Representation to Greater Cambridge Shared Planning Service's Local Plan- Regulation 19

Covering letter

Introduction

Thank you for providing the Greater Cambridge Development Corporation (GCDC) the opportunity to comment on the Regulation 19 version of Greater Cambridge Shared Planning Service's (GCSP) Local Plan. The Greater Cambridge Development Corporation (GCDC) welcomes the publication of the Plan and the opportunity to make representations ahead of its submission and examination.

The ongoing engagement and cooperation between the Councils through the joint planning service and with the GCDC as the Development Corporation and future planning authority, is also welcomed.

This letter and accompanying schedule of comments is the written response of GCDC to the Regulation 19 consultation. We have submitted comments on your consultation platform and, as noted on the platform, GCDC would like to register its interest to speak at the Plan's examination in relation to the Cambridge East and Cambridge Biomedical Campus policies. GCDC would also be happy to participate in relevant hearing sessions if the appointed Inspector considers this to be appropriate. It should be noted that while GCDC is a centrally-led development corporation, this response only represents the views of the development corporation, and not those of the Secretary of State or Government more widely.

Summary of our position

GCDC would like to express its support for the Plan, which takes a positive approach to achieving growth and delivering sustainable new development. Notwithstanding the specific matters raised in individual representations, it is considered that, overall, GCSP has effectively co-operated with GCDC to address strategic matters within the Plan, and that the Plan achieves a sound strategy for the area within the Plan Period.

It is noted and recognised that the Plan is a 'legacy plan' being prepared under the previous plan-making system. Under the transitional arrangements this means that it will be considered in the light of the tests of soundness that feature in the National Planning Policy Framework (NPPF), which was published in December 2024.

In this context we view the Plan as being consistent with national policy, and sound, positively prepared, meeting the area's objectively assessed needs and projects an annual housing delivery rate which will meet the government's own annual housing delivery rate, as set out in the Standard Method (2026). We also consider it to be 'justified' based on proportionate evidence to reach an appropriate strategy. In this context, the following should be noted in relation to the GCDC's role, purpose and objectives.

What is the role of GCDC?

GCDC was legally established as a centrally-led urban development corporation on 23 July 2026, following a public consultation that took place between 4 February 2026 and 1 April 2026. Alongside its statutory purposes the Government response to the consultation set out six updated objectives for the Development Corporation:

Transformational economic growth

- Drive a step change in the sustainable and inclusive economic development of Greater Cambridge, commensurate with its status as a critical national growth area. Deliver a significant increase in high-quality jobs and homes, cement Greater Cambridge's status as a global centre for science, technology, and innovation. In delivering growth, recognise the importance of high-quality placemaking that respects Greater Cambridge's distinctive character, heritage and natural environment, creating beautiful, well-designed places where people want to live, work, study and visit. Provide current and future generations living and working in Greater Cambridge with a high quality of life.

Infrastructure-led development

- Coordinate and advance the delivery of a radical upgrade to infrastructure in Greater Cambridge, removing systemic barriers to growth and setting new benchmarks for connectivity and sustainability. Work with stakeholders and local partners, including utility companies, to identify infrastructure solutions for the region so that planning for future demand is aligned with forecasts for growth.

Innovative investment

- Establish Greater Cambridge as the UK's flagship for public-private investment into infrastructure and housing, unlocking significant capital. Front-load infrastructure funding to accelerate delivery of well-planned, sustainable communities that go beyond current and draft local plan ambitions. Drawing on the government's track record for attracting private investment at 5 times the level of public funding, this investment would support delivery at major strategic locations.

Environment and climate

- Deliver environmentally sustainable and climate resilient outcomes, through creating and maintaining large, connected, high-quality green and blue spaces, and long-term stewardship of natural assets. Collaborate with local partners, statutory agencies and communities through the planning system and other processes to enable biodiversity net gain, nature recovery, improved air quality and public access to nature.

Inclusion and opportunity

- Reduce inequality between people and places in Greater Cambridge, maintaining a high rate of affordable housing delivery. Establishing a progressive skills and talent agenda that links local communities to the growing opportunities across the innovation ecosystem, and so reduces unemployment in all age categories.

Local representation, participation and transparency

- Ensure that community representation is embedded in the work of the Development Corporation. Make engagement accessible, transparent, and involve communities and local organisations at formative stages from making decisions to developing plans.

Following its establishment, GCDC is expected to receive planning powers in 2027, subject to Parliamentary approval, with specific arrangements and the date on which these powers will transfer likely to be confirmed in late 2026. In the consultation on establishing the Development Corporation and the subsequent response, the Government set out its intention to enable the Development Corporation to make decisions on strategic scale planning applications. The Government also set out its intention that GCDC should assume plan-making powers. This could involve the Secretary of State directing this power back to the two councils from the transfer date, to enable the councils to continue progressing the Local Plan through examination and to adoption. It is likely that GCDC will be the planning authority with responsibility for local plan making when the local plan is next up for review.

Transformational Growth

A key objective for GCDC is to achieve transformational growth and it is considered that the growth planned for in this Local Plan represents an effective opportunity for this within the Plan period. Nevertheless, the GCDC will be working within the scope of its powers and with partners and stakeholders to support and where possible increase that delivery. It has also undertaken some work to consider the potential for significant additional economic led growth supported by early infrastructure delivery, building on the growth identified in the Local Plan and over a longer time frame through to 2050-

2060 to make this truly transformational and to understand the level of infrastructure and other investment that will be necessary to achieve this longer-term objective. GCDC intend to work closely with the Mayor and the Cambridge and Peterborough Combined Authority (CPCA) as they develop the Cambridgeshire and Peterborough SDS and with these two Councils in any future plan making activities.

Statement of Common Ground

Notwithstanding the individual representations that are made in this response, given the statutory purposes that GCDC already has and its geographical scope, it is recommended that a Statement of Common Ground is prepared to help explain our relationship with GCDC, GCSP, and CPCA, and how we intend to work together in addition to addressing any relevant specific matters in the representations.

I trust that this helps to explain the approach to the GCDC's specific representations on the publication version of the Local Plan and provides useful context for consideration during the examination of the Plan. I look forward to continuing close working and cooperation as the Plan progresses.

Yours sincerely,

Anthony Hollingsworth
Director of Planning & Place

Appendix: A) Detailed comments

Paragraph / Reference	Suggested amendments to wording	Do GCDC consider the Local Plan policy to be legally compliant?	Do GCDC consider the Local Plan policy to be sound?	Comment / Explanation
Development Strategy - Introduction				
1.17	We work closely with bodies like the Cambridgeshire and Peterborough Combined Authority, who are the Local Transport Authority responsible for preparing the Local Transport Plan for the county, and Cambridgeshire County Council, who are the Highway Authority and responsible for a range of issues such as education. We will collaborate with the CPCA on their emerging Spatial Development Strategy which does not influence this Plan but will be integral to local plan reviews and successor local plans.	Yes	Yes	GCDC has included a minor comment to improve this section. In paragraph 1.17 – 'regional context' - there is no mention of the emerging Spatial Development Strategy (SDS) that is being produced by the Cambridgeshire and Peterborough Combined Authority. The SDS will not influence GCSP's Plan, but future local plan reviews and successor local plans must be in general conformity with the SDS. Therefore, GCDC think a reference should be made to the CPCA's emerging SDS.
1.21	On 23 July 2026, the government established the Greater Cambridge	Yes	Yes	GCDC has included a minor comment to improve this section.

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	Development Corporation ~~The government has established the Cambridge Growth Company~~ to work with local partners to develop and start to deliver an ambitious plan for delivering high- quality sustainable growth in Cambridge. Their work is focused on unlocking and accelerating development, preparing the evidence base to support development of an infrastructure-first growth plan, and identifying solutions to complex planning constraints that effect the area.			It is amended to reflect recent governance changes.
S/DS Development Strategy				
1	No suggested amendments	Yes	Yes	GCDC supports this policy. • GCDC is of the view that the Plan uses up-to-date, proportionate and objective evidence, including the Greater Cambridge Employment and Housing Evidence Update 2025, CPCA Local Growth Plan (2025), Government's Standard Method (2026) and Review of Economic Data, Context and Representations Report (2026) to inform its strategy. We view the Plan as being positively prepared and it will meet the area's objectively assessed needs.

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				• Through its use of the CPCA's Local Growth Plan (2025), GCSP also demonstrate that their Plan is informed by collaboration with other authorities. • In relation to question of whether the Plan is 'effective' and whether it deliverable by 2045 (the end of the Plan period), on page 46 the Plan states that: ''a sustained increased level of annual completions at or above the annual housing requirement is not anticipated until the second half of the plan period due to the sustainable development strategy set out in this plan and the infrastructure constraints relating to water and transport (for which improvements are not anticipated to be delivered until later in the plan period)''. We recognise that GCSP has made considered spatial choices that deliver their objectively assessed jobs and housing needs. We therefore view the Plan as taking a justified and effective strategy, consistent with national policy.
2	No suggested amendments	Yes	Yes	GCDC supports this policy. • In GCDC's view, the Plan takes a positive approach to delivering sustainable development by ensuring new housing and employment delivery connects to existing and planned-for infrastructure and takes advantage of committed-to public investment. Schemes such as Cambridge South East Transport (CSET) Phase 1 and Phase 2, the relocation of Waterbeach railway station, the Cambourne to Cambridge guided busway, and East West Rail offer significant opportunities to deliver new development in highly

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				sustainable locations. Furthermore, significant public investment has already been committed to sites such as Northstowe, Bourn Airfield and Waterbeach. From GCDC's perspective, it is right that the Plan seeks to utilise these opportunities because this this approach will maximise value for money to taxpayers. It is also the correct approach, because it builds upon significant work which has already occurred and therefore offers a quicker route to delivery. • GCDC will continue to collaborate with GCSP and other local partners to ensure that, collectively, we utilise existing infrastructure and new infrastructure interventions to deliver sustainable growth.
2.62	No suggested amendments	Yes	Yes	GCDC supports this policy. • In the Cambridge Growth Company's representation to the Regulation 18 version of the Plan, CGC stated that: ''the confirmation of green belt release for strategic site allocations is welcomed, but CGC considers that it would be beneficial to further review whether grey belt opportunities in sustainable locations may provide opportunities for additional site allocations which could accommodate future growth''. • GCDC is the organisation now established with a formal regeneration role; GCDC is satisfied that GCSP has assessed additional grey belt opportunities for this Plan.
2.8	The continuing strength of the nationally important Greater Cambridge economy provides	Yes	Yes	GCDC has included a minor comment to improve this policy.

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	justification for exploring higher employment and related housing figures. The Greater Cambridge Development Corporation's core function is to secure the regeneration of its area which includes ensuring that housing and social facilities are available to encourage people to live and work in the area.			• This section does not make any reference to the potentially transformative role that GCDC could play in infrastructure delivery. The government's response to the development corporation consultation (3 June 2026) set GCDC's second objective as facilitating 'infrastructure-led development' involving "the delivery of a radical upgrade to infrastructure in Greater Cambridge''. Achieving this will enable nationally significant levels of growth to be delivered in Greater Cambridge. It could also mean that key infrastructure constraints are removed so that delivery can occur at an earlier date. GCDC and local partners will work together to plan infrastructure interventions which require a significant level of organisation and funding. We recognise that these interventions will take time to realise, but the Plan should explain that the establishment of GCDC could transform infrastructure delivery in Greater Cambridge and accelerate housing delivery beyond the rates included within the draft plan housing trajectory.
Policy S/C/LCR: Land at Clifton Road (including Cambridge Junction and Cambridge Leisure)				
1	No suggested amendments	Yes	Yes	GCDC supports this policy. • GCDC support the redevelopment of this area and want to participate in ongoing conversations about how this site can be developed with densities that take advantage of its highly sustainable location.

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				• The government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge' noted that ''the Development Corporation will unlock investment into social infrastructure and public spaces through a variety of routes''. GCDC share the Plan's aspiration to secure the long-term enhancement of the Cambridge Junction, which is a vital regional cultural venue. • The delivery of a future eastern entrance to the Cambridge railway station offers an excellent opportunity to capitalise upon the opportunity of East-West Rail to regenerate this area. We recognise that there is an important task for the developer and public sector bodies to align timelines for the planning application to regenerate the area and the application for the new entrance. We are keen to work with GCSP and the developer on this task.
Policy S/CE: Cambridge East				
1.	A new city district of ~~approximately~~ a minimum of 8,000 homes delivered from 2032, or earlier, subject to the necessary water infrastructure being available, significant employment floorspace in use classes E(g) and approximately 20,000 square metres	Yes	No	As the policy is currently written, GCDC do not currently think it is sound. • In the Cambridge Growth Company's representation to the Regulation 18 version of the Plan, it was previously stated that a ''degree of flexibility'' should be encouraged "within both policy and allocations to allow for housing growth beyond the

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	gross internal area (GIA) of B2/B8 employment floorspace, with a range of supporting services and facilities, including retail, community, cultural, faith, leisure, education and sports and open space uses. The built area of the expansion will be contained within the Site Allocation boundary identified on the Policies Map.			current levels currently identified in the draft Plan and encourage the acceleration of delivery where the identified infrastructure constraints on growth can be alleviated''. • Noting that GCDC is the organisation now established with a formal regeneration role, we think that this comment is still relevant. We understand that Hill and Homes England – who are now joint owners of the site- are undertaking substantial evidence gathering to explore issues such as transport, housing density and social infrastructure in greater detail. After speaking to GCSP, we recognise there has been a sequencing issue in terms of this evidence gathering occurring in parallel to the Regulation 19 consultation, when ideally this evidence would have been completed before the Regulation 19 consultation to inform any relevant representations. It is possible that this evidence could conclude that higher densities are achievable on the site above 8,000 homes, especially once the positive impact of the new East West railway station is accounted for on the site. We would ask that GCSP change the word 'approximately' to 'minimum' to provide a pragmatic solution to addressing this sequencing issue, which would help the site to achieve its potential. • GCDC would like GCSP to caveat the 'from 2032.' It is appropriate for GCSP to consider water constraints across the Plan, including through its site allocations. However, GCSP, GCDC and the wider Water Scarcity Group are collaborating to deliver water interventions which will address water constraints. We want the policy to be more flexible to consider

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				the possibility that this work might address infrastructure constraints and allow for earlier delivery. • GCDC are keen to speak at the Examination to discuss this policy.
4	Cambridge East will be a vibrant, inclusive new city district that reflects the spirit of Cambridge while helping to shape its future. Through the new railway station being delivered by the East West Rail project, the city district will become a highly accessible destination. Rooted in a unique setting, Cambridge East will offer welcoming, walkable neighbourhoods which support an intergenerational community to live well, work purposefully, learn, and thrive.	Yes	No (but this comment is not related to soundness, it is only a minor suggestion)	GCDC has included a minor comment to improve this section of the policy. • GCDC think that the new East West Rail station offers a great opportunity to maximise sustainable travel at Cambridge East and it should have a central role in the 'objectives and place identity' section of the policy. In the Policy S/CBN: Cambourne North within the 'objectives and place identity', the new East West Rail station plays a central role in the policy, and GCDC thinks there should be consistency across the Plan's policies, i.e. it should also be prominent in the Cambridge East policy.
7	a. ~~Approximately~~ A minimum of 8,000 homes (to deliver 3,950 dwellings to 2045 subject to the necessary water infrastructure being available) of a range of sizes, types	Yes	No	See points made above in relation to part 1: • GCDC think that 'minimum' provides more flexibility and would provide a pragmatic solution to the sequencing issue. • GCDC is keen to register to speak at the Examination to discuss this policy.

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	and tenures to meet the identified diverse housing needs and to support a mixed and balanced intergenerational community, specifically, including:			
9	b. Integrates well with established and new neighbouring communities, including Marleigh and Springstead Village. c. Consider how the site can integrate with the nearby site allocation - Land South of Coldham's Lane (Policy S/C/SCL) to create an innovation cluster.	Yes	No (but this comment is not related to soundness, it is only a minor suggestion)	GCDC has included a minor comment to improve this section of the policy. • The Cambridge Growth Company submitted a representation to GCSP's Regulation 18 version of the Plan. In this representation, CGC stated that they would like to see the Plan ''more explicitly recognise the value of intensifying and expanding the identified innovation clusters to fully realise growth potential and agglomeration benefits''. GCDC is the organisation now established with a formal regeneration role. GCDC notes there is no reference to the adjacent allocation - 'Land South of Coldham's Lane, Cambridge'. The two sites have the potential to create an innovation cluster. This should be referred to in the site allocation.
17	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~~ capitalising on the new East West	Yes	No (but this comment is not related to soundness, it is only a	GCDC has included a minor comment to improve this policy. • GCDC think that the new East West Rail station offers a great opportunity to maximise sustainable travel at Cambridge East and it should have more prominence in the policy.

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	Rail station to promote a low car living approach where 'walking and wheeling' are the first choice for most residents, workers and visitors from the outset,		minor suggestion)	
Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm				
1	No suggested amendments	Yes	Yes	GCDC support this policy. • The proposal represents a positive approach to maximising the opportunity presented by the Cambridge South East Transport Phase 2 scheme, albeit GCDC notes that this will require an extension to the proposed route. GCDC will continue to work with GCSP and other local partners to deliver new infrastructure interventions for key sites, such as Grange Farm, in the Plan.
Policy S/WNT: Waterbeach New Town				
1	No suggested amendments	Yes	Yes	GCDC support this policy. • In relation to Policy S/WNT: Waterbeach New Town, we support this site allocation. Homes England has committed considerable funding to accelerate the Waterbeach New Town development. This includes over £23m to relocate the railway station, in addition to providing a £61 million loan. GCDC are pleased to see the Plan capitalising upon the substantial

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				public investment which has already been committed at the site. We will continue to work with GCSP, Homes England and other local partners to ensure that this site fulfils its potential.
Policy S/BA: Bourn Airfield New Village				
1	No suggested amendments	Yes	Yes	GCDC support this policy. • GCDC would like to express support for the policy. The Juniper partnership— which includes Homes England —acquired Bourn Airfield in March 2025. GCDC will continue to work with GCSP, the Juniper Partnership and other local partners to deliver new infrastructure interventions for key sites in the Plan.
Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital)				
2	No suggested amendments	Yes	Yes	GCDC supports this section of the policy. • The section under 'objectives and place identity' captures the unique nature of the Campus and why its continued success is so important to Greater Cambridge and our national economy.
10	In order to achieve this, a whole Campus Masterplan developed with demonstrable ~~input~~ collaboration ~~from~~ between existing landowners	Yes	No, but the objection does not relate to this	GCDC supports this section of the policy but propose a minor tweak. • The landowner and tenant organisations play an integral role in the functioning of CBC. Research from Cambridge Ahead

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	and major occupiers across the Campus, will be required		section of the policy.	has shown that proximity to other similar organisations is a key motivating factor for retaining and attracting organisations to CBC. It is therefore right that landowners and tenant organisations play an important role in discussions about how CBC can be improved and expanded.
22	Make a minor amendment to the Green Belt boundary to remove the land that would be required for the delivery of a new junction that would be essential to enable delivery of a viable site access to development land on the Biomedical Campus. A more specific map of the land that would be required will be provided at the time of completing the intended Statement of Common Ground.	Yes	No, unless the suggested amendment is included within the Plan and on the Policies Map.	• In the previous representation to GCSP's Regulation 18 version of the Plan, CGC submitted this representation to the CBC policy: ''CGC supports this policy and the allocation for expansion through release of land from the Green Belt for future phases to support the future development of the Biomedical Campus. CGC recommends that further consideration is given to the boundary of this allocation in relation to the proposed access. The access as shown on the Spatial Framework plan figure 63 appears not to be deliverable due to the consented scheme to the north of Babraham Road. Therefore an alternative redline for the proposal allocation should be considered to allow for alternative access arrangements.'' GCDC is the organisation now established with a formal regeneration role. GCDC note that the maps haven't substantially changed from Regulation 18 to Regulation 19 and that access remains an issue. We therefore think that CGC's comment remains relevant. Addressing the issue of

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				access arrangements to CBC from Babraham at this stage will support the overarching delivery of the site and avoid delaying the submission of the planning application. GCDC are willing to undertake some work detailing how much Green Belt release would be required. This could be agreed through the Statement of Common Ground.
22c	No suggested amendments	Yes	No, unless the suggested amendment is included within the Plan and on the Policies Map.	GCDC supports the policy. • GCDC notes that Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital) has been written to capitalise on the opportunity that Cambridge South East Transport Phase 2 offers. GCDC support this approach, which will help achieve the aim of delivering new development in sustainable locations. We agree that CSET2 is required to ensure that existing and new workers can travel to this world-class Campus via sustainable more sustainable methods of transport.
31b	b. Set out the layout, mix and scale of uses, including the relationship with the existing Campus composition, ensuring there is a balance of uses across the existing and expanded Campus;	Yes	No, but the objection does not relate to this section of the policy.	GCDC supports the policy and has included a minor suggestion to improve the policy. • Through the new masterplan, GCDC are keen to see a fair balance of uses across the site and are keen to help facilitate discussions between occupiers, GCSP and landowners to achieve this outcome.

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				• GCDC notes that the expansion of the Campus will require a substantial amount of a wide range of new infrastructure. GCDC would like to note that we are committed to working with the landowners, CBC Ltd, GCSP and other local partners on the emerging masterplan and infrastructure delivery plan.
Policy S/CBN: Cambourne North				
1	No suggested amendments	Yes	Yes	GCDC supports this policy. • GCDC agrees with GCSP's explanation in the supporting information to this policy in paragraph 3.3.3 that the new station which will be delivered by East West Rail presents a significant opportunity to expand the town further, in a way that is both sensitive to local landscape character and ecological sites but also supports the existing town so that it becomes more sustainable and can offer the services and facilities required of a modern town.
16b	No suggested amendments	Yes	Yes	GCDC supports this policy. • GCDC supports the requirements for developers to pay a financial contribution to the delivery of an enhanced EWR station. We agree with this aspiration to make the new station a key component of the Station Quarter, Cambourne North, and the wider town.

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				• The government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge' set the Development Corporation an objective of achieving 'infrastructure-led development', to ''coordinate and advance the delivery of a radical upgrade to infrastructure in Greater Cambridge, removing systemic barriers to growth and setting new benchmarks for connectivity and sustainability.'' To achieve this objective in Cambourne, GCDC will work with East West Rail, GCSP and other local partners to deliver the new station. • It should also be noted that officials in GCDC are collaborating with the GCSP, CPCA and Cambridgeshire County Council to produce the Greater Cambridge Transport Strategy (GCTS), a 'sub-strategy' to the Cambridgeshire and Peterborough Local Transport and Connectivity Plan, which will help to support the Plan's ambitions to deliver new development in sustainable locations, including the new station for Cambourne.

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Policy S/AMC/NEC: North East Cambridge				
1	No suggested amendments	Yes	Yes	• GCDC supports changing this from a site allocation to an 'area of Major Change'. • GCDC agree with the continued identification of this area for regeneration. It has excellent transport connections to other parts of the city and new development in this area would harness the Cambridge Science Park's legacy of innovation. • In July 2026 the Housing Minister submitted a letter to the Chief Executive of the Planning Inspectorate requesting that inspectors take a pragmatic and proportionate approach when assessing viability and deliverability evidence. In this letter, the Housing Minister stated that: ''with the benefits of up-to-date local plans firmly in mind, it is important that local plan deliverability and viability challenges be considered in a broad context, especially when economic conditions are volatile and are causing fluctuations to market conditions and heightening development risk and associated costs. As such, allocations should generally be assessed against their prospects of delivery over the plan period as a whole, rather than solely against current market conditions''. Noting that this is not a site allocation, GCDC perceive this passage to be relevant to North East Cambridge. GCDC agrees that it is right to continue to prioritise this area for regeneration, and we agree with the expressed sentiment in paragraph 2.58, where it states 'the Councils will continue to engage with relevant

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				partners to confirm a refined position for that later plan-making stage'.
Policy CC/SD: Sustainable development and the climate emergency				
1	No suggested amendments	Yes	Yes	GCDC supports this policy • The government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge' noted that: ''working with local partners, and relevant bodies, will be crucial to balancing viability and deliverability alongside respecting Greater Cambridge's unique heritage, natural environment, climate resilience and nature recovery, and this integrated approach will be central to the Development Corporation's purpose''. GCDC, therefore supports this policy because embedding the principles of climate change mitigation and adaption in development is an important way that we will help to address the causes of climate change.
Policy CC/NZ: Net zero carbon new buildings				
1	No suggested amendments	Yes	Yes	GCDC supports this policy • The government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge' noted that: ''working with local partners, and relevant bodies, will be crucial to balancing viability and deliverability alongside respecting Greater Cambridge's unique heritage, natural

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				environment, climate resilience and nature recovery, and this integrated approach will be central to the Development Corporation's purpose''. GCDC, therefore supports this policy because the proposed hierarchal approach to reducing heat and power demands, along with supplying energy demand onsite, will enable new development to help to address the causes of climate change.
Policy CC/WE: Water efficiency in new developments				
1	No suggested amendments	Yes	Yes	GCDC supports this policy. • GCDC recognises the ambitions in this policy and agrees that achieving these standards will be an important way to reduce demand on water in the area. • The GCDC are participants of the Water Scarcity Group, which is an independent advisory group formed in 2023 to tackle water scarcity and resource issues in Greater Cambridge. Collectively the group is working to resolve existing wastewater capacity and continues to engage with a range of delivery partners to deliver new water savings measures to reduce water demand in the short-medium term. • GCDC will continue to work through the Water Scarcity Group to improve water efficiency, support water-saving and retrofit campaigns, and explore new water resource options. We will continue to support water companies in delivering their long-

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				term supply plans, while testing innovative ideas such as capturing and storing excess winter water for later use, working with farmers, the Middle Level Commissioners and Water Resources East. • The Cambridge Growth Company agreed a statement of common ground with GCSP to address water infrastructure issues. GCDC is the organisation now established with a formal regeneration role. GCDC is seeking to agree a new Statement of Common Ground with GCSP to renew our shared commitment to addressing water infrastructure constraints.
Policy CC/IW: Integrated water management, sustainable drainage and water quality				
1	No suggested amendments	Yes	Yes	GCDC supports this policy. • Achieving integrated water management is essential to delivering sustainable growth in Greater Cambridge. • The GCDC are participants of the Water Scarcity Group, which is an independent advisory group formed in 2023 to tackle water scarcity and resource issues in Greater Cambridge. Collectively the group is working to resolve existing wastewater capacity issues and engage with a range of delivery partners to deliver new water savings measures to reduce water demand in the short-medium term.

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				• GCDC will continue to work through the Water Scarcity Group to improve water efficiency, support water-saving and retrofit campaigns, and explore new water resource options. We will continue to support water companies in delivering their long-term supply plans, while testing innovative ideas such as capturing and storing excess winter water for later use, working with farmers, the Middle Level Commissioners and Water Resources East. • The Cambridge Growth Company agreed a statement of common ground with GCSP to address water infrastructure issues. GCDC is the organisation now established with a formal regeneration role. GCDC is seeking to agree a new Statement of Common Ground with GCSP to renew our shared commitment to addressing water infrastructure constraints.
Policy CC/FM: Managing flood risk				
1	No suggested amendments	Yes	Yes	GCDC supports this policy • The government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge' noted that: ''working with local partners, and relevant bodies, will be crucial to balancing viability and deliverability alongside

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				respecting Greater Cambridge's unique heritage, natural environment, climate resilience and nature recovery, and this integrated approach will be central to the Development Corporation's purpose''. GCDC, therefore supports this policy because embedding the principles of climate change mitigation and adaption in development is an important way we will address the causes of climate change. • The Cambridge Growth Company agreed a statement of common ground with GCSP to address water infrastructure issues. GCDC is the organisation now established with a formal regeneration role. GCDC is seeking to agree a new Statement of Common Ground with GCSP to renew our shared commitment to addressing water infrastructure constraints.
Policy CC/RE: Renewable energy projects and infrastructure				
1	No suggested amendments	Yes	Yes	GCDC supports this policy • The government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge' noted that: ''working with local partners, and relevant bodies, will be crucial to balancing viability and deliverability alongside respecting Greater Cambridge's unique heritage, natural environment, climate resilience and nature recovery, and this integrated approach will be central to the Development

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				Corporation's purpose''. GCDC agrees with GCSP's assertion that ''increasing the use of renewable and other low-carbon energy technologies will be a key means of achieving the emissions reductions targets set by the Government and meeting increased energy demands.'' GCDC therefore supports the policy.
Policy BG/GI: Green Infrastructure				
1	No suggested amendments	Yes	Yes	GCDC supports this policy. • In the government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge', under the 'environment and climate' objective, the Development Corporation was set the task of delivering ''environmentally sustainable and climate resilient outcomes, through creating and maintaining large, connected, high-quality green and blue spaces, and long-term stewardship of natural assets''. We share GCSP's ambition to protect and enhance green infrastructure, therefore, GCDC supports the policy.
Policy WS/CF: Community, sports, and leisure facilities				
1	No suggested amendments	Yes	Yes	GCDC supports this policy. • The government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge' noted that ''the Development Corporation will unlock investment into

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				social infrastructure and public spaces through a variety of routes''. GCDC will work with GCSP to achieve our shared ambition for delivering new community, sports, and leisure facilities.
Policy GP/PP: People and place responsive design				
1	**No suggested amendments**	Yes	Yes	GCDC supports this policy. • In CGC's representation to the Regulation 18 version of the Plan, CGC commented that ''CGC supports the commitment to high-quality, well-designed places and buildings as set out in relevant placemaking polices in the Plan. Well-designed and well-built places are essential components of the good growth which CGC supports''. GCDC would like to repeat this previous expression of support; well-designed places and buildings are essential components of good growth and therefore GCDC supports the policy.
Policy J/NE: New employment development proposals				
1	No suggested amendments	Yes	Yes	GCDC supports this policy. • The government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge' set the first objective of the Development Corporation as delivering 'transformational economic growth', by driving ''a step change

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				in the sustainable and inclusive economic development of Greater Cambridge, commensurate with its status as a critical national growth area''. GCDC will continue to work with GCSP to ensure that employers can find the right location to expand or establish new businesses in the Greater Cambridge area.
Policy J/EP: Supporting a range of facilities in employment parks				
1	No suggested amendments	Yes	Yes	GCDC supports this policy. • Greater Cambridge is home to exceptional employment parks, and we want to see these places become even better places to work. In the government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge' under the first objective 'transformational economic growth', the Development Corporation was set the task of delivering 'transformational economic growth' and noted that this growth should ''recognise the importance of high quality placemaking that respects Greater Cambridge's distinctive character, heritage and natural environment, creating beautiful, well-designed places where people want to live, work, study and visit''. GCDC will continue to work with GCSP to ensure that Greate Cambridge continues to be an exceptional place to work.
Policy H/AH: Affordable housing				
1	No suggested amendments	Yes	Yes	GCDC supports this policy.

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				• The government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge' set the Development Corporation an objective of achieving 'inclusion and opportunity'. As part of this objective, GCDC should ''reduce inequality between people and places in Greater Cambridge, maintaining a high rate of affordable housing delivery''. GCSP's Plan sets a positive aspiration for affordable housing delivery which GCDC will help to achieve.
Policy H/SS: Residential Space Standards and accessible homes				
1	No suggested amendments	Yes	Yes	**GCDC supports this policy** • In the government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge', under the 'innovative investment' objective, the Development Corporation was set the task of front-loading ''infrastructure funding to accelerate delivery of well-planned, sustainable communities that go beyond current and draft local plan ambitions sustainable and climate resilient outcomes, through creating and maintaining large, connected, high-quality green and blue spaces, and long-term stewardship of natural assets''. Delivering high-quality well-planned new housing will form a core component of this objective. We therefore support GCSP's policy. GCDC would also like to note that as we strengthen our capacity, we will consider how we can integrate the ambition for high-quality design into our own programme of work. GCDC will seek to build-upon the high

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				standards that that the Greater Cambridge Design Review Panel and the Cambridgeshire Quality Panel have set for new development in the area.
Policy I/ST: Sustainable transport and connectivity				
1	No suggested amendments	Yes	Yes	GCDC supports this policy. • The infrastructure-first, vision-led approach to transport is supported, given transport constraints remain one of the key limitations on growth. The government's response to the consultation 'Establishing a Development Corporation in Greater Cambridge' set the Development Corporation an objective of achieving 'infrastructure-led development', to ''coordinate and advance the delivery of a radical upgrade to infrastructure in Greater Cambridge, removing systemic barriers to growth and setting new benchmarks for connectivity and sustainability.'' This will also involve working "with stakeholders and local partners, including utility companies, to identify infrastructure solutions for the region so that planning for future demand is aligned with forecasts for growth''. • Officials in GCDC are collaborating with officers in GCSP, CPCA and Cambridgeshire County Council to produce the Greater Cambridge Transport Strategy (GCTS), a 'sub-strategy' to the Cambridgeshire and Peterborough Local Transport and Connectivity Plan, which will help to support the Plan's

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				ambitions to deliver new development in sustainable locations. • As noted in our comments to policy S/DS: Development Strategy, GCDC think that the Plan takes a positive, sensible approach to taking advantage of existing and planned-for infrastructure. Schemes such as Cambridge South East Transport (CSET) Phase 1 and Phase 2, the relocation of Waterbeach Station, the Cambourne to Cambridge guided busway, and East West Rail offers significant opportunities to deliver new development in highly sustainable locations. It is right that the Plan seeks to maximise such opportunities and GCDC will continue to collaborate with GCSP and other local partners to ensure that collectively we take advantage of these transformative infrastructure proposals.
Policy I/ID: Infrastructure and delivery				
10.74	For the Greater Cambridge area, the infrastructure needed to support planned growth over the plan period, and deliver the spatial strategy, is set out the IDP, which has been informed through engagement with relevant services providers. Where appropriate, account has been had to ongoing management and maintenance, the need to fund initial	Yes	Yes	GCDC has included a minor comment to improve this policy. GCDC is the organisation now established with a formal regeneration role and have proposed wording to clarify the role that we might play in infrastructure delivery.

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	establishment costs, and any monitoring requirements. The infrastructure identified in the IDP will be delivered through a combination of public and private sector investment, including through the use of Community Infrastructure Levy (CIL) and planning obligations. The Greater Cambridge Development Corporation's core functions include providing or facilitating the provision of infrastructure and it will play an important convening and co-ordination role in infrastructure delivery.			