

My ref: Greater Cambridge Local Plan

Your ref:

Date: 28th January 2026

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Dear Sirs

Draft Greater Cambridge Local Plan – Consultation

I refer to the consultation on the Greater Cambridge Local Plan and thank the City and District Council for affording the County Council the opportunity to comment.

I have received comments from several services within the County Council and these are set out in the Appendix 1 to this letter. I trust that this will be of assistance to the City and District Council as it progresses the Local Plan.

Please feel free to reach out if you wish to discuss these comments further.

Yours sincerely

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Colum Fitzsimons
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Planning, Growth and Environment

Appendix 1: Draft Greater Cambridge Local Plan – Consultation: Response by Cambridgeshire County Council

Response By	Chapter/Policy/Paragraph	Response/Comment
Lead Local Flood Authority	General Comments	<ul style="list-style-type: none"> • The LLFA are pleased with the holistic approach taken to promote surface water management, SuDS, water quality, biodiversity, and climate change. • We highly advocate more emphasis on watercourse management and maintenance. Reference should be made to section 25 of the Land Drainage Act 1991 which requires riparian landowners to maintain ordinary watercourses. Riparian owners are responsible for maintaining and clearing debris (even if this is not from their land) from the watercourse or ditch as well as vegetation on the banks in order to keep them clear and prevent flooding. In addition, Cambridgeshire County Council's Flood Risk Team have published The Watercourse Reinstatement Guide (2022). This document advocates for the reinstatement of watercourses such as removal of culverts and re-naturalising a watercourse back to its original state. Further information on watercourse guidance can be found here: Watercourse guidance Cambridgeshire County Council. Please note, constructions or alterations within an ordinary watercourse (temporary or permanent) require consent from the Lead Local Flood Authority under section 23 of the Land Drainage Act 1991. • It is appreciated that Cambridgeshire Flood and Water Supplementary Planning Guidance (SPD), National Standards for Sustainable Drainage Systems, and the Cambridgeshire County Councils Surface Water Planning Guidance and SuDS Manual are highlighted. These are fundamental documents to surface water management. • We would highly recommend that Anglian Water, the IDB and the Environment Agency are consulted in relation to flood risk management, to ensure that their comments on this Local Plan can be taken into account.
Lead Local Flood Authority	Policy CC/FM: Managing flood risk	<ul style="list-style-type: none"> • We support the inclusion of the policy as it covers the importance of managing flood risk in new developments. Please note we would encourage reference to the National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG) in this policy. It is appreciated the policy has a proactive approach to mitigating and adapting to climate change, with reference to surface water flooding within the local plan. Please note, in section 4.44 (Chapter 4: Climate Change), there is a reference to 'safe access and egress route'; however, this should be revised to read as 'safe access and escape route' in line with PPG.

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Lead Local Flood Authority	Policy CC/SD: Sustainable development and the climate emergency	<ul style="list-style-type: none"> This policy places emphasis on how new developments should demonstrated flood risk from all sources has been avoided or managed. Perhaps, it would be beneficial to list all sources of flood risk. Sources include rivers and the sea, direct rainfall on the ground surface, rising groundwater, overwhelmed sewers and drainage systems, reservoirs, canals and lakes and other artificial sources (Paragraph 001 PPG)
Lead Local Flood Authority	Policy CC/IW: Integrated water management, sustainable drainage and water quality	<ul style="list-style-type: none"> The LLFA support that the policy requires SuDS to be incorporated as part of new developments. The emphasis on water quality within this policy is appreciated. We would encourage specific promotion of above-ground open SuDS such as wetlands, attenuation basins, ponds and swales as they provide water quantity, water quality, amenity and biodiversity benefits. PPG Paragraph 55 details the importance of SuDS which includes reducing the need for carbon-intensive construction and pumped systems, replenishing groundwater resources and capturing and re-using rainwater. There should be reference made to the SuDS Management train. The management train is a sequence of drainage features that collect, convey, store and manage quality of surface water runoff as it drains through the development. Source control, in the management train, should prioritised. They assist in mimicking the natural runoff from the site and provides the first stage of the SuDS Management Train, intercepting surface water at a localised level. As source control can be in the form of bioretention, rain gardens, over paved areas (permeable paving) and on roofs (green roofs) it is possible to fit this in every development around the hard landscaping without taking up much space
Lead Local Flood Authority	Policy BG/GI: Green and Blue Infrastructure	<ul style="list-style-type: none"> Support, as blue/green infrastructure can provide multi-functional benefits for surface water management.
Lead Local Flood Authority	Policy CC/DC: Designing for a changing climate	<ul style="list-style-type: none"> Support. It is noted that benefits of green roofs are listed in terms of passive cooling of buildings which is supported. Nevertheless, it would be beneficial to incorporate how green roofs assist in surface water and climate management. Green roofs can mimic predevelopment state of hydraulic and hydrology as well as remove atmospherically deposited urban pollutants. It is appreciated that climate change is widely discussed; however, reference should be made on how surface water systems should be designed with an allowance for climate change (Climate change allowances for peak rainfall).

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Lead Local Flood Authority	Greater Cambridge Integrated Water Management Study - Level 2 Strategic Flood Risk Assessment	<ul style="list-style-type: none"> • We have the following comments to make: <ul style="list-style-type: none"> ○ The term 'safe access and egress' should not be used. It should read 'safe access and escape'. This is in line with PPG updates. ○ We appreciate the level detail presented with reference to surface water flood risk in the report. In particular, the suite of maps provided for allocated plots. However, it is unclear whether the most up to date data is used for surface water flood risk mapping. In 2025, the Environment Agency updated the national map showing the risk of flooding from surface water. The information for this can be found here: Risk of flooding from surface water – understanding and using the map - GOV.UK. ○ It is noted that 'Former Spicers Site, Sawston Business Park, Sawston' appears to be located in Source Protection Zone 1 (inner zone) according. Section 6.5 of the SPD states that runoff from a site should be of an acceptable water quality to protect receiving waters. The size and number of treatment stages required is based on the level of pollution entering the system and the status of the groundwater into which the site proposes to discharge. As this area is located in Source Protection Zone 1 (inner zone), an additional treatment component (i.e. over and above that required for standard discharges), or other equivalent protection is required. This is to provide environmental protection in the event of an unexpected pollution event or poor system performance. For further information please see section 26.7.1 of the CIRIA SuDS Manual.
Transport Strategy	General Comments	<ul style="list-style-type: none"> • The Council welcomes the continued close working on the Greater Cambridge Local Plan with GCSP and looks forward to continuing this close working relationship with further development of the Plan and associated transport evidence. • Recent announcements regarding East West Rail including Cambridge Station Eastern Access, Cambridge East Station and Cambourne Station should be reflected in the Local Plan. • Safeguarding land: could the plan be more explicit about protecting land around the rail routes for future stations – re. point above about Cambridge Eastern Access, Cambridge East station, Cambourne station and even a Fulbourn station which was inc. in past transport plans etc. and

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		<p>with EWR and recent mayoral transport priorities it may feel like a missed opportunity to not at least have a line in policy. Can only see vague references with regards rail freight and sidings.</p> <ul style="list-style-type: none"> • There should be clear references to the requirement for developers to submit Transport Assessments (page 27 Strategic Infrastructure Priority). • Page 165, paragraph 4a could refer to the Rights of Way Improvement Plan (ROWIP) https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/rights-of-way-improvement-plan • It could be useful for the Local Plan to refer to the Royston to Granta Park Strategic Transport Study when talking about the southern biotech cluster. • Rights of Way Improvement Plan should be referenced where connectivity/community & social inclusion is discussed. Often there is a reference to ensuring facilities and developments are connected better by active travel (walking, cycling, wheeling etc.) but there is already a network that can be built upon or improved for this
Transport Strategy	Chapter 2: Development Strategy	<ul style="list-style-type: none"> • In broad transport terms CCC supports the Local Plan and the associated development strategy. The transport evidence developed to date alongside the development strategy demonstrates that the Local Plan is deliverable in transport terms, if sufficient mitigation of the key development locations is provided. • CCC acknowledges that the CPCA, together with partners including CCC and the GCSP, are developing a new Transport Strategy for Cambridge and South Cambridgeshire. The transport related comments made by CCC in response to the Draft Local Plan are therefore made under the assumption that this new Transport Strategy will be delivered alongside and fully cognisant of the Local Plan, Development Strategy and site specific mitigation. • It is however important to state that all the strategic sites contained in the draft Local Plan require transport mitigation strategies to support their delivery. This mitigation includes stringent trip budgets which are to be agreed with CCC as Highway Authority. In addition, the transport infrastructure requirements for each of the strategic sites are significant, therefore deliverability and viability will be key considerations. • Related to the above point on mitigation, CCC would re-emphasise that in transport terms, the strategic sites are heavily reliant on the GCP programme of works being delivered. The

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		<p>deliverability and viability of these sites and indeed the deliverability of the wider development strategy is intrinsically linked to the delivery of the GCP transport schemes. Therefore, these sites will be expected to contribute to the delivery of these GCP schemes.</p> <ul style="list-style-type: none"> The development of the Greater Cambridge Transport Strategy (led by the Cambridgeshire and Peterborough Combined Authority) will provide the transport Strategy to support the Local Plan. The Council is working with the CPCA to support this process. The draft Local Plan makes several references to City Access (e.g. Figure 13). This workstream has been superseded by the forthcoming Greater Cambridge Transport Strategy.
Transport Strategy	<p>Chapter 2: Development Strategy</p> <p>Paragraph 2.26 – Infrastructure needs</p>	<ul style="list-style-type: none"> In relation to the point made about viability and infrastructure requirements to ensure a development site is deliverable, it is essential to recognise that whilst CCC agrees that the Grange Farm site can be delivered in transport terms with sufficient mitigation, it is only deliverable if CSETS phase 2 is built as well as an extension to CSETS with grade separation over the A11 into Grange Farm, with bus priority across a new junction on the A1307. This is a significant and complex infrastructure requirement. Grange Farm would benefit from a detailed transport strategy to set out the full transport mitigation package, as is the case with Cambourne and other strategic sites. The Local Plan has a role to make it clear that there is a requirement for development contained within the Plan to help fill funding gaps in the delivery of transport infrastructure. The GCP schemes, as already discussed, are heavily relied upon within the Plan. Whilst the GCP programme has funding, it is predicated on match funding for infrastructure and therefore developers benefitting from such infrastructure will be expected to contribute proportionately towards schemes that serve their sites. As a result, obligations for both infrastructure and for commuted sums for maintenance should be factored into the Infrastructure Delivery Plan and associated sites within it.
Transport Strategy	Policy S/CBN: Cambourne North	<ul style="list-style-type: none"> CCC supports the new settlement allocation at Cambourne North and Cambourne, noting that the transport evidence carried out to date suggests that development here can be mitigated, subject to the delivery of East-West Rail and Cambourne to Cambridge (C2C) with relevant extensions into the site at Cambourne North, along with other site specific highway, public

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		<p>transport and active travel improvements. In addition, CCC supports the development of a stringent trip budget for the new settlement.</p> <ul style="list-style-type: none"> • CCC has and is continuing to work, in its role as Highway Authority, with GCSP and other local authority partners on a comprehensive transport and mitigation strategy for Cambourne and welcomes the opportunity for this. • CCC notes the importance of ensuring, in terms of transport and movement, that the new settlement north of Cambourne interacts with the existing Cambourne villages. CCC supports the strong emphasis on active travel for this. • CCC would also like to highlight the importance of connecting the settlements and villages located close to Cambourne with the new rail station proposed as part of East-West rail. A new settlement of this size and a new rail station offer a significant opportunity to connect more remote settlements to active travel and public transport corridors to create an improved network. • Cambourne requires the delivery of East West Rail (EWR) and an extension to Cambourne to Cambridge busway across the A428 to Cambourne North and onto Papworth. This mitigation package is not inconsiderable. The Council would like to continue working on a detailed transport strategy for Cambourne.
Transport Strategy	Policy S/NEC: North East Cambridge	<ul style="list-style-type: none"> • CCC supports the allocation of the NEC Area as set out in the position Statement issued in January 2025. The site is subject to a vehicular trip budget this requires the developers to contribute to the delivery of a wide range of strategic and local mitigation measures. • The position statement is being reviewed in light of the news that the Waste Water Treatment Works are unlikely to be relocated. This has an impact on the level of development that can be accommodated in the NEC area while still remaining within the vehicular trip budget. • The Transport Position Statement for North East Cambridge is currently being updated.
Transport Strategy	Policy S/CE: Cambridge East	<ul style="list-style-type: none"> • The developers of Cambridge East prepared a number of Topic Papers that were discussed and agreed with the local authority partners including CCC. These papers represented chapters of the initial transport strategy for the Cambridge East area.

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		<ul style="list-style-type: none"> • This transport strategy needs to be reviewed in light of the recent announcement of a station within the site as part of EWR and the proposed provision of an eastern access to Cambridge station, both of which have the possibility to significantly impact the operation of the site in transport terms. • The Council would like to continue to be actively involved in the development of transport evidence and strategy for Cambridge East.
Transport Strategy	Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm	<ul style="list-style-type: none"> • CCC acknowledges and agrees that the site at Grange Farm is deliverable in transport terms if a sufficient mitigation package is delivered alongside the development. Transport modelling undertaken demonstrates this point, with the delivery of the GCP's CSETS Phase 2 scheme and a further extension to CSETS to cross the A11 to deliver grade separated, high quality public transport access to the site from Cambridge along the A1307 corridor. This grade separated crossing of the A11 along with a new junction with bus priority to cross the A1307 into the site would, it is agreed, provide sufficient public transport access to aid mitigation of the site. In addition, CCC supports the development of a stringent trip budget for the new settlement. • CCC would however state that the mitigation package tested to date is a significant one in terms of infrastructure requirement and likely cost of delivery, which is a lingering consideration in terms of practical deliverability and viability of a site. As highway authority, CCC would emphasise that this site is only deliverable with such a mitigation package in place. • Related to the viability of the infrastructure required to deliver the Grange Farm site, it is important to note that the size and scale of this development (and of all major sites in the Plan) is vital in order for this to be deemed a sustainable location. To this end, the site must be of the correct size and scale to facilitate significant levels of developer related funding to help 'fill' any funding gaps associated with the transport infrastructure required. The site, as already stated, is reliant on the implementation GCP CSETS phase 2 scheme and also an extension to this across the A11 which is currently untested and is not funded. • As such, CCC believe that this site would benefit from a detailed transport strategy to refine the trip budget for the site and set out the full mitigation package required, as is already the case for several of the other strategic sites such as Cambridge East, North East Cambridge (NEC) and is being developed for Cambourne. CCC would welcome the continued opportunity to work with GCSP (and other Local Authority partners) on this.

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Transport Strategy	Policy I/TH: Travel Hub facilities	<ul style="list-style-type: none"> This could refer to CPCA emerging strategy work Mobility Hub Strategy and need to strengthen links with EV charging infrastructure.
Transport Strategy	Policy I/EV: Parking and electric vehicles	<ul style="list-style-type: none"> It would be useful to understand how levels of car ownership will determine car parking levels. This policy would benefit from reference to both CCC and CPCA Active Travel Strategies
Transport Strategy	Policy GP/QP: Establishing high quality landscape and public realm	<ul style="list-style-type: none"> This policy would benefit from reference to cycle parking being located conveniently in order to help reduce nuisance parking of bikes.
Transport Strategy	Draft Plan Interim Statement of Common Ground	<ul style="list-style-type: none"> While there are many areas of agreement, as far as we are aware, the Statement of Common Ground was not checked with Transport Strategy or wider CCC colleagues prior to publication. The Council would therefore welcome discussions regarding future iterations of the document.
Transport Strategy	Typographic and editorial	<ul style="list-style-type: none"> Page 116, paragraph 1e should refer to Newmarket Road Park & Ride rather than Newmarket Park & Ride. Page 162, paragraph 3.1.117 Typo - The city centre has therefore had to evolved to ensure it remains a vibrant place to visit. Make sure references to strategies are correct e.g. CCC Active Travel Strategy for Cambridgeshire. Cambridgeshire County Council is referenced in several places, please ensure that the Council is referred to as Highway Authority where appropriate (e.g. page 36, paragraph 1.16).
Active Travel	Policy I/ST: Sustainable Transport and Connectivity	<ul style="list-style-type: none"> Suggested amended/additional wording highlighted: <ol style="list-style-type: none"> <i>Development must be located and, through a vision-led approach, designed to reduce reliance on the car, and promote sustainable <u>and active</u> travel appropriate to its location.</i> <i>Planning permission will only be granted for development where the site has (or will attain) sufficient integration and accessibility by walking, wheeling, cycling or public and community transport, <u>as set out in Cambridgeshire County Council's Active Travel Toolkit</u>, having regard to:</i>

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		<p>a. <i>Ensuring development is designed around the principles of walkable neighbourhoods and healthy towns <u>and streets</u> through provision of safe, direct, <u>accessible, active travel</u> routes within permeable layouts that <u>prioritise</u>, facilitate and encourage short distance trips by walking, wheeling and cycling between home and nearby centres of attraction, and to bus stops, mobility (travel) hubs or railway stations, to provide real travel choice for some or all of the journey;.....</i></p> <p>e. <i>Protection and improvement of existing walking, wheeling and cycle routes, including the Rights of Way network, to ensure the effectiveness and amenity of these routes is maintained, including through maintenance, crossings, signposting and waymarking, and, where appropriate, <u>all-weather surfacing</u>, widening and lighting;</i></p>
Active Travel	Policy I/EV: Parking and Electric Vehicles	<ul style="list-style-type: none"> • Paragraph 3 - Cycle parking • This policy has been significantly watered down and we object to this. The standards were updated in 2018 from the previous Local Plan precisely because developers consistently installed cycle racks which were difficult, sometimes impossible, to access in terms of spacing, poorly located, or required users to use steep ramps or lift their bikes. There is no explanation of why elements have been removed which are essential to ensure high quality cycle parking for all new developments. The topic paper suggests that in combining the Cambridge Local Plan and South Cambridgeshire Local Plan 2018 simplicity has been prioritised whilst favouring more cycle parking, but this simplicity will result in the poor provision that was a common feature of pre-2018 cycle parking. These elements include: <ul style="list-style-type: none"> ○ Statement regarding avoidance of basement parking, acceptable gradient of ramp and need to provide a proportion of the parking on the ground floor for less able users or those with non-standard bikes. Equally that double stacker racks or high/low racks should only be considered for non-residential and large student developments with 20% required to be Sheffield stands. ○ The standards should refer to the City Council’s Cycle Parking Guide for New Residential Developments to which all cycle parking should accord in terms of spacing, and cycle stand specification required. This guidance should be updated to include specifications for non-standard bikes which are often poorly implemented.

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		<ul style="list-style-type: none"> ○ Distinction between short stay parking for visitors & shoppers which should be located as close as possible to the main entrances of buildings and employee/long stay cycle parking. The distinction in numbers needed for each should be retained as the requirements in terms of location and security are very different. ○ The visitor parking requirement for residential developments. All blocks of flats, for example, should have a small number of stands next to the main entrances.
Active Travel	Policy WS/HD: Creating healthy new developments	<ul style="list-style-type: none"> ● Paragraph 1.h. - Ensuring employment areas have the facilities for active travel (Jobs) - why is this for employment areas only? Suggest the following amendment: <i>Ensure that developments are designed to encourage healthy lifestyles with high quality active travel routes which, for employment areas, connect to nearby population centres and for residential developments connect to key destinations.</i>
Active Travel	Policy S/PA/CC: Cambridge City Centre	<ul style="list-style-type: none"> ● An important issue for the city centre is the lack of public cycle parking. This policy should include the need to increase the amount of public cycle parking as part of new development wherever possible.
Active Travel	Policy S/CE: Cambridge East	<ul style="list-style-type: none"> ● Amendments suggested – as set out in the CCC Active Travel Strategy ‘wheeling’ refers to travel using a wheelchair, mobility scooter, pushing a pushchair etc. rather than cycling. ● Suggest the following amendment to the ‘Movement’ section: <i>Movement</i> <i>14. Ensure an exemplar approach to movement and transport within and through the site, transforming the wider connectivity of the eastern edge of Cambridge and promoting a low car living approach where ‘walking, wheeling and cycling’ is the first choice for most residents and visitors from the outset, by:</i> <ul style="list-style-type: none"> <i>a. providing a series of well connected ‘walkable neighbourhoods’, each meeting everyday needs, with effective wayfinding within and between neighbourhoods;</i> <i>b. delivering a high-quality public transport route through the site connecting the relocated Newmarket Road Park and Ride into the city, serving Springstead Village and other mobility hubs within the district and neighbourhood centres;</i>

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		<p><i>c. locating all development within easy walking distance of mobility hubs, with significant provision of public transport, <u>walking, wheeling and cycling</u> connections throughout the site connecting to wider routes that will enable sustainable and <u>active</u> journeys to be made between Cambridge East and other key destinations within Cambridge, including:</i></p> <p><i>i. Cambridge Station, City Centre and onwards to West Cambridge and wider destinations on radial <u>cycle and public</u> transport corridors; and</i></p> <p><i>ii. Southern loop <u>and high-quality active travel routes</u> to serve Cambridge Biomedical Campus, Cambridge South Station and Cambridge Leisure site.</i></p> <p><i>d. providing vehicular access only from Newmarket Road, Airport Way, Coldham’s Lane and Barnwell Road into distinct low traffic neighbourhoods which are:</i></p> <p><i>i. not linked for general traffic;</i></p> <p><i>ii. promote low car ownership by supporting low levels of parking, provided in innovative forms of car storage such as off-plot car barns.</i></p>
Active Travel	Policy S/WC: West Cambridge	<ul style="list-style-type: none"> • Movement – there should be a statement referring to facilitating the Cambourne to Cambridge busway and associated active travel route.
Education	General Comments	<ul style="list-style-type: none"> • Our assessment of the proposed allocations confirms that early years and school needs can be met through a combination of existing facilities and the new provision planned for each of the major developments. • We note that the development strategy states that villages should play only a limited role in meeting future development needs. However, many village schools are experiencing a fall in rolls because of a declining school-aged population and would benefit with some more housing, particularly affordable housing. Examples of such schools are Hauxton and Milton. We consider that the plan has a role in supporting existing communities and families and ensuring that local facilities, including schools remain viable. We also note that many village neighbourhood plans also support the need for affordable housing. • There is little reference to children with Special Educational Needs and Disabilities (SEND), with what there is focused mostly on housing being able to accommodate people with disabilities.

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		<p>There is a need for more SEND provision across the area through a mixture of more provision in mainstream schools and additional places in special schools.</p> <ul style="list-style-type: none"> • Similarly, there is limited reference to early years provision beyond what is planned within new developments. Demand is expected to rise due to the extension of free childcare eligibility to children from nine months of age. Meeting this need will require a combination of expansions at schools and by voluntary and private sector providers.
Education	Policy S/NEC: North East Cambridge	<ul style="list-style-type: none"> • The draft refers to “Two primary schools, with land reserved for a third if population triggers are met”. The County Council’s assessment for the NEC area is for two primary schools comprising a 3 form of entry and a 2 form of entry school to serve the CWWTW site. It is supportive of the proposal to reserve additional land as a contingency.
Education	Policy S/CBN: Cambourne North	<ul style="list-style-type: none"> • Item 9c should include the provision of a special school, which is likely to be required to mitigate the impact of such a large allocation. For Northstowe and some other developments there is a separate reference to education needs in the “Uses” list so a similar approach is suggested for Cambourne North and amend to "Education facilities to meet the needs of the development including early years, primary schools, secondary schools, sixth form and for special educational needs”.
Education	Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm	<ul style="list-style-type: none"> • Item 7k should include the provision for either a new special school or expansion of Granta School nearby, which is likely to be required to mitigate such a large allocation. We suggest a separate reference to education needs in the “Uses” list such as "Education facilities to meet the needs of the development including early years, primary schools, secondary schools, and for special educational needs”.
Education	Policy S/NST: Northstowe New Town	<ul style="list-style-type: none"> • Paragraph 2.3.77 - This wording is not quite correct. We suggest: “A nursery, secondary school, primary school and special school have now been built but further education facilities will be required to meet the needs of the new town, including additional primary schools”.
Education	Policy S/WNT: Land north of Waterbeach	<ul style="list-style-type: none"> • Vision and Identity paragraph 2 - The list does not include the special school. • Built Form paragraph 10c - The wording is ambiguous and may be construed as suggesting more than 2 secondary schools on the site. We suggest amending to: “Two other Local Centres,

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		one of which will serve the northeastern residential area and a secondary school and primary schools to meet the needs of the development.”
Education	Policy WS/NC: Meeting the needs of new and growing communities	<ul style="list-style-type: none"> • Paragraph 6.25 - There is no reference to special needs provision. • Paragraph 6.32 - There is no reference to special needs provision. The inclusion of the reference to discourage the use of restrictive covenants that would restrict the ability to use homes for childminding business use is supported.
Education	Site Allocations Topic Paper	<ul style="list-style-type: none"> • Paragraph 5.41 - The outline permission includes provision of a special school.
Education	Infrastructure Delivery Plan	<ul style="list-style-type: none"> • Page 73 – amend the following sentence: School sizes vary considerably across Greater Cambridge. In the city, provision ranges from small one-form entry schools (such as Fen Ditton Primary and St Philip’s CE Primary <u>St Paul’s CE Primary and The Spinney Primary</u>) to larger three-form entry schools (such as Queen Edith and Trumpington Meadows <u>St Matthew’s and Trumpington Park</u>).
Libraries	General Comment	<ul style="list-style-type: none"> • We are looking to co-locate and work the assets harder, making the library flexible enough to host the library offer, targeted support (children’s centres), community centres (well established in the City with Clay farm, Cherry Hinton and East Barnwell) and could do more under cultural hubs, NHS delivery etc.
Libraries	Policy WS/CF: Community, Sports, and Leisure facilities	<ul style="list-style-type: none"> • The application of building class to ensure facilities within a development is noted. However, experience indicates that this approach can be restrictive when delivering a modern, flexible community building or library. Such facilities often accommodate diverse activities, including hosting community banks, providing arts and creative spaces, supporting live sports events, offering room hire, and enabling NHS service delivery. In some cases, protracted negotiations with landlords have been required to permit these activities due to class restrictions. • Flexibility is essential when replacing services to avoid imposing requirements that mandate replication of a traditional, standalone library model. Shared spaces should not be perceived as inferior alternatives. While the current wording appears to support this principle, it would be helpful to test it against a practical example: if Arbury Court Library were replaced with a combined children’s centre and library offer, would this arrangement meet the stated criteria?

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Libraries	Policy WS/CH: Cultural and creative hubs	<ul style="list-style-type: none"> • Opportunity to co-locate or better still make buildings work harder. Many libraries operate 28 hours a week, can the shelving fold away to be used as an arts/cultural hub outside – see Fore Street Living Room Library – Jan Kattein Architects Architecture, planning & communities. Or at a smaller level Melbourn hub, Gamlingay Eco hub and EverySpace Everyplace – Jan Kattein Architects Architecture, planning & communities. • Trying to link up better quality community spaces that are sustainable through multi use and investment upfront inflexible buildings.
Libraries	Policy WS/MU: Meanwhile uses during long term redevelopments	<ul style="list-style-type: none"> • Mixed success with this, we have had it at Northstowe, Alconbury and Waterbeach to help create new hubs for communities to engage with. • However, things like building in spaces for visit from food trucks and the mobile library can help with logistics of a new community as it sets up before permanent facilities are in place (learning from Northstowe).
Libraries	Policy WS/IO: Creating inclusive employment and business opportunities through new developments	<ul style="list-style-type: none"> • Some opportunities to work with Adult Education to support this offer and specifically the Business and Intellectual Property to support new opportunities that can develop in new community. Business & IP Centre Cambridgeshire (BIPC) Cambridgeshire County Council Potential to buy into specific project work in a community to support ambitions.
Communities	Wellbeing and Social Inclusion	<ul style="list-style-type: none"> • None or little reference of crime, antisocial behaviour, domestic violence, county lines (growing), faith, tourism, those seeking sanctuary, transport, resident voice, integrated neighbourhoods, parish council opportunities. What will the added pressures be to the health support available? Will there be enough school places? enough activities for youth? extra curricular activities to allow parents to work, public toilets - accessibility and dignity? • With health, one of the biggest themes is mental health, which links with outcomes for employment, citizenship, family etc. • There is nothing that looks at specific provision or use for young people, which could be within either sports and leisure or within cultural hubs where perhaps a aim around supporting new and aspiring artists could be made there is very little in relation to youth or families.

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Communities	Infrastructure	<ul style="list-style-type: none"> • Mention of active travel but needs reference to lighting, cameras so that learning can be taken from Northstowe bus route antisocial behaviour and thefts. • The need for shops at an earlier stage of the build, youth and community centres also to encourage new community development and to stimulate social capacity at an early stage. • S106 money delivery needs to be standardised and made easier to access. • Digital infrastructure does not refer to digital poverty. • Transport seemed to feature heavily, whereas education, schools, libraries, healthcare, community centres and halls, culture, faith and public art was mentioned. How money is drawn down in terms of when and how is important. Having visited new developments where people have moved in and there is constant noise, dust, and disruption, an alternative place to be isn't on offer or available. Health and wellbeing is severely impacted when the onus is on getting people into their properties to release funding to provide community space. Could developers be asked to provide that first and draw that down afterwards to cover their costs?
Communities	Biodiversity and Green Spaces	<ul style="list-style-type: none"> • focuses on protecting green space but could be balanced with people's interactions with green space. • Gardens as extensions C11of green spaces? • Play not specifically referenced • Effective engagement/groups that can look after and nurture green spaces • The link of specific activities park run, wild swimming, pump tracks how can these activities come together and harmonise with biodiversity • The City Council produced a report with Women in Sport https://www.nccp.org.uk/wp-content/uploads/2024/11/Access-to-Nature-Report-October-2024-newsletter.pdf which demonstrated that a third of young women in Cambridge did not feel safe in open spaces within the city. 76% reported a lack of toilet or appropriate changing facilities. Although some of the issues young women have in these areas are peer or socially based there are clear issues with the ways these spaces are planned and designed that would be good to understand and

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		<p>reflect on findings in the future planning of these areas to reduce the barriers to young women accessing these spaces and engaging in sport or exercise.</p>
Communities	Homes	<ul style="list-style-type: none"> • Need for bungalows/housing that is accessible for older people other those with disabilities and in turn these developments need to be the most accessible, closer to hospitals, regular public transport, communal social spaces, access to physical activities (falls prevention)
Communities	General Comments	<ul style="list-style-type: none"> • The traveller policy mentions - be located where the needs of the residents can be met without placing undue pressure on existing local services and facilities. I could not see this reference as explicit as this in any other area e.g. a new housing estate is often built without thorough reference to this. • We are consistently looking at career paths and opportunities for young people, the volume of work within this plan could provide opportunities within this area. Whether there was any opportunity within this to focus on a local workforce percentage or a commitment to apprenticeship, training opportunities for local young people as part of this whole process
Adult Commissioning	Policy H/SH: Specialist housing	<ul style="list-style-type: none"> • It is suggested that the text should include a summary paragraph describing specialist housing, for example: <i>‘Supported accommodation can take many forms and cover a wide range of needs, from sheltered housing (where residents live mainly independent lives whilst sharing some communal facilities), to tenancy-based, supported living accommodation where support may be delivered on-site for up to 24 hours per day, through to extra care housing and care homes, where a level of personal care or support is typically provided’</i> • Paragraph 4 - Clarification is sought on the meaning of “unallocated strategic sites” as referenced in this paragraph. Given the well-documented and growing demand for all forms of specialist housing, it is considered that this policy requirement should apply to all strategic sites, rather than being limited solely to unallocated sites. • In addition, the current threshold of 1,000 dwellings is considered unduly high. Reducing this threshold would enable the delivery of specialist housing in a wider range of suitable locations, particularly those that are well served by local shops and services, public transport and other sustainable modes of transport, and community facilities appropriate to the needs of the intended occupiers, as set out in paragraph 1(c) of Policy H/SH. This approach would provide

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		greater flexibility, better reflect local housing needs, and help ensure that appropriate specialist housing is delivered in sustainable and accessible locations across the plan area.
Adult Commissioning	General Comment	<ul style="list-style-type: none"> • We suggest replacing the term “people with disabilities” with “people with care and support needs” throughout the document. This terminology is more inclusive, as it encompasses a broader range of needs, including those relating to mental health, physical health, and learning disabilities. • This amendment should be reflected consistently across the entire document, including all policy references.
Adult Commissioning	Policy S/JH: New jobs and homes	<ul style="list-style-type: none"> • We would also be grateful if you could clarify the source of the data used to determine the number of housing units and bed spaces cited in the Paragraph 3c of Policy S/JH. Could you please confirm whether this information has been cross-referenced with the County Council’s demand profile? • Based on our data, the projected need for residential and nursing beds for individuals aged 18–64 within Cambridge City and South Cambridgeshire is approximately 12 beds by 2041, which appears to differ from the figures presented in the document. The difference between the data sets is significant and therefore we recommend that the these are reviewed and confirmed before being published due to the risk of a) oversupply b) inappropriate type of supply of housing being developed as a result. • The links of our demand profiles are given below: https://www.cambridgeshire.gov.uk/asset-library/cambridgeshire-specialist-supported-accommodation-needs-assessment-2024.pdf https://www.cambridgeshire.gov.uk/asset-library/older-peoples-accommodation-demand-profiles.pdf
Minerals and Waste Planning Authority	Chapter 1 About the Plan Paragraph 1.11	<ul style="list-style-type: none"> • Suggest the following amendment: <i>The policies in the Local Plan form part of the Development Plan for the area, along with the Cambridgeshire and Peterborough Minerals and Waste <u>Local Plan</u>, and ‘made’ Neighbourhood</i>

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		<p><i>Plans produced by local communities for their designated areas. When it is adopted, the Greater Cambridge Local Plan will supersede the currently adopted local plans:</i></p>
Minerals and Waste Planning Authority		<ul style="list-style-type: none"> • North East Cambridge [Pages 103, 111] • Page 103: “North East Cambridge – Vision - d. Safeguarded uses include the Waste Transfer Station, Aggregates Railheads, and Cowley Road Bus Depot, which must be maintained unless relocation is secured; and...” • Page 111: Supporting Text - “3.1.8 In addition to legacy infrastructure, NEC currently includes safeguarded Aggregates Railheads and a Waste Transfer Station. The Aggregates Railheads are of strategic importance and also provide the potential to minimise the movement of construction materials and waste by road. Unless and until a suitable off-site alternative for replacement railheads can be identified, the proposed approach is to retain the Aggregates Railheads in situ. It is proposed to relocate the Waste Transfer Station preferably off-site or alternatively to a more appropriate location within Cowley Road Industrial Estate adjacent to the Aggregates Railheads to facilitate the vision for NEC and to optimise development and, therein, mixed development.” • General support for text on page 103 Vision – criterion d which safeguards the Waste Transfer Station and Aggregates Railhead unless relocation is secured. • General support for supporting text & Request for additional text on page 111 in paragraph 3.1.8 setting out the approach to the safeguarded sites. However, it would be appropriate to explain that the Aggregates Railhead and Waste Transfer station are safeguarded strategic facilities under the Cambridgeshire and Peterborough Minerals and Waste Local Plan and refer to a relevant statement of common ground (see below). • Request for updated statement of common ground – Cambridgeshire County Council, was, along with a number of other organisations signatories to the North East Cambridge Area Action Plan Proposed Submission Duty to Cooperate Statement of Common Ground (November 2021). As the safeguarding of waste and minerals remains a strategic matter that affects more than one authority, a reaffirming or update to that statement of common ground to support this draft plan is requested.

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Minerals and Waste Planning Authority	Policy S/NEC: North East Cambridge	<ul style="list-style-type: none"> • General support for text on page 103 Vision – criterion d which safeguards the Waste Transfer Station and Aggregates Railhead unless relocation is secured. • General support for supporting text & Request for additional text on page 111 in paragraph 3.1.8 setting out the approach to the safeguarded sites. However, it would be appropriate to explain that the Aggregates Railhead and Waste Transfer station are safeguarded strategic facilities under the Cambridgeshire and Peterborough Minerals and Waste Local Plan and refer to a relevant statement of common ground (see below). • Request for updated statement of common ground – Cambridgeshire County Council, was, along with a number of other organisations signatories to the North East Cambridge Area Action Plan Proposed Submission Duty to Cooperate Statement of Common Ground (November 2021). As the safeguarding of waste and minerals remains a strategic matter that affects more than one authority, a reaffirming or update to that statement of common ground to support this draft plan is requested.
Minerals and Waste Planning Authority	S/RRA/SCS: Land to the south of Cambridge Services, A14	<ul style="list-style-type: none"> • Additional supporting text requested • Site is partly located within the Consultation Area for the Uttons Drove Water Recycling Centre. This should be identified as a constraint in the supporting text. The following supporting text is recommended for inclusion. <i><u>"This site is near to the Uttons Drove Water Recycling Centre. An odour assessment may be required. Please refer to Policy 16 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) for further information."</u></i>
Minerals and Waste Planning Authority	S/RRA/BBP: Land at Buckingway Business Park	<ul style="list-style-type: none"> • Support Inclusion of Text • Supporting text 3.5.22 refers to Policy 16 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan, and need for odour assessment. General support for inclusion of supporting text.
Minerals and Waste Planning Authority	S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital)	<ul style="list-style-type: none"> • Additional supporting text requested • Site area includes a safeguarded Waste Management Area for the partially implemented Energy Innovation Centre (EIC) as shown on the Cambridgeshire and Peterborough Minerals

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		<p>and Waste Local Plan (2021) Policies Map. Developers should be made aware that the partial implementation of this EIC involved the construction of underground tunnels; and this should be considered in any design. It is requested that supporting text to this effect is included in the Plan for this allocation.</p>
Minerals and Waste Planning Authority	S/AMC/IWM: Imperial War Museum, Duxford	<ul style="list-style-type: none"> • Additional supporting text requested • Site is partly located within the Consultation Area for the Duxford Water Recycling Centre. This should be identified as a constraint in the supporting text. The following supporting text is recommended for inclusion. <p><i><u>"This site is near to the Duxford Water Recycling Centre. An odour assessment may be required. Please refer to Policy 16 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) for further information."</u></i></p>
Minerals and Waste Planning Authority	S/AMC/GT: Optimisation of Gypsy and Traveller Sites: Chesterton Fen Road, Milton and Smithy Fen, Cottenham	<ul style="list-style-type: none"> • Additional supporting text requested • Site is partly located within the Consultation Area for the Cambridge Northern Fringe Aggregates Railheads and the Cambridge North Water Recycling Centre. Any proposals must demonstrate that they are compatible with the existing railhead and waste management uses and will not be adversely affected by their proximity. An additional criterion to policy S/SMC/GT should be added, suggested text: <p><i><u>"The Chesterton Fen Site located near to the Cambridge Northern Fringe Aggregates Railheads and the Cambridge North Water Recycling Centre, any proposals must demonstrate compliance with Policy 16 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) (or any successor policies)."</u></i></p>
Minerals and Waste Planning Authority	Policy CC/CE: Supporting a circular economy and sustainable resource use	<ul style="list-style-type: none"> • Alteration to Paragraph 4.68 suggested: Reference to the Cambridgeshire and Peterborough Minerals and Waste Local Plan is supported, suggest the following alteration to the above text (4.68): <p><i><u>"This policy should be read alongside the adopted Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) (or successor document), which contains policies relevant to planning applications for minerals and waste development. Policies that promote circular economy principles include, Policy 8 (Recycled and Secondary Aggregates, And Concrete</u></i></p>

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		<p><i><u>Batching) and Policy 14 (Waste Management Needs Arising from Residential and Commercial Development). Note, Policy 8 and 14 can apply to residential and commercial / employment developments, see policy text for further information.”</u></i></p> <ul style="list-style-type: none"> • Additional Supporting Text requested: To support the circular economy policy it is requested that it includes supporting text to cross-reference to the Minerals Safeguarding Areas identified in the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021). Suggested text as follows: <i><u>“Sand and Gravel and Chalk Mineral Safeguarding Areas as identified by the Cambridgeshire and Peterborough Minerals and waste Local Plan (2021). Where these resources exist, circular economy statements should acknowledge their presence and seek to make best use of the resources as part of the development, or within other developments.”</u></i>
Minerals and Waste Planning Authority	Glossary - Entry for Cambridgeshire and Peterborough Minerals and Waste Plan	<ul style="list-style-type: none"> • Update to entry: This entry appears to be out of date and not reference the current Minerals and Waste Local Plan which was adopted in 2021 which superseded the Core Strategy and Site Specific Proposals document, nor the RECAP Design Guide.
Public Health	Chapter 1: Development Strategy Vision for Greater Cambridge	<ul style="list-style-type: none"> • It is pleasing to see that the vision for Greater Cambridge is based on the following seven strategic priorities: These are supported by public health. <ul style="list-style-type: none"> ○ Wellbeing and social inclusion ○ Biodiversity and green spaces ○ Great places ○ Homes ○ Jobs ○ Climate change ○ Connectivity and infrastructure. • Public health welcome the ‘Draft vision’ for inclusive communities that aim to provide a high quality of life with housing and social infrastructure that meets people’s needs through all stages of life; food security; and that the physical and mental health and happiness of people

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		<p>will be prioritised; and that open spaces will be easily accessible and that large scale natural spaces will be able to be reached by active travel modes.</p> <ul style="list-style-type: none"> • Public health welcome that health and wellbeing will be embedded throughout the plan e.g., that new development that creates sustainable, well-designed places which facilitate improving health, wellbeing and social interaction to reduce inequalities, promote inclusivity and support a sense of community will be prioritised. That there will be high quality new homes to meet the needs of all the community, including older people, those with care needs and younger people. That there will be investment in new or improved healthcare, public open spaces, community buildings, and active travel infrastructure making healthier lifestyles achievable. That there will be an extensive network of green infrastructure, green corridors and open spaces to increase the value of the environment for people and wildlife. That there will be realistic alternatives to private car use to encourage walking, cycling, wheeling and use of public transport. • Public health welcome the acknowledgement that climate change and global warming can lead to serious impacts on human health, environment, infrastructure and the economy. • A full review of the proposed and existing allocations in the Draft Local Plan has been carried out. PH welcome and support Greater Cambridge in their promise to deliver healthy places and communities, especially the inclusion of ageing well and accommodation for people with disabilities; the provision of permanent pitches for the Gypsy and Traveller community; a range of homes including for key worker and affordable; healthcare facilities; education and community facilities; provision of open space, play parks, green and blue infrastructure, sports facilities etc; and opportunities for active travel and job opportunities in the larger developments. These are all important factors for healthy and equitable communities. • In addition to the provision of permanent pitches, public health also recommends for the Gypsy and Traveller community that there are no inequalities for these communities as they have a right to an education, health services, and health and safety to ensure that the sites for the permanent pitches: <ul style="list-style-type: none"> ○ Are located within 1.5 miles of a primary school and 2 miles of a GP surgery ○ Provide satisfactory amenity for neighbouring occupiers ○ Pitch size facilitates good quality accommodation

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		<ul style="list-style-type: none"> ○ Includes play provision, that noise and disturbance are mitigated ○ That the health and safety of occupants are not put at risk from poor air quality, noise, contamination or flood risk.
Public Health	Policy WS/HS: Pollution Health and Safety	<ul style="list-style-type: none"> ● Public health support Draft Policy WS/HS that seeks to ensure amenity for new buildings and neighbours by minimising the impacts of: <ul style="list-style-type: none"> ○ Light pollution - Public health would like to see glint and glare included within this policy. ○ Noise and vibration ○ Air quality, odour, dust, and other fugitive emissions to air ○ Contaminated land ○ Hazardous installations ○ Environmental nuisance / pollution and agent of change principle ● Public health would like to see water pollution and overheating included within this policy.
Public Health	Policy WS/HD: Creating Healthy New Developments	<ul style="list-style-type: none"> ● Public Health are supportive of Draft Policy WS/HD that HIAs should form an integral part of preparing a development proposal and undertaken early to inform the proposed design and layout. Topics that could form the HIA and that can affect the health and wellbeing of different groups within a community. PH acknowledge that an HIA needs to be proportionate to the development proposed. The topics are: <ul style="list-style-type: none"> ○ Housing, ○ access to healthcare services, community and other social infrastructure ○ access to open space and nature e.g., green and blue spaces ○ air quality, noise and neighbourhood amenity ○ accessibility and active travel ○ employment facilities for active travel

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		<ul style="list-style-type: none"> ○ crime reduction and community safety ○ access to healthy food e.g., allotments ○ access to work and training ○ social cohesion and inclusive design e.g., that new developments should meet the needs of disabled people, older people and children and young people; and make provision for disadvantaged groups ○ minimising pollution and the use of resources ○ climate change <ul style="list-style-type: none"> ● Public health fully support the inclusion of ‘Hot Food Takeaways’. However, public health is disappointed that it is implied that hot food takeaways will be supported in Greater Cambridge’s designated centres irrespective of its distance from a primary or secondary school, further education college or youth centre, as there is evidence that promoting unhealthy eating habits, particularly high-fat, high-sugar and high-salt diets contribute to childhood obesity and poor oral health. They can lead to increased consumption of fast food over healthier school meals and a rise in health inequalities. ● Public Health would like to be consulted on any planning applications for HFTs as we would like to see restrictions on opening hours to reduce the accessibility to school children at the end of the school day which could be achieved by the imposition of planning conditions. ● Public health recommends that Gambling is also included within this policy. Gambling presents significant public health issues, causing individual, family, and societal harm, including debt, mental health crises (anxiety, depression, suicide), relationship breakdown, substance misuse, and crime. ● Public health recommends that advertising for High in Fat, Salt and Sugar (HFSS) is also included within this policy. This has been done by other councils. HFSS are a major public health issue because their excessive consumption drives obesity, type 2 diabetes, heart disease, and certain cancers, leading to increased mortality and burden on health systems; they are heavily marketed, especially to children, influencing poor diets, and their affordability/promotions encourage overconsumption creating a cycle of poor health and growing non-communicable disease rates.

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Public Health	Policy I/ST: Sustainable transport and connectivity	<ul style="list-style-type: none"> • Public health support the transport user hierarchy promoting active travel above the use of all other vehicles. Public Health recommend that active travel routes and sustainable travel opportunities in developments should: <ul style="list-style-type: none"> ○ contribute to maintaining, improving and adding to connectivity for pedestrians, cyclists, users of wheeled mobility aids ○ be well defined, lit, feel safe with natural surveillance wherever possible ○ respond to the needs of people with disabilities and reduced mobility ○ maintain, improve and add to rail, bus and community transport connectivity ○ provide infrastructure to facilitate sustainable transport
Biodiversity and Greenspaces	Policy S/AMC/SCL: South of Coldham's Lane	<ul style="list-style-type: none"> • We are concerned that the 'South of Coldham's Lane Area of Major Change' allocation site covers a large number of Local Sites, including Norman Cement Pits, Coldham's Lane Old Landfill Sites, CU Officer training Corps Pit and Cherry Hinton Brook City Wildlife Sites. • We welcome the inclusion of a requirement to 'deliver appropriate ecological management' and reference to Local Sites within the Policy S/AMC/SCL. However, this doesn't really consider the importance of this land as a strategic wildlife corridor, identified in the Cambridge Nature Network, nor the identification of land for habitat enhancement / creation within the Local Nature Recovery Strategy (final version expected to be published at end of 2025). • We recommend the wording of the policy be expanded to include strengthening of the important wildlife corridor and delivery of Local Nature Recovery Strategy priority habitat actions.
Biodiversity and Greenspaces	Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital), including policy S/SEA/CBC	<ul style="list-style-type: none"> • We welcome that nature is included within the policy for the Cambridge Biomedical Campus (including Addenbrooke's Hospital), particularly the need to 'improving ecological links between Nine Wells LNR and GoG Magog Hills' and the allocation of 'Non-development areas adjacent to Cambridge Biomedical Campus Strategic Enhancement Area' (S/SEA/CBC)
Biodiversity and Greenspaces	Policy S/CBN: Cambourne North and policy S/SEA/CBN	<ul style="list-style-type: none"> • We are concerned that the location and scale of the proposal for the Cambourne North allocation site and the adjacent to Cambourne North Strategic Enhancement Area (S/SEA/CBN) have the potential to adversely impact irreplaceable habitat (ancient woodland) and protected

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		<p>sites (including Eversden and Wimpole Woods Special Area of Conservation). We do not believe this potential impact on biodiversity has been adequately considered when selecting the location or the type of development (large town) being allocated. We would suggest the allocation do not comply with the National Planning Policy Framework’s notion of ‘sustainable development’ and there will be significant conflict with draft BG/BG policy for any development coming forward. It also appears to be wholly at odds with South Cambridgeshire District Council and Cambridge City Council’s draft biodiversity strategies and their support of the Local Nature Recovery Strategy, which at their heart seek to protect, enhance, expand and connect existing wildlife sites and local priority habitats and species. We urge the current form of the Cambourne North site allocation is reviewed, including more detailed rigorous ecological investigations, reworked and potentially removed / relocated / scaled back to avoid significant impacts to biodiversity and avoid blocking the delivery of the Local Nature Recovery Strategy.</p> <ul style="list-style-type: none"> • Paragraph 11 of the National Planning Policy Framework (NPPF) that requires, for plan-making, all plans to seek sustainable pattern of development, including improve the environment. Paragraph 11(b) goes on to insist that “strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area”. We suggest that the scale and extent of the proposed Cambourne North allocation will impact these ‘areas or assets of particular importance’, notably irreplaceable habitat and protected sites, and it will not deliver improvements for biodiversity. • Paragraph 192 of NPPF clearly states that plans should “promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species”. We would suggest that engulfing ancient woodland, as well as positioning such a sizeable development in a clear pathway between scattered remnants of ancient woodlands in this landscape, would be a significant barrier to achieve ecological networks and significantly impact bats, including barbastelle bats. • As noted in your supporting evidence, the allocation site may support functionally linked land for the barbastelle bat population of Eversden and Wimple Woods Special Area of Conservation (SAC) and therefore, we are surprised not to see baseline study of bat usage in the landscape to inform the site allocation process, or a draft Habitats Regulations Assessment.

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		<p>Currently, there is not sufficient publicly available information to ascertain the usage of this landscape by bats and therefore, we recommend a more detailed assessment, potentially including detailed bat survey work, is complete to determine whether the proposed site allocation for Cambourne North is appropriate, in the correct location or of the correct type / scale. This may identify changes to the site allocation boundary of the Cambourne North and adjacent Strategic Enhancement Area, and/or requirements for more substantial mitigation (e.g. green bridges over A428) to enable the development to be delivered. This information is also important to help the local authority determine whether the site allocation / local plan will have a likely significant effect on the SAC and require an appropriate assessment (Habitats Regs).</p> <ul style="list-style-type: none"> Finally, we refer GCSP to the Local Nature Recovery Strategy's Local Habitat Map, which shows approximately half of the Cambourne North & adjacent SEA being allocated for habitat creation, primarily woodland. We would strongly recommend these areas are excluded from the allocation site – if they continue to be included, then we would suggest they are allocated as woodland creation within the Strategic Enhancement Area, but it would be essential that woodland creation is secured in advance of urban development. We also suggest to further minimise impact to biodiversity, that the allocation site if focused immediately adjacent to existing urbanised areas (e.g. A428, Cambourne and potential railway station), rather than sprawling into the rural countryside.
Biodiversity and Greenspaces	Policy BG/BG: Biodiversity and geodiversity	<ul style="list-style-type: none"> (2) We support the requirement to secure 20% Biodiversity Net Gain as part of major developments. This will help deliver the local authority's commitment to doubling nature. It is also in keeping with emerging policies for other local plans in Cambridgeshire. (7) We are concerned that protection is solely focused on existing sites of biodiversity or geological importance, as identified on the policies map. This will result in any proceeding changes to existing Local Sites or selection of new Local Sites (which happens on a twice yearly basis) not captured on the policies map, will not be afforded the same protection. We seek that this section of the policy be expanded to include impact on all land (designated or not) supporting habitats/ species that meet City Wildlife Site or County Wildlife Site criteria. We would suggest that any candidate geological site is also included in requirements for surveys, and seek avoidance of adverse impact on any other land that meets Local Geological Sites

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		<p>criteria. Or alternatively, a recognition that the latest information of Local Sites should be obtained from the Cambridgeshire and Peterborough Environmental Records Centre (CPERC).</p> <ul style="list-style-type: none"> We would also suggest that the policy map in 'live' and measures are put in place to update it on an annual basis, following release of the updated Local Sites GIS layers from CPERC.
Definitive Map Team	General comment	<ul style="list-style-type: none"> Throughout the Plan, reference is made to 'Rights of Way'. This is not a class of highway and it is ambiguous as to whether the document is referring to public, permissive, or private rights of way. If the Plan is intending to refer to public rights of way, i.e., Public Footpaths, Bridleways, Restricted Byways, and Byways Open to All Traffic, then it should be unambiguous about this and use the term 'public rights of way' - easily abbreviated to 'PROW'. If the reference to 'Rights of Way' is also intended to encompass permissive rights of access or other privately managed routes, then this should be clarified.
Definitive Map Team	Policy I/ST: Sustainable Transport and Connectivity Paragraph 2.d	<ul style="list-style-type: none"> We welcome this ambition. The policy should make clear that opportunities should be sought to maximise the provision of new active travel routes (ie, hard-surfaced routes for utility travel) and new 'leisure' routes comprised of PROW (ie, soft-surface routes that provide enhanced countryside access)
Definitive Map Team	Policy I/ST: Sustainable Transport and Connectivity Paragraph 2.e	<ul style="list-style-type: none"> We welcome the ambition to protect and improve existing non-motorised user routes. It should be noted that "improvement" works such as re-surfacing a soft-surface PROW to a tarmac facility, can potentially be damaging to the pre-existing network of PROW. This potentially introduces disbenefits to the established user base and to biodiversity, and so does not always neatly marry with a desire to "protect" the network. Accordingly, the document should acknowledge that improvements to PROW will take place "where appropriate", and in a manner that is sympathetic to the existing nature of the PROW.
Definitive Map Team	Policy GP/PP: People and Place, Paragraph 1.b.i	<ul style="list-style-type: none"> The policy seeks to maximise active travel. It should also seek to make best use of opportunities to enhance countryside access through an expanding network of PROW and permissive access routes for leisure journeys.
Definitive Map Team	GP/LC: Landscape Character Paragraph 1.b	<ul style="list-style-type: none"> Where there are existing public rights of way the character of those should be retained by green corridors or other means.

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Definitive Map Team	GP/LC: Landscape Character Paragraph 1.b	<ul style="list-style-type: none"> This paragraph identifies the need to consider the cumulative effects of development on local landscape character. The local plan should consider opportunities to improve connectivity between adjoining or adjacent development sites so that provision is made for non-motorised routes that link developments. The existing practice of treating each development as an isolated site, even where there are separate parcels within a larger development, restricts the ability of the highway authority to require each individual development to contribute to the creation of a more connected PROW and no-motorised user network.
Definitive Map Team	GP/QP: Quality and public realm Paragraph 1.b	<ul style="list-style-type: none"> The policy could explicitly recognise the value of PROW in providing connectivity between rural communities. Development should not hinder this function but should seek to augment it, and where there is limited rural connectivity, expanding the PROW network should be championed.
Definitive Map Team	Policy WS/HD: Healthy Developments Paragraph 1e	<ul style="list-style-type: none"> The facilities to promote non-motorised access for all should seek to provide connectivity to the PROW network. To increase accessibility any existing barriers to access such as stiles or gates should be removed wherever possible.
Definitive Map Team	Policy WS/HD: Healthy Developments Para 1h	<ul style="list-style-type: none"> We propose that active travel facilities should be designed to link to networks beyond the development.
Definitive Map Team	Policy J/NE: New Employment Paragraph 3.g	<ul style="list-style-type: none"> Where consideration is given regarding access to employment sites by foot or cycle, consideration should be given to see if public rights of way can be instated to provide access opportunities. Where PROW are unachievable, permissive footpaths and bridleways should be considered.
Definitive Map Team	Policy J/NE: New Employment Paragraph 3.g	<ul style="list-style-type: none"> Where consideration is given regarding access to employment sites by foot or cycle, consideration should be given to see if public rights of way can be instated to provide access opportunities. Where PROW are unachievable, permissive footpaths and bridleways should be considered.
Definitive Map Team	Policy WS/CF: Community, sports, and leisure facilities	<ul style="list-style-type: none"> The policy does not recognise the health and wellbeing benefits offered by the PROW network. This network enables people to make a connection with the natural environment, providing an opportunity to enhance mental wellbeing, and enables users to exercise at the same time as travelling to a destination. They offer clean, traffic free journey opportunities. PROW are an

Response By	Chapter/Policy/Paragraph	Response/Comment
		existing leisure and cultural asset which can be maximised and the policy could do more to recognise and promote this.
Definitive Map Team	Policy WS/HD: Health Developments Paragraph 1.c	<ul style="list-style-type: none"> We support providing and enhancing accessibility to green and blue spaces, but the policy could recognise that non-motorised user routes to leisure spaces can contribute to healthier lifestyles.
Definitive Map Team	Policy WS/HD: Health Developments Paragraph 1.e	<ul style="list-style-type: none"> The policy could support the establishment of PROW to enable and encourage users to connect to the wider PROW network, which can provide much greater opportunities for exercise than that available within one single development.
Definitive Map Team	Policies Map	<ul style="list-style-type: none"> The Policies Map shows protected open spaces and nature reserves. Public rights of way are an amenity as well as providing connectivity to key sites. As such could they be included on the policy mapping.
Definitive Map Team	BG/GI: Green and Blue Infrastructure Paragraph 2.b	<ul style="list-style-type: none"> In addition to filling in missing natural links, developments should wherever possible provide routes that enable access to the wider countryside, ideally through public rights of way, or otherwise by permissive routes.