

## **CAMBRIDGE AHEAD RESPONSE TO THE DRAFT GREATER CAMBRIDGE LOCAL PLAN (REGULATION 18)**

This document has three sections:

1. Key messages;
2. The full written response;
3. Response to Specific Policies (Extracts from Full Written Response)

### **1. KEY MESSAGES**

- Welcoming the underlying vision of good growth the Local Plan outlines, building on previous Local Plans for the area and balancing an ambition to support “the internationally significant innovation economy with a need to increase the quality of everyday life for all in our communities.” There is a need to balance Cambridge’s role as a global city with its local context, ensuring that growth also meets the needs of local communities and improves quality of life.
- Welcoming the acknowledgement of the need for different housing types and tenures, meeting the needs of different communities – particularly those put forward by Cambridge Ahead’s Young Advisory Committee as meeting the needs of young people
- Supporting the use of robust local data to inform economic modelling and recognising the effort to work with the grain of the clustering nature of the innovation economy
- Supporting over-provision for commercial space and housing, if economic performance is higher and infrastructure constraints are overcome, is welcome flexibility
- Emphasising the importance of the innovation infrastructure that underpins growth
- Highlighting that the dependence on infrastructure delivered by other bodies, particularly transport, emphasises the importance of system-wide alignment to unlock this growth and join up across current and evolving land-use, transport and growth planning strategies
- Asking for greater flexibility on densification, to high design and environmental standards, which would strengthen the draft Plan’s performance against its objectives around sustainability and housing delivery, and underpin key quality of life factors – such as access to public transport, public services and amenities
- Welcoming efforts to provide for “whole economy” needs, through a balanced provision of commercial space, notably in mid-tech and logistics
- Encouraging further consideration and an open and strategic approach to grey belt assessment which may uncover further opportunities that meet the stated objectives of the Local Plan

## 2. FULL WRITTEN RESPONSE

Cambridge Ahead welcomes the underlying vision of good growth the Local Plan outlines, building on previous Local Plans for the area and balancing an ambition to support “the internationally significant innovation economy with a need to increase the quality of everyday life for all in our communities.” There is a need to balance Cambridge’s role as a global city with its local context, ensuring that growth also meets the needs of local communities and improves quality of life.

Our comments on the draft Local Plan have been themed into key areas of relevance and interest to Cambridge Ahead members, who collectively employ over 40,000 people in the city region. These comments draw on our members’ expertise in bringing forward development in the Plan area, and their desire to see good growth in the local economy.

### *Planning for growth*

- The Local Plan sets out the intention to take projected jobs growth as far as is defensible under the test of objectively assessed need, which is welcome. Cambridge Ahead particularly supports the use of local data that we commission from the Centre for Business Research to inform the modelling of jobs and housing growth. The inclusion of additional headroom in both jobs and housing projections appropriately reflects Cambridge’s growth potential and aligns with wider ambitions across the place. This approach is vital for long-term viability and enhances the overall robustness of the draft Plan. With this in mind, the Local Plan, future spatial and housing strategies and supporting infrastructure need to design-in flexibility so that they can adapt to changing patterns of economic activity, new economic sectors and the future needs of a growing and more diverse population.
- We welcome the draft Local Plan’s supportive approach to clusters, which appropriately reflects the increasingly clustered nature of the Cambridge knowledge economy over the past decade, as evidenced by recent research from the Centre for Business Research<sup>1</sup>. In particular, the prioritisation of additional commercial space within existing cluster centres, including at North East Cambridge and through green belt release at the Cambridge Biomedical Campus and Babraham Research Campus, is welcome. The acknowledgment of the Southern Cluster as one of the key drivers of Greater Cambridge’s innovation economy and its role in supporting sustainable growth, is also positive - recognising the potential of major employment locations to evolve over time – it will be vital that this cluster and others are well connected to each other and to residential areas to ensure their vibrancy and viability. The Plan’s recognition of infrastructure supporting the innovation economy, including densification at Whittle Laboratory, proposed growth at Babraham, and the proposed innovation hub, is also positive. We would like to see the Plan more explicitly recognise the value of existing innovation infrastructure and the benefits of intensifying and expanding the parks and clusters to fully realise agglomeration benefits. In particular, the Plan’s recognition of the global importance and growing breadth of scientific activity within major clusters is welcome. It acknowledges the increasing overlap between disciplines and the important role that major campuses and business parks play in supporting discovery, translation and innovation within an increasingly connected ecosystem. We also welcome the Plan’s support for developments that strengthen clusters, including its recognition that the Cambridge ecosystem requires a diverse range of commercial space to accommodate different stages of business growth.

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<sup>1</sup> Cambridge Ahead and Centre for Business Research. (2025). *Business parks and clusters*. Available at: <https://cambridgeahead.co.uk/wp-content/uploads/2025/10/Business-Growth-and-Clusters-Cambridge-City-Region-2015-2024.pdf>

- The retained allocation for North East Cambridge is welcome; relocation of the Cambridge Waste Water Treatment Plant (CWTP) would unlock significant benefits in terms of sustainable growth at the site. The need for funding to deliver this remains a major concern, and Cambridge Ahead supports efforts to explore this further.
- The approach the Local Plan has taken to setting out how land should be used to support the wider economy is welcome, particularly the allocation of space for industrial, logistics and mid-tech uses, which helps promote a more balanced economy and address existing shortfalls. However, it is important to recognise that Greater Cambridge operates within wider regional and national supply chains and there needs to be in-built flexibility to respond to the needs of the economy. In this context, it will be important to ensure that the approach to industrial and warehousing provision retains sufficient flexibility to respond effectively to changing industrial and commercial needs over time.
- The supportive approach to meanwhile use (as put forward by Cambridge Ahead's Young Advisory Committee) is welcome, recognising its role in promoting inclusive growth and contributing to placemaking, particularly within large-scale developments. Partnership working between organisations, asset owners, developers and local authorities will be important to ensure the success of meanwhile use schemes.
- It is welcome to see the approach to supporting a circular economy and sustainable resource use in the draft Local Plan; in particular, the focus on reducing embodied carbon and the proportional approach to integrating circular economy principles is particularly welcome and builds on the work of Cambridge Ahead's Young Advisory Committee in this area.
- Cambridge Ahead welcomes the Local Plan's commitment to a vision-led approach to transport planning in the context of new development. This is essential to tackle one of the key constraints on the Cambridge economy and to supporting delivery of the Local Plan. However, given the rapidly evolving policy landscape, forthcoming spatial planning strategies and other interdependencies, alongside a complex governance environment, it will be important to ensure explicit consideration of how uncertainty is managed in applying this approach. Greater clarity on how the vision-led approach will remain robust and adaptable in the face of change would strengthen its effectiveness and support confident delivery.
- While not within the immediate scope of the Draft Greater Cambridge Local Plan, there are wider concerns about how energy demand and water capacity, including wastewater treatment, will be met across Greater Cambridge to support the Plan alongside other growth strategies. This is particularly pressing given projections that energy demand could triple by 2050 (from a 2021 baseline)<sup>2</sup>, excluding Cambridge Growth Company plans. Cambridge Ahead's research<sup>3</sup> suggests that energy capacity may become a significant constraint on growth. The complexity of managing energy and water supply, including balancing the needs of households, businesses, agriculture and the environment, highlights the importance of a strategic, master-planned approach. We welcome the recognition of immediate water constraints in the Infrastructure Delivery Plan and encourage continued engagement with partners to

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<sup>2</sup> Cambridgeshire County Council. (n.d.). *Local Area Energy Planning*. Available online: <https://www.cambridgeshire.gov.uk/residents/climate-change-energy-and-environment/climate-change-action/low-carbon-energy/local-area-energy-planning>

<sup>3</sup> Cambridge Ahead. (2024). *The Infrastructure Gap: The future of sustainable energy in Greater Cambridge*. Available at: <https://cambridgeahead.co.uk/wp-content/uploads/2025/03/the-future-of-sustainable-energy-in-greater-cambridge.pdf>

acknowledge these challenges and work collaboratively towards long-term solutions. We also encourage prioritised engagement (convened through Cambridge Growth Company) with regulators, national government and local authorities to support early investment in local energy infrastructure and the development of an integrated energy masterplan aligned with planning and growth strategies across the region.

### *Housing need*

- We welcome the Local Plan's commitment to delivering an appropriate mix of housing types and tenures to support balanced and inclusive communities. This is essential for effective placemaking, improving quality of life, and addressing the city region's longstanding housing challenges. In particular, the continued focus on provision of affordable housing is welcome, as sufficient supply is critical to easing housing pressures, expanding housing options and addressing shortages that contribute to wider issues such as homelessness. Greater Cambridge has consistently had strong higher delivery of affordable homes compared to the trend across England<sup>4</sup>. Provision of affordable housing at a range of market rent points, to meet the differing needs of different employees across a range of income levels, remains critical. The recognition of the role of Community Land Trusts in diversifying housing provision for local people is welcome, particularly the Plan's exception that allows Community Land Trusts to be considered as a viable model for affordable housing provision.
- Flexibility is critical in delivering different types and tenures, particularly for longer term strategic plans. The Plan's design-led approach to housing development is positive, providing the flexibility needed to deliver high-quality and well-designed schemes that can respond to the changing needs of the population.
- It is also welcome that the Plan recognises the importance of offering a diverse range of housing options, including affordable housing and exception sites, build-to-rent, self-build and custom-build, specialist housing, co-living, houses in multiple occupation (HMOs), and student accommodation – as called for by Cambridge Ahead's Young Advisory Committee. This breadth reflects an intention to meet the needs of different demographics within a high-growth, high-demand area. However, we encourage further consideration of alternative housing types, such as compact housing, as previously advocated by the Young Advisory Committee and highlighted in recent Future of Work research<sup>5</sup>. This outlines the need to increase the supply of independent, space-efficient homes within walking or cycling distance of major employment centres, offering a significant opportunity to ease housing pressures while supporting sustainable, well-connected development. The acknowledgement of the area's ageing population and the associated need for accessible and adaptable homes is particularly important, ensuring that provision supports residents in different stages of life.
- It is welcome that the Plan supports the conversion of non-residential premises to residential use and seeks to restrict the loss of housing to visitor accommodation in order to safeguard housing supply. However, there are concerns regarding the proposed test for assessing the loss of visitor accommodation, which may benefit from reconsideration in light of current housing pressures. Given Greater Cambridge's sustained and exceptional growth trajectory, there is a

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<sup>4</sup> Savills and Cambridge Ahead. (2025). *Greater Cambridge Housing Dashboard – Q3 2025 Planning Consents and Build Out Rates*.

<sup>5</sup> Cambridge Ahead Young Advisory Committee. (2026). *People and Place: Securing Cambridge's Growth Through Workforce and Housing*. Available online: <https://cambridgeahead.co.uk/wp-content/uploads/2026/01/Future-of-Work-Report-Jan-2026.pdf>

strong case for facilitating the conversion of surplus visitor accommodation to residential use through planning policy where appropriate. A more proportionate and economically grounded approach, rather than the stringent economic test currently proposed, would better reflect present conditions and support the delivery of much-needed homes.

- The Local Plan also acknowledges the important role that employer-led housing plays in supporting sustainability, the knowledge economy and placemaking, which is welcome. Employer-led housing has been particularly impactful in delivering specialist housing at pace, supporting Cambridge's growth.

#### *Density*

- The Plan's ambition to optimise density and support higher-density development in locations where existing services and transport infrastructure can sustain it is welcome. Clear recognition of the benefits associated with higher density is an important and positive step.
- Cambridge Ahead firmly supports the use of appropriate and high-quality density as a mechanism for delivering additional housing and commercial space in sustainable locations, while strengthening the viability of public transport and public services like healthcare.
- The continued commitment to high-quality, well-designed places and buildings is welcome. The Plan's emphasis on high-quality development provides important assurance; well-designed and well-built places help attract and retain talent, support thriving communities, and this ultimately underpins sustainable economic growth.
- Well-executed densification in suitable places is essential for a growing city such as Cambridge. Higher-density development in areas with strong transport and public service provision is fundamental to ensuring long-term viability. Concentrating densification around existing infrastructure also provides significant environmental benefits by improving mobility and reducing reliance on private car travel, for example the CBI development.
- However, there are significant concerns about some of the limits and constraints specified in the current approach to density within the Local Plan, particularly the emphasis on conformity and heritage considerations. The automatic assessment triggers linked to building heights across different location types risks unduly constraining well-justified higher density developments which would deliver clear benefits in terms of amenity, future transport provision, and long-term viability and sustainability.
- The requirement to protect views of historic tall elements by preventing any obstruction or detracting from distant, strategic, or local views of key landmarks has the potential to unnecessarily restrict opportunities for sustainable and strategic growth, and to limit the wider benefits associated with increased density. Greater flexibility on density is needed, including through reframing the Skyline and Tall Buildings policy. We would welcome the policy being revised to allow for taller buildings in a wider range of locations than currently specified.

#### *Green belt and grey belt*

- Cambridge Ahead welcomes the confirmation of green belt release to meet the needs of strategic sites, such as the Cambridge Biomedical Campus.

- Cambridge Ahead understands that the grey belt assessment will be published following the Local Plan consultation. However, the apparent early determination, in advance of the published review, that there are no strategic exceptional circumstances to justify release of green belt land, and by extension grey belt release for strategic planning purposes, remains a concern. We strongly encourage GCSP to approach the assessment with an open mind, to reassess existing assumptions in light of the newly defined concept of the 'grey belt' in the revised NPPF, and to explore the potential of such sites positively and strategically. Careful consideration of opportunities in grey belt areas has the potential to enable denser and more sustainable development, supporting wider social and environmental objectives of the draft Plan, such as climate resilience, high-quality placemaking, biodiversity gains, and reduced need for commuting, while also creating opportunities for sustainable infrastructure provision, including renewable energy, active and sustainable travel solutions such as mixed-modal public transport solutions and expansion of active travel routes as the city grows, for example. This approach could strengthen deliverability of the Local Plan by reducing dependence on future transport infrastructure delivery. Given the exceptional and unprecedented nature of Greater Cambridge's growth in recent years and expected continued trajectory, this will be an important consideration going forward.
- If the conclusion of the grey belt assessment does not provide opportunities for the Local Plan to enable a more balanced pattern of development, with delivery spread across a wider range of settlements, it may be timely to revisit some of the aspects of the original rationale underpinning the green belt and assess whether the emphasis on component parts would benefit from updating, particularly clause 1b in Policy S/GB and the importance placed on the protection of "setting" and visual aspects of the skyline – and consideration of whether this continues to be appropriate in the mid-21st century. We would suggest that the climate crisis and housing crisis we now face (which were not material factors when the green belt policy was originally established) could be considered as exceptional circumstances which could justify a more flexible and permissive approach to grey belt in particular, and potentially some further limited release of city-edge green belt in due course. This is particularly relevant in the context of the updated National Planning Policy Framework's revised presumption in favour of sustainable development. There is an opportunity to take a more strategic and redistributive approach to grey and green belt policy, focusing on releasing land in sustainable locations while still ensuring the green belt continues to prevent urban sprawl and supports access to green space. Rather than positioning the green belt as a binary choice between retention or release, a more flexible and redistributive approach would allow it to better support sustainable growth while continuing to serve its core purpose.
- It is welcome that the Local Plan highlights the importance of the nature network and its alignment with the Local Nature Recovery Strategy. We support the Plan's intention to increase and improve wildlife habitats and green spaces for people. There is a valuable opportunity to strengthen the existing nature network and to allocate publicly accessible green space and nature recovery areas alongside other land uses, thereby supporting environmental objectives as well as placemaking, connectivity, green infrastructure, and overall quality of life.

#### *Deliverability*

- The delivery of the Local Plan is increasingly interdependent with the Cambridgeshire and Peterborough Local Growth Plan, the future Sustainable Development Strategy (SDS) at the Cambridgeshire and Peterborough level, and Cambridge Growth Company's plan, as well as

with delivery of key infrastructure such as the Cambourne to Cambridge transport corridor and East West Rail. Some of these interdependencies, particularly those relating to transport strategy and the delivery of major transport infrastructure, are critical to delivery of the Local Plan while also sitting largely outside the direct control of the planning system. These dependencies sit alongside broader enabling requirements such as water, energy, and social infrastructure provision. As these strategies and interventions progress, it is important that they are informed by consistent evidence and aligned assumptions on spatial strategy, infrastructure provision and phasing, with greater clarity on the assumptions being made where delivery relies on decisions or investment beyond the planning system. Clear recognition of these interdependencies and stronger systems alignment will be critical to ensuring coherent land-use and investment decisions to strengthen the robustness of the Plan in unlocking the future growth potential of the Cambridge city region.

- Given the pace of change in the innovation economy and the international competition for investment and talent, it is particularly important that the Local Plan maintains sufficient flexibility to allow major employment locations and clusters to adapt, intensify and evolve over time. This includes the ability to modernise, replace or repurpose existing buildings and infrastructure as technologies, research practices and occupier requirements change.
- An infrastructure-first approach remains essential to delivering good growth. The timely delivery of infrastructure that has passed statutory processes will be critical to addressing existing constraints and unlocking future potential. The recognition of this by local partners is welcome, as reflected in the CPCA's Statement of Intent on the Greater Cambridge Transport Strategy. It will be essential that the relevant bodies (CPCA, Cambridge Growth Company, local authorities and others) continue to collaborate closely to ensure coherent and complementary strategies that deliver infrastructure-first, sustainable and inclusive growth.
- Given the draft Local Plan's reliance on the delivery of major infrastructure beyond the control of the GCSP, there is a need to recognise and manage delivery risk. A more phased and prioritised approach, based on realistic assumptions about funding for infrastructure, governance changes and expected delivery timelines, may be more appropriate and strengthen the robustness of the Local Plan. This may also support businesses and investors who need longer-term certainty to enable investment decisions and support growth.
- The recognition of the importance of the Wellcome Genome Campus is welcome, and it is positive that the Local Plan is seeking to support the evolution of this employment park, among others. It should however be noted that the provision of transport infrastructure to support growth at the Campus is critical. Similar consideration applies to other sites such as the planned expansion of Cambourne, which is dependent on the delivery of the Cambourne-to-Cambridge transport corridor and delivery of East West Rail. Recent research commissioned by Cambridge Ahead demonstrates that delivery of public transport infrastructure – such as the original Guided Busway, Cambridge North and A14 road improvements – has supported employment growth in the business parks and clusters beyond the city centre<sup>6</sup>. The major significance of transport infrastructure to support growth cannot be understated, and while this is not within scope of the Local Plan, the impact of future transport planning and intervention

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on the Local Plan delivery must be recognised – connectivity between employment and housing, as well as between employment sites, is critical.

- There is particular concern that the additional new housing outlined in the Plan, beyond those sites already identified in the currently adopted plan, is largely dependent on two major sites: Grange Farm and the expansion of Cambourne. While larger strategic sites play a vital role, this approach may pose delivery risks that are beyond the control of the GCSP, particularly where delivery is dependent on major infrastructure and therefore often takes longer to deliver. This is demonstrated by recent challenges following the Government's withdrawal of funding from CWWTP, the resulting impact on the Hartree development, and ongoing uncertainty regarding North East Cambridge. It is therefore essential that local authorities and partners support strategic sites to deliver at a steady and robust rate. Alongside this, a more balanced approach which phases smaller sites alongside larger strategic developments would help mitigate delivery risk, improve resilience, and support growth – providing greater flexibility in meeting housing needs. It would be helpful for the Plan to provide greater clarity on how this approach supports adaptability and can respond to changing circumstances over the Plan period, without altering its overall ambition.
- There are concerns about the cumulative impact of Local Plan requirements on viability and, ultimately, delivery in practice. While the ambition to secure affordable housing, affordable workspace, high design quality / low carbon and wider public benefits such as biodiversity net gain and urban greening is understood and supported, anecdotal reports suggest that some sites are struggling to come forward because viability is proving too challenging. This is reportedly being seen across housing and employment development, particularly in certain accommodation types, highlighting the need to consider viability in the round and to apply viability testing consistently to all forms of affordable provision across different development types. The Plan would benefit from a clearer, aggregated assessment of viability outcomes, informed by both permissions granted and historic delivery, to better understand where negotiated reductions have occurred and how trade-offs are being made.
- There is also a need to recognise the cumulative effect of multiple policy requirements. Individually, expectations around design quality, sustainability standards and affordable provision are reasonable; taken together, they can place significant pressure on scheme viability, particularly where there is limited flexibility in how costs are absorbed. In practice, these requirements operate as a form of land value capture, without always clearly acknowledging who ultimately bears the cost.
- Cambridge is often viewed as a location able to absorb the highest standards due to strong land values. While understandable, this can mask real delivery constraints and may contribute to schemes stalling, raising questions about the impact on housing and employment delivery and overall momentum.
- A more open and balanced approach to viability, which recognises the limits of what can reasonably be achieved on every site, and articulates a hierarchy of requirements, would strengthen the credibility of the Plan and support delivery. In doing so, it should be recognised that while some sites may be able to accommodate a wide range of objectives, others may benefit from a more focused set of priorities, enabling stronger delivery, greater differentiation between places, and increased local diversity and choice. Greater clarity on how competing

objectives are prioritised when viability becomes constrained would provide increased certainty and help ensure that high-quality growth can be delivered at pace.

### **3. RESPONSE TO THE SPECIFIC POLICIES (EXTRACTS FROM FULL WRITTEN RESPONSE)**

#### **Summary of the Greater Cambridge Local Plan**

##### ***Your representations – Summary of comments***

CA welcomes the vision of good growth, which balances support for the internationally significant innovation economy with improved quality of life for local communities. We support the use of robust local data and the recognition of the clustering nature of the economy, alongside flexibility to allow additional commercial space and housing where performance is strong and infrastructure constraints are addressed. The Plan's reliance on externally delivered infrastructure, particularly transport, highlights the need for system-wide alignment. Greater flexibility on high-quality densification and a more strategic approach to grey belt assessment would further support sustainability, housing delivery, and growth objectives.

##### ***Full comments***

Cambridge Ahead welcomes the underlying vision of good growth the Local Plan outlines, building on previous Local Plans for the area and balancing an ambition to support “the internationally significant innovation economy with a need to increase the quality of everyday life for all in our communities.” There is a need to balance Cambridge's role as a global city with its local context, ensuring that growth also meets the needs of local communities and improves quality of life.

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##### ***Planning for growth***

- The Local Plan sets out the intention to take projected jobs growth as far as is defensible under the test of objectively assessed need, which is welcome. Cambridge Ahead particularly supports the use of local data that we commission from the Centre for Business Research to inform the modelling of jobs and housing growth. The inclusion of additional headroom in both jobs and housing projections appropriately reflects Cambridge's growth potential and aligns with wider ambitions across the place. This approach is vital for long-term viability and enhances the overall robustness of the draft Plan. With this in mind, the Local Plan, future spatial and housing strategies and supporting infrastructure need to design-in flexibility so that they can adapt to changing patterns of economic activity, new economic sectors and the future needs of a growing and more diverse population.
- We welcome the draft Local Plan's supportive approach to clusters, which appropriately reflects the increasingly clustered nature of the Cambridge knowledge economy over the past decade, as evidenced by recent research from the Centre for Business Research<sup>7</sup>. In particular, the prioritisation of additional commercial space within existing cluster centres, including at North East Cambridge and through green belt release at the Cambridge Biomedical Campus and Babraham Research Campus, is welcome. The acknowledgment of the Southern Cluster as one

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of the key drivers of Greater Cambridge's innovation economy and its role in supporting sustainable growth, is also positive – recognising the potential of major employment locations to evolve over time – it will be vital that this cluster and others are well connected to each other and to residential areas to ensure their vibrancy and viability. The Plan's recognition of infrastructure supporting the innovation economy, including densification at Whittle Laboratory, proposed growth at Babraham, and the proposed innovation hub, is also positive. We would like to see the Plan more explicitly recognise the value of existing innovation infrastructure and the benefits of intensifying and expanding the parks and clusters to fully realise agglomeration benefits. In particular, the Plan's recognition of the global importance and growing breadth of scientific activity within major clusters is welcome. It acknowledges the increasing overlap between disciplines and the important role that major campuses and business parks play in supporting discovery, translation and innovation within an increasingly connected ecosystem. We also welcome the Plan's support for developments that strengthen clusters, including its recognition that the Cambridge ecosystem requires a diverse range of commercial space to accommodate different stages of business growth.

- The retained allocation for North East Cambridge is welcome; relocation of the Cambridge Waste Water Treatment Plant (CWTP) would unlock significant benefits in terms of sustainable growth at the site. The need for funding to deliver this remains a major concern, and Cambridge Ahead supports efforts to explore this further.
- The approach the Local Plan has taken to setting out how land should be used to support the wider economy is welcome, particularly the allocation of space for industrial, logistics and mid-tech uses, which helps promote a more balanced economy and address existing shortfalls. However, it is important to recognise that Greater Cambridge operates within wider regional and national supply chains and there needs to be in-built flexibility to respond to the needs of the economy. In this context, it will be important to ensure that the approach to industrial and warehousing provision retains sufficient flexibility to respond effectively to changing industrial and commercial needs over time.
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- While not within the immediate scope of the Draft Greater Cambridge Local Plan, there are wider concerns about how energy demand and water capacity, including wastewater treatment, will be met across Greater Cambridge to support the Plan alongside other growth strategies. This is particularly pressing given projections that energy demand could triple by 2050 (from a 2021 baseline)<sup>8</sup>, excluding Cambridge Growth Company plans. Cambridge Ahead's research<sup>9</sup> suggests that energy capacity may become a significant constraint on growth. The complexity of managing energy and water supply, including balancing the needs of households, businesses, agriculture and the environment, highlights the importance of a strategic, master-planned approach. We welcome the recognition of immediate water constraints in the Infrastructure Delivery Plan and encourage continued engagement with partners to acknowledge these challenges and work collaboratively towards long-term solutions. We also encourage prioritised engagement (convened through Cambridge Growth Company) with regulators, national government and local authorities to support early investment in local energy infrastructure and the development of an integrated energy masterplan aligned with planning and growth strategies across the region.

### *Housing need*

- We welcome the Local Plan's commitment to delivering an appropriate mix of housing types and tenures to support balanced and inclusive communities. This is essential for effective placemaking, improving quality of life, and addressing the city region's longstanding housing challenges. In particular, the continued focus on provision of affordable housing is welcome, as sufficient supply is critical to easing housing pressures, expanding housing options and addressing shortages that contribute to wider issues such as homelessness. Greater Cambridge has consistently had strong higher delivery of affordable homes compared to the trend across England<sup>10</sup>. Provision of affordable housing at a range of market rent points, to meet the differing needs of different employees across a range of income levels, remains critical. The recognition of the role of Community Land Trusts in diversifying housing provision for local people is welcome, particularly the Plan's exception that allows Community Land Trusts to be considered as a viable model for affordable housing provision.
- Flexibility is critical in delivering different types and tenures, particularly for longer term strategic plans. The Plan's design-led approach to housing development is positive, providing the flexibility needed to deliver high-quality and well-designed schemes that can respond to the changing needs of the population.
- It is also welcome that the Plan recognises the importance of offering a diverse range of housing options, including affordable housing and exception sites, build-to-rent, self-build and custom-build, specialist housing, co-living, houses in multiple occupation (HMOs), and student accommodation – as called for by Cambridge Ahead's Young Advisory Committee. This breadth reflects an intention to meet the needs of different demographics within a high-growth, high-demand area. However, we encourage further consideration of alternative housing types,

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such as compact housing, as previously advocated by the Young Advisory Committee and highlighted in recent Future of Work research<sup>11</sup>. This outlines the need to increase the supply of independent, space-efficient homes within walking or cycling distance of major employment centres, offering a significant opportunity to ease housing pressures while supporting sustainable, well-connected development. The acknowledgement of the area's ageing population and the associated need for accessible and adaptable homes is particularly important, ensuring that provision supports residents in different stages of life.

- It is welcome that the Plan supports the conversion of non-residential premises to residential use and seeks to restrict the loss of housing to visitor accommodation in order to safeguard housing supply. However, there are concerns regarding the proposed test for assessing the loss of visitor accommodation, which may benefit from reconsideration in light of current housing pressures. Given Greater Cambridge's sustained and exceptional growth trajectory, there is a strong case for facilitating the conversion of surplus visitor accommodation to residential use through planning policy where appropriate. A more proportionate and economically grounded approach, rather than the stringent economic test currently proposed, would better reflect present conditions and support the delivery of much-needed homes.
- The Local Plan also acknowledges the important role that employer-led housing plays in supporting sustainability, the knowledge economy and placemaking, which is welcome. Employer-led housing has been particularly impactful in delivering specialist housing at pace, supporting Cambridge's growth.

#### *Density*

- The Plan's ambition to optimise density and support higher-density development in locations where existing services and transport infrastructure can sustain it is welcome. Clear recognition of the benefits associated with higher density is an important and positive step.
- Cambridge Ahead firmly supports the use of appropriate and high-quality density as a mechanism for delivering additional housing and commercial space in sustainable locations, while strengthening the viability of public transport and public services like healthcare.
- The continued commitment to high-quality, well-designed places and buildings is welcome. The Plan's emphasis on high-quality development provides important assurance; well-designed and well-built places help attract and retain talent, support thriving communities, and this ultimately underpins sustainable economic growth.
- Well-executed densification in suitable places is essential for a growing city such as Cambridge. Higher-density development in areas with strong transport and public service provision is fundamental to ensuring long-term viability. Concentrating densification around existing infrastructure also provides significant environmental benefits by improving mobility and reducing reliance on private car travel, for example the CBI development.
- However, there are significant concerns about some of the limits and constraints specified in the current approach to density within the Local Plan, particularly the emphasis on conformity and heritage considerations. The automatic assessment triggers linked to building heights

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<sup>11</sup> Cambridge Ahead Young Advisory Committee. (2026). *People and Place: Securing Cambridge's Growth Through Workforce and Housing*. Available online: <https://cambridgeahead.co.uk/wp-content/uploads/2026/01/Future-of-Work-Report-Jan-2026.pdf>

across different location types risks unduly constraining well-justified higher density developments which would deliver clear benefits in terms of amenity, future transport provision, and long-term viability and sustainability.

- The requirement to protect views of historic tall elements by preventing any obstruction or detracting from distant, strategic, or local views of key landmarks has the potential to unnecessarily restrict opportunities for sustainable and strategic growth, and to limit the wider benefits associated with increased density. Greater flexibility on density is needed, including through reframing the Skyline and Tall Buildings policy. We would welcome the policy being revised to allow for taller buildings in a wider range of locations than currently specified.

#### *Green belt and grey belt*

- Cambridge Ahead welcomes the confirmation of green belt release to meet the needs of strategic sites, such as the Cambridge Biomedical Campus.
- Cambridge Ahead understands that the grey belt assessment will be published following the Local Plan consultation. However, the apparent early determination, in advance of the published review, that there are no strategic exceptional circumstances to justify release of green belt land, and by extension grey belt release for strategic planning purposes, remains a concern. We strongly encourage GCSP to approach the assessment with an open mind, to reassess existing assumptions in light of the newly defined concept of the 'grey belt' in the revised NPPF, and to explore the potential of such sites positively and strategically. Careful consideration of opportunities in grey belt areas has the potential to enable denser and more sustainable development, supporting wider social and environmental objectives of the draft Plan, such as climate resilience, high-quality placemaking, biodiversity gains, and reduced need for commuting, while also creating opportunities for sustainable infrastructure provision, including renewable energy, active and sustainable travel solutions such as mixed-modal public transport solutions and expansion of active travel routes as the city grows, for example. This approach could strengthen deliverability of the Local Plan by reducing dependence on future transport infrastructure delivery. Given the exceptional and unprecedented nature of Greater Cambridge's growth in recent years and expected continued trajectory, this will be an important consideration going forward.
- If the conclusion of the grey belt assessment does not provide opportunities for the Local Plan to enable a more balanced pattern of development, with delivery spread across a wider range of settlements, it may be timely to revisit some of the aspects of the original rationale underpinning the green belt and assess whether the emphasis on component parts would benefit from updating, particularly clause 1b in Policy S/GB and the importance placed on the protection of "setting" and visual aspects of the skyline – and consideration of whether this continues to be appropriate in the mid-21st century. We would suggest that the climate crisis and housing crisis we now face (which were not material factors when the green belt policy was originally established) could be considered as exceptional circumstances which could justify a more flexible and permissive approach to grey belt in particular, and potentially some further limited release of city-edge green belt in due course. This is particularly relevant in the context of the updated National Planning Policy Framework's revised presumption in favour of sustainable development. There is an opportunity to take a more strategic and redistributive approach to grey and green belt policy, focusing on releasing land in sustainable locations while still ensuring the green belt continues to prevent urban sprawl and supports access to

green space. Rather than positioning the green belt as a binary choice between retention or release, a more flexible and redistributive approach would allow it to better support sustainable growth while continuing to serve its core purpose.

- It is welcome that the Local Plan highlights the importance of the nature network and its alignment with the Local Nature Recovery Strategy. We support the Plan's intention to increase and improve wildlife habitats and green spaces for people. There is a valuable opportunity to strengthen the existing nature network and to allocate publicly accessible green space and nature recovery areas alongside other land uses, thereby supporting environmental objectives as well as placemaking, connectivity, green infrastructure, and overall quality of life.

### *Deliverability*

- The delivery of the Local Plan is increasingly interdependent with the Cambridgeshire and Peterborough Local Growth Plan, the future Sustainable Development Strategy (SDS) at the Cambridgeshire and Peterborough level, and Cambridge Growth Company's plan, as well as with delivery of key infrastructure such as the Cambourne to Cambridge transport corridor and East West Rail. Some of these interdependencies, particularly those relating to transport strategy and the delivery of major transport infrastructure, are critical to delivery of the Local Plan while also sitting largely outside the direct control of the planning system. These dependencies sit alongside broader enabling requirements such as water, energy, and social infrastructure provision. As these strategies and interventions progress, it is important that they are informed by consistent evidence and aligned assumptions on spatial strategy, infrastructure provision and phasing, with greater clarity on the assumptions being made where delivery relies on decisions or investment beyond the planning system. Clear recognition of these interdependencies and stronger systems alignment will be critical to ensuring coherent land-use and investment decisions to strengthen the robustness of the Plan in unlocking the future growth potential of the Cambridge city region.
- Given the pace of change in the innovation economy and the international competition for investment and talent, it is particularly important that the Local Plan maintains sufficient flexibility to allow major employment locations and clusters to adapt, intensify and evolve over time. This includes the ability to modernise, replace or repurpose existing buildings and infrastructure as technologies, research practices and occupier requirements change.
- An infrastructure-first approach remains essential to delivering good growth. The timely delivery of infrastructure that has passed statutory processes will be critical to addressing existing constraints and unlocking future potential. The recognition of this by local partners is welcome, as reflected in the CPCA's Statement of Intent on the Greater Cambridge Transport Strategy. It will be essential that the relevant bodies (CPCA, Cambridge Growth Company, local authorities and others) continue to collaborate closely to ensure coherent and complementary strategies that deliver infrastructure-first, sustainable and inclusive growth.
- Given the draft Local Plan's reliance on the delivery of major infrastructure beyond the control of the GCSP, there is a need to recognise and manage delivery risk. A more phased and prioritised approach, based on realistic assumptions about funding for infrastructure, governance changes and expected delivery timelines, may be more appropriate and strengthen the robustness of the Local Plan. This may also support businesses and investors who need longer-term certainty to enable investment decisions and support growth.

- The recognition of the importance of the Wellcome Genome Campus is welcome, and it is positive that the Local Plan is seeking to support the evolution of this employment park, among others. It should however be noted that the provision of transport infrastructure to support growth at the Campus is critical. Similar consideration applies to other sites such as the planned expansion of Cambourne, which is dependent on the delivery of the Cambourne-to-Cambridge transport corridor and delivery of East West Rail. Recent research commissioned by Cambridge Ahead demonstrates that delivery of public transport infrastructure – such as the original Guided Busway, Cambridge North and A14 road improvements – has supported employment growth in the business parks and clusters beyond the city centre<sup>12</sup>. The major significance of transport infrastructure to support growth cannot be understated, and while this is not within scope of the Local Plan, the impact of future transport planning and intervention on the Local Plan delivery must be recognised – connectivity between employment and housing, as well as between employment sites, is critical.
- There is particular concern that the additional new housing outlined in the Plan, beyond those sites already identified in the currently adopted plan, is largely dependent on two major sites: Grange Farm and the expansion of Cambourne. While larger strategic sites play a vital role, this approach may pose delivery risks that are beyond the control of the GCSP, particularly where delivery is dependent on major infrastructure and therefore often takes longer to deliver. This is demonstrated by recent challenges following the Government's withdrawal of funding from CWWTP, the resulting impact on the Hartree development, and ongoing uncertainty regarding North East Cambridge. It is therefore essential that local authorities and partners support strategic sites to deliver at a steady and robust rate. Alongside this, a more balanced approach which phases smaller sites alongside larger strategic developments would help mitigate delivery risk, improve resilience, and support growth – providing greater flexibility in meeting housing needs. It would be helpful for the Plan to provide greater clarity on how this approach supports adaptability and can respond to changing circumstances over the Plan period, without altering its overall ambition.
- There are concerns about the cumulative impact of Local Plan requirements on viability and, ultimately, delivery in practice. While the ambition to secure affordable housing, affordable workspace, high design quality / low carbon and wider public benefits such as biodiversity net gain and urban greening is understood and supported, anecdotal reports suggest that some sites are struggling to come forward because viability is proving too challenging. This is reportedly being seen across housing and employment development, particularly in certain accommodation types, highlighting the need to consider viability in the round and to apply viability testing consistently to all forms of affordable provision across different development types. The Plan would benefit from a clearer, aggregated assessment of viability outcomes, informed by both permissions granted and historic delivery, to better understand where negotiated reductions have occurred and how trade-offs are being made.
- There is also a need to recognise the cumulative effect of multiple policy requirements. Individually, expectations around design quality, sustainability standards and affordable provision are reasonable; taken together, they can place significant pressure on scheme viability, particularly where there is limited flexibility in how costs are absorbed. In practice, these

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<sup>12</sup> Cambridge Ahead and Centre for Business Research. (2025). *Business parks and clusters*. Available at: <https://cambridgeahead.co.uk/wp-content/uploads/2025/10/Business-Growth-and-Clusters-Cambridge-City-Region-2015-2024.pdf>

requirements operate as a form of land value capture, without always clearly acknowledging who ultimately bears the cost.

- Cambridge is often viewed as a location able to absorb the highest standards due to strong land values. While understandable, this can mask real delivery constraints and may contribute to schemes stalling, raising questions about the impact on housing and employment delivery and overall momentum.
- A more open and balanced approach to viability, which recognises the limits of what can reasonably be achieved on every site, and articulates a hierarchy of requirements, would strengthen the credibility of the Plan and support delivery. In doing so, it should be recognised that while some sites may be able to accommodate a wide range of objectives, others may benefit from a more focused set of priorities, enabling stronger delivery, greater differentiation between places, and increased local diversity and choice. Greater clarity on how competing objectives are prioritised when viability becomes constrained would provide increased certainty and help ensure that high-quality growth can be delivered at pace.

## **About the Plan**

### ***Your representations - Summary of comments***

- The Local Plan is interdependent on wider strategies, infrastructure delivery, and enabling services such as water, energy, and social infrastructure. As these strategies and interventions progress, it is important they are informed by consistent evidence and aligned assumptions on spatial strategy, infrastructure provision and phasing, with greater clarity on the assumptions being made where delivery relies on decisions or investment beyond the planning system. Clear recognition of these interdependencies and stronger systems alignment will be critical to ensuring coherent land-use and investment decisions to strengthen the robustness of the Plan in unlocking future growth potential of the Cambridge city region.

### ***Full comments***

- The delivery of the Local Plan is increasingly interdependent with the Cambridgeshire and Peterborough Local Growth Plan, the future Sustainable Development Strategy (SDS) at the Cambridgeshire and Peterborough level, and Cambridge Growth Company's plan, as well as with delivery of key infrastructure such as the Cambourne to Cambridge transport corridor and East West Rail. Some of these interdependencies, particularly those relating to transport strategy and the delivery of major transport infrastructure, are critical to delivery of the Local Plan while also sitting largely outside the direct control of the planning system. These dependencies sit alongside broader enabling requirements such as water, energy, and social infrastructure provision. As these strategies and interventions progress, it is important that they are informed by consistent evidence and aligned assumptions on spatial strategy, infrastructure provision and phasing, with greater clarity on the assumptions being made where delivery relies on decisions or investment beyond the planning system. Clear recognition of these interdependencies and stronger systems alignment will be critical to ensuring coherent land-use and investment decisions to strengthen the robustness of the Plan in unlocking the future growth potential of the Cambridge city region.
- Given the pace of change in the innovation economy and the international competition for investment and talent, it is particularly important that the Local Plan maintains sufficient flexibility to allow major employment locations and clusters to adapt, intensify and evolve over

time. This includes the ability to modernise, replace or repurpose existing buildings and infrastructure as technologies, research practices and occupier requirements change.

- An infrastructure-first approach remains essential to delivering good growth. The timely delivery of infrastructure that has passed statutory processes will be critical to addressing existing constraints and unlocking future potential. The recognition of this by local partners is welcome, as reflected in the CPCA's Statement of Intent on the Greater Cambridge Transport Strategy. It will be essential that the relevant bodies (CPCA, Cambridge Growth Company, local authorities and others) continue to collaborate closely to ensure coherent and complementary strategies that deliver infrastructure-first, sustainable and inclusive growth.
- Given the draft Local Plan's reliance on the delivery of major infrastructure beyond the control of the GCSP, there is a need to recognise and manage delivery risk. A more phased and prioritised approach, based on realistic assumptions about funding for infrastructure, governance changes and expected delivery timelines, may be more appropriate and strengthen the robustness of the Local Plan. This may also support businesses and investors who need longer-term certainty to enable investment decisions and support growth.

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

#### ***Your representations - Summary of comments***

- The Local Plan's approach to housing need is broadly welcomed, particularly its use of local data, headroom for growth, and commitment to a diverse mix of housing types and tenures, including affordable housing. However, there are concerns around the cumulative impact of policy requirements on viability. Greater clarity on how competing objectives are prioritised when viability becomes constrained would provide increased certainty and help ensure that high-quality growth can be delivered at pace.

#### ***Full comments***

##### *Housing need*

- We welcome the Local Plan's commitment to delivering an appropriate mix of housing types and tenures to support balanced and inclusive communities. This is essential for effective placemaking, improving quality of life, and addressing the city region's longstanding housing challenges. In particular, the continued focus on provision of affordable housing is welcome, as sufficient supply is critical to easing housing pressures, expanding housing options and addressing shortages that contribute to wider issues such as homelessness. Greater Cambridge has consistently had strong higher delivery of affordable homes compared to the trend across England<sup>13</sup>. Provision of affordable housing at a range of market rent points, to meet the differing needs of different employees across a range of income levels, remains critical. The recognition of the role of Community Land Trusts in diversifying housing provision for local people is welcome, particularly the Plan's exception that allows Community Land Trusts to be considered as a viable model for affordable housing provision.
- Flexibility is critical in delivering different types and tenures, particularly for longer term strategic plans. The Plan's design-led approach to housing development is positive, providing the

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<sup>13</sup> Savills and Cambridge Ahead. (2025). *Greater Cambridge Housing Dashboard – Q3 2025 Planning Consents and Build Out Rates*.

flexibility needed to deliver high-quality and well-designed schemes that can respond to the changing needs of the population.

- It is also welcome that the Plan recognises the importance of offering a diverse range of housing options, including affordable housing and exception sites, build-to-rent, self-build and custom-build, specialist housing, co-living, houses in multiple occupation (HMOs), and student accommodation – as called for by Cambridge Ahead’s Young Advisory Committee. This breadth reflects an intention to meet the needs of different demographics within a high-growth, high-demand area. However, we encourage further consideration of alternative housing types, such as compact housing, as previously advocated by the Young Advisory Committee and highlighted in recent Future of Work research<sup>14</sup>. This outlines the need to increase the supply of independent, space-efficient homes within walking or cycling distance of major employment centres, offering a significant opportunity to ease housing pressures while supporting sustainable, well-connected development. The acknowledgement of the area’s ageing population and the associated need for accessible and adaptable homes is particularly important, ensuring that provision supports residents in different stages of life.
- It is welcome that the Plan supports the conversion of non-residential premises to residential use and seeks to restrict the loss of housing to visitor accommodation in order to safeguard housing supply. However, there are concerns regarding the proposed test for assessing the loss of visitor accommodation, which may benefit from reconsideration in light of current housing pressures. Given Greater Cambridge’s sustained and exceptional growth trajectory, there is a strong case for facilitating the conversion of surplus visitor accommodation to residential use through planning policy where appropriate. A more proportionate and economically grounded approach, rather than the stringent economic test currently proposed, would better reflect present conditions and support the delivery of much-needed homes.
- The Local Plan also acknowledges the important role that employer-led housing plays in supporting sustainability, the knowledge economy and placemaking, which is welcome. Employer-led housing has been particularly impactful in delivering specialist housing at pace, supporting Cambridge’s growth.

### *Infrastructure needs*

An infrastructure-first approach remains essential to delivering good growth. The timely delivery of infrastructure that has passed statutory processes will be critical to addressing existing constraints and unlocking future potential.

### *Viability*

- There are concerns about the cumulative impact of Local Plan requirements on viability and, ultimately, delivery in practice. While the ambition to secure affordable housing, affordable workspace, high design quality / low carbon and wider public benefits such as biodiversity net gain and urban greening is understood and supported, anecdotal reports suggest that some sites are struggling to come forward because viability is proving too challenging. This is reportedly being seen across housing and employment development, particularly in certain accommodation types, highlighting the need to consider viability in the round and to apply

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<sup>14</sup> Cambridge Ahead Young Advisory Committee. (2026). *People and Place: Securing Cambridge’s Growth Through Workforce and Housing*. Available online: <https://cambridgeahead.co.uk/wp-content/uploads/2026/01/Future-of-Work-Report-Jan-2026.pdf>

viability testing consistently to all forms of affordable provision across different development types. The Plan would benefit from a clearer, aggregated assessment of viability outcomes, informed by both permissions granted and historic delivery, to better understand where negotiated reductions have occurred and how trade-offs are being made.

- There is also a need to recognise the cumulative effect of multiple policy requirements. Individually, expectations around design quality, sustainability standards and affordable provision are reasonable; taken together, they can place significant pressure on scheme viability, particularly where there is limited flexibility in how costs are absorbed. In practice, these requirements operate as a form of land value capture, without always clearly acknowledging who ultimately bears the cost.
- Cambridge is often viewed as a location able to absorb the highest standards due to strong land values. While understandable, this can mask real delivery constraints and may contribute to schemes stalling, raising questions about the impact on housing and employment delivery and overall momentum.
- A more open and balanced approach to viability, which recognises the limits of what can reasonably be achieved on every site, and articulates a hierarchy of requirements, would strengthen the credibility of the Plan and support delivery. In doing so, it should be recognised that while some sites may be able to accommodate a wide range of objectives, others may benefit from a more focused set of priorities, enabling stronger delivery, greater differentiation between places, and increased local diversity and choice. Greater clarity on how competing objectives are prioritised when viability becomes constrained would provide increased certainty and help ensure that high-quality growth can be delivered at pace.

### **Policy S/GB: The Cambridge Green Belt**

#### ***Your representations - Summary of comments***

We strongly encourage GCSP to approach the grey belt assessment with an open mind, to reassess existing assumptions in light of the newly defined concept of the 'grey belt' in the revised NPPF, and to explore the potential of such sites positively and strategically. Careful consideration of opportunities in grey belt areas has the potential to enable denser and more sustainable development, supporting wider social and environmental objectives of the draft Plan.

#### ***Full comments***

- Cambridge Ahead welcomes the confirmation of green belt release to meet the needs of strategic sites, such as the Cambridge Biomedical Campus.
- Cambridge Ahead understands that the grey belt assessment will be published following the Local Plan consultation. However, the apparent early determination, in advance of the published review, that there are no strategic exceptional circumstances to justify release of green belt land, and by extension grey belt release for strategic planning purposes, remains a concern. We strongly encourage GCSP to approach the assessment with an open mind, to reassess existing assumptions in light of the newly defined concept of the 'grey belt' in the revised NPPF, and to explore the potential of such sites positively and strategically. Careful consideration of opportunities in grey belt areas has the potential to enable denser and more sustainable development, supporting wider social and environmental objectives of the draft Plan, such as climate resilience, high-quality placemaking, biodiversity gains, and reduced

need for commuting, while also creating opportunities for sustainable infrastructure provision, including renewable energy, active and sustainable travel solutions such as mixed-modal public transport solutions and expansion of active travel routes as the city grows, for example. This approach could strengthen deliverability of the Local Plan by reducing dependence on future transport infrastructure delivery. Given the exceptional and unprecedented nature of Greater Cambridge's growth in recent years and expected continued trajectory, this will be an important consideration going forward.

- If the conclusion of the grey belt assessment does not provide opportunities for the Local Plan to enable a more balanced pattern of development, with delivery spread across a wider range of settlements, it may be timely to revisit some of the aspects of the original rationale underpinning the green belt and assess whether the emphasis on component parts would benefit from updating, particularly clause 1b in Policy S/GB and the importance placed on the protection of "setting" and visual aspects of the skyline – and consideration of whether this continues to be appropriate in the mid-21st century. We would suggest that the climate crisis and housing crisis we now face (which were not material factors when the green belt policy was originally established) could be considered as exceptional circumstances which could justify a more flexible and permissive approach to grey belt in particular, and potentially some further limited release of city-edge green belt in due course. This is particularly relevant in the context of the updated National Planning Policy Framework's revised presumption in favour of sustainable development. There is an opportunity to take a more strategic and redistributive approach to grey and green belt policy, focusing on releasing land in sustainable locations while still ensuring the green belt continues to prevent urban sprawl and supports access to green space. Rather than positioning the green belt as a binary choice between retention or release, a more flexible and redistributive approach would allow it to better support sustainable growth while continuing to serve its core purpose.
- It is welcome that the Local Plan highlights the importance of the nature network and its alignment with the Local Nature Recovery Strategy. We support the Plan's intention to increase and improve wildlife habitats and green spaces for people. There is a valuable opportunity to strengthen the existing nature network and to allocate publicly accessible green space and nature recovery areas alongside other land uses, thereby supporting environmental objectives as well as placemaking, connectivity, green infrastructure, and overall quality of life.

### **Policy S/NEC: North East Cambridge**

#### ***Full comments***

- The retained allocation for North East Cambridge is welcome; relocation of the Cambridge Waste Water Treatment Plant (CWTP) would unlock significant benefits in terms of sustainable growth at the site. The need for funding to deliver this remains a major concern, and Cambridge Ahead supports efforts to explore this further.

### **Climate change**

- **Policy CC/CE: Supporting a circular economy and sustainable resource use**
- It is welcome to see the approach to supporting a circular economy and sustainable resource use in the draft Local Plan; in particular, the focus on reducing embodied carbon and the proportional approach to integrating circular economy principles is particularly welcome and builds on the work of Cambridge Ahead's Young Advisory Committee in this area.

### **Biodiversity and green spaces**

- **Policy BG/EO: Providing and enhancing open spaces**
- It is welcome that the Local Plan highlights the importance of the nature network and its alignment with the Local Nature Recovery Strategy. We support the Plan's intention to increase and improve wildlife habitats and green spaces for people. There is a valuable opportunity to strengthen the existing nature network and to allocate publicly accessible green space and nature recovery areas alongside other land uses, thereby supporting environmental objectives as well as placemaking, connectivity, green infrastructure, and overall quality of life.

### **Wellbeing and social inclusion**

- **Policy WS/MU: Meanwhile uses during long term redevelopments**
- The supportive approach to meanwhile use (as put forward by Cambridge Ahead's Young Advisory Committee) is welcome, recognising its role in promoting inclusive growth and contributing to placemaking, particularly within large-scale developments. Partnership working between organisations, asset owners, developers and local authorities will be important to ensure the success of meanwhile use schemes.

### **Great places**

- **Policy GP/HD: Housing density**

#### ***Your representations - Summary of comments***

- Cambridge Ahead welcomes the Plan's ambition to optimise density in locations supported by existing services and transport, recognising the benefits for housing delivery, public transport viability and sustainable growth. The commitment to high-quality, well-designed places and buildings is also supported. However, there are significant concerns about some of the limits and constraints specified in the current approach to density within the Local Plan, particularly the emphasis on conformity and heritage considerations. Greater flexibility on density is needed, including through reframing the Skyline and Tall Buildings policy.

### **Full comments**

- The Plan's ambition to optimise density and support higher-density development in locations where existing services and transport infrastructure can sustain it is welcome. Clear recognition of the benefits associated with higher density is an important and positive step.
- Cambridge Ahead firmly supports the use of appropriate and high-quality density as a mechanism for delivering additional housing and commercial space in sustainable locations, while strengthening the viability of public transport and public services like healthcare.
- The continued commitment to high-quality, well-designed places and buildings is welcome. The Plan's emphasis on high-quality development provides important assurance; well-designed and well-built places help attract and retain talent, support thriving communities, and this ultimately underpins sustainable economic growth.
- Well-executed densification in suitable places is essential for a growing city such as Cambridge. Higher-density development in areas with strong transport and public service provision is fundamental to ensuring long-term viability. Concentrating densification around

existing infrastructure also provides significant environmental benefits by improving mobility and reducing reliance on private car travel, for example the CBI development.

- However, there are significant concerns about some of the limits and constraints specified in the current approach to density within the Local Plan, particularly the emphasis on conformity and heritage considerations. The automatic assessment triggers linked to building heights across different location types risks unduly constraining well-justified higher density developments which would deliver clear benefits in terms of amenity, future transport provision, and long-term viability and sustainability.
- The requirement to protect views of historic tall elements by preventing any obstruction or detracting from distant, strategic, or local views of key landmarks has the potential to unnecessarily restrict opportunities for sustainable and strategic growth, and to limit the wider benefits associated with increased density. Greater flexibility on density is needed, including through reframing the Skyline and Tall Buildings policy. We would welcome the policy being revised to allow for taller buildings in a wider range of locations than currently specified.

- **Policy GP/ST: Skyline and tall buildings**

***Your representations - Summary of comments***

- There are concerns about some limits and constraints in the current approach to density within the Local Plan, particularly the emphasis on conformity and heritage considerations. The automatic assessment triggers linked to building heights across different location types risks unduly constraining well-justified higher density development that would deliver benefits in terms of amenity, future transport provision, and long-term viability and sustainability. The requirement to protect views of historic tall elements has the potential to unnecessarily restrict opportunities for sustainable, strategic growth and the wider benefits of increased density. Greater flexibility on density is needed, including through reframing this policy.

***Full comments***

- There are significant concerns about some of the limits and constraints specified in the current approach to density within the Local Plan, particularly the emphasis on conformity and heritage considerations. The automatic assessment triggers linked to building heights across different location types risks unduly constraining well-justified higher density developments which would deliver clear benefits in terms of amenity, future transport provision, and long-term viability and sustainability.
- The requirement to protect views of historic tall elements by preventing any obstruction or detracting from distant, strategic, or local views of key landmarks has the potential to unnecessarily restrict opportunities for sustainable and strategic growth, and to limit the wider benefits associated with increased density. Greater flexibility on density is needed, including through reframing the Skyline and Tall Buildings policy. We would welcome the policy being revised to allow for taller buildings in a wider range of locations than currently specified.

**Jobs**

- **Policy J/NE: New employment development proposals**

***Your representations - Summary of comments***

- Cambridge Ahead welcomes the Local Plan's intention to take projected jobs growth as far as is defensible and supports the use of robust local evidence that Cambridge Ahead commissions. The inclusion of additional headroom in both jobs and housing projections appropriately reflects Cambridge's growth potential and aligns with wider ambitions across the place. This approach is vital for long-term viability and enhances the overall robustness of the draft Plan. We welcome the draft Local Plan's supportive approach to clusters, which appropriately reflects the increasingly clustered nature of the Cambridge knowledge economy over the past decade.

### **Full comments**

- The Local Plan sets out the intention to take projected jobs growth as far as is defensible under the test of objectively assessed need, which is welcome. Cambridge Ahead particularly supports the use of local data that we commission from the Centre for Business Research to inform the modelling of jobs and housing growth. The inclusion of additional headroom in both jobs and housing projections appropriately reflects Cambridge's growth potential and aligns with wider ambitions across the place. This approach is vital for long-term viability and enhances the overall robustness of the draft Plan. With this in mind, the Local Plan, future spatial and housing strategies and supporting infrastructure need to design-in flexibility so that they can adapt to changing patterns of economic activity, new economic sectors and the future needs of a growing and more diverse population.
- We welcome the draft Local Plan's supportive approach to clusters, which appropriately reflects the increasingly clustered nature of the Cambridge knowledge economy over the past decade, as evidenced by recent research from the Centre for Business Research<sup>15</sup>. In particular, the prioritisation of additional commercial space within existing cluster centres, including at North East Cambridge and through green belt release at the Cambridge Biomedical Campus and Babraham Research Campus, is welcome. The acknowledgment of the Southern Cluster as one of the key drivers of Greater Cambridge's innovation economy and its role in supporting sustainable growth, is also positive – recognising the potential of major employment locations to evolve over time – it will be vital that this cluster and others are well connected to each other and to residential areas to ensure their vibrancy and viability. The Plan's recognition of infrastructure supporting the innovation economy, including densification at Whittle Laboratory, proposed growth at Babraham, and the proposed innovation hub, is also positive. We would like to see the Plan more explicitly recognise the value of existing innovation infrastructure and the benefits of intensifying and expanding the parks and clusters to fully realise agglomeration benefits. In particular, the Plan's recognition of the global importance and growing breadth of scientific activity within major clusters is welcome. It acknowledges the increasing overlap between disciplines and the important role that major campuses and business parks play in supporting discovery, translation and innovation within an increasingly connected ecosystem. We also welcome the Plan's support for developments that strengthen clusters, including its recognition that the Cambridge ecosystem requires a diverse range of commercial space to accommodate different stages of business growth.
- The approach the Local Plan has taken to setting out how land should be used to support the wider economy is welcome, particularly the allocation of space for industrial, logistics and

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<sup>15</sup> Cambridge Ahead and Centre for Business Research. (2025). *Business parks and clusters*. Available at: <https://cambridgeahead.co.uk/wp-content/uploads/2025/10/Business-Growth-and-Clusters-Cambridge-City-Region-2015-2024.pdf>

mid-tech uses, which helps promote a more balanced economy and address existing shortfalls. However, it is important to recognise that Greater Cambridge operates within wider regional and national supply chains and there needs to be in-built flexibility to respond to the needs of the economy. In this context, it will be important to ensure that the approach to industrial and warehousing provision retains sufficient flexibility to respond effectively to changing industrial and commercial needs over time.

- **Policy J/AW: Affordable workspace and creative industries**

***Your representations – Summary of comments***

- The cumulative impact of Local Plan requirements on viability and delivery is a concern. There is a need to recognise the cumulative effect of multiple policy requirements which can place significant pressure on scheme viability. The Plan would benefit from a clearer, aggregated assessment of viability outcomes, informed by both permissions granted and historic delivery, to better understand where negotiated reductions have occurred and how trade-offs are being made. Greater clarity on how competing objectives are prioritised when viability becomes constrained would provide increased certainty and help ensure that high-quality growth can be delivered at pace.

***Full comments***

- There are concerns about the cumulative impact of Local Plan requirements on viability and, ultimately, delivery in practice. While the ambition to secure affordable housing, affordable workspace, high design quality / low carbon and wider public benefits such as biodiversity net gain and urban greening is understood and supported, anecdotal reports suggest that some sites are struggling to come forward because viability is proving too challenging. This is reportedly being seen across housing and employment development, particularly in certain accommodation types, highlighting the need to consider viability in the round and to apply viability testing consistently to all forms of affordable provision across different development types. The Plan would benefit from a clearer, aggregated assessment of viability outcomes, informed by both permissions granted and historic delivery, to better understand where negotiated reductions have occurred and how trade-offs are being made.
- There is also a need to recognise the cumulative effect of multiple policy requirements. Individually, expectations around design quality, sustainability standards and affordable provision are reasonable; taken together, they can place significant pressure on scheme viability, particularly where there is limited flexibility in how costs are absorbed. In practice, these requirements operate as a form of land value capture, without always clearly acknowledging who ultimately bears the cost.
- Cambridge is often viewed as a location able to absorb the highest standards due to strong land values. While understandable, this can mask real delivery constraints and may contribute to schemes stalling, raising questions about the impact on housing and employment delivery and overall momentum.
- A more open and balanced approach to viability, which recognises the limits of what can reasonably be achieved on every site, and articulates a hierarchy of requirements, would strengthen the credibility of the Plan and support delivery. In doing so, it should be recognised that while some sites may be able to accommodate a wide range of objectives, others may benefit from a more focused set of priorities, enabling stronger delivery, greater differentiation

between places, and increased local diversity and choice. Greater clarity on how competing objectives are prioritised when viability becomes constrained would provide increased certainty and help ensure that high-quality growth can be delivered at pace.

- **Policy J/VA: Visitor accommodation, attractions and facilities**

***Your representations - Summary of comments***

- It is welcome that the Plan supports conversion of non-residential premises to residential use while restricting loss of housing to visitor accommodation to safeguard supply. However, there are concerns about the proposed test for assessing the loss of visitor accommodation, which may benefit from reconsideration given current housing pressures. With Greater Cambridge's growth trajectory, there is a case for facilitating the conversion of surplus visitor accommodation to residential use where appropriate through planning policy. A more proportionate and economically grounded approach, rather than the stringent economic test proposed, would better reflect present conditions and support the delivery of much-needed homes.

***Full comments***

- It is welcome that the Plan supports the conversion of non-residential premises to residential use and seeks to restrict the loss of housing to visitor accommodation in order to safeguard housing supply. However, there are concerns regarding the proposed test for assessing the loss of visitor accommodation, which may benefit from reconsideration in light of current housing pressures. Given Greater Cambridge's sustained and exceptional growth trajectory, there is a strong case for facilitating the conversion of surplus visitor accommodation to residential use through planning policy where appropriate. A more proportionate and economically grounded approach, rather than the stringent economic test currently proposed, would better reflect present conditions and support the delivery of much-needed homes.

**Homes**

- **Policy H/AH: Affordable housing**

***Your representations - Summary of comments***

- The Local Plan's commitment to delivering a balanced mix of housing types and tenures is welcome, particularly its focus on affordable housing to address Cambridge's long-standing challenges. The recognition of diverse housing options to meet differing needs, as highlighted by Cambridge Ahead's Young Advisory Committee, is positive, as is support for affordable homes across a range of rent levels and for employer-led housing.

***Full comments***

- We welcome the Local Plan's commitment to delivering an appropriate mix of housing types and tenures to support balanced and inclusive communities. This is essential for effective placemaking, improving quality of life, and addressing the city region's longstanding housing challenges. In particular, the continued focus on provision of affordable housing is welcome, as sufficient supply is critical to easing housing pressures, expanding housing options and addressing shortages that contribute to wider issues such as homelessness. Greater Cambridge has consistently had strong higher delivery of affordable homes compared to the

trend across England<sup>16</sup>. Provision of affordable housing at a range of market rent points, to meet the differing needs of different employees across a range of income levels, remains critical. The recognition of the role of Community Land Trusts in diversifying housing provision for local people is welcome, particularly the Plan's exception that allows Community Land Trusts to be considered as a viable model for affordable housing provision.

- Flexibility is critical in delivering different types and tenures, particularly for longer term strategic plans. The Plan's design-led approach to housing development is positive, providing the flexibility needed to deliver high-quality and well-designed schemes that can respond to the changing needs of the population.
- It is also welcome that the Plan recognises the importance of offering a diverse range of housing options, including affordable housing and exception sites, build-to-rent, self-build and custom-build, specialist housing, co-living, houses in multiple occupation (HMOs), and student accommodation – as called for by Cambridge Ahead's Young Advisory Committee. This breadth reflects an intention to meet the needs of different demographics within a high-growth, high-demand area. However, we encourage further consideration of alternative housing types, such as compact housing, as previously advocated by the Young Advisory Committee and highlighted in recent Future of Work research<sup>17</sup>. This outlines the need to increase the supply of independent, space-efficient homes within walking or cycling distance of major employment centres, offering a significant opportunity to ease housing pressures while supporting sustainable, well-connected development. The acknowledgement of the area's ageing population and the associated need for accessible and adaptable homes is particularly important, ensuring that provision supports residents in different stages of life.
- The Local Plan also acknowledges the important role that employer-led housing plays in supporting sustainability, the knowledge economy and placemaking, which is welcome. Employer-led housing has been particularly impactful in delivering specialist housing at pace, supporting Cambridge's growth.

- **Policy H/HM: Housing mix**

***Your representations - Summary of comments***

- The Local Plan's commitment to delivering a balanced mix of housing types and tenures is welcome, particularly its focus on affordable housing to address Cambridge's long-standing challenges. The recognition of diverse housing options to meet differing needs, as highlighted by Cambridge Ahead's Young Advisory Committee, is positive, as is support for affordable homes across a range of rent levels and for employer-led housing.

***Full comments***

- We welcome the Local Plan's commitment to delivering an appropriate mix of housing types and tenures to support balanced and inclusive communities. This is essential for effective placemaking, improving quality of life, and addressing the city region's longstanding housing challenges. In particular, the continued focus on provision of affordable housing is welcome, as sufficient supply is critical to easing housing pressures, expanding housing options and

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<sup>16</sup> Savills and Cambridge Ahead. (2025). *Greater Cambridge Housing Dashboard – Q3 2025 Planning Consents and Build Out Rates*.

<sup>17</sup> Cambridge Ahead Young Advisory Committee. (2026). *People and Place: Securing Cambridge's Growth Through Workforce and Housing*. Available online: <https://cambridgeahead.co.uk/wp-content/uploads/2026/01/Future-of-Work-Report-Jan-2026.pdf>

addressing shortages that contribute to wider issues such as homelessness. Greater Cambridge has consistently had strong higher delivery of affordable homes compared to the trend across England<sup>18</sup>. Provision of affordable housing at a range of market rent points, to meet the differing needs of different employees across a range of income levels, remains critical. The recognition of the role of Community Land Trusts in diversifying housing provision for local people is welcome, particularly the Plan's exception that allows Community Land Trusts to be considered as a viable model for affordable housing provision.

- Flexibility is critical in delivering different types and tenures, particularly for longer term strategic plans. The Plan's design-led approach to housing development is positive, providing the flexibility needed to deliver high-quality and well-designed schemes that can respond to the changing needs of the population.
- It is also welcome that the Plan recognises the importance of offering a diverse range of housing options, including affordable housing and exception sites, build-to-rent, self-build and custom-build, specialist housing, co-living, houses in multiple occupation (HMOs), and student accommodation – as called for by Cambridge Ahead's Young Advisory Committee. This breadth reflects an intention to meet the needs of different demographics within a high-growth, high-demand area. However, we encourage further consideration of alternative housing types, such as compact housing, as previously advocated by the Young Advisory Committee and highlighted in recent Future of Work research<sup>19</sup>. This outlines the need to increase the supply of independent, space-efficient homes within walking or cycling distance of major employment centres, offering a significant opportunity to ease housing pressures while supporting sustainable, well-connected development. The acknowledgement of the area's ageing population and the associated need for accessible and adaptable homes is particularly important, ensuring that provision supports residents in different stages of life.

- **Policy H/BR: Build to rent homes**

***Your representations - Summary of comments***

- The Local Plan's commitment to delivering a balanced mix of housing types and tenures is welcome, particularly its focus on affordable housing to address Cambridge's long-standing challenges. The recognition of diverse housing options to meet differing needs, as highlighted by Cambridge Ahead's Young Advisory Committee, is positive.

***Full comments***

- We welcome the Local Plan's commitment to delivering an appropriate mix of housing types and tenures to support balanced and inclusive communities. This is essential for effective placemaking, improving quality of life, and addressing the city region's longstanding housing challenges. In particular, the continued focus on provision of affordable housing is welcome, as sufficient supply is critical to easing housing pressures, expanding housing options and addressing shortages that contribute to wider issues such as homelessness. Greater Cambridge has consistently had strong higher delivery of affordable homes compared to the

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<sup>18</sup> Savills and Cambridge Ahead. (2025). *Greater Cambridge Housing Dashboard – Q3 2025 Planning Consents and Build Out Rates*.

<sup>19</sup> Cambridge Ahead Young Advisory Committee. (2026). *People and Place: Securing Cambridge's Growth Through Workforce and Housing*. Available online: <https://cambridgeahead.co.uk/wp-content/uploads/2026/01/Future-of-Work-Report-Jan-2026.pdf>

trend across England<sup>20</sup>. Provision of affordable housing at a range of market rent points, to meet the differing needs of different employees across a range of income levels, remains critical. The recognition of the role of Community Land Trusts in diversifying housing provision for local people is welcome, particularly the Plan's exception that allows Community Land Trusts to be considered as a viable model for affordable housing provision.

- Flexibility is critical in delivering different types and tenures, particularly for longer term strategic plans. The Plan's design-led approach to housing development is positive, providing the flexibility needed to deliver high-quality and well-designed schemes that can respond to the changing needs of the population.
- It is also welcome that the Plan recognises the importance of offering a diverse range of housing options, including affordable housing and exception sites, build-to-rent, self-build and custom-build, specialist housing, co-living, houses in multiple occupation (HMOs), and student accommodation – as called for by Cambridge Ahead's Young Advisory Committee. This breadth reflects an intention to meet the needs of different demographics within a high-growth, high-demand area. However, we encourage further consideration of alternative housing types, such as compact housing, as previously advocated by the Young Advisory Committee and highlighted in recent Future of Work research<sup>21</sup>. This outlines the need to increase the supply of independent, space-efficient homes within walking or cycling distance of major employment centres, offering a significant opportunity to ease housing pressures while supporting sustainable, well-connected development. The acknowledgement of the area's ageing population and the associated need for accessible and adaptable homes is particularly important, ensuring that provision supports residents in different stages of life.
- **Policy H/CL: Co-living**

#### ***Your representations – Summary of comments***

- The Local Plan's commitment to delivering a balanced mix of housing types and tenures is welcome, particularly its focus on affordable housing to address Cambridge's long-standing challenges. The recognition of diverse housing options to meet differing needs, as highlighted by Cambridge Ahead's Young Advisory Committee, is positive.

#### ***Full comments***

- We welcome the Local Plan's commitment to delivering an appropriate mix of housing types and tenures to support balanced and inclusive communities. This is essential for effective placemaking, improving quality of life, and addressing the city region's longstanding housing challenges. In particular, the continued focus on provision of affordable housing is welcome, as sufficient supply is critical to easing housing pressures, expanding housing options and addressing shortages that contribute to wider issues such as homelessness. Greater Cambridge has consistently had strong higher delivery of affordable homes compared to the trend across England<sup>22</sup>. Provision of affordable housing at a range of market rent points, to

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<sup>20</sup> Savills and Cambridge Ahead. (2025). *Greater Cambridge Housing Dashboard – Q3 2025 Planning Consents and Build Out Rates*.

<sup>21</sup> Cambridge Ahead Young Advisory Committee. (2026). *People and Place: Securing Cambridge's Growth Through Workforce and Housing*. Available online: <https://cambridgeahead.co.uk/wp-content/uploads/2026/01/Future-of-Work-Report-Jan-2026.pdf>

<sup>22</sup> Savills and Cambridge Ahead. (2025). *Greater Cambridge Housing Dashboard – Q3 2025 Planning Consents and Build Out Rates*.

meet the differing needs of different employees across a range of income levels, remains critical. The recognition of the role of Community Land Trusts in diversifying housing provision for local people is welcome, particularly the Plan's exception that allows Community Land Trusts to be considered as a viable model for affordable housing provision.

- Flexibility is critical in delivering different types and tenures, particularly for longer term strategic plans. The Plan's design-led approach to housing development is positive, providing the flexibility needed to deliver high-quality and well-designed schemes that can respond to the changing needs of the population.
- It is also welcome that the Plan recognises the importance of offering a diverse range of housing options, including affordable housing and exception sites, build-to-rent, self-build and custom-build, specialist housing, co-living, houses in multiple occupation (HMOs), and student accommodation – as called for by Cambridge Ahead's Young Advisory Committee. This breadth reflects an intention to meet the needs of different demographics within a high-growth, high-demand area. However, we encourage further consideration of alternative housing types, such as compact housing, as previously advocated by the Young Advisory Committee and highlighted in recent Future of Work research<sup>23</sup>. This outlines the need to increase the supply of independent, space-efficient homes within walking or cycling distance of major employment centres, offering a significant opportunity to ease housing pressures while supporting sustainable, well-connected development. The acknowledgement of the area's ageing population and the associated need for accessible and adaptable homes is particularly important, ensuring that provision supports residents in different stages of life.
- **Policy H/MO: Houses in multiple occupation (HMOs)**

#### ***Your representations – Summary of comments***

- The Local Plan's commitment to delivering a balanced mix of housing types and tenures is welcome, particularly its focus on affordable housing to address Cambridge's long-standing challenges. The recognition of diverse housing options to meet differing needs, as highlighted by Cambridge Ahead's Young Advisory Committee, is positive.

#### ***Full comments***

- We welcome the Local Plan's commitment to delivering an appropriate mix of housing types and tenures to support balanced and inclusive communities. This is essential for effective placemaking, improving quality of life, and addressing the city region's longstanding housing challenges. In particular, the continued focus on provision of affordable housing is welcome, as sufficient supply is critical to easing housing pressures, expanding housing options and addressing shortages that contribute to wider issues such as homelessness. Greater Cambridge has consistently had strong higher delivery of affordable homes compared to the trend across England<sup>24</sup>. Provision of affordable housing at a range of market rent points, to meet the differing needs of different employees across a range of income levels, remains critical. The recognition of the role of Community Land Trusts in diversifying housing provision

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<sup>23</sup> Cambridge Ahead Young Advisory Committee. (2026). *People and Place: Securing Cambridge's Growth Through Workforce and Housing*. Available online: <https://cambridgeahead.co.uk/wp-content/uploads/2026/01/Future-of-Work-Report-Jan-2026.pdf>

<sup>24</sup> Savills and Cambridge Ahead. (2025). *Greater Cambridge Housing Dashboard – Q3 2025 Planning Consents and Build Out Rates*.

for local people is welcome, particularly the Plan's exception that allows Community Land Trusts to be considered as a viable model for affordable housing provision.

- Flexibility is critical in delivering different types and tenures, particularly for longer term strategic plans. The Plan's design-led approach to housing development is positive, providing the flexibility needed to deliver high-quality and well-designed schemes that can respond to the changing needs of the population.
- It is also welcome that the Plan recognises the importance of offering a diverse range of housing options, including affordable housing and exception sites, build-to-rent, self-build and custom-build, specialist housing, co-living, houses in multiple occupation (HMOs), and student accommodation – as called for by Cambridge Ahead's Young Advisory Committee. This breadth reflects an intention to meet the needs of different demographics within a high-growth, high-demand area. However, we encourage further consideration of alternative housing types, such as compact housing, as previously advocated by the Young Advisory Committee and highlighted in recent Future of Work research<sup>25</sup>. This outlines the need to increase the supply of independent, space-efficient homes within walking or cycling distance of major employment centres, offering a significant opportunity to ease housing pressures while supporting sustainable, well-connected development. The acknowledgement of the area's ageing population and the associated need for accessible and adaptable homes is particularly important, ensuring that provision supports residents in different stages of life.

## **Infrastructure**

- **Policy I/ST: Sustainable transport and connectivity**

### ***Your representations - Summary of comments***

- CA welcomes the commitment to a vision-led approach to transport planning in the context of new development. This is essential to tackle one of the key constraints on the Cambridge economy and to supporting delivery of the Local Plan. However, given the rapidly evolving policy landscape, forthcoming spatial planning strategies and other interdependencies, alongside a complex governance environment, it will be important to ensure explicit consideration of how uncertainty is managed in applying this approach. Greater clarity on how the vision-led approach will remain robust and adaptable in the face of change would strengthen its effectiveness and support confident delivery.

### ***Full comments***

- Cambridge Ahead welcomes the Local Plan's commitment to a vision-led approach to transport planning in the context of new development. This is essential to tackle one of the key constraints on the Cambridge economy and to supporting delivery of the Local Plan. However, given the rapidly evolving policy landscape, forthcoming spatial planning strategies and other interdependencies, alongside a complex governance environment, it will be important to ensure explicit consideration of how uncertainty is managed in applying this approach. Greater clarity on how the vision-led approach will remain robust and adaptable in the face of change would strengthen its effectiveness and support confident delivery.

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<sup>25</sup> Cambridge Ahead Young Advisory Committee. (2026). *People and Place: Securing Cambridge's Growth Through Workforce and Housing*. Available online: <https://cambridgeahead.co.uk/wp-content/uploads/2026/01/Future-of-Work-Report-Jan-2026.pdf>

- **Policy I/EI: Energy infrastructure masterplanning**

***Your representations – Summary of comments***

- While not within the immediate scope of the Local Plan, there are concerns about how energy demand will be met to support the Plan alongside other growth strategies. The complexity of managing energy highlights the importance of a strategic, master-planned approach. We encourage engagement (convened through Cambridge Growth Company) with regulators, national government and local authorities to support early investment in local energy infrastructure and the development of an integrated energy masterplan aligned with planning and growth strategies across the region.

***Full comments***

- While not within the immediate scope of the Draft Greater Cambridge Local Plan, there are wider concerns about how energy demand and water capacity, including wastewater treatment, will be met across Greater Cambridge to support the Plan alongside other growth strategies. This is particularly pressing given projections that energy demand could triple by 2050 (from a 2021 baseline)<sup>26</sup>, excluding Cambridge Growth Company plans. Cambridge Ahead's research<sup>27</sup> suggests that energy capacity may become a significant constraint on growth. The complexity of managing energy and water supply, including balancing the needs of households, businesses, agriculture and the environment, highlights the importance of a strategic, master-planned approach. We welcome the recognition of immediate water constraints in the Infrastructure Delivery Plan and encourage continued engagement with partners to acknowledge these challenges and work collaboratively towards long-term solutions. We also encourage prioritised engagement (convened through Cambridge Growth Company) with regulators, national government and local authorities to support early investment in local energy infrastructure and the development of an integrated energy masterplan aligned with planning and growth strategies across the region.

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<sup>26</sup> Cambridgeshire County Council. (n.d.). *Local Area Energy Planning*. Available online: <https://www.cambridgeshire.gov.uk/residents/climate-change-energy-and-environment/climate-change-action/low-carbon-energy/local-area-energy-planning>

<sup>27</sup> Cambridge Ahead. (2024). *The Infrastructure Gap: The future of sustainable energy in Greater Cambridge*. Available at: <https://cambridgeahead.co.uk/wp-content/uploads/2025/03/the-future-of-sustainable-energy-in-greater-cambridge.pdf>