

Greater Cambridge Shared Planning Policy Team,
South Cambridgeshire District Council,
South Cambridgeshire Hall,
Cambourne Business Park,
Cambourne, Cambridge
CB23 6EA

30 January 2026

Dear Sir/Madam

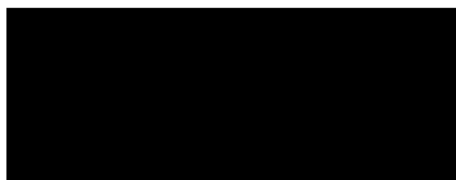
UAC100/JAF

**RE: Greater Cambridge Local Plan Consultation: Reg 18
Consultation**

Please find attached a representation in respect of the above,
submitted on behalf of **Urban&Civic**.

U&C very much welcome and look forward to the opportunity, that
has already been extended, to further discuss the detail of the
Waterbeach allocation, in the context of the representation set out
herewith.

Yours faithfully,



Email: 



Encl: Representation

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Representations

Policy S/WNT Waterbeach New Town

These representations are submitted by David Lock Associates on behalf of Urban&Civic (U&C). U&C now own the Barracks and Airfield site at Waterbeach, which forms the major part of the Waterbeach New Town allocation. Prior to the purchase of the site U&C were development partner to the previous owners, the Defence Infrastructure organisation.

As master developer, U&C are delivering the redevelopment of the Barracks and Airfield, primarily under Outline Planning Permission S/0559/17/OL (dated 25 September 2019).

U&C is proud of the progress made to date in bringing forward the New Town and is fully invested in and committed to the realisation of the vision for Waterbeach over the long term. The emerging Local Plan still has a very important role to play in this endeavour. The new Plan provides a vital driver. While the principle of the development is established and embedded in extant outline planning permissions across the whole site, there remain some significant challenges to accelerating delivery and achieving full build-out. U&C want to underline that while new Policy must not undermine the extant permissions, it must do more than just validate that which has planning permission. Successful outcomes, on the back of outline planning permissions, are far from determined or certain.

It is important that Policy clears the way for continued implementation; it should not undermine or seek to unpick commitments which all stakeholders have worked hard to agree, as expressed in the existing Policy and the Adopted SPD – these are the ground rules which have governed permissions, secured investment and underpinned viability. What might be regarded as beneficial simplification in this draft policy, loses some important nuance and inadvertently creates uncertainty or conflict with what is in progress.

U&C appreciate that the Policy team are not necessarily close to the complexities of implementation and would very much welcome collaboration to evolve the draft Policy before Regulation 19, to ensure it supports and facilitates delivery. While these comments can only be couched in terms of an objection, within the constraints of a formal stage of consultation, they are made very much in the spirit of continuing to work closely with the Local Planning Authority to achieve shared objectives for Waterbeach.

This requires that the Waterbeach Policy:

- i. Supports continued and accelerated delivery, recognising that this is at present governed by the previous policy provisions and SPD. The parameters and important commitments set out therein (not least given two principal landowners who must work together to deliver comprehensive development) must not be undermined.

These fixes can be augmented, if deemed necessary, through new provisions to guide detailed design and to support faster delivery going forward, but if these new requirements inadvertently undermine the overall framework for delivery, there is risk of delay or investment stalling. There needs to be a clear basis for change and any implications which may frustrate continued implementation must be addressed.

- ii. Provide adequate policy cover for any new, full applications (should the existing permissions fall away or be superseded or where drop-in applications occur). This means important matters of principle also need to be carried forward from the Adopted Policy and by giving continuing weight to the SPD Framework for Development.

It also requires that those other policies of the Plan, that govern the detailed design of the component parts of the New Town, do not impose unreasonable or unachievable requirements upon developers such that investment will be deterred or impeded. U&C are committed to achieving the highest quality of sustainable development but there are practical, technical and commercial limitations. A balance needs to be struck between high ambition and what is affordable and deliverable at scale, where delivery is dependent upon housebuilder partners.

As the policy team has indicated scope for further detailed discussion in respect of the above, we highlight below our initial, main observations and some concerns (other minor comments can be discussed in the round), which would be the focus of this discussion:

The draft Policy:

- Makes no mention of any on-going role for the SPD, which is obviously pursuant to the extant policy, but is still critical. The SPD was deliberately formulated as a 'Delivery Plan' and delivery is still at a very early stage. It needs to be carried forward. The way in which the SPD Spatial Framework Plan is carried forward is extremely important and, in its detail, very sensitive; it is the basis for achieving comprehensive development. It rests upon a body of detailed technical work. Nevertheless, the SPD Framework Plan is a diagram for interpretation and translation into Parameter Plans and proposals, it can't just be adopted as a Policy 'compliance plan.' It is not for that purpose. The Policy seeks to adopt a loose diagram as a compliance plan; it is not consistent with the SPD Framework Plan or the extant OPP parameter plans (though it states it is). This needs to be comprehensively reviewed and amended. SCDC need to consider carefully the purpose and status any plan that accompanies the Policy. If such a plan is included, it needs explanation and clarity in relation to the technical work underpinning it.
- The transport position, particularly in relation to the A10, is complex and tied to the phasing of the permitted development and a monitor and manage regime. The Policy does not reflect this or capture the access or transport proposals accurately.

- Includes some new requirements which are inconsistent with the extant permissions, don't reflect progress, or are in very direct conflict, so are not necessarily capable of being implemented without fettering planned implementation. Notably Gypsy and Traveller pitches are now required by Policy but are not required by the extant permission or the SPD.
- Does not include the northern buffer area in the allocated area (Denny Abbey and surrounds) but this is referred to in the Policy. There is a new requirement for a 'Strategic Enhancement Area' – this is outside the Policy boundary and there is no explanation of what is now expected.
- Presents land uses as fixed amounts when many should be expressed as 'potential for'.
- Suggests the museum, which is a private enterprise can be protected. While space for the museum can be secured (and is), planning cannot protect a private enterprise.
- Presents a different and unsubstantiated position on the heritage value and retention of existing features, which conflicts with the extant OPP and the robust heritage impact assessment work that supported the OPP and the SPD.
- Draws conclusions on drainage which don't reflect the extensive technical work undertaken that supported planning applications and the SPD.
- Does not reflect the way design codes are being used to guide detailed design at the phase level.

Policy H/BR Build to Rent

U&C is supportive of the proposed new policy to support build to rent proposals and guide their delivery, but would like to highlight and seek clarification in relation to one important missed opportunity and seek an amendment to the Policy.

It is assumed that 'scale and location' as referred to in Policy a relates to the spatial/physical characteristic of the any proposal (not the mix of tenures). It is correct that, achieving a rich and varied residential environment, when so much standard housebuilding is homogeneous in form and character, is a recurring challenge. Some forms of build to rent offer scope to introduce a differentiated product, such a higher density apartment development with activated ground floor uses.

Point 1a of the policy indicates an expectation that build to rent should only reflect the wider context in terms of scale and location, which in many cases will be new housing. In some circumstances, this would be a missed opportunity. The Policy should be amended to acknowledge scope for an exception. Where design coding seeks more prominent development that is deliberately differentiated from the surrounding context, build to rent may present a good way to deliver more intense/impactful development (such as distinctive marker buildings or corner buildings, as well as architectural distinctiveness). The emerging proposals on the Waterbeach Lakeside represent an excellent example of this opportunity.

Some clarification in relation to Point d would also be beneficial. The requirement for build to rent development to be professionally managed and subject to a management plan is vital, but it is not necessary for the whole scheme to be managed by one management operator. One operator will likely manage the housing component of any such proposal, but in a number of circumstances, not least where build to rent is integrated into mixed use development, supporting uses, outdoor spaces or associated public realm might beneficially fall into different management arrangements, such as a site wide estate management company.

Policy CC/SD Sustainable Development

U&C question whether it is proportionate and appropriate that all applications will be required to submit a sustainability statement without any consideration of the type of development or the context such as where large-scale development is delivered in phases and sustainability is addressed strategically.

In this circumstance, the policy approach might impact supporting infrastructure or enabling works and impose an unnecessary burden on the preparation of planning applications, which in turn might impact delivery.

U&C have also found that establishing sitewide and key phase level strategies are an effective mechanism for establishing appropriate sustainability targets (including those related to climate) - subsequent detailed applications are required to demonstrate conformity with such strategies, and U&C is able to steer housebuilders and developers to achieve the targets. Therefore, U&C further suggest that the policy is amended to acknowledge that where sitewide or phased sustainability strategies are in place already a conformity statement should be submitted rather than a standalone sustainability statement.

U&C suggest that the draft Policy is amended so that the flexibility applied to minor applications is extended to major applications (ie a Sustainability Statement may form part of a Design and Access Statement or Planning Statement for the proposal in certain circumstances).

The draft Policy also requires Circular Economy reporting. It should be expanded to define what is required in relation to different scale and forms of development in this respect particularly if the expectation is that it will apply to outline proposals and strategic scale development.

CC/NZ Net Zero Carbon New Buildings

U&C suggest that draft Policy reference to 'the submission of an appropriate energy assessment incorporating Passivhaus energy performance calculations' is amended.

Standard Assessment Procedure (SAP) calculations are the UK Government's approved method for assessing the energy performance of new residential dwellings and ensure compliance with relevant regulations, the Building Regulations Part L.

U&C is extremely concerned that the targets (Part B, bullet no.1) proposed relate to Total Energy Use (regulated and unregulated) for homes when developers/housebuilders have absolutely no control over unregulated energy use within the home and mechanisms to achieve this at scale do not exist at the present time. This target is not universally achievable. U&C suggest that the criteria which

states 'All dwellings must achieve an EUI of no more than 35 kWh per meter squared per year' should be amended to set a target for regulated energy use only. This is more realistic and better reflects the UK Government's Net Zero 2050 strategy.

U&C seek clarification on the use of 'maximise' for the draft Policy wording which relates to generating on-site renewable energy (Part C, bullet no.5). This should be quantified.

In relation to energy offsetting (Part D, bullet no.6), U&C seek clarity on the offsetting payments referred to in the draft Policy – the Authority should establish an appropriate calculation methodology and define the costs to be paid.

U&C is extremely concerned in relation to the assured performance aspect of the draft Policy (Part D, bullet no.7). U&C suggest that the policy is amended to refer to specific development types where the use of an assured performance method should apply. It is prohibitive and particularly onerous to require this for all development types.

U&C is also extremely concerned that the policy as drafted will require 'all major development' to undertake a whole life carbon emission assessment. U&C suggest that the policy is amended so that it is specific about types of development where this is required and flexibility should be added to indicate how this will be applied in relation to phased development and sustainability strategies.

CC/WE Water Efficiency in New Developments

U&C objects to Policy CC/WE as drafted. The availability of capacity across all utilities is an essential prerequisite to determining if the Local Plan Development Strategy is deliverable. It is not reasonable to expect proposals to demonstrate adequate water supply infrastructure capacity off site to serve development at some later stage; there must be a solution in prospect and planned. The onus is on the utility providers to engage with the Plan process and ensure there is a connection and capacity to support the proposals. For this reason, bullet 1 is not effective Policy and should be deleted.

U&C further raise concerns about the water usage targets in the draft Policy. Water usage of 'no more than 80 litres/person/day for residential development of 100 or more homes' is a very ambitious target that is not achievable without grey water recycling and rainwater harvesting systems in place. This raises significant technical, management, maintenance and cost challenges and is proving, through even small demonstration projects, to be extremely difficult to deliver and secure longer term. Mainstream, mass market housebuilders cannot currently respond to this requirement. U&C suggest that the policy is amended to refer to a more achievable requirement for 'no more than 95 litres/person/day for residential development of 100 or more homes'.

U&C also raise concern that for non-residential development five BREEAM credits under category Wat 01 is onerous. The flexibility allowed in the policy which refers to 'unless demonstrated not practicable' is supported and should be retained, so as not to fetter development coming forwards in circumstances where 5 credits is not achievable.

BG/BG Biodiversity and Geodiversity

U&C objects to a universal requirement for all development to provide a minimum of 20% biodiversity net gain, unless exempt under the Environment Act 2021. As drafted the policy is inconsistent with UK Government legislation (which requires a minimum of 10%) and introduces a blanket constraint that may well frustrate necessary development. Particularly in circumstances when standalone applications are brought forward as a component part or to support wider proposals this is likely to have unintended consequences. For example, it may impede U&C's ability to secure permissions for enabling infrastructure other than through reserved matters or where the narrow limits of the current exemptions in Environment Act 2021 cannot be met.

U&C suggest that the policy wording is amended to refer to a 'target of 20% biodiversity net gain' rather than a 'minimum' and to acknowledge circumstances when exceeding nationally set requirements may not be appropriate.

BG/GI Green and Blue Infrastructure

Whilst U&C support the provision of well designed, integrated and functional green infrastructure within developments, it is concerned over the apparent duplication of policy and guidance that is referred to in this policy. It requires developments to achieve a number of 'initiatives' and 'objectives': Urban Greening Factor, Green Infrastructure Initiatives and Building for Nature. There is no supporting evidence to demonstrate whether these initiatives' and 'objectives' are all compatible and necessary and how compliance is to be tested. The draft Policy lacks clarity and as written is difficult to interpret.

Adoption of an Urban Greening Factor Target of 0.4 is applied to 'all major residential development' is also of greatest concern. This method and practice have potential value at a fine grain, small scale and particularly within defined urban sites; it is however extremely difficult to see how it can be scaled up and applied to larger scale development, delivered in phases. We urge SCDC to consider again the practicality of the proposed approach and its purpose when large scale development is subject to broader land use budget calculation and monitoring against prescriptive standards, such as open space provision and biodiversity net gain. Purpose, method and a clear demonstration of it could work is absent and very necessary if this approach is to be considered further.

BG/EO Providing and Enhancing Open Spaces

U&C note that the draft Policy doesn't provide information (per population target) for all open space standards. The draft Policy lacks clarity and as written is difficult to interpret. U&C impress upon SCDC the need to provide evidence to support an up-to-date position on average household size and its application to policy.

H/AH Affordable Housing

U&C object to the affordable housing Policy as drafted. A target of 40% is welcomed as long as it is explicit that this may not be achievable in all circumstances. The Policy fails to acknowledge, apart from in an oblique reference within the supporting text, which is inadequate for clarification, that viability is relevant. To maintain a blanket requirement of 40% minimum on all sites without exception or scope for negotiation, requires that the Authority demonstrate that 40% is achievable on all sites, in all circumstances, at all points across the plan period and having regard to

all other considerations that go to viability. That is simply not possible, the scope for exception is therefore essential to make the policy sound.