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30.01.2026

To whom it may concern,

Draft Greater Cambridge Local Plan – Comments by NP Architects

NP Architects is a small architectural practice based in central Cambridge with extensive experience working with Greater Cambridge Shared Planning. We specialise in delivering high-quality small residential developments, including self-build projects and schemes for SME housebuilders across the city and surrounding villages.

This experience has given us a strong understanding of local planning policy and its practical application, particularly the challenges faced by small and medium-sized developers. Our comments on the Draft Greater Cambridge Local Plan therefore focus on this sector, with targeted suggestions to refine key policies to better support SME developers, whose presence within Greater Cambridge is in clear decline.

We support many of the Draft Local Plan's strategic objectives, including meeting housing need, addressing climate change and enhancing the environment. However, our representation focuses specifically on residential development delivered by SME developers on windfall sites, small brownfield sites and sensitive urban redevelopment within existing sustainable locations, which can often be delivered more quickly and sustainably than larger strategic sites.

The national decline in SME developers is well documented and evident locally, with several established local companies we have worked with having ceased trading in recent years. While this reflects a range of economic and regulatory pressures, the Local Plan presents a valuable opportunity to improve the deliverability of small and brownfield sites and to better support SME developers, who remain critical to housing delivery and urban regeneration.

This position is supported by national policy, with the Government noting that smaller firms provide local jobs and train eight out of ten construction apprentices yet have seen their market share fall significantly to larger developers.

Set out below are our comments on specific policies where targeted refinements could materially improve the deliverability of small sites and better support SME development.



Policy CC/FM: Managing Flood Risk

We support the policy's objectives in managing river and tidal flood risk. However, we have experienced consistent difficulties with its application to surface water flooding, where mapping is often vague, overly precautionary and limited to small parts of a site.

Paragraph 175 of the National Planning Policy Framework confirms that the Sequential Test is not required where a site-specific Flood Risk Assessment demonstrates that development and access are not at risk, and that minor development should not be subject to the Sequential Test where appropriate assessments are provided.

Policy CC/FM would benefit from clearer alignment with the NPPF by explicitly confirming that, where a robust Flood Risk Assessment demonstrates surface water flooding to be negligible or manageable, the Sequential Test will not be required. Applying the Sequential Test to all surface water flood risk sites places a disproportionate burden on small developments and risks undermining the delivery of small and windfall sites.

Policy H/AH: Affordable Housing

We recognise the need for affordable housing and accept that a 40% requirement may be achievable on large strategic sites. However, this level of provision frequently conflicts with viability on small and medium-sized schemes delivered by SME developers.

A fixed 40% requirement on smaller sites often renders schemes undeliverable, either preventing sites from coming forward or resulting in lengthy viability negotiations that SMEs are less able to accommodate. While sites of 1 to 9 dwellings are exempt, viability for 40% affordable housing typically only becomes realistic on much larger schemes. This creates a delivery gap, particularly for schemes of 10 to 30 dwellings.

To improve deliverability and support SME developers, we recommend a scaled affordable housing requirement:

- 10 to 15 dwellings: 10%
- 16 to 25 dwellings: 20%
- 26 to 30 dwellings: 30%

This approach would improve certainty, support viability and enable more sites to come forward, while still delivering meaningful affordable housing across the plan period.

Policy BG/BG: Biodiversity Net Gain

We support the policy's aim to enhance biodiversity. However, the current proposal for 20% places a disproportionate burden on small and medium-sized sites delivered by SME developers.

The government is currently considering an exemption for sites under 0.2 hectares, recognising the practical challenges of achieving meaningful biodiversity net gain on small, constrained urban and brownfield sites. A fixed requirement for 20% biodiversity net gain on schemes of more than nine dwellings' risks creating a similar viability barrier, potentially preventing small sites from coming forward.

We therefore recommend a scaled approach:

- sites under 0.2 hectares to be exempt
- small sites between 0.2 and 1 hectares to provide 10% net gain in biodiversity net gain in line with national requirements.
- Sites over 1 hectare to provide 20% biodiversity

This would maintain the Plan's commitment to biodiversity while ensuring small sites remain viable and continue to contribute to housing supply

Policy I/EV: Parking and electric vehicles

We support this policy, which actively encourages sustainable travel. Cycling is an integral part of Cambridge's character and we fully support measures that make it more convenient. We write on behalf of the whole practice, of whom cycle to our place of work in central Cambridge.

While we agree with much of the policy, we have concerns regarding the longstanding committee preference for locating cycle stores at the front of every property. This approach may be appropriate in certain circumstances, such as on new build sites with a blank canvas. However, it does not adequately recognise the wide range of situations where front-facing cycle storage would be impractical or undesirable.

These include existing urban settings with narrow plots where achieving an attractive and active frontage is important, conservation areas where visual impact must be carefully managed, and sites where more convenient or logical access to a cycle route or highway is available from the side or rear of the property.

We therefore consider the requirement for residential cycle storage to be located in a purpose-built structure at the front of the dwelling or within a garage to be overly restrictive. We recommend that this requirement be removed, with greater reliance placed on the policy's provision for conveniently sited cycle storage, to be assessed on a case-by-case basis.

Policy H/GL: Garden land and subdivision of existing plots

We are disappointed to see the subdivision of garden land further restricted to framework-only sites. In our experience, the subdivision of garden land in areas just outside the framework has supported several one-off self-builders over the years, using plots that would otherwise have remained as residential amenity land rather than farmland or greenfield land, which is more typically used for large-scale developments.

We urge the Council to reconsider this approach by requiring evidence that the land has been in use as garden land for at least ten years prior to the application. This would allow the continued subdivision of extensive garden land to create new plots on the edge of frameworks in sustainable locations, provided the proposal complies with the remainder of the policy.

Policy H/DC: Dwellings in the countryside

Over the years, we have worked on a number of agricultural barn conversions that meet the criteria of Class Q of the General Permitted Development Order (GPDO) 2015, some of which can provide attractive opportunities for small developers. However, we frequently encounter large portal-frame barns with extensive footprints that are poorly suited to residential use. Their deep floor plans and utilitarian form rarely result in a high-quality or attractive appearance within the countryside. On several occasions, we have worked collaboratively with the Council to develop more appropriate and visually appealing schemes by relying on what is commonly referred to as a “fallback position”. This typically involves securing Class Q approval based on the existing footprint, while proposing a more sympathetic, agriculturally inspired building form that responds more positively to its rural context.

While this approach is often supported in principle, it is frequently treated as a departure from policy. This is largely because the existing policy is out of date and conflicts with the provisions of Class Q. The proposed policy appears to replicate this issue and therefore requires reconsideration.

We therefore suggest that the policy is reworded to formally define and support this form of sustainable brownfield development in the countryside for example:

Proposals for the reuse of buildings in the countryside for residential use will be supported where:

- a. The existing building is, or would be, eligible for conversion to residential use under Class Q of the General Permitted Development Order (or any successor legislation), or where a realistic fallback position can be demonstrated;*
- b. The proposal relates to previously developed land and does not result in the unjustified extension of development into the open countryside;*
- c. The scale, massing and overall footprint of the proposed development are comparable to the existing building, or to that which could be delivered under Class Q;*
- d. The design delivers a higher-quality and more attractive outcome than the conversion of the existing building;*
- e. The proposal results in an improved relationship with the surrounding landscape and enhances the visual appearance of the site within its rural context; and*
- f. The development complies with all other relevant policies of the Development Plan.*

Proportionate Application of Policy

As a final comment, the Local Plan should emphasise that reports and initial information requirements must be proportionate to the scale of development. Requiring excessive technical reports at an early stage can be costly and high risk for SME developers, potentially discouraging the delivery of small sites. Where detailed information is necessary, it should be limited to what is reasonable and, where possible, secured through planning conditions rather than required at the point of submission.

We trust that these comments will be given due consideration and would be pleased to engage further with Greater Cambridge Shared Planning on the issues raised.

Yours faithfully,

NP Architects