

Your ref: BG/PO
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Date: 29/01/2026

Planning Policy
Greater Cambridge Planning

Dear Sir / Madam,

REG 18-DRAFT GREATER CAMBRIDGE LOCAL PLAN CONSULTATION

DRAFT POLICY BG/PO– OBJECTION

On behalf of our client, Varrier-Jones Foundation (hereafter “VJF”), we are responding to the Regulation 18 consultation on the emerging Greater Cambridge Local Plan (hereafter “the Plan”). This representation objects to the proposed draft allocation of Protected Open Space (Parks and Recreation Space subcategory) on land owned by VJF within the village of Papworth Everard, Cambridgeshire.

The land in question lies on the south-western edge of the settlement, immediately adjacent to the settlement framework, with the A1198 bypass forming its outer boundary, referred to as Park at St Peter's Lane.

Existing Protected Open Space in Papworth Everard

Papworth Everard is currently served by a number of designated local green spaces under the adopted South Cambridgeshire Local Plan 2018. These include:

- Papworth recreation Ground - community green space located within the village, providing formal and informal recreational opportunities;
- Jubilee Green - public open space situated centrally in Papworth Everard. It is used for informal recreation, children’s play, and community events;
- Papworth Hall - adjoining open grounds act as a recreational and amenity space that is used by residents for informal activities with mature planting;
- Meadow at western end of Church Lane - open field of grassland situated on the edge of the settlement offering informal recreational space;
- Papworth Wood (SSSI) – an 8.7-hectare Site of Special Scientific Interest woodland with public access from near the hospital grounds, offering biodiversity and informal recreation.

Papworth Everard also benefits from several areas designated as protected village amenity areas located across the settlement.

There are currently no allocations for future development of housing in Papworth Everard, so the question is raised why additional protected open space allocations have been proposed within the draft local plan, especially in regard to the large extent of land to the south west (Park at St Peter's Lane).

Open Space Assessments

South Cambridgeshire Sustainability Appraisal Report Appendix 12, titled “*Review of Proposals for Local Green Space, Protected Village Amenity Areas and Important Countryside Frontages*”, forms part of the adopted South Cambridgeshire Local Plan evidence base. It was prepared as an appendix to the Initial Sustainability Appraisal Report in support of the Issues and Options consultation undertaken in 2012–2013. The proposed allocation at Park at St Peter’s Lane was not included or assessed within this earlier open space assessment, and therefore did not form part of the evidence used to justify open space designations in the adopted South Cambridgeshire Local Plan. As such, there is no historic assessment demonstrating that the site meets the relevant policy tests for protection as local green space or protected village amenity area under the adopted South Cambridgeshire Local Plan.

As part of the First Conversation consultation in 2020, a Call for Sites consultation was held including submissions for green space. Upon reviewing the sites submitted to the Call for Green Sites, no land within Papworth Everard was put forward for consideration. Consequently, no sites located in Papworth Everard were assessed as part of the Green Infrastructure evidence base study commissioned by the Councils. In the absence of any site submissions, the study did not undertake an appraisal of potential new or enhanced green spaces within the village, and no conclusions were drawn regarding the suitability, deliverability, or need for additional green infrastructure in this location.

The emerging Greater Cambridge Local Plan has reviewed protected open spaces and introduces a new supporting Topic Paper, which replaces and expands upon earlier South Cambridgeshire assessments. This updated evidence base is therefore the relevant material for assessing new or amended open space allocations. Topic Paper 3: Biodiversity and Green Spaces specifically references the proposed allocation ZP&G 045 – Park at St Peter’s Lane and explains that sites designated as Protected Open Space must demonstrate either environmental or recreational importance.

However, the justification for the proposed allocation at ZP&G 045 remains unclear, as whilst Topic Paper 3 identifies new sites it does not provide a site-specific assessment demonstrating how this land meets the required criteria.

Protected Open Space Allocation under Draft Policy BG/PO

A significant area of Papworth Everard, Park at St Peter’s Lane, has been allocated under draft policy BG/PO for Protected Open Space. As a Park and Garden designation, it is intended to be retained and safeguarded for public recreation, amenity and green space use, restricting development in these areas.

Part of the land proposed for the Protected Open Space allocation was previously promoted for residential development (HELAA site ID: 115352). At present, the land has no open space designation within the adopted Local Plan. Draft Policy BG/PO requires Protected Open Space to demonstrate either environmental or recreational importance in order to justify its designation.

The land was assessed through the HELAA process and received a ‘red’ score, primarily due to concerns regarding landscape impact and potential encroachment into the countryside. It is noted that the HELAA submission related to a larger area of land, including land to the north of the proposed Protected Open Space allocation at Park at St Peter’s Lane, rather than the precise extent of the draft designation.

An Ecological Report previously submitted by Applied Ecology Ltd concluded that adverse impacts on the nearby SSSI are unlikely, indicating that the land itself does not perform a specific environmental protection function. The land is not located within the Green Belt, and while priority habitats are present within the area of land, these are capable of mitigation and enhancement, with biodiversity net gain capable of being delivered through development.

The land is under private ownership and does not function as formal public open space. While a public right of way footpath crosses the site, this provides only pedestrian passage and does not grant recreational use or public open space status. If the site were to be developed in the future, there is significant potential to enhance public recreational use. Development could incorporate formal public open space, improved pedestrian and cycle access, landscaping, and recreational facilities, creating a safe and accessible environment for the community.

Although the site lies adjacent to the Conservation Area, this relationship alone does not confer recreational or environmental importance and certainly not in a manner that necessitates some heightened policy protection of the land. There is no adopted neighbourhood plan or other community-led evidence identifying the land as valued open space or demonstrating a local need for its protection.

Taken together, the evidence suggests that the allocation of the site as Protected Open Space is largely derived from HELAA landscape and countryside impact considerations, rather than from demonstrable recreational use or intrinsic environmental importance. These matters are not special, insofar they relate to huge swathes of open countryside across the District. As such, the justification for designation under draft policy BG/PO appears to rely on development constraint evidence rather than on the policy tests required for Protected Open Space designation.

The land at St Peter's Lane is well-located relative to existing services, schools, and public transport links to Cambridge, including bus routes and cycling connections. Its draft designation as protected open space restricts opportunities to provide much-needed housing in a village that can sustainably accommodate growth.

The draft Plan and associated evidence base do not demonstrate that the Park at St Peter's Lane is of exceptional historic, ecological, or recreational value that would warrant full protection under the draft allocation. Without robust evidence, the designation risks unnecessarily constraining the Local Plan's ability to deliver future housing in this area.

Summary

In conclusion, while the importance of green space is acknowledged, the scale of the proposed Protected Open Space allocation at Park at St Peter's Lane is disproportionate when viewed in the context of existing protected open and green spaces within Papworth Everard.

The proposed designation is not supported by robust, site-specific evidence and does not demonstrate that the land is of sufficient environmental, recreational, or community value to warrant protection under draft policy BG/PO. As a result, the allocation would unnecessarily constrain sustainable development opportunities in the future on a site set within the defined edge of the bypass, including the delivery of much-needed housing, in a location that is well related to the existing settlement and its services.

The imposition of extensive designations across land owned and controlled by Varrier-Jones Foundation, without prior engagement with the landowner, is unduly restrictive and risks prejudicing the ability of the emerging Local Plan to respond flexibly to future development needs.

Any future consideration of green infrastructure provision in Papworth Everard should be informed by proportionate evidence gathering and/or site submissions made through subsequent stages of plan preparation, rather than through precautionary or blanket designations.

We therefore request that the Council engage with the landowner, remove the proposed Protected Open Space allocation at Park at St Peter's Lane from draft policy BG/PO, and recognise that general development management policies provide adequate control over the land set against the quality and characteristics of the land.

The land is clearly not of a heightened quality to warrant such a designation. There is no evidence to support the Council's unilateral and uninformed approach to designate land that has been well-managed for many years under the custodianship of the Varrier-Jones Foundation. The manner in which the Planning Authority has sought to advance the open space designation acts against collaboration, engagement and trust in the planning system.

Should you have any questions, please do not hesitate to get in touch.

Kind regards,

Sophia Nitschke
Senior Planner