

Although the draft Greater Cambridge Local Plan's approach to open space is stronger in some strategic respects (e.g. clearer green-infrastructure narrative), it also has several practical weaknesses with regard to how open space is secured and evidenced for POS- deficient Cambridge wards – in particular.

Loss of a clear, tabulated standard (Appendix I in CLP 2018)

In 2018, Appendix I of the Cambridge Local Plan set out numeric open space and recreation standards in a single, easily referenced table, directly tied to the city's evidence base. It has been used routinely in development management, and in public consultations on planning applications by residents. In this draft joint Plan, insofar as one can tell, the equivalent material is spread across core policies, supporting text and separate guidance (e.g. the Open Space in New Developments SPD). This makes it harder for users to see, in one place, the precise expectations how these relate to Cambridge-specific situations.

Weaker visibility of ward-by-ward deficiencies

The 2018 plan and its evidence sit on top of the 2011 clearly documented Open Space and Recreation Strategy. This broke down provision and deficits by ward, so Officers, Councillors and residents could see exactly where shortfalls were most acute and then argue objectively for targeted mitigation. In the draft joint plan, that ward-level picture is pushed entirely into the background. Further, this Plan relies on the historic (updated? where?) evidence base. It fails to offer a simple schedule or map of deficient wards. This weakens transparency in evaluating local impacts of development proposals. This is a very serious flaw that **must be rectified**.

Diffusion across the larger geography

The 2018 Cambridge plan is focused on the City and its wards, so its open space policies and standards focussed firmly on City needs. This draft Greater Cambridge plan covers both Cambridge and South Cambridgeshire, so its open space policy language is therefore more general and region-wide. This blunts the sharpness of essential City-specific tools (such as ward-based standards, targeted deficiency mapping, or explicit prioritisation of small urban infill and park improvements in City wards).

Reliance on separate SPDs and evidence

In 2018, a development-scale user could go from Policy 68 and Appendix I straight to the essential POS numbers and use them. Under this draft joint plan, the operational detail is pushed into SPDs and technical evidence (including the revised Open Space in New Developments SPD and other green-infrastructure work). This may be helpful to professional practitioners but causes key information to be manifestly less visible for members of the public. Further: this key information is functionally less "locked in" than clear figures in the main plan document itself. This is another serious flaw that **must be rectified**.

Consequent implications for POS-deficient wards

For wards already known to be deficient in open space, the 2018 framework made it relatively easy to demonstrate that a new scheme must both meet the numeric standard and, where possible, help address a quantified local shortfall. In this draft joint plan, while *the words* to support "natural spaces like parks, woodland and nature rich habitats" is clear, *the vital route* from that high-level commitment to measurable, ward-level gains is (unhelpfully) more indirect. In practice this will rely on how consistently key decision-makers reach back into the now obscured evidence. This **must be rectified** by the provision of explicit ward-focused requirements in the policy wording itself.

Reliance on evidence and data that are too old

The Open Space and Recreation Strategy 2011 and its assessment sections usefully break down open space provision, surpluses, and deficits by ward, using the standards that underpin the 2018 CLP. Section 4 of the Strategy "breaks the information down by ward and provides data on the deficits in each ward and the ward's strengths and weaknesses in terms of open space"; this is the source used when the Local Plan or an evidence papers refer to "wards with significant open space deficiencies."

The draft Greater Cambridge Local Plan refers to the Strategy and other open-space evidence instead of reproducing a ward-by-ward list of deficient wards in the plan itself. As a result, to see exactly which wards are currently classed as having quantitative open space deficiencies against the standards, it is necessary to go to the tables and ward write-ups in the **2011 Open Space and Recreation Strategy** and its assessment documents, rather than to an up-to-date schedule in the new draft plan. This is a **very serious** weakness that **must be rectified**.