

My ref: Greater Cambridge Local Plan

Your ref:

Date: 29th January 2026

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Dear Sirs

Draft Greater Cambridge Local Plan – Consultation

The County Council has submitted representations to the Local Plan in my previous letter dated 28th January 2026. Since then, I have also received further comments made by the Chair and Vice-chair of the Council's Environment and Green Investment Committee. These are set out in the Appendix 1 to this letter.

I would be grateful if you could register these comments in addition to the previous representations made by the County Council.

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

Response By	Chapter/Policy/Paragraph	Response/Comment
Chair and Vice-chair of Environment and Green Economy Committee	Policy S/DS: Development strategy	<ul style="list-style-type: none"> • We understand the rationale behind the approach and acknowledge that it supports relatively sustainable growth in a low-conflict way by concentrating development around existing transport links in Cambridge and the larger towns. A key benefit for smaller villages is that they are largely protected from change. While this may be popular locally, it is not without consequences. • Villages that currently lack local shops and services are unlikely ever to reach the scale at which such amenities become viable. • Public transport is a particular concern. With a congestion charge strongly rejected by residents, there is no clear additional funding mechanism for public transport. As a result, these villages are likely to remain poorly connected, either without public transport altogether or with infrequent, low-quality services. Even if communities wished to grow to a scale that could support viable services, this plan effectively prevents them from doing so. • It may be argued that a future local plan could allow specific villages to pursue a different strategy. However, the current plan does not consider the consequences of rejecting growth. Bus franchising alone, without new funding, will not deliver the level of change required. • For example, Benwick in Fenland has seen its population grow significantly, from 860 to 1,145 between 2001 and 2021, and this growth has been accompanied by improved local amenities. Without development, similar villages are unlikely ever to generate the funding needed to enhance active travel infrastructure or connectivity. This may be an acceptable outcome, but it is a deliberate choice and should be stated more explicitly. • Conversely, many of these group villages are already experiencing substantial infill development, as Benwick again illustrates. In practice, this often exceeds the intended limit of eight dwellings per site, leading to traffic impacts and community concern about the scale of change. There is little reason to believe this trend will stop once the local plan is adopted. • The plan treats such development as “windfall”, but it is unclear whether communities will be adequately supported to manage it in line with green and blue infrastructure, climate objectives, and active travel ambitions. If policy does not actively encourage growth in smaller settlements, is it nevertheless strong enough to ensure that any growth which does occur

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		<p>delivers appropriate supporting infrastructure? Will future limits of two or eight dwellings per site be enforceable, given past experience?</p> <ul style="list-style-type: none"> • More broadly, there is a lack of clarity around how Section 106 and CIL funds generated by growth will be distributed to improve connectivity within villages and across the wider area. Has this been properly considered or modelled?
Chair and Vice-chair of Environment and Green Economy Committee	Policy S/SH: Settlement hierarchy	<ul style="list-style-type: none"> • “Rural Centres” is a misleading term. These are among the least rural villages: they do not feel remote, lack strong rural characteristics, are close to Cambridge, benefit from good transport links, and are not shaped by a rural economy. The label is therefore unhelpful and should not be applied to the largest hub villages. • “Minor rural centres” are more genuinely rural, although many function economically as suburban settlements, with high levels of commuting and, in some cases, their own science parks. Describing these places as rural introduces bias into policy discussions and planning decisions, obscuring their hybrid or suburban character. • “Smaller villages”, by contrast, are distinctly rural, facing traditional rural challenges and displaying classic rural characteristics, yet they are not classified as rural under the current terminology.
Chair and Vice-chair of Environment and Green Economy Committee	Policy WS/CF: Community, sports, and leisure facilities	<ul style="list-style-type: none"> • Swimming pools – It is essential that new towns include high-quality municipal swimming pools. While operation through secondary schools may be acceptable initially, this approach is unlikely to be sufficient as towns grow. Even if funding through Section 106 or CIL is not prioritised, land should still be safeguarded for future provision. Swimming pools are vital community assets: they support children, young people and older residents, help build a strong sporting culture, and can significantly reduce car dependency when provided locally. A lack of local pools is a major driver of car travel. • Leisure centres – Leisure centres are critical for public health and for fostering a culture of sport and physical activity. South Cambridgeshire is the only district without its own leisure centres, relying heavily on village college sports facilities and on Cambridge City to meet demand. Purpose-built leisure centres offer higher-quality facilities and a wider range of activities. The current shortfall undermines participation in sport, increases car journeys, and leaves some residents unable to access facilities at all.

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Chair and Vice-chair of Environment and Green Economy Committee	Policy I/ST: Sustainable transport and connectivity	<ul style="list-style-type: none"> • While this is not intended to be a transport strategy, the absence of ring roads, dedicated public transport routes through the city centre, and an active travel ring road or strong inter-village connections means the plan does little to reduce reliance on private car travel. • New towns are predominantly planned to the north of the city, while most employment opportunities are located to the south, and connectivity—particularly for journeys from the north—is not consistently strong.
Chair and Vice-chair of Environment and Green Economy Committee		<ul style="list-style-type: none"> • Nature – We strongly support the ambition to double nature recovery. In particular, we ask whether the Local Plan could be used more proactively to increase residents’ access to nature and promote active travel, for example by creating new rights of way into and across adjacent farmland or nature reserves. Many new developments remain designed with a single point of access focused on car use. Could stronger requirements ensure that developments are better connected to surrounding farmland, green spaces, or nature reserves? • In addition, the Plan provides little detail on the five proposed “dispersed” green infrastructure initiatives. While some of these may be achievable, it is unclear how they will be delivered in practice. Further clarification is also needed on how the Plan will actively promote and support environmentally friendly farming.
Chair and Vice-chair of Environment and Green Economy Committee	Policy I/SD: Servicing and last-mile deliveries	<ul style="list-style-type: none"> • Last-mile delivery is referenced, but this should more explicitly consider solutions such as delivery lockers within new communities at the earliest planning stages. There is also an opportunity to support how people live today by retrofitting existing communities. Can planning policy actively support the provision of parcel lockers, particularly given the widespread closure of post offices? This is a significant driver of unnecessary car journeys. • Letterboxes and parcel storage also require attention. Where letterboxes are inaccessible, for example, located behind gated or locked entrances, it becomes much harder for residents to receive deliveries and manage day-to-day life. Safe, secure, and accessible locations for letterboxes and parcel storage should be a priority in new developments. Anecdotally, residents often redirect deliveries to parents’ homes to avoid these issues, which in turn increases travel demand and undermines trip budgets for schemes.

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Chair and Vice-chair of Environment and Green Economy Committee	Policy S/PRIA: Public Realm Improvement Areas (PRIA) in Cambridge	<ul style="list-style-type: none"> Rain gardens and in-street rain gardens – There is strong support for embedding flood-alleviation principles into micro rain gardens and small parcels of land within new developments, such as spare or under-used corners. Their role in managing surface water and reducing flood risk should be made more explicit. There is also an opportunity to design small green spaces in ways that help residents understand and value their function in preventing flooding. A key question remains whether growth funding for this type of intervention will be distributed across Greater Cambridge as a whole, or primarily targeted at areas experiencing new development.
Chair and Vice-chair of Environment and Green Economy Committee	Policy CC/IW: Integrated water management, sustainable drainage and water quality	<ul style="list-style-type: none"> Rain gardens and in street rain gardens – Embedding principle of flood alleviation in micro rain gardens and bits of new properties e.g. spare corners is supported. Also being more explicit about their role in flood alleviation. Is there a way to design small green spaces which makes people think about preventing flooding. Again, will funding from growth for this be distributed across Greater Cambridge, or reserved for the areas seeing new development?
Chair and Vice-chair of Environment and Green Economy Committee	Policy H/MO: Houses in multiple occupation (HMOs)	<ul style="list-style-type: none"> The plan currently makes explicit reference to student accommodation, a need for one-bed properties, and to HMOs. In practice, HMOs are doing a significant amount of “heavy lifting” in housing people aged 20–30 (and potentially older), yet they are often a highly sub-optimal form of housing. This cohort is critical to achieving our global city ambitions, but it is unclear whether the proposed housing genuinely caters for them. While many may aspire to one-bedroom flats, the reality is that if HMOs are the only affordable option, this may not be sufficiently attractive to encourage them to locate here. This raises questions about global competitiveness. Young professionals in particular often want to live in or close to Cambridge, may not own a car, and value high-quality, well-located housing. Alternative models, such as co-housing (for example, Marmalade Lane), could be well suited to this group. It feels as though they should be recognised as a distinct housing category. They are essential to the city’s future yet currently underserved. There should be strong support for strict limits on the density of HMOs within any given area. In places such as Orchard Park, HMO concentrations may already be too high, and urgent action is needed to introduce and enforce density limits across the wider area. High concentrations of HMOs can undermine placemaking, contribute to a more transient

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		<p>population, and are often associated with poorer property maintenance, all of which have a negative impact on neighbourhood quality.</p>
<p>Chair and Vice-chair of Environment and Green Economy Committee</p>	<p>Policy GP/QD: Achieving high quality development</p>	<ul style="list-style-type: none"> Designing streets, towns, and cities with properly secure parking facilities is essential if we are serious about supporting alternative modes of transport. For example, motorbike parking in Cambridge city centre does not allow riders to secure their vehicles to a fixed anchor, such as a rail or ground-embedded locking ring. As people are increasingly encouraged to travel longer distances by electric bike, greater attention must be given to improving the safety and security of bike storage—particularly in workplaces and residential developments.