1] https://www.horsham.gov.uk/_data/assets/pdf_file/0019/106552/Natural-Englands-Position-Statement-for-Applications-within-the-Sussex-North-Water-Supply-Zone-September-2021.pdf

S/DS:
Development
strategy

We broadly support the proposed policy direction in terms of where development should be focused (where it has the least climate impact etc). Our main concern, as detailed in previous sections, is the amount of development proposed.

We do however wish to raise concern over the amount of Green Belt that is likely to be destroyed through these plans. In particular, the NE Cambridge development is referred to as being on brownfield land, but this is only made possible by displacing Cambridge Wastewater Treatment works to Honey Hill, which is in the Green Belt.

As a general point, existing buildings should be re-used wherever possible before new building is considered (“The Greenest building is the one that already exists”– Carl Elefante [1]).

We have commented on some of the specific area proposals under the relevant sections.

[1] <https://www.architectsjournal.co.uk/news/opinion/the-greenest-building-is-the-one-that-already-exists>

S/SH: Settlement hierarchy	No comment
S/SB: Settlement boundaries	No comment

CAMBRIDGE URBAN AREA

Section	Our comments
Cambridge urban area - general comments	<p>Our city has massive environmental capacity issues, with inadequate space in the streets and public realm to cater for existing traffic, let alone approved growth already in the pipeline – even before considering these First Proposals. The capacity issues have to be tackled, with additional growth considered only if they can be resolved.</p> <p><i>We agree that “development must also be carefully designed to respect the historic character of the city” but are concerned that this aspiration does not appear to be backed up by detailed plans or evidence. For example, the analysis of Green Belt areas and their characteristics does not include historic environment designations (even though the Green Belt was set up to protect the setting of the historic University city). The claim in the Strategic Heritage Impact Assessment that “future growth in Cambridge has the potential to strengthen and reinforce these characteristics, enabling the City to meet contemporary environmental, economic and social drivers without undermining its economic identity” is not supported by evidence.</i></p>
S/NEC: North East Cambridge	<p>We have previously commented in detail on the plans for NE Cambridge [1]. We welcome some of the changes made to the Area Action Plan following the consultation, notably the increase in green space provision, reduction in building heights, and the rebalancing of jobs and homes which has been achieved through a reduction in the area of commercial office space. However, we remain essentially opposed to this development on the following grounds: a) although on a brownfield site, the development will directly cause the destruction of Green Belt land by displacing the Waste Water Treatment Works to Honey Hill. There is no operational need for the works to move; the</p>

	<p>proposal is purely to create development opportunity. b) As set out in our response to S/JH, we believe that the number of new houses already committed in the adopted Local Plans is sufficient to meet objectively assessed need: therefore we do not agree with bringing additional large developments forward at this point.</p> <p>[1] https://southcamb.southcambridgeshire.gov.uk/assets/images/local_parties/southcambridgeshire/NE%20Cambridge%20Development%20Sep2020.pdf</p>
S/AMC: Areas of Major Change	No comment
S/OA: Opportunity Areas in Cambridge	<p>S/OA/NR and S/OA/BC (Newmarket Road Retail Park and Beehive Centre)</p> <p>We agree that Newmarket Road Retail Park and the Beehive Centre are not the best use of this land. The retail park model places great emphasis on access by car, disadvantages small independent businesses, and contributes to the decline of high streets. We would welcome proposals to redevelop these areas to meet identified needs.</p> <p>S/OA/AS (Abbey Stadium)</p> <p>Abbey Stadium provides community support to a number of individuals and organisations in and around Cambridge, and is popular with local residents. Currently the stadium's location and associated infrastructure results in significant impact to local residents through parking in and around surrounding streets during Men's Football games on Football Match days. Any proposed change of use should take into account the entire local impact of the new proposed change of use, specifically how visitors are likely to travel to the site, and how public transport use can be integrated into any change of use.</p>
S/LAC: Other site allocations in Cambridge	<p>S/C/SCL (Land south of Coldham's Lane)</p> <p>We have previously objected to the planning application for land south of Coldham's Lane [1]. Our concerns related to an absence of proper accounting for the predictable and significant short-term impacts of the proposed development (increased traffic, type of traffic (i.e lorries) and congestion;</p>

	<p>high likelihood of pollution and flooding; negative impact on biodiversity). We also felt there was insufficient analysis of management and funding implications for the proposed urban country park in this application. We would want to see these issues fully addressed in future policy.</p> <p>[1] https://cambridge.greenparty.org.uk/site/Cambridge/files/Green%20Party%20response_ColdhamsLanePlanningAp_2102326FUL.pdf</p>
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EDGE OF CAMBRIDGE

Section	Our comments
Edge of Cambridge - general comments	<p>We are very concerned at the apparent lack of consideration for Cambridge's historic environment. For example, the Green Belt assessment omits consideration of historic environment designations and landscape character constraints. We agree with Cambridge Past, Present and Future's policy statement that "<i>preventing urban sprawl so as to protect the setting of the historic city is irreconcilable with continued city fringe development.</i>" [1]</p> <p>[1] https://www.cambridgeppf.org/cambridgeppf-green-belt-policy</p>
S/CE: Cambridge East	<p>Any development at Cambridge East must first and foremost benefit local people. This is a deprived area within our affluent city which is in desperate need of good quality green and community spaces. We have previously shared a radical alternative proposal for the land at Marshalls [1].</p> <p>[1] https://greens4abbey.org.uk/true-green-project/</p>
S/NWC: North West Cambridge	<p>Water</p>

We have yet to see data to evidence that Eddington as a benchmark development on sustainability is succeeding in maintaining water usage to 100 litres/person/day. We have asked for this data which we would expect to be available, but as yet have not seen the evidence. We would like to know how the greywater will be managed and how much land use will be required to support an increase in 1000-1500 housing units.

Medical Centre

It is imperative that the medical centre and pharmacy are provided on site for the existing population of Eddington. We are concerned that Eddington cannot support an increase of housing 1000-1500 without this facility. We understand that the physical building is available, but the delay is with NHS provision. This needs to be resolved before consent is given to a further 1000-1500 dwellings.

Primary School at Eddington

We understand that the purpose-built primary school which was primarily built to support the new population at Eddington is now over-subscribed and residents of Eddington are not being provided with places. This needs to be resolved if the population of the Eddington district is to increase by 1000-1500 dwellings.

Affordable Housing

The First Proposals state that "*The North West Cambridge Area Action Plan requires a minimum of 50% affordable housing to meet the needs of Cambridge University and College key workers in housing need*". We presume that the comment on page 83 of the First Proposals, "*If need is not demonstrated, provision should be in the form of normal affordable housing*" means that in this eventuality only 40% of the new homes would be 'affordable'. We believe that all new developments over a certain size should provide a minimum of 50% affordable housing and ask that this loophole be taken out (see further comments under H/AH).

Ecologically Sensitive Area within the land parcel known as 'The 19 acre field' - private market housing development site

	<p>We ask for clarification on the status and proposed use of the area generally described as an ecologically sensitive area and which has had informal signage displayed for many years not permitting public access.</p> <p>Will this area be opened for public access? If so, we would ask for safeguards to prevent any resultant threats to the wildlife or environment. We welcome initiatives to increase people's access to quality green space; however if this is indeed an ecologically sensitive area we would be concerned that use could lead to a decline in the condition of the habitat.</p>
<p>S/CBC: Cambridge Biomedical Campus</p>	<p>In line with our overall comments on the scale of growth planned for Greater Cambridge, we do not support the expansion of the campus. A priority for us in this area is the protection of Nine Wells nature reserve, including indirect impacts from development adjacent to the site itself.</p>
<p>S/WC: West Cambridge</p>	<p>No comment</p>
<p>S/EOC: Other existing allocations on the edge of Cambridge</p>	<p>No comment</p>

NEW SETTLEMENTS

Section	Our comments
New settlements - general comments	No comments
S/CB: Cambourne	To date, Cambourne has grown rapidly but with a lack of strategic planning, leading to a deficit in infrastructure. We therefore broadly welcome the policy direction set out here and look forward to the further development of plans to achieve the stated aims.
S/NS: Existing new settlements	<p>Northstowe</p> <p>We share the strong concerns expressed by residents of Longstanton and others about the impacts of building to date on local water tables. A Hydrogeological Assessment commissioned by Longstanton Parish Council [1] concluded that local land use change as a result of the development of Northstowe is the most significant impact on the local groundwater elevation. Initial construction at Northstowe lowered the water table to such an extent that ponds have dried out. The development has changed the recharge of local groundwater features and it is unclear whether they will recover. We call for no further building at Northstowe until this issue is fully resolved. We also call for tighter enforcement of the environmental standards the developers are required to meet - our local members describe them as currently 'getting away with the bare minimum', resulting in a settlement that is far from sustainable.</p> <p>[1] http://www.longstanton-pc.gov.uk/ UserFiles/Files/Reports/202105HRWallingfordReport3-reduced.pdf</p>

CLIMATE CHANGE

Section	Our comments
Climate change - general comments	<p>The aim to “<i>help Greater Cambridge transition to net zero carbon by 2050</i>” is necessary but inadequate. ‘Net zero’ refers to a situation where ongoing emissions of carbon are balanced by carbon sinks. However, the level at which atmospheric carbon eventually stabilises will be determined by the total accumulated emissions up to that point, not by the balance between sources and sinks in that moment. Therefore it is critical to a) radically reduce emissions as early as possible in this time period and b) protect stocks of carbon, such as those in soils and vegetation, to prevent their release to the atmosphere. Without this understanding, the Local Plan risks driving large emissions in the short term (from materials such as concrete used in building, habitat destruction, operational emissions during building works) in the name of achieving net zero balance in the long term. This is not an effective strategy to avert climate disaster. We note that a total carbon budget for Greater Cambridge of 11 million tonnes for the period 2020-2100 has been calculated (page 143, First Proposals). This must be given equal weighting and emphasis with the net zero target.</p> <p>We agree with the comment calling for a “<i>degree of flexibility in policies, to allow for changes in approach and technologies during the timescale of the plan</i>”. It is important that policies and standards are reviewed regularly to keep pace both with emerging evidence and technology, and with evolving national and international policy direction and targets. We look forward to seeing further detail of how this will be achieved.</p> <p>As with all the aspirations within the Local Plan, success of the policies on new buildings will depend on how well they are implemented by developers. We look forward to seeing more detail on how the Planning Authority will assure quality control as the Local Plan begins to be implemented.</p> <p>Retrofit</p> <p>We have a major overarching concern that the First Proposals deal only with new development and largely ignore the huge challenges posed by Greater Cambridgeshire’s existing built environment. The approach taken by officers in the webinars is to acknowledge this but to say that retrofit is outside the scope of a Local</p>

Plan. We do not agree: retrofit will be within the direct scope of the Plan (guiding planning decisions) whenever it involves works which could potentially require planning permission or listed building consent.

We would like to know what proportion of the projected demand for new homes and jobs could be met through a programme of retrofitting and bringing existing buildings into full use (including vacant properties, second homes, etc). We do not know whether this information exists, but it seems an important piece of evidence when assessing the Local Plan.

The Climate Change section should include specific policies covering retrofit. Government Green Homes targets present serious challenges now, and will get ever more serious during the Plan period, with high risks of carbon (and money) being wasted on inappropriate works. Yet Net Zero Carbon for existing buildings is mentioned only cursorily, on a single page (35) of the Local Plan's Net Zero Carbon Evidence Base. There is no mention whatsoever of the need for a different approach to buildings of traditional solid wall construction. These may form at least a quarter of the existing stock; this proportion should have been considered and assessed as part of the Evidence Base. It could even be as high as 35%, the proportion quoted in the BRE study "Solid wall heat losses and the potential for energy saving" published by DECC in 2015.

The specific challenges of traditional buildings , and the risks of unforeseen consequences (and of consequent waste, rather than saving, of carbon and money) are highlighted in PAS2035, the Government's guidance on domestic retrofit, which is referenced in Policy GP/CC. However the PAS is not freely available, but published by the British Standards Institute, costs £190, and so is inaccessible to home owners and others who need the guidance - and the reference in the Policy is futile in its draft form.

The Climate Change section of the Plan should quote key principles and guidance* from PAS 2035 and its non-domestic counterpart PAS 2038 (and reference other freely available advice including from the STBA and IHBC as well as the Government's own guidance to Private Sector Landlords) in sufficient detail to ensure that people dealing with ALL traditional buildings (not only heritage assets) have access to the appropriate advice and skills to ensure that their buildings are put in good repair, and then suitable retrofit measures are applied as appropriate. This is essential to achieve the aims of the PASs and to minimise unintended consequences.

CC/NZ: Net zero carbon new buildings

We welcome the proposed policy direction but feel the policy needs to be strengthened at a number of points as explained below. As a broader point: we welcome the ambition shown in applying more rigorous standards than existing national schemes (such as BREEAM), but have concerns about how this will be delivered in practice. We look forward to further information on how the Planning Authority, Building Control and other departments will work together to ensure effective delivery of these policies. We are pleased to hear that the Planning Authority currently intends that the policy will apply to minor developments (to be confirmed at later policy stages), and will consider applying the policy to temporary buildings on a case-by-case basis.

- **Embodied carbon.** The recognition of embodied carbon is positive but does not go far enough. The definition of a Net Zero Carbon building set out in the Evidence Base does not include its embodied carbon: this is a very serious omission which undermines all claims made about the sustainability of new development.
- **Retrofit first.** A report by the US National Trust for Historic Preservation [1] concluded that “*reusing an existing building and upgrading it to be as efficient as possible is almost always the best choice regardless of building type and climate*”. Before any new build is undertaken, consideration must be given to reuse of existing buildings. The policy should require a whole-life carbon assessment whenever demolition of an existing building is proposed. This would enable a carbon pay-back time to be calculated: how many years will it take for the carbon savings achieved in a more efficient building to offset the carbon losses incurred in demolition and construction? (see also under Climate Change ‘general comments’ for further discussion about retrofit)
- **Use of sustainable materials.** Where new build is necessary, the choice of materials must consider their embodied carbon and broader sustainability credentials, as well as their insulating properties. Reuse and recycling of materials should be favoured. The use of timber from sustainably managed (ideally UK) woodland should be promoted. Lime mortar should be used instead of cement wherever possible. Finally, buildings should be designed for longevity.
- **Offsetting.** We welcome the conditions set out under ‘Part D’ (page 146) that limit the use of offsetting. It is important that offsetting is genuinely a last resort and is not used by developers to avoid meeting net zero requirements on-site. The carbon accounting for any offsetting schemes applied must be rigorous and transparent.

[1] https://living-future.org/wp-content/uploads/2016/11/The_Greenest_Building.pdf

<p>CC/WE: Water efficiency in new developments</p>	<p>Water supply has emerged as a key issue for stakeholders during this consultation. We have discussed this in our response to the ‘Vision and Development Strategy’ section. Relevant to the current section: improving water efficiency is vital but is highly unlikely to result in an overall reduction in water use in the face of the proposed levels of development. Our comments below must be taken in this context.</p> <p>We welcome the ambitious target set for water efficiency and the incorporation into this policy of the findings of the Greater Cambridge Integrated Water Management Study (2021): water efficient fixtures and fittings, water reuse, surface water, greywater integrated on site. We look forward to further detail on how achievement of this target will be enforced and monitored.</p> <p>We are not clear to what extent wastewater management falls within the remit of the Local Plan. However, sewage management, including separation of surface water drainage from sewers, is a critical element of sustainability for new developments and we would like to see more information on this, or signposting to where such information exists. Similarly, although it is stated that water supply is not within the remit, the importance of “<i>making full use of water re-use measures on site including rainwater harvesting and grey water recycling</i>” is acknowledged. Again we would like to see details of how this will be achieved. Ideally we feel that rainwater harvesting and grey water use in new developments should be mandatory and designed in from the start.</p>
<p>CC/DC: Designing for a changing climate</p>	<p>We support the proposed policy direction. We would highlight the need to consider the impact of extreme weather events on existing buildings as well as new ones (tying into our comments about retrofit), and also the need for buildings (and features such as green roofs) to be kept in good condition.</p>
<p>CC/FM: Flooding and integrated water management</p>	<p>We broadly support the proposed policy direction.</p> <p>We welcome the statement that “<i>Flood management policies will require that the risk of flooding is not increased elsewhere as a result of new development</i>”. To achieve this it will be essential to assess the <u>cumulative</u> impact of development at catchment level.</p>
<p>CC/RE: Renewable energy projects and infrastructure</p>	<p>We feel this is a highly important policy area, given the potential for landscape impacts. We broadly support the proposed policy direction and look forward to seeing further detail as the plan progresses.</p>

<p>CC/CE: Reducing waste and supporting the circular economy</p>	<p>We welcome this policy. Clearly, co-ordination between this policy and the Minerals and Waste Plan will be essential to avoid policy gaps and ensure the necessary infrastructure is in place to handle this recycling stream.</p> <p>We are interested to know how small-scale projects (including incremental renovation works and retrofitting) can be brought within this policy. The regular sight of skips filled with materials which could be recycled along with offcuts of new building materials demonstrates that action is needed.</p>
<p>CC/CS: Supporting land based carbon sequestration</p>	<p>We strongly welcome this policy because protecting carbon stocks is critical to averting climate disaster. We urge that this policy does not focus solely on peatland but on all land-based carbon stocks (as set out in Natural England Research Report NERR094 which we note is one of the studies cited). Grassland (including urban green spaces), scrub, hedgerows etc all store carbon.</p> <p>We would also reiterate the important distinction between a carbon sink (actively drawing down carbon from the atmosphere) and a carbon stock (carbon that is already locked away). It is vital to protect our carbon stocks even if they are not currently carbon sinks (see also our response under Climate Change - general comments).</p>

BIODIVERSITY AND GREEN SPACES

Section	Our comments
<p>BG/BG: Biodiversity and geodiversity</p>	<p>We support the proposal for 20% Biodiversity Net Gain (BNG, twice the national requirement of 10%), which recognises the poor starting point for biodiversity in the region, and support the policy that development should be required to achieve BNG. However:</p> <ul style="list-style-type: none"> • The outputs of the BNG calculation must always be ‘sense-checked’ by suitably qualified ecologists. Otherwise, we are concerned that over-reliance on the metric could lead to undesirable results. The metric has a number of flaws, a key one being that it favours habitats that are quick and easy to

create, not necessarily those that have the greatest wildlife or climate benefit. Furthermore, it does not account for indirect impacts of development on habitats and species.

- The policy allows off-setting to take place *off-site*. Given that (as stated in the Council's webinar) net gain is unlikely to be achievable "on-site" in most cases, the target itself starts to look meaningless. For example, quick gains in the Biodiversity Metric can be achieved by improving the measured condition of existing large biodiversity sites. While a desirable outcome in itself, this must not be used to compensate for the loss of a biodiversity site to development. It is important that the net result of this policy is not to 'concentrate' biodiversity in fewer sites. An increase in the total area of green space, with appropriate biodiversity, is necessary for improving ecological connectivity and climate resilience, and for balancing the objectives of nature recovery and improving people's access to green space.
- New habitats created as part of the net gain approach need to be explicitly protected from development in future rounds of planning. In the government's proposed implementation of BNG, new sites are only required to be protected for 30 years, but this time limit is inappropriate. It can take more than 30 years for a range of habitats to develop on a newly created site. For example, Trumpington's two country parks, now almost 14 years old, are still developing to their full potential and already under threat from the Cambridge South station development. International guidance is that areas recognised as needing protection for their biodiversity should be accorded this "in perpetuity".
- We are very concerned by the statement that "development proposals adversely affecting sites of biodiversity or geological importance ***will not normally be permitted***". This policy should be much more strongly worded – it will be very difficult to assess/measure with any certainty situations where "*public benefits significantly outweigh any adverse impacts*" – and we think that the proposed wording will provide a major loophole for developers to damage biodiversity. The flaws in the cost/benefit approach have been amply illustrated elsewhere in the country – for example by proposals to build a theme park on top of the Swanscombe Marshes SSSI, or to drain and build over an area of Portsmouth Harbour despite it holding every level of statutory wildlife protection. To address concern, we call for, at minimum, a strong policy statement that all existing designated sites (with either national or local designation) remain protected and undeveloped. The development of such sites must not be considered under a cost/benefit analysis approach: it is not possible to weigh factors such as job creation against the irreversible loss of these special places. The consultation document itself makes it clear that, "*National planning policy requires us to protect and enhance sites of biodiversity and geodiversity importance*", and this should be a fundamental policy within the Local

	<p>Plan. The topic paper for biodiversity states “...we consider that additional clarity is required to set out how the principles [i.e. the requirement that sites of biodiversity importance are protected] set out in national policy should be applied at a local level” and this point needs to be addressed in the Local Plan.</p>
<p>Policy BG/GI: Green infrastructure</p>	<p>This policy direction is very ambiguously explained and, although the policy itself is generally good, it will need much greater clarification to avoid misinterpretation by developers and those assessing planning applications. The thrust of the policy should be very clearly related to the policies on Great Place/Climate Change. We are not clear how this policy interacts with the open space standards referred to in BG/EO but would strongly advocate for specific targets to be set for the provision of the different types of Green Infrastructure wherever possible (see also our comments under BG/EO).</p> <p>1st bullet: GI to be “<i>appropriate to its local context</i>” – we agree with this general direction but this phrase should be clarified.</p> <p>2nd bullet (Supporting delivery of biodiversity net gain, including by providing links between habitats within and beyond the site boundary, and connecting where appropriate to the wider ecological network) – we agree with this in general but again it should be worded more clearly. We welcome the recognition of the need for a ‘bigger, better, more joined up’ approach which is now an accepted biodiversity principle, but we are concerned by the phrase ‘<i>carefully balancing the needs of wildlife and people</i>’ which would be very difficult to define in practice.</p> <p>5th bullet (Enhancing access and connectivity) – we think this has the same meaning/intention as 2 and 3 and so could be deleted to reduce complexity.</p> <p>6th and 7th bullets (Providing environmental enhancement; and Supporting climate mitigation and adaptation) need further explanation with perhaps an example, so that these general statements are comprehensible in the context of the Local Plan.</p> <p>Within this GI policy, we would like to see a clear statement that provision of green space (one of the forms of GI) should respect the Natural England Accessible Natural Greenspace Standards (which have been used in Suffolk and Shropshire). These standards are that green space should:-</p> <ul style="list-style-type: none"> ● Be at least 2 ha in size, and no more than 300 metres (5 minutes walk) from home; and ● Include at least:

	<ul style="list-style-type: none"> ○ one accessible 20 ha site within two km of each home; ○ one accessible 100 ha site within five km of each home; and ○ one accessible 500 ha site within ten km of each home; <p>In addition, the Standards call for a minimum of one ha of statutory Local Nature Reserves per thousand population.</p> <p>We support the policy direction that development should meet the GI Standard given in <i>Building with Nature</i>.</p> <p>We support most of the final components of this policy, including the list of strategic GI initiatives, but are unclear what is meant by the five “<i>dispersed initiatives</i>” and how development can contribute to these in practice.</p> <p>We support the policy of <i>Expanding Greater Cambridge’s ‘urban forest’</i>. The tree and hedge cover in the Greater Cambridge area is too low and thus we are pleased to see projects to increase this. See also our response to BG/TC.</p> <p>We are pleased to see <i>Allotments and Community Gardening</i> listed in this section. Allotments can contribute to a number of policy targets, including under climate change, biodiversity and green space, wellbeing and great places. There is a large unmet demand for allotments in Cambridge, as evidenced by long waiting lists. The current standard for allotment provision in new settlements in both the Cambridge and South Cambridgeshire local plans is 0.4 hectares per 1000 residents. To ensure the demand for allotments is met across Greater Cambridge, we need an assessment of current levels of provision, and a plan (encompassing both existing and planned settlements) to achieve this level of provision everywhere. Adequate quality of provision must also be included in the standard, for example on-site water supply (ideally using harvested rainwater or other suitable supply rather than potable water), provision of accessible plots for disabled allotment holders, and the possibility for appropriate structures such as sheds and polytunnels to be incorporated into allotment sites.</p>
<p>Policy BG/TC: Improving tree canopy cover and</p>	<p>We support this policy and are pleased to see that it is worded in terms of outcomes (tree canopy cover) rather than inputs (e.g. number of trees planted).</p>

<p>the tree population</p>	<p>We would like to see the policy require that best practices in the selection of tree species are followed, e.g. taking into account concerns such as maximising biodiversity benefits; ensuring resilience of the tree population to drought, disease, storm winds; avoiding problems such as allergen production or roots creating hazards, etc. [1]</p> <p>We welcome the policy direction “<i>provide sufficient space above and below ground for trees and other vegetation to mature</i>”. The layout of tree planting and the amount of space given to each tree is an important determinant of tree survival - trees standing alone, and with limited space for root development or rainwater interception, are more susceptible to damage from wind or drought - as was seen at the Grafton Centre where many of the trees that were planted did not survive long.</p> <p>We strongly support the fact that the first five bullet points are about “protecting” existing trees on a development site. We therefore caution that the qualification of “<i>when felling proves necessary</i>” will need very careful definition: felling should only be undertaken in exceptional circumstance (e.g when necessary for public safety or protecting property) and, if essential, should only be undertaken at a time of year when it does not damage wildlife such as nesting birds. A frequent cause of tree felling is shading of gardens and developers should be required to think long term about shade-casting when selecting tree species and planting locations.</p> <p>[1] See for example https://www.forestresearch.gov.uk/tools-and-resources/fthr/urban-tree-manual/</p>
<p>Policy BG/RC: River corridors</p>	<p>We strongly support the need to protect river corridors. This policy will need precise and clear definition to ensure that it is enforceable.</p> <p>We welcome projects that aim to partially renaturalise the Cam by restoring flood plains and habitats, for example at Logan’s Meadow, Stourbridge and Jesus Green. Such projects should be prioritised because of their potential to benefit wildlife and water quality while helping reduce flood risk. We support the goal of improving people’s access to high quality green spaces, but care must be taken that multiple uses of the river and its corridor do not threaten its environmental value. The possible damage to vital habitats by high numbers of visitors is recognised in the evidence document; Greater Cambridge Green Infrastructure Opportunity Mapping (2020).</p>

<p>Policy BG/PO: Protecting open spaces</p>	<p>We understand that this policy is about protecting existing open spaces but the lack of direction and information associated with it makes it impossible to comment on. Policy to protect existing open spaces is extremely important, especially given that in recent years so many open spaces, including many of those specifically listed and supposedly protected under the two current Local Plans for the City and South Cambridge have been threatened or damaged [1]. We request a clearly worded policy so that we can assess and comment on it.</p> <p>[1] See for example https://cambridge.greenparty.org.uk/news/local-greens-object-to-development-st-matthews-piece.html</p>
<p>Policy BG/EO: Providing and enhancing open Spaces</p>	<p>We welcome many aspects of the policy relating to the need for new, larger and enhanced open spaces, but as written it potentially could lead to more green lawns with scattered trees, lacking wildlife habitat and biodiversity, landscape appeal and other genuine amenity value found in many recent new developments. We support the need for open space for all the activities mentioned, with an understanding that such spaces should be managed wherever possible to maximise biodiversity (reduced grass mowing, zero pesticide use, planting of trees and hedges and wildflower areas).</p> <p>The policy direction under BG/GI should also apply here – development should require open space:</p> <ul style="list-style-type: none"> ● <i>“As an integral part of the development, so that it informs the overall development design. This should include identifying, retaining and enhancing existing natural features of value.</i> ● <i>Across all phases of development.</i> ● <i>To be successful for the lifetime of the development, including providing plans for management, maintenance and funding.”</i> <p>We agree that multi-functionality is useful where appropriate, but this should not be used as an opportunity to reduce the overall amount of open space made available - most green spaces are not suitable for all activities (for example, allotments and sports pitches). To maximise benefits to both people and wildlife, it is important to provide a diverse range of green spaces. Retention of any existing mature habitats and features (for example trees, hedges, ponds, pasture) within a development site should be a priority (Cambourne provides a good example). New green spaces can include community woodland, flower meadows, wetlands – not just the typical short-mown grass and flowerbeds. Where possible, communities should be involved in planning and managing the use of their green spaces, e.g. through ‘Friends of...’ groups with support from Council officers. In particular, we welcome the inclusion of community food</p>

	<p>growing opportunities in this policy and would like to see greater emphasis on this type of open space, with the recognition that allotments cannot be conflated with other open spaces as these are not publically accessible to all.</p> <p>Given that SUDS, habitat, recreational space etc can be delivered by the same parcel of land as long as the overall green space provision is adequate, we request some reflection on whether SUDS could be treated as open space – e.g. if a balancing pond is also part of a community park, it could be managed in a more wildlife-friendly and accessible way than if it wasn't; in the same way ponds could be made a more frequent component of parks and grassy open spaces.</p> <p>The proposed review of open space standards is welcome but must not result in their watering down. The current standards for types of open space provision per head of population [1], [2] must be seen as a minimum that developers have to meet. We were very concerned that the original proposals for NE Cambridge failed to meet these standards, and it was only after strong public push back in the consultation that the plans were amended to meet the minimum requirements for different types of green space per resident.</p> <p>[1] Cambridge Local Plan, October 2018. Appendix I, table I.1 https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf</p> <p>[2] South Cambridgeshire Local Plan, October 2018. Policy SC/7. https://www.scams.gov.uk/media/17793/south-cambridgeshire-adopted-local-plan-2018.pdf</p>
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WELLBEING AND INCLUSION

Policy	Your comments
Wellbeing and inclusion -	We firmly support the Greater Cambridge Shared Partnership in ensuring that Greater Cambridge's valuable open spaces are protected but recognise that the fulfillment of this promise is threatened

general
comments

by the planned development in the north part of the city. At the moment it is apparent that *all* the citizens of Cambridge do not benefit from the development of new homes and jobs given that Cambridge is becoming widely recognised as the most unequal city in the UK. Only this week a Guardian journalist published a scathing article following his visit to Cambridge where he discovered “desperate inequality” [1], particularly when encountering our fellow citizens using the food banks in the ward of Abbey. According to the thinktank, Centre for Cities, Cambridge is the most unequal city in the UK [2].

We are concerned that the Local Plan’s slogan of ‘good growth’ will not only worsen environmental damage, but will fail to serve our Cambridge citizens who are greatly disadvantaged. Instead, the planned growth will only serve our significantly privileged citizens - widening the socio-economic gap even further. To illustrate, it was noted in a Cambridge Commons report [3] that while the top 6% of earners in Cambridge earn 19% of the total income generated in the city, the bottom 20% of earners received only 2% of the total income. In addition, it is well known that contemporary Cambridge has experienced one of the fastest growths in housing supply but the average house price exceeded half a million pounds in September this year [4] meaning that you need to earn over £49,338.00 in order to afford to buy a home in this city [5]. These ‘home-truths’ make Cambridge amongst the most unaffordable cities in the UK despite the amount of wealth that is generated here. A good standard of living, where one can afford to get onto the property ladder, is simply not accessible to many local residents who grow up here. Also the high cost of living in Cambridge is likely to deter those living in other parts of the country and the world from coming to live here.

[1] Aditya Chakraborty, ‘The truth is now plain: in Johnson’s Britain, some lives are more equal than others,’ <https://www.theguardian.com/commentisfree/2021/dec/09/johnson-britain-equal-cambridge-rich-poor>

[2] <https://www.centreforcities.org/blog/value-challenges-taking-wider-view-city-economies/>

[3] <https://www.thecambridgecommons.org/wp-content/uploads/2019/01/Cambridge-Commons-SIP-Final-Report-1.pdf>

[4] <https://landregistry.data.gov.uk/app/ukhpi/browse?from=2021-01-01&location=http%3A%2F%2Flandregistry.data.gov.uk%2Fid%2Fregion%2Fcambridge&to=2021-12-01&lang=en>

[5] <https://www.gocompare.com/home-insurance/salary-to-buy/>

WS/HD: Creating healthy new developments

For any development that does occur, we support the idea of “*high quality people-focused spaces*” being created but would like the Greater Cambridge Shared Planning team to explain in more detail what these might look like. The possibility of a policy which “*restricts the development of new hot-food takeaway premises close to schools or leisure centres*” and “*limits the concentration of hot food takeaway premises in city, town, neighbourhood and village centres*” seems sound in light of the worrying rise in obesity amongst children leaving primary school. Measures should be taken to safeguard our children’s health, particularly those being raised in our more impoverished neighbourhoods. How can we encourage and enable local families to eat a balanced and sufficient diet? Sustainable food shops selling organic fruit and vegetables, such as the ones sold on Cambridge market or via home delivery companies such as Cambridge Organic Food Company or sustainable local enterprises such as Full Circle, tend to be located in the centre of the city or via home delivery which is much more expensive than the fruit or vegetables you can pick up in the supermarket. Nourishing, organic food and the culture of making one’s own dinner with locally grown food seem to be restricted to our middle classes. We would like to see local businesses who already produce healthy food for the residents of Cambridge having a presence in local shops in Chesterton, Arbury, Abbey and Kings Hedges. We feel the Council should be approaching these local businesses and provide incentives for them to trade in areas where all local people can access them; not just those who live in Market or Petersfield or Trumpington.

We also feel it would be effective to encourage existing takeaways to offer healthier options so that children and young people might benefit from a better diet. This has already been done in Tottenham where local takeaways had the chance to take part in a competition. Taster’s Chicken Shop in Tottenham’s [1] new healthier children’s menu featured grilled chicken, salad and chunky chips in controlled portion sizes for the same price as the existing fried chicken and fries options. Due to the declining health of our more disadvantaged families, we would like to see the Local Plan delivering interventions that help to reverse this trend like those set out in the ‘Encouraging Healthier Takeaways in Low Income Communities’ based on research by the Cities Institute, London Metropolitan University, October 2014 [2]. For example, in the East Midlands, Indian restaurants were targeted by the Eat out Eat in Healthy project and asked if they might try altering the ingredients of their curries with dry spice mixes and less oil. When consumer tasting sessions demonstrated that most customers preferred the taste of the healthier curries, these restaurants

	<p>were converted to providing a healthier menu. In another initiative, the Healthier Takeaways project in Antrim, the fat and salt content of 12 fish and chip shops were tabulated and the results were shown to the owners. The ones who were higher up on the table were shocked into making changes to their cooking techniques. Further, in the London Borough of Haringey, it was found that promoting the Healthier Catering Commitment in the same street meant that, once some businesses on that street had signed up, the others did not want to be left out. [3] This evidence demonstrates that once the message has come from local authorities that local businesses need to step up their game in helping their customers make healthier choices and ultimately lead longer lives, then local businesses respond and take action. We all know that this issue is particularly poignant in Cambridge where the difference in life expectancy between the richest and the poorest is an alarming 11.6 years [4]. We feel the impetus for action from our council to start tackling this startling inequality in Cambridge has never been greater.</p> <p>[1] https://www.gov.uk/government/case-studies/healthy-high-streets-challenge-and-tasters-fried-chicken-shop</p> <p>[2] https://www.cieh.org/media/1242/encouraging-healthier-takeaways-in-low-income-communities.pdf</p> <p>[3] https://www.cieh.org/media/1242/encouraging-healthier-takeaways-in-low-income-communities.pdf</p> <p>[4] https://consultations.greatercambridgeplanning.org/greater-cambridge-local-plan-first-proposals/explore-theme/wellbeing-and-social-inclusion</p>
<p>WS/CF: Community, sports, and leisure facilities</p>	<p>We broadly agree that a good standard of education should be offered to all citizens and that good schools can strengthen and stabilise our local communities giving our children and young people a steady foundation for their future. However, going to a good school is no guarantee of a child's ability to improve their life chances if the complications of accessing help at home are to be considered. A representative from Kings Hedges Family Support Group has observed that growing inaccessibility to social care and services means that many families miss out on getting help when their children are young, entrenching these members of our society in patterns of inequality that follow them throughout their lives. According to this spokesperson, having a space to study at home and having parents who provide books to read makes a bigger difference than going to a school</p>

	<p>attended by children from different socio-economic backgrounds. [1]</p> <p>This also feeds into the cultural capital of Cambridge’s young people from deprived backgrounds which has been considered by those running the Cambridge Junction. They identified that there is a need for children to have a greater sense of ownership of cultural capital across socio-economic boundaries. If a child comes from a family who cannot afford to travel to a cultural event/activity or to buy refreshments whilst there then this of course prevents them from engaging with that activity and cuts that child/children off from valuable cultural engagements that others of their age group benefit from. There needs to be ways of giving ownership of the arts to those young people who don’t feel it’s for them. In terms of how Cambridge is going to help its disadvantaged citizens gain better accessibility to community, sports and leisure facilities, three barriers have to be overcome. First, those most affected by inequality cannot be easily reached. Regardless of the multitude of Cambridge organisations that exist to assist our residents with the lived consequences of core inequality, Cambridge’s core inequality will only be properly addressed once those who really need help are effectively targeted. Second, there is a lack of effective frameworks and resources in the areas that are most affected by inequality. After all, setting up these structures requires dedicated time and energy that local people just cannot afford even if the funds are there to do it. Third, there is an absence of real understanding of the existing inequality in Cambridge, and a corresponding lack of real motivation to help the communities most affected. [1] In Cambridge a “wide cultural gap exists between those at opposing ends of the inequality spectrum who have very little contact with each other.” [1]</p> <p>Further, concerning access to Cambridge’s recreational green open spaces, we would like to see more access to green spaces for the residents of Abbey, Arbury and Kings Hedges. We object to the City Council having built on an open space alongside the Meadows Community Centre in Arbury and would like to see the City Council turning the existing open spaces in Arbury into spaces for recreational use.</p> <p>[1] https://www.thecambridgecommons.org/wp-content/uploads/2019/01/Cambridge-Commons-SIP-Final-Report-1.pdf</p>
<p>WS/MU: Meanwhile uses</p>	<p>We recommend that temporary spaces and buildings are used to assist with Cambridge’s glaring problem of unaffordable housing via the method of property guardianship which is endorsed on our</p>

<p>during long term redevelopments</p>	<p>government’s website: “It is widely accepted that a property guardian is someone who has entered into an agreement to live in a building or part of a building that would otherwise be empty for the primary purpose of securing and safeguarding the property.” [1] There are a number of well-established property guardianship organisations and it is known that one of them, Dot Dot Dot, has experience of finding temporary tenants in empty properties in Eastfield, Chesterton which provided an affordable place to live for a number of individuals in the interim period before these properties were demolished to build more social housing by local housing association, Hundred Houses Society. [2]</p> <p>[1] https://www.gov.uk/government/publications/property-guardians-fact-sheet/property-guardians-a-fact-sheet-for-current-and-potential-property-guardians</p> <p>[2] https://www.cambridgeindependent.co.uk/news/eastfield-regenerating-the-past-9054166/</p>
<p>WS/IO: Creating inclusive employment and business opportunities through new developments</p>	<p>We broadly support that appropriately scaled developments are required to contribute to local training, skills and employment opportunities, especially apprenticeships, in order that the local community benefits from the development. We also support the idea that these same developments open up supply chain opportunities to local businesses during the stages of development. Furthermore, we are in agreement with the Cambridge Anti-Poverty Strategy 2020-2023’s identification of a hollowed-out labour market that is particular to Cambridge City. We believe that many Cambridge residents have limited access to the higher tiers of the Cambridge labour market. There are no obvious routes into the science and tech business and Cambridge University careers from the standpoint of the local Cambridge citizen. The existence of the science and tech scene in Cambridge and the presence of Cambridge University attracts brilliant minds to our city and along with that great wealth but the wealth is not filtering down. [1] There needs to be more opportunities for our young people to grow and develop their skills, knowledge and passions with interesting careers, not just those advertised on the Cambridge Network or on the Cambridge University Jobs website. There is a lack of an obvious go-to resource for local citizens to find interesting opportunities, aside from that provided by the Job Centre or by sponsored jobs search engines. We recommend that a provision with the same verve and vigour as the Cambridge Network is set up to provide the aforementioned local skills, training and apprenticeship opportunities and that these opportunities are targeted towards those in our local community who most need it.</p>

	<p>[1] https://www.thecambridgecommons.org/wp-content/uploads/2019/01/Cambridge-Commons-SIP-Final-Report-1.pdf</p>
<p>WS/HS: Pollution, health and safety</p>	<p>The Cambridge Green Party advocates the following measures to provide a healthy environment for its residents:</p> <ul style="list-style-type: none"> - An emissions-free zone in the centre of Cambridge - Campaign for major investment into active transport with the goal of creating a fully interconnected, properly segregated cycle network - Work with residents to create low traffic neighbourhoods [1] - Campaign for improvements to the bus system to make it the cheapest and most enjoyable way to travel around Cambridge - Campaign for strict rules against engine idling as long as diesel and petrol vehicles are still used in the city centre - Accelerate and manage the shift to electric vehicles by installing many more free or low-cost charging points, accessible to existing residents and standard in all new builds, and introducing appropriate safety regulations including clear guidelines on which vehicles can use which routes <p>In addition, in line with our response to the Infrastructure section, we broadly welcome initiatives to reduce movements within settlements, and to enhance the use of either active or electric transport which in turn reduce pollution and enhance the health of our residents.</p> <p>We specifically support attributes that can be incorporated into the design of the settlements themselves such as:</p> <ol style="list-style-type: none"> 1. Cycle greenways 2. A parking permit cost that is a deterrent, with exemptions for special needs. Significant costs for second car permits 3. Ensure 'advance green phases' for bicycles at lights 4. European style provision for cycles and pedestrians and disabled people <p>[1] https://www.sustrans.org.uk/our-blog/get-active/2020/in-your-community/what-is-a-low-traffic-neighbourhood</p>

GREAT PLACES

Policy	Your comments
Great places – general comments	<p>Great places have a compelling blend of community, nature, and beauty. Cambridge is destroying all of these, and rapidly creating naff spaces.</p> <p>The Great Places paper refers to Heritage Assets, but completely fails to recognise that the city of Cambridge is a city heritage asset of worldwide significance which meets UNESCO’s Outstanding Universal Value criteria for World Heritage status.</p> <p>This significance derives from the combination of its built and natural heritage. The draft Plan fails to recognise the vital role which this special character plays in making Cambridge a great place to live in, work, study, and visit.</p> <p>The draft Plan’s approach involves a false separation between Landscape and Townscape (Objective 6) and Historic Environment (Objective 7), which for Cambridge has resulted in inadequate consideration and valuation of the historic city in its historic landscape setting, with historic landscape and open spaces considered as green infrastructure but not as historic environment.</p> <p>Cambridge’s special character has been, and continues to be, under severe threats from the quantum of already approved growth (built developments and pressures on both streets and green spaces). There are severe environmental capacity issues in trying to accommodate the demands of a 21st century city within what remains the built fabric and spaces of a medieval market town.</p> <p>These fundamental conflicts between growth on the one hand and environmental capacity and special character on the other should have been recognised as a key challenge for the draft Local Plan.</p> <p>But the draft Plan documents include no assessment of current pressures, let alone the impacts of the draft First Proposals.</p>

Instead, para 3.2.4 of the Strategic Heritage Impact Assessment: baseline makes a totally unjustified statement that:

“3.2.4 Future growth in Cambridge has the potential to strengthen and reinforce these characteristics, enabling the City to meet contemporary environmental, economic and social drivers without undermining its economic identity”.

Overall, the Evidence base for Great Places is inadequate, and the proposals are premature pending a thorough review of the success or failure of existing policies.

Community requires a degree of stable population, and works better when people are investing in a place they want to stay in. However, people often come to Cambridge for 5 years in a tech job or a research post and move on again. This benefits the diversity of our city but means that civic engagement is patchy and social networks are largely based on livelihood or interests, rather than place. New neighbourhoods need additional community spaces to encourage cohesion and local friendships. Independent shops are a good place for community to build, we must do away with the assumption that new developments will orbit around a supermarket.

Nature is being annihilated globally, it is not a problem specific to Cambridge. It is necessary to have some spaces where humans can enjoy interacting with nature, and some spaces where nature can enjoy NOT interacting with humans. For a city, Cambridge is quite wealthy in green spaces, but lockdown and shortage of community facilities have given many green spaces the air of a festival in daytime and a fix room at nighttime. New developments must do better than a tree in a square metre of soil, or a rooftop garden, people need space to walk in nature, to watch it, to rest in it.

Beauty is part of our heritage in Cambridge, not only through the natural world but an incredible architectural inheritance. The narrative on many central streets is one of design and construction skills being lost - vulgar unworthy buildings which spoil the setting of the wonderful ones. Soulless concrete and glass, towers of it, and chain brands that welcome you to Clone Town, Anywhere. And public art that aspires to be vapid enough to fit right in.

We want to see this three-fold destruction paused, until the planning system is fit to support appropriate means to heal the damage.

<p>GP/PP: People and place responsive design</p>	<p>We are concerned that by merging the local plan with South Cambs the detail relating to the special character of the city may be diluted:</p> <p>Developments within Cambridge should enhance the character of the city.</p> <p>The local plan should be clearer about which local characteristics we want to maintain, and which we want to see no more of.</p> <p>For example, we'd be happy to see more roads like Willow Walk, we'd be happy never to see another Station Road.</p> <p>We would like to see discussion of giving protection to views and approaches. For example, Sheffield Local Plan seems to have more protection for views because the hills offer a few really distinctive views. Oxford and Edinburgh seem to have more comprehensive protected views, where we only seem to have a mention of views into and out of the conservation area which hasn't helped to protect Station Road, Hills Road or Histon Road from ugly development.</p> <p>Construction seems to cut a lot of corners, many homes have poor insulation and soundproofing.</p> <p>We would like to see an analysis of why the last Local Plan has allowed so many dire buildings, to inform improvements this time around.</p>
<p>GP/LC: Protection and enhancement of landscape character</p>	<p>The proposed policy sounds good, but doesn't take into account how overdevelopment is changing the landscape. Parks can get saturated with walkers, litter, barbeques, dogs, vehicle noise... overuse is a tangible change to landscape character.</p>
<p>GP/GB: Protection and enhancement of the Cambridge Green Belt</p>	<p>The proposed local plan is ripping chunks out of the Green Belt, so it's impossible to take this policy seriously.</p> <p>The detailed Green Belt assessments are inadequate because they don't include the historic environment, such as Conservation area designations. N.B. the Green Belt was set up to protect the setting of the historic University city.</p>

<p>GP/QD: Achieving high quality development</p>	<p><i>“Major schemes should share a native 3-D file for assessment”</i> - we do not understand what is meant by a native 3-D file and suggest this needs to be clarified in non-technical terms. We think the ideal approach would be for the planning portal to provide a facility for computer models to be viewed on the web by consultees prior to approval. Currently the planning portal is one of the biggest obstacles to community engagement.</p> <p><i>“Create attractive and appropriately-scaled built frontages to positively enhance streets and/or public spaces in both urban and rural settings.”</i> - we suggest this needs to go further. Frontage is important but often neighbours will have a view from the back of a new development. The design has to be great quality from all viewpoints, and from walkways within.</p> <p>Quality seems to be something that has been compromised on in many new developments, with developers offering S106 money or a park to make up for the fact it looks horrible or is otherwise poor quality. There needs to be a higher minimum standard, which doesn't leave room for horse-trading.</p>
<p>GP/QP: Establishing high quality landscape and public realm</p>	<p>We support the point about prioritising pedestrian movement. We recognise a difficult challenge in managing the needs of different users, for example allowing sufficient safe space for pedestrians and wheelchair users while allowing somewhere for delivery vehicles, electric scooters and bikes, and taxis to pull up. Some more thought needs to be given to making footways porous for pedestrians, but protecting them from motorised vehicles. One example might be the provision of inset bays for drop-off of people and goods (with appropriate deterrents against use for general parking in line with Policy I/EV).</p> <p>How is the local plan going to treat anti-terror architecture, for example the anti-cyclist barrier on Kings Parade? If this is temporary, as the council claims, the replacement should be planned out and subject to consultation.</p> <p>We want to see widespread implementation of Low Traffic Neighbourhoods. In particular, the Local Plan should be setting out a plan for low-traffic movement around the city centre, progressing the Making Space for People SPD, and 15 minute neighbourhoods.</p> <p>The Oxford adopted local plan has a section (V4) on the strategic importance of district and local shopping centres for reducing travel time, and the character and uses of these. Some of the transport problems in Cambridge seem to be to do with people driving to shops which only have one outlet in the city centre and it seems to be worth trying to decentralise this.</p>

<p>GP/HA: Conservation and enhancement of heritage assets</p>	<p>This is vital. The historic environment, and its capacity (or not) to withstand existing growth (let alone new growth proposed) should have been considered at the start of the Great Places chapter. Understand what you have, then consider its capacity for change.</p> <p>The proposals fail to consider anything other than designated heritage assets. There is no consideration of the heritage significance of Cambridge as a whole, or of the heritage significance of undesignated buildings and spaces –notably Cambridge’s market, which pre-dates the University, and Grantchester meadows.</p> <p>The Local Plan should clarify the role and the heritage of the market square as a historic centre of the city.</p> <p>We would have more faith in the Heritage Impact Assessment if there was more evidence of knowledge of Cambridge, and of issues, policies, and initiatives relating to its historic environment. We deem it unfit for purpose. There is no mention of any Conservation Area appraisal apart from the Historic Core, and no cumulative assessment of significance and issues identified in these Appraisals.</p>
<p>GP/CC: Adapting heritage assets to climate change</p>	<p>This policy is basically very good - but should relate to all buildings of traditional construction, and needs some updating. Please refer to our response to CC/NZ: Net zero carbon new buildings.</p>
<p>GP/PH8: Protection of Public Houses</p>	<p>There are other types of community asset in danger, community centres, youth centres, museums, cafes, faith centres. The focus on public houses doesn’t reflect the diversity of the city.</p>

JOBS

Policy	Your comments
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Jobs – general comments	<p>We have commented on the overall number of new jobs under the policy S/JH. See also our comments under Wellbeing and Inclusion.</p> <p>We have not given detailed comments on all of the following sections. Our overarching concern is that this Local Plan must effectively tackle poverty and inequality in Greater Cambridgeshire. Previous approaches have failed to do this. Much is made of the long term sustained growth of the Greater Cambridgeshire economy but this prosperity is not felt by all. Use of foodbanks in Cambridge is up by 127% since 2015 [1]. Walking through Cambridge city centre you see vacant shops, a lack of small independent businesses, and people in various conditions of distress, including begging and rough sleeping. Further growth in the much-vaunted ‘high technology cluster’ will not address these problems, but risks inflating the ‘Cambridge bubble’ yet further and putting a decent standard of living even further out of reach for a majority of people (see also our response to ‘Wellbeing and inclusion - general comments’). Unemployment is not necessarily a helpful metric when we have people holding down multiple jobs but still having to choose between heating and eating.</p> <p>[1] https://cambridgecity.foodbank.org.uk/2021/05/04/foodbank-use-in-cambridge-up-127-since-2015/</p>
J/NE: New employment development proposals	No comment
J/RE: Supporting the rural Economy	No comment
J/AL: Protecting the best agricultural land	<p>We broadly support this policy.</p> <p>We suggest that there are potential conflicts between this policy and CC/CS which need to be explored. A large part of Greater Cambridge’s carbon emissions comes from ‘wasted peat’. To protect the remaining carbon stock in our peatlands and restore them to a net carbon sink, significant land management changes will be necessary including allowing some rewetting of the peat soils. This will entail loss of agricultural yields (which must however be set against the total collapse of food production in the worst climate scenarios).</p>

	<p>We seek reassurance that this policy would not prevent habitat restoration projects on drained peat soils currently under agricultural use.</p>
<p>J/PB: Protecting existing business space</p>	<p>No comment</p>
<p>J/RW: Enabling remote working</p>	<p>We broadly support the aims of this policy but it must be based on a rigorous assessment of need. Demand for local employment hubs may currently be low due to the risk posed by COVID and it is not clear how this will develop in the future. Similarly, residential extensions should be tested against proof of need. This could be a very easy loophole to start building loft extensions and garden studios with no intention of working in them.</p> <p>Clearly further exploration is needed of the funding model for employment hubs. Operators must not be permitted to charge excessive prices for use of these facilities, especially in areas where there are few alternatives for remote workers. The possibility of publicly funded hubs, for example based in libraries, should be explored.</p>
<p>J/AW: Affordable workspace and creative industries</p>	<p>We support the aims of this policy. We are concerned that it will have the same problem as so-called “affordable” housing, i.e. that 80% of the market rate in Cambridge is still out of the reach of most (see our comments under housing). Ideally, the rate which is considered ‘affordable’ should be set through assessment of the ability of the target market to pay these rates.</p>
<p>J/EP: Supporting a range of facilities in employment parks</p>	<p>We broadly support this policy and would additionally request a range of green spaces in employment parks. Employees need nature for wellbeing, space to walk, and somewhere to eat a packed lunch if they decide not to purchase food on-site. Cambridge Science Park provides a reasonably good model - there is a duck pond and some grass, a richer habitat would attract more wildlife, leading to greater wellbeing.</p>

J/RC: Retail and centres	<p>We support an update of the policies on retail and leisure. COVID has accelerated changes that were already happening. In Cambridge, as in other places across the country, shops are closing, leaving empty space. We hope that the policies on “retail and centres” will take account of this. There are clear links to other policies, such as housing, jobs and great places (but not limited to these) so our centres are not full of empty, under-used, buildings.</p> <p>We welcome the intention to ‘establish a hierarchy of centres across Greater Cambridge’. As regards Cambridge itself, ‘encouraging small-scale units’ may not be sufficient to attract the range of users mentioned. The 2009 ‘<u>Clone Town</u>’ report from the New Economics Foundation highlighted a number of reasons for Cambridge’s lack of diversity as a shopping centre. These included the very high rents charged by landlords (mostly the Colleges, with this situation tied into the university’s own funding challenges); the frequent traffic gridlocks and the fact the Park and Ride services funnel shoppers into a few central locations.</p>
J/VA: Visitor accommodation, attractions and facilities	No comment
J/FD: Faculty development and specialist / language schools	No comment

HOMES

Policy	Your comments
Homes – general comments	See also our comments under S/JH regarding overall numbers of homes to be built and under Wellbeing and Inclusion regarding affordability.

	<p>We would like to see the direct evidence for housing need in Greater Cambridge (broken down by different sizes and types of home), not just the use of average house prices as a proxy. It is well-known that people struggle to afford homes in our area (particularly in Cambridge), and there is often an unchallenged assumption that this is due to an undersupply of housing, which is best addressed by building more. What research has been carried out into what actually drives high house prices in Cambridge, and what evidence is there that building more houses will address this? The situation we are currently in, with house prices soaring and many people unable to afford to live near where they work, has arisen despite significant house building programmes: we question whether a policy of more of the same is likely to help.</p>
<p>H/AH: Affordable housing</p>	<p>The aim of this policy should be to respond to the demand for truly affordable housing that people want to live in. The Cambridge Green Party believes we need a large increase in council owned and managed secure rented property backed up by community ownership cooperatives, housing associations and co-housing projects.</p> <p>We would like to see an assessment of the success or otherwise of previous policies to address the shortage of truly affordable housing.</p> <p>We have previously engaged with the issue of Affordable Housing - see for our example our response to the new housing policies consultation earlier this year [1]. Our key points from that consultation remain salient: we believe that a discount of 20% relative to the market rate is insufficient to make 'Affordable Private Rent' homes truly affordable for local people. We are very concerned that the Setting of Affordable Rents Policy seems to demonstrate that, by the Council's own metrics, 'affordable' housing will in fact be no such thing. The justification given is that providing greater discounts would not be "viable" in terms of Registered Housing Providers' business plans. We also think that 40% 'affordable' housing in developments is insufficient and call for a minimum of 50%.</p> <p>It would be useful to have a definition of the term Affordable housing which encompasses both home-owning and rental.</p> <p>[1] https://southcambbs.greenparty.org.uk/assets/images/local_parties/southcambridgeshire/Green%20response%20housing%20consultation%20March%202021.pdf</p>

<p>H/ES: Exception sites for affordable housing</p>	<p>We broadly support this policy direction, as long as a) exception sites are only created in response to objectively assessed local need, and b) the clause “<i>Rural exception sites will be allowed in the Green Belt only when it can be demonstrated that non Green-Belt alternative sites are not available</i>” is rigorously enforced. We are concerned by the statement that “<i>A small amount of market housing will be allowed on exception sites where it can be justified on viability or deliverability grounds</i>”: there will need to be very clear and well-enforced rules about when this is allowable, with a quantified definition of “a small amount”, to avoid Exception Sites policy becoming a loophole for building on sites where development would not otherwise be permitted.</p> <p>We are very pleased to see mention of “<i>community led housing initiatives such as community land trusts, co-housing and co-operatives</i>” and would like to see these types of housing given greater policy emphasis.</p> <p>We agree that rural exception sites must not be ‘squeezed out’ by First Home sites and support policies intended to prevent this.</p>
<p>H/HM: Housing mix</p>	<p>No comment</p>
<p>H/HD: Housing density</p>	<p>We broadly support this policy, as long as standards for accessible green space provision are met (see also BG/EO). Where people do not have private gardens, it is especially important that opportunities for local food growing - such as allotments, community farming schemes - are provided. We note that building height is not mentioned in this section (although it is covered elsewhere): a drive for higher housing density must not override considerations such as landscape impacts from inappropriately tall buildings. The building heights initially proposed for NE Cambridge proved unacceptable to the public in the first round of consultation, and have been reduced in the next draft.</p>
<p>H/GL: Garden land and subdivision of existing plots</p>	<p>We support this policy direction. As mentioned in the First Proposals document, gardens can help mitigate surface water flooding. As such, we would support the introduction of a condition that permeable surfaces must be used if gardens are converted to driveways.</p>

H/SS: Residential space standards and accessible homes	We broadly support this policy. UK minimum space standards are not generous and should be treated as a bare minimum.
H/SH: Specialist housing and homes for older people	We support this policy. We would add that it needs to be set alongside infrastructure and services policies to ensure access to specialist support for the social groups identified. This has not always been the case to date, e.g. lack of pharmacy/medical provision on major development sites in Cambridge.
H/CB: Self- and custom-build homes	We broadly support this policy. Two questions of clarification: 1) What are the selection criteria for inclusion on the register - e.g. can residents from outside Greater Cambridge can bid for sites? 2) Will policies CC/NZ (net zero buildings) and CC/WE (water efficiency) apply to self- and custom-build homes?
H/BR: Build to rent homes	<p>Although we accept that the private rented sector has a role in meeting housing need, the sector is failing to provide secure, affordable and high standard homes. Reform to housing policy is needed at national level to address this, but in the meantime local policy should try to limit the damage. A fundamental drawback of private rentals is that affordability cannot be guaranteed, but depends on the wider market conditions.</p> <p>We note that <i>“Build to Rent developments should meet the requirements as set out in the Greater Cambridge Housing Strategy (Cambridge City Council and South Cambridgeshire District Council, June 2021)”</i>. At the time the draft of this policy was consulted on we raised concerns which still apply to the published policy. It is not clear how much of the policy will actually be enforceable by the councils and how much will be negotiable with developers. The word ‘should’ is frequently used, as in “Tenancies of at least three years should be offered”, “No- one should be excluded on the basis of being in receipt of state benefits”– does ‘should’ mean ‘must’ in this context? An example we would particularly like to draw attention to is paragraph 12: “Quality of schemes is important; particularly environmental standards in line with the councils’ Sustainable Design and Construction Supplementary Planning Document.” Does this mean that developers will be contractually required to meet all standards set out in this document? The Green Party believes all new-build homes must meet the highest standards of sustainability and requests clarification on this point.</p>

	<p>“The policy will require at least 20% of homes on a Build to Rent development of 10 or more homes to be affordable private rented, and make clear that these homes will contribute towards the overall 40% affordable homes to be provided on a mixed tenure development.”. We call for greater ambition in the provision of affordable housing. We note that 20% is the standard benchmark given in national planning guidance. Given the crisis of affordable housing in Cambridge, we would like to see a much greater proportion of affordable rents provided in these developments.</p>
H/MO: Houses in multiple occupation (HMOs)	<p>At their best, house shares can be a more efficient use of a house than single occupancy (potentially reducing carbon emissions per person), can lead to lower heating and food bills for individuals, can enable people to live whether they otherwise could not afford to, and can provide a range of social benefits. However, currently HMOs are often sub-standard housing, poorly adapted to multiple occupancy, with gardens frequently removed to accommodate parking and bins. Rather than carrying forward existing policy, we call for a review of its successes and failures to inform a revised policy.</p>
H/SA: Student accommodation	<p>We agree that this policy is needed but would suggest awaiting 2022 findings from Universities on how demand for student accommodation is changing (given the changes brought about by Covid and Brexit). Anecdotally, demand from private 6th form colleges and from foreign students to Anglia Ruskin has fallen.</p>
H/DC: Dwellings in the countryside	<p>We broadly support this policy.</p>
H/RM: Residential moorings	<p>Again, rather than simply carrying forward the policy, it is important to review its successes and failures to inform any necessary updates. Cambridge City Council’s 2017 consultation, which proposed among other things a potential doubling of houseboat residents’ fees and plans to clear the Riverside section of Abbey of houseboats entirely, met with fierce local opposition and lessons must be learned from this.</p> <p>We are aware of some particular issues with existing provision:</p> <ul style="list-style-type: none"> ● New moorings should come with appropriate pumpout facilities - the one on Jesus Green is inadequate and needs replacing. ● pontoons, if supplied, need to be designed with someone involved who knows the shape of a narrowboat, and can ensure that boats will fit.

	<ul style="list-style-type: none"> ● Fixtures for moorings need to be designed with caution, and awareness that flooding can endanger boats and their occupants if they are moored with inappropriate fixtures.
H/RC: Residential caravans	See comments under H/GT
H/GT: Gypsy and Traveller and Travelling Show People sites	<p>It is essential that this policy is based on good evidence and on genuine consultation with the communities affected. This has often not been the case in the past. The 2011 Cambridge Sub-Region Gypsy and Traveller Accommodation Needs Assessment was a desk-based exercise, dependent on existing data but with a number of dubious assumptions applied. This resulted in a gross under-estimate of accommodation need.</p> <p>We are aware that the updated Accommodation Needs Assessment has been delayed by the impacts of the pandemic and will reserve detailed comment on this policy until the results are available. We are however very concerned that the private company carrying out the assessment will have been unable to establish much contact with the communities in question. We also hear that there is uncertainty over the exact terms of reference and area being covered by the assessment.</p> <p>We welcome the statement that <i>“the needs assessment will seek to identify the needs of Gypsies and Travellers that no longer travel”</i> as this was a serious omission in previous assessments.</p> <p>The national context for this policy is a shortage of pitches on Traveller sites [1]. Gypsy and Traveller people are estimated to have life expectancies of between ten and 25 years shorter than the general population. Pupils from the Gypsy, Roma and Traveller ethnic groups have the lowest average score in GCSEs of any ethnic group. Gypsies and Travellers are more likely to experience housing deprivation than any other ethnic group [2].</p> <p>Many current sites are in areas of high air pollution or and/or poorly connected. The chronic shortage and poor quality of sites provided nationally can be corrected at the local level by local authorities. The Local Plan should therefore prioritise delivery of sites for Gypsy, Roma and Traveller communities and ensure that they meet their needs, are sufficiently spacious, affordable, and are in locations that are desirable to this community.</p>

	<p>[1] Research by Friends Families and Travellers - https://www.gypsy-traveller.org/wp-content/uploads/2021/01/Availability-of-pitches-on-Traveller-sites-in-England_FINAL.pdf).</p> <p>[2] https://www.gypsy-traveller.org/wp-content/uploads/2020/12/Friends-Families-and-Travellers-submission-to-the-Commission-on-Race-and-Ethnic-Disparities-Call-for-Evidence-on-Ethnic-Disparities-and-Inequality-in-the-UK-FINAL.pdf</p>
H/CH: Community led housing	We broadly support this policy. As a general principle, the Green Party supports a large increase in council owned and managed secure rented property backed up by community ownership cooperatives, housing associations and co-housing projects. It will important to be clear which policies in the Local Plan (e.g. net zero buildings, affordable housing provision) will apply to community led housing developments.

INFRASTRUCTURE

Policy	Your comments
Policy I/ST: Sustainable transport and connectivity	<p>The very significant development of communities, from proposals in the Plan, around Cambridge over the coming years will significantly affect not only the immediate area of the settlements, but the travel links to the City. It is the position of the Cambridge Green Party that the scale of this development puts insupportable pressure on both the ecology and the infrastructure of the Cambridge area. What we are discussing below is damage limitation.</p> <p>As a mitigating axiom there must be a 'Green Line' standard by which these developments are evaluated, that is they should be net <i>reducers</i> of greenhouse gases by dint of their design delivering both very low emissions within the development but facilitating emission reduction in neighbouring villages/settlements. Inclusion of such a 'Green Line' for planning consent is consistent with best practice, as set out in the strategy document of Taunton and Somerset council. Such criteria should be formally evaluated as part of the planning consent process.[1]</p>

This 'Green Line' sets a higher and more appropriate travel standard for developers. Developers must therefore show that they will not provide simply convenient routes to 'Park 'n' Rides' for getting people to the City centre or to their places of work. The significant increase in population must be accommodated so that it does not turn outlying villages into car parks, and/or overwhelm an already stretched transport infrastructure. It must therefore take responsibility for both the consumer demand and the ecological impact of end-to-end change in travel load of anticipated journeys.

This would include the council ensuring, as part of the consent process, undertaking of an ongoing responsibility for underwriting of bus or other transport methods for completing habitual journeys [2]. Examples of this exist and should be expanded as a matter of urgency.

An essential criterion against which all developments and their respective transport plans should be evaluated must be whether they *reduce the total number of car movements into the city*. This is to say they must have a net positive impact on congestion and pollution. Without a net reduction in car movements any hope of achieving a net zero city by 2030 will be lost.

Policy discussion of larger scale infrastructure projects must recognise that they will be subject to long delay before delivery and will therefore have no immediate effect on the impact of either traffic or pollution. Infrastructure initiatives should be swift to implement and implicit in planning permissions.

We broadly welcome initiatives to reduce movements within settlements, and to enhance the use of either active or electric transport.

We specifically support attributes that can be incorporated into the design of the settlements themselves such as:

- I. Cycle greenways
- II. A parking permit cost that is a deterrent, with exemptions for special needs. Significant costs for second car permits .
- III. Ensure 'advance green phases' for bicycles at lights
- IV. European style provision for cycles and pedestrians and disabled

Bus transport should be enabled such that regular services reach travel hubs, or their nearest equivalent, serving the main demanded destinations. Convenient and economical end-to-end journeys will be essential. It must be recognised that public transport is a lifeline for many people. A lack of adequate provision

	<p>disproportionately affects people in lower income brackets who cannot afford to either own a car or live close to centres of employment.</p> <p>Arrangements where possible for simplified and good value single ticketing would be an advantage and should be explored as is currently the case in the Mega-rider pilot in Cambridge.[3].</p> <p>Travel hubs have been much spoken however they have been increasingly and incorrectly equated to Park and Rides. Unlike Park and Rides, they embody a fundamental infrastructure strategy to reduce the incentive to own and use a car, and to provide safe and efficient transport for everybody. As references to Travel Hubs are common to many proposals, we strongly suggest that that pilots of the Smarter Cambridge Travel specification[4] be set up in at least two suitable areas, perhaps serving existing new developments. As Travel Hubs are not as simple as park and rides they will need work to refine the integration of the various modes of transport involved, and the stakeholders.</p> <p>[1] Somerset West and Taunton Local Planning Authority, 'Climate Positive Planning Draft Interim Policy Statement on Planning for the Climate Emergency'. [2] https://www.stagecoachbus.com/promos-and-offers/east/single-bus-tickets-cambridge, https://www.environment.admin.cam.ac.uk/travel/travel-bus [3] https://www.stagecoachbus.com/promos-and-offers/east/new-flexible-bus-tickets [4] https://www.smartertransport.uk/travel-hubs/?utm_source=General+contacts&utm_campaign=953b6ad41a-Weekly+Mailchimp+Mailout&utm_medium=email&utm_term=0_df1204f23f-953b6ad41a-253543989</p>
<p>Policy I/EV: Parking and electric vehicles</p>	<p>We support this proposed policy, particularly that developers should be required to provide extensive and inclusive cycle parking at homes, destinations, and travel hubs. This provision should meet the Green Line criterion of contributing a demonstrable reduction in both traffic and emissions. We would strongly support a Workplace Parking Levy to be introduced across Greater Cambridge. This would act as a further disincentive to all but essential car ownership and vehicle movements and provide a source of funding to support eco-travel infrastructure.</p> <p>Car parking, while necessary, should be designed on a 'need to have' rather than a 'want to have' basis. As mentioned above, residents' parking permit costs should be a disincentive to car ownership. Possible</p>

	<p>alternative pricing for electric vehicles could be explored. Policies must be fair to all sections of society, including meeting the needs of individuals with a genuine need for access to a car.</p> <p>Car Clubs are a positive innovation. Lift sharing should be enabled on a Greater Cambridge-wide basis possibly using a car sharing system such as Liftshare. Developers can and should be responsible for making sure that Liftshare or similar apps are available to new residents.</p> <p>We welcome the proposal for electrical charging points but call for greater ambition. We note that according to Department of Transport Statistics [1], the number of charging points per 100,000 population is 44.8 in Cambridge and only 28.0 in South Cambridgeshire. By contrast, the rate in Oxford is 69.3, in Bedford 58.4, and North Devon 52: clearly there is room for improvement.</p> <p>Rapid charging is essential to the rapid uptake of EV's. The minimum specification for EV charging points as set out in the First Proposals is unambitious and will quickly become insufficient. New developments should be specified to have a minimum of 11kW with smart loading and easy access to 3 phase charging. This will meet the expected rise in the consumption of electricity by households (approx. 50%) in the near future and mean the increased capacity of inverters will not act as an infrastructure deficit, which would be very costly to redress. This level of provision will require an increase in the capacity of local substations by about 50%. In 2017 the Netherlands 50% of public charging was rapid charging, compared to about 5% in the UK.</p> <p>If Cambridge truly aspires to being a world-leading city it should be matching the Netherlands in the provision of this infrastructure, in which investment in local EV charging points is fundamentally different to the UK. The Netherlands had in 2017 a highly effective EV on request policy, under the 'Green Deal'. The spending of £2.2m in the UK is compared to approx. £28m in the Netherlands. The majority of UK spending is directed at inter-city infra-structure. The GP Cambridge feel that if Cambridge is to meet best practice this difference should be redressed both through policy and through planning criteria.</p> <p>[1] Electric vehicle charging device statistics: October 2021 https://www.gov.uk/government/statistics/electric-vehicle-charging-device-statistics-october-2021</p>
Policy I/FD: Freight and	We support the need to reduce the number of road freight and servicing vehicles, but would like to see strong wording concerning the need to move to a system of rail freight and other sustainable delivery

<p>delivery consolidation</p>	<p>mechanisms. We support the policy proposal concerning local travel hubs, and urge the Planning Authority to take note of the specification for Travel Hubs set out by Smarter Cambridge Transport [1].</p> <p>A further 'Green Line' should be established such that existing levels of road freight transport will not increase as a result of developments and that, just as in the case of human transport, planning will be made to account for end-to-end journeys and to provide infrastructure broad enough to lower net carbon emissions. This would include for example enabling neighbouring villages or other settlements to have convenient access to freight travel hubs, while avoiding consequential environmental degradation.</p> <p>[1] https://www.smartertransport.uk/travel-hubs/</p>
<p>Policy I/SI: Safeguarding important infrastructure</p>	<p>We support this policy direction</p>
<p>Policy I/AD: Aviation development</p>	<p>Aviation is one of the most energy intensive and polluting forms of transport, with both global and local impacts. Airport infrastructure also has negative impacts on residents, as exemplified by recent community opposition to the proposed new radar at Marshalls Airfield [1] . The core policy should be that there should be no development of the airport except under exceptional circumstances (for example replacing outdated infrastructure with safer or lower-impact alternatives).</p> <p>The Cambridge Green Party would therefore add to this policy direction an additional explicit objective to apply planning permission in future based on the criterion of 'whole project' emissions reduction and positive ecological impact.</p> <p>[1] https://cambridge.greenparty.org.uk/news/green-abbey-councillor-objects-to-new-airport-radar.html</p>
<p>Policy I/EI: Energy infrastructure masterplanning</p>	<p>This proposal aligns with our policy, however it should be seen within the context of 'net reductions' for the city. This puts a community obligation on those responsible for developments that would otherwise result in an increase in emissions. The criterion should be impact not scale.</p>

<p>Policy I/ID: Infrastructure and delivery</p>	<p>The Green Line here is any net increase in negative environmental impact. New development should not result in net increase of life-cycle emissions. Subject to this caveat, we support this proposal but would add that there should be severe penalties for not delivering on agreed infrastructure commitments. It must be illustrated that penalties may not under any circumstances be factored into project costings.</p>
<p>Policy I/DI: Digital infrastructure</p>	<p>We support this initiative and would like the policy to be worded clearly to show that it is inclusive to the whole community.</p> <p>Digital infrastructure should align with best practice for futureproofing in order to ensure that incentives to work without the necessity to use car transport are clearly established.</p>