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Date: 22/09/2026

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Dear Planning Policy,

PROPOSED SUBMISSION GREATER CAMBRIDGE LOCAL PLAN 2024 - 2045

REGULATION 19 CONSULTATION SEPTEMBER 2026

LAND BETWEEN HUNTINGDON ROAD AND HISTON ROAD, CAMBRIDGE (DARWIN GREEN)

These representations have been prepared by Bidwells LLP on behalf of Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners in response to the Regulation 19 Consultation of the Proposed Submission Greater Cambridge Local Plan ('GCLP'). These representations relate to Land between Huntingdon Road and Histon Road, Cambridge (also known as Darwin Green) ("the Site").

These representations set out comments with a specific consideration of the requirements of Paragraph 36 of the National Planning Policy Framework ('NPPF') (2024) which states that when examining local plans they should be examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are 'sound'. A plan is considered 'sound' if it is:

a) ***Positively prepared*** *– providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs[20]; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
b) ***Justified*** *– an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence;*
c) ***Effective*** *– deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
d) ***Consistent with national policy*** *– enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

These representations also take account of Paragraph 16 of the NPPF (2024) which states that Plans should:

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a) be prepared with the objective of contributing to the achievement of sustainable development[10];

b) be prepared positively, in a way that is aspirational but deliverable;

c) be shaped by early, proportionate and effective engagement between plan- makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

Whilst the GCLP will be examined against the NPPF (2024), due to transitional arrangements once adopted (anticipated 2028), the NPPF (2026) will be the relevant material consideration in terms of national policy that future development proposals will be assessed against. Annex A (Paragraph 2) of the NPPF (2026) states that development plan polices which are materially inconsistent with the national decision-making polices ('NDMPs') in the NPPF should be given very limited weight. As such the below representations take account of this and where necessary comment on the consistency of polices with the NDMPs set out within the NPPF (2026).

Land between Huntingdon Road and Histon Road (Darwin Green) has historically been formed of two separate allocations – one within the Cambridge City Local Plan (2018) (Policy 20: Land between Huntingdon Road and Histon Road Area of Major Change) (also known as Phase 1) and one within the South Cambridgeshire Local Plan (2018) (Policy SS/2: Land between Huntingdon Road and Histon Road) (also known as Phases 2 and 3). This is owing to the fact that the site spans across the administrative boundary of both local authorities. Both sites benefit from outline planning permission and Phase 1 also benefits from six subsequent reserved matters approvals and is partly occupied, with the remaining parcels under construction. Phases 2 and 3 are now at Reserved Matters stage.

These representations are prepared in respect of Darwin Green, most notably Phases 2 and 3. Phases 2 and 3 benefits from outline planning permission granted in 2024 ((22/02528/OUT), as varied by 22/02528/NMA2)). Barratt David Wilson Homes are now in the process of working with the Greater Cambridge Shared Planning Service to progress conditions and reserved matters, under a Planning Performance Agreement (PPA). Therefore, in light of outline planning permission with all matters reserved apart from access being granted, representations are largely focused on matters that relate to the remaining reserved matters (appearance, landscaping, layout and scale). These representations also consider the continued site allocation policy for Darwin Green and any relevant policies relating to the wider Development Strategy proposed in the Plan.

Response to the Draft Greater Cambridge Local Plan

Policy S/HHR: Land between Huntingdon Road and Histon Road

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy S/HHR: Land between Huntingdon Road and Histon Road. The policy is unsound as it is not effective.

Whilst Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners support the continued allocation of Darwin Green under Policy S/HHR: Land between Huntingdon Road and Histon Road, they wish to make minor changes to the policy wording.

Land between Huntingdon Road and Histon Road (also known as Darwin Green) has historically been formed of two separate allocations – one within the Cambridge City Local Plan (2018) (Policy 20: Land between Huntingdon Road and Histon Road Area of Major Change) (also known as Phase 1) and one within the South Cambridgeshire Local Plan (2018) (Policy SS/2: Land between Huntingdon Road and Histon Road) (also known as Phases 2 and 3). This is owing to the fact that the site spans across the administrative boundary of both local authorities. Both sites benefit from outline planning permission and Phase 1 also benefits from six subsequent reserved matters approvals and is partly occupied, with the remaining parcels under construction. Phases 2 and 3 are now at Reserved Matters stage.

Therefore, the ability under the emerging Greater Cambridge Local Plan to allow for a single policy and a comprehensive approach to the Darwin Green site as a whole is supported. However, the policy approach must acknowledge the fact that Darwin Green Phase 1 is now well advanced in terms of construction, is partly occupied and that a significant amount of technical work has already been undertaken to support the development of both Phase 1 and Phases 2 and 3.

Minor changes to the wording of Policy S/HHR is therefore requested, as detailed below. Any proposed deletions to the policy wording are shown as strikethrough text and any additions to the policy wording are shown in red text. The justification for the changes are set out in turn under each sub-heading and in italics.

Policy S/HHR: Land between Huntingdon Road and Histon Road Darwin Green

Uses

3. Darwin Green (Land between Huntingdon Road and Histon Road) is allocated for mixed-use development as shown on the Policies Map, comprising:

   a. Approximately 2,700 homes (delivering all homes within the plan period) of an appropriate mix of types, sizes and tenures (including affordable housing) attractive to, and meeting the needs of, all ages and sectors of society, including those with disabilities;

   b. A range of services and facilities commensurate with a sustainable urban extension of this scale, including:

   i. Education uses, including Secondary and Primary ~~Secondary school~~;

   ii. ~~Two primary schools~~;

   iii. Community facilities and rooms;

   iv. Retail units;~~,~~ ~~including a food store (approximately 2,000 square metres)~~;

   v. Library;

   vi. Open space and recreation, including allotments and outdoor sports facilities, and appropriate provision for children and teenagers; and

   vii. A new Country Park between Huntingdon Road, Cambridge Road/Histon Road and the A14 set within the Cambridge Green Belt.

Justification for proposed amendments to wording of Policy

The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written and unambiguous and has a clear purpose, as per requirements in paragraph 16 (d) and (f) of the NPPF (2024).

The changes to the policy wording are also required in order to ensure the policy is sufficiently flexible over the plan period to allow for the education uses to come forward in line with the requirements of the County Council and can respond to changing needs and opportunities.

In terms of the retail provision, the reference to food store of approximately 2,000 square metres is overly prescriptive and relates to old guidance which no longer reflects current market conditions. The Councils produced an Informal Planning Policy Guidance for Foodstore Provision in North West Cambridge in 2011 which envisaged a larger retail store of approximately 2,000 m2 for the Local Centre at Darwin Green One. However, with the changing way we shop (namely the increase in home delivery and changing habits post Covid) the size of foodstore provision is no longer expected to need to extend to approximately 2,000 m2. The policy should therefore be worded to simply refer to 'retail units' which is a more flexible approach.

The development of Land between Huntingdon Road and Histon Road must do the following:

Movement

11. Ensure the development is highly accessible and permeable to all its residents by walking, cycling and high-quality public transport, to support non-car modes of travel, recreation and health. Measures, which will need to be explored in further detail through the Transport Assessment and Travel Plan for the site, must include:

    a. Provision of high-quality public transport (HQPT) to serve the development, including bus priority through the development and segregation if required, linking the route effectively with the wider bus network;

    b. Encouraging car clubs to minimise the amount of land given over to car parking;

    c. Measures to achieve a modal share of no more than 40% of trips by car (excluding passengers); and

    d. Securing a network of strong internal and external cycle and pedestrian links to neighbouring parts of the urban and rural areas.

    e. The timely provision of vehicular access points for Phases 2 and 3 via the built spine road approved as part of Phase 1, connecting to the B1049 Cambridge Road in the east, and connecting to Huntingdon Road via the street network within Phase 1.

    The site must not provide vehicular access directly onto the A14 or to Girton.

    ~~12. Details must be provided that set out infrastructure costs and delivery phasing, demonstrating how the necessary transport measures will be delivered at a time that enables optimal transport outcomes. This includes the timely provision of vehicular access points for Phases 2 and 3 via the built spine road approved as part of Phase 1, connecting to the B1049 Cambridge Road in the east, and connecting to Huntingdon Road via the street network within Phase 1. The site must not provide vehicular access directly onto the A14 or to Girton.~~

13. Adequate highway capacity will be required to serve all stages of development. Planning permission will be subject to conditions requiring that sufficient highway capacity is available in the A14 corridor between Girton and Milton throughout the development for the traffic forecast to be generated by each phase of development.

14. Mechanisms for delivery, monitoring and review of transport interventions, including potential delivery through Section 106 obligations, CIL, or other appropriate funding mechanisms will need to be agreed and secured with the Highways Authority.

Justification for proposed amendments to wording of Policy

The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written and unambiguous, as per requirements in paragraph 16 (d) of the NPPF (2024).

With reference to part 12 of the Policy, the current drafting of the policy provides an element of unnecessary duplication. Some of the wording could be incorporated within part 11 (as suggested) and the remainder deleted. The Policy is already clear, at part 14, that appropriate funding mechanisms will need to be agreed and secured with the Highways Authority in terms of transport infrastructure and, at part (a) of part 17 of the Policy, that details of phasing is required.

Lifespan

17. In addition to the requirements on the Validation Checklist, the following will be required at the submission of an outline or major planning application:

a. A site wide masterplan and, for Phases 2 and 3, a site wide Phasing Plan to demonstrate that services, facilities and infrastructure necessary to meet the day-to-day needs of the development, will be planned and delivered in a timely and efficient way. Additional off-site services and facilities may be delivered within the wider north-west Cambridge area, if appropriate.

~~b. A design code for future phases of the development;~~

~~c. A Transport Assessment and Travel Plan;~~

~~d. Noise and air quality assessments~~; and

e. A comprehensive environmental management and construction strategy for all phases of development. Measures to minimise the adverse effects during construction may include:

i. Imposing planning conditions to minimise the adverse effects of construction activity on residential amenity and the environment;

ii. Introducing a scheme to avoid construction vehicles travelling through existing residential areas of Cambridge and villages in the locality, and to avoid unacceptable adverse impacts on traffic flows on the A14 and the surrounding road network; and

iii. Imposing planning conditions around the timing of construction traffic movements on the network, if necessary, taking account also of the need to minimise adverse impacts on residential amenity.

18. Secured through a legal agreement (S106), confirm the long-term governance (including management and maintenance) of the new country park

Justification for proposed amendments to wording of Policy

The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written and unambiguous and has a clear purpose, as per requirements in paragraph 16 (d) and (f) of the NPPF (2024).

Reference should be made to a Site-Wide Phasing Plan as opposed to Phasing Plan. This is to ensure the Policy is clear and reflects the approach agreed with officers at Greater Cambridge Shared Planning (GCSP) service in respect of the extant outline planning permission for Phases 2 and 3 of the Site (22/02528/OUT), as varied by 22/02528/NMA2. This states, under condition 8, that a Site Wide Phasing Plan shall be submitted to the local planning authority for their approval prior to, or concurrently with, the submission of the first of the Reserved Matters application(s).

The requirement at parts (c) and (d) are not necessary as already form part of the Validation Checklist for outline or major planning applications.

Policy CC/SD: Sustainable development and the climate emergency

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy CC/SD. The policy is unsound as it is not effective.

Whilst the proportionate approach set out within part 2 of the policy is welcomed, it will be important to ensure the policy provides sufficient flexibility to accommodate changes in climate change policy and good practice over the lifetime of the Plan. As such, the inclusion of the phrase "where appropriate" before listing the range of issues should be included. It should be recognised that Sustainability Statements will be bespoke to the proposal they support and as such it may not be necessary or appropriate to address all elements from (a)-(i).

The inclusion of part 2(b) for Sustainability Statements to outline the approach to Net Zero Carbon is also considered onerous and goes beyond national policy requirements. Whilst Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners support the national objective to achieve net zero by 2050, it is not a statutory requirement within either the Building Regulations or the NPPF (2026) for development proposals and local plans to achieve net zero with regards to carbon emissions. This hence goes beyond national policy and standards and may threaten the viability and/or deliverability of development.

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners also query the inclusion of part 2(f) for Sustainability Statements to outline the approach to nature-based solutions and note that, if this is to be included, then the GCLP should provide further detail on what consists of a nature-based solution. At present the policy is too loosely worded and does not define what is expected.

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners also raise concern that the Viability Appraisal that accompanies the Regulation 19 Local Plan does not incorporate sufficient consideration of the increased build costs of the extensive sustainability requirements set out in part 2(a)-(i). It will also be important to ensure the policy enables sufficient flexibility to accommodate changes in climate change policy and good practice over the lifetime of the Plan. Climate change scenarios predict extensive changes by 2050, much of which is dependent on government and human action so there is substantial uncertainty over outcomes. The Local Plan will therefore need to build in suitable flexibility to accommodate these changes within the lifetime of the Plan.

At present the policy is not considered to be positively prepared and threatens to undermine the viability and deliverability of development and hence delivery of the objectively assessed needs of the Authority across the plan period. Further, as outlined above the requirements set out in Policy CC/SD are considered to exceed those set out in national policy, both from a plan making perspective within the

NPPF (2024) and development management perspective in considering the NDMPs within the NPPF (2026).

Policy CC/DC: Designing for a changing climate

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy CC/DC. The policy is unsound as it is not effective.

It will be important to ensure the policy enables sufficient flexibility to accommodate changes in climate change policy and good practice over the lifetime of the Plan. Climate change scenarios predict extensive changes by 2050, much of which is dependent on government and human action so there is substantial uncertainty over outcomes. The Local Plan will therefore need to build in suitable flexibility to accommodate these changes within the lifetime of the Plan.

Furthermore, with regards to the reference at part 2, (a), (iii), to prioritising passive design solutions to minimise internal heat generation through 'Energy efficient design to minimise internal heat generation with a focus on building services', the policy is too loosely worded and does not clearly define what is expected.

Policy CC/NZ: Net zero carbon new buildings

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy CC/NZ. The Policy is unsound and inconsistent with national policy.

Whilst Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners recognise the need for new homes to reduce the level of carbon they emit through their operation and support the aspiration to deliver high-performance, low-carbon built development, achieving net zero new buildings will add significant costs to new developments, costs that will ultimately be passed on to consumers.

With regards to Part A (Space Heating) the requirement for dwellings to achieve a space heating demand of 15-20kwH per metre squared per year accords with the Climate Change Committees, LETI Net Zero definition and Passivhaus standard – which are higher than other national standards and hence place unrealistic and onerous expectations on developers and housebuilders.

With regard to Part B (Total Energy Use Intensity, EUI), the EUI targets are split between uses. For residential dwellings, the targets are set at 35 kWh per metre squared per year which is aligned with LETI Net Zero definition and the National Grid Future Energy Scenarios. The policy once again goes above and beyond national standards.

Reliance on CIBSE TM54 modelling, which is MEP-led, overlaps with energy performance assessments already embedded within Excellent/Outstanding BREEAM requirements under Ene 01. This duplication may reduce certainty without adding meaningful environmental benefit.

This policy will therefore be significantly more restrictive than national Building Regulations and imposes requirements that are far beyond the capability, cost model, supply chain and technical delivery routes used by standard UK volume housebuilders. It is also not clear what robust evidence has been provided to show that these targets will not impact on the delivery of new homes within Greater Cambridge. Without more detailed and robust evidence considering the deliverability of these standards in relation to the allocated sites and the rate at which new homes are expected to come forward this policy cannot be considered to be sound.

Whilst it is acknowledged the GCLP will be examined against the NPPF (2024), the introduction of PM13 within the NPPF (2026) establishes a clear direction from national government that standards within local plans should not exceed national expectations unless fully evidenced.

To ensure the GCLP continues to be consistent with national policy and is positively prepared, it is requested therefore that parts A and B of the Policy are deleted and replaced with a policy that is consistent with the NPPF (2026). Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners encourages a proportionate, evidence-based approach that reflects realistic delivery stages and aligns with existing standards. Any policies exceeding Building Regulation standards would need to be based on robust and credible evidence including demonstrating their viability in the local development market.

Policy CC/IW: Integrated water management, sustainable drainage and water quality

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **Object** to Policy CC/IW. The policy is unsound as it is not justified.

Part 6a of the policy states development must demonstrate that there is capacity for waste water treatment and adequate wastewater conveyancing infrastructure to support the whole development. Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners does not consider this approach to be sound on the basis that water infrastructure providers have a legal requirement to provide the necessary infrastructure to meet the needs of Greater Cambridge's current and future population and that it should not be for house builders and other developers to address the failings of water companies to upgrade infrastructure.

When considering water and wastewater capacity it must be recognised that water companies are subject to statutory duties under S37 and 94 of the Water Industry Act 1991 (WIA 1991). Section 37 of the Act, set out below, imposes a statutory duty on all water companies to provide and maintain adequate infrastructure and potable water supplies.

> *"S37 General duty to maintain water supply system etc. (1) It shall be the duty of every water undertaker to develop and maintain an efficient and economical system of water supply within its area and to ensure that all such arrangements have been made— (a) for providing supplies of water to premises in that area and for making such supplies available to persons who demand them; and (b) for maintaining, improving, and extending the water undertaker's water mains and other pipes, as are necessary for securing that the undertaker is and continues to be able to meet its obligations under this Part. (2) The duty of a water undertaker under this section shall be enforceable under section 18 above— (a) by the Secretary of State; or (b) with the consent of or in accordance with a general authorisation given by the Secretary of State, by the Director."*

Section 106 of the WIA 1991 confers the power to connect to a public sewer. Section 106(1) states that the owner of any premises or the owner of any private sewer which drains premises, shall be entitled to have its drains or sewer communicate with the public sewer of any sewerage undertaker and therefore discharge foul water and surface water from those premises or that private sewer. Specifically, in relation to wastewater, the Supreme Court considered this matter in 2009 – see Barratt versus Welsh Water [2009] UKSC 13. Paragraph 23 of the decision is salient. Given its importance in the context of wastewater it is recited in full below:

> *"The right to connect to a public sewer afforded by section 106 of the 1991 Act and its predecessors has been described as an "absolute right". The sewerage undertaker cannot refuse to permit the connection on the ground that the additional discharge into the system will overload it. The burden of dealing with the consequences of this additional discharge falls directly upon the undertaker and the consequent expense is shared by all who pay sewerage charges to the undertaker. Thus, in Ainley v Kirkheaton Local Board (1891) 60 LJ (Ch) 734 Stirling J held that the exercise of the right of an owner of property to discharge into a public sewer conferred by section 21 of the 1875 Act could not be prevented by the local authority on the ground that the discharge was creating a nuisance. It was for the local authority to ensure*

that what was discharged into their sewer was freed from all foul matter before it flowed out into any natural watercourse."

Consequently, it is inappropriate to include a policy in the local plan requiring all development proposals to demonstrate that there is capacity for wastewater treatment and adequate wastewater conveyancing infrastructure to serve the whole development. It is agreed that there must be sufficient water capacity and wastewater infrastructure to serve new development but it is the responsibility of water companies, working with local authorities and the Environment Agency, to plan for the future demand for water services relating to the development requirements proposed in local plans, not applicants. If the water company is unable to support the development needed in Greater Cambridgeshire, this needs to be disclosed in the Water Resource Management Plan.

In terms of wastewater treatment, Paragraph 201 of the National Planning Policy Framework (NPPF) (2024) states that the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Therefore, whilst the Plan should contain policies aimed at ensuring that wastewater capacity is not put under undue pressure, planning decisions should assume that these regimes will operate effectively. As such, Part 6 (a) should be deleted from the policy.

Policy BG/BG: Biodiversity and geodiversity

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy BG/BG. The Policy is unsound and inconsistent with national policy.

The proposed requirement to uplift the mandatory minimum to 20% BNG for major development is considered unsound, as it is not adequately justified and is inconsistent with national policy.

The uplift is not supported by a robust evidence base and does not sufficiently demonstrate that it is proportionate or deliverable across all sites. It is unclear if a 20% BNG requirement has been factored into the Viability Assessment which has the potential to significantly increase development costs and render development unviable and undeliverable.

The Environment Act (2021) provides a clear statutory framework for the delivery of 10% BNG on qualifying development. 20% BNG as proposed by policy BG/BG is considered an unnecessary additional requirement going beyond the statutory requirement which has been fully evidenced.

As the Council will be aware, the NPPF (2026) indicates that the only time where it may be appropriate to seek more than 10% BNG through local policy relates to allocations, and even then, only where this is clearly evidenced and justified. This is a clear direction of travel with regard to BNG that there should not be general requirements for development to deliver beyond the 10% required by the Environment Act.

Further there appears to be no evidence demonstrating the exceptional circumstances required to justify a 20% BNG requirement, nor has the Authority demonstrated within the Viability Assessment that 20% BNG is achievable and will retain viability of development when taking into account all the other associated costs of development.

It is hence recommended that the policy is amended to only require qualifying developments (as defined by the Environment Act, 2021) to achieve 10% BNG.

Policy BG/GI: Green and blue infrastructure

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy BG/GI. The policy is unsound as it is not effective.

Information requirements must be specific and the policy must allow for a planning judgement and balanced decision to allow for site and development specific issues to be taken into account. Furthermore, clarification is sought on the details required by a 'Green Infrastructure Plan' and 'Green Infrastructure (GI) Statement' and whether or not this would or could form part of a Design and Access Statement (DAS). As currently worded the requirement is too vague and it is not clear what these deliverables would achieve that is not already secured through the submission of a DAS.

Policy BG/UGF: Urban Greening Factor

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy BG/UGF. The policy is unsound as it is not effective.

The introduction of a Greening Factor (via Natural England's Urban Greening Factor (UGF)) as a design tool to quantify urban greening is supported. However, the proposed minimum score of 0.4 (predominantly residential within Cambridge Defined Development Extent) and 0.3 (predominantly commercial development) should be accompanied by explicit interfaces with BNG and open space policies within the GCLP to avoid duplication or double-counting. For example, the Policy should state that UGF is a design/greening tool, while BNG remains the statutory metric, and that measures may contribute to both only where obligations are clearly accounted for to avoid double-counting. The policy should also confirm how off-site GI contributions mandated under BG/GI are distinct from, and not duplicative of, off-site BNG and open space requirements already secured under other policies.

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners also query whether the urban greening factor has been taken into account within the Viability Assessment, with the concern that establishing a new mandatory requirement for a factor of 0.4 may be both inappropriate and render development unviable (particularly when this is in addition to the other extensive environmental and sustainability requirements set out within the emerging GCLP).

At present this additional requirement risks rendering residential development unviable and hence we consider the draft policy to be unjustified and inconsistent with national policy.

The policy, therefore, requires targeted amendments to ensure it is locally justified, deliverable, and properly aligned with statutory Biodiversity Net Gain (BNG) and GCSP open space contributions. In addition, the policy needs to recognise the important contribution of rooftop solar PV combined with green infrastructure proposals and how it can be integrated within the approach to greening.

Policy BG/TC: Tree canopy cover and the tree population

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy BG/TC. The policy is unsound as it is not effective.

In terms of part 1 of the policy, some minor changes to the wording are proposed, as per below. Any proposed deletions to the policy wording are shown as strikethrough text and any additions to the policy wording are shown in red text.

"1. All applications for development where there are trees on, or immediately adjacent to the development site, should be made in accordance with the recommendations set out in BS5837: 2012 (Trees in relation to design, demolition and construction – Recommendations) and accompanied by an Arboricultural Impact Assessment where appropriate and a tree protection plan and/or a Hedgerow Survey that demonstrates how the proposal:

a. Evaluates, preserves, protects and enhances existing trees and hedgerows on site;

b. Ensures retained trees and/or hedgerows are integrated into the development design where possible to ensure their long-term preservation; and

b. Ensures that there is sufficient space above and below ground, for existing, replacement and newly planted trees, hedgerows and other vegetation to mature and to be maintained in the long term.

In the Cambridge context, where sites are often constrained and development viability is already heavily influenced by multiple policy requirements, it is important to ensure the policy provides sufficient flexibility and does not compromise scheme deliverability and, in turn, the ability of the Local Plan to be implemented as intended.

Policy WS/NC: Meeting the needs of new and growing Communities

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy WS/NC. The policy is unsound as it is not effective.

With regards to part 4 of the policy and the requirement for proposals for residential sites of 200 or more dwellings to be informed by detailed assessments of both sports, recreation, culture and community needs and include strategies that address identified needs, these assessments should be prepared by the Councils as part of their Infrastructure Delivery Plan, and the responsibility should not fall on developers to determine which community needs a development should meet. Furthermore, this repeats requirements set out in Policy BG/EO so it should be removed.

With regards to part 6 and the reference to contributions towards the provision of community facilities based on a standard of 129 m^2 of floorspace per 1,000 additional population, whilst it is acknowledged that this has been informed by the South Cambridgeshire Community Facilities Study (2025), it is not clear whether any corresponding study has been undertaken for Cambridge city. As such, the inclusion of the standard of 129 m^2 of floorspace per 1,000 additional population towards the provision of indoor community facilities is currently not fully justified.

Policy WS/HS: Pollution, health and safety

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy WS/HS and the approach for how development should take account of sources of pollution. The policy is unsound as it is not effective.

In particular, the requirement at part 2 of the policy for all major development proposals to submit an assessment of the impact of new external and internal lighting is overly prescriptive and not justified. Minor amendments to the policy wording at part 2 are suggested below with additional text shown in red and text to be deleted shown as strikethrough.

"2. All major development proposals, or any other proposals which include large scale lighting schemes (such as the floodlighting of external recreational and sporting facilities/pitches), will be required to submit an assessment of the impact of new external ~~and internal~~ lighting or changes to existing external lighting on any sensitive residential premises both on-site and off-site as well as on the wider surrounding open spaces and, or countryside, where appropriate ~~applicable~~. For certain major and Environmental Impact Assessment (EIA) development (outline or full planning applications), a more detailed lighting impact assessment or strategy may be required at the determination stage. Any assessment should be undertaken considering guidance set out in the Greater Cambridge Sustainable Design and Construction SPD or successor document."

Furthermore, the requirement at part 7 for **all** major and minor planning applications (excluding householder developments) to submit an Air Quality Statement is overly prescriptive and not justified. This part of the policy should therefore be deleted.

Policy GP/PP: People and place responsive design

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy GP/PP. The policy is unsound as it is not effective.

This policy repeats sections of policies GP/QD and as such is inconsistent with paragraph 16 of the NPPF (2024) which states that plans should serve a clear purpose and avoid unnecessary duplication of policies that apply to a particular area (including policies in the Framework, where relevant).

There are numerous cases where these policies could be written more clearly and/or consolidated to avoid ambiguity and repetition. For example, Policy GP/QD states, at Part 1 (a) (iii) that development proposals will be supported that respond to Greater Cambridge's communities by "*Designing streets, places and public realm to remove the threat or perceived threat of crime and improve community safety, especially for those with protected characteristics under the Equality Act".* Policy GP/QD then states, at part 2 (d) that development proposals will be expected to demonstrate how they have addressed the following design principles and requirements including "*Create safe open spaces and active streets that design out crime and consider counter-terrorism protective security measures that are proportionate to the building, street or place, particularly places with higher crowd densities"* and again at (h) to "*Provide a comprehensive and accessible design approach that ensures the successful integration of safety and security such as Hostile Vehicle Mitigation".*

Policy GP/QD: Achieving high quality development

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy GP/PP. The policy is unsound as it is not effective.

This policy repeats sections of policies GP/PP and GP/QP and as such is inconsistent with paragraph 16 of the NPPF (2024) which states that plans should serve a clear purpose and avoid unnecessary duplication of policies that apply to a particular area (including policies in the Framework, where relevant). There are numerous cases where these policies could be written more clearly and/or consolidated to avoid ambiguity and repetition.

For example, Part 2 (h) requires the successful integration of safety and security such as Hostile Vehicle Mitigation but there is no guidance within the Policy on which development proposals this will be required and as currently worded appears to be a blanket approach across all forms of development. This does not take into account the site-specific circumstances, setting and contexts of individual development sites. To be effective and justified the policy should be reworded to state that such design measures will be required "where appropriate" and should provide further guidance on what measures are envisioned.

Policy GP/QP: Establishing high quality landscape and public realm

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy GP/QP. The policy is unsound as it is not effective.

Whilst Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners broadly support Policy GP/QP, consideration of individual site circumstances and the circumstances of a local area should also be taken into account. Introducing an inflexible and prescriptive constraint could undermine development capacity, density and viability and is not aligned with national planning policy or

with the Government's stated ambition for growth. As such, the words "where appropriate" should be added to Part 1 (a) (i) of the Policy, as per below (see red text):

"1. Development proposals are required to deliver high quality landscape and public realm by:

a. Enabling local communities:

i. Create a range of open spaces that provide comfortable formal and informal places to rest, socialise and play, provide drinking water fountains, shade and shelter, bicycle parking, street lighting, signage and public art where appropriate, designed in a coordinated and needs-led approach that is accessible and age appropriate for its user;

Policy H/AH: Affordable Housing

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy H/AH. The policy is unsound as it is not effective.

The policy needs to ensure it is sufficiently flexible in order to respond to changing needs and opportunities. Furthermore, the ability to include cascade mechanisms is requested to be included in the policy.

Policy H/HM: Housing Mix

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy H/HM. The policy is unsound as it is not effective.

The policy does not enable the ability to respond to market demands. In particular, there is insufficient evidence demonstrating that the specific percentages set out are justified across:

- different market areas,
- settlement types (urban, edge-of-Cambridge, new settlements, villages),
- tenure types, or
- varying site constraints.

National policy (NPPF paragraphs 61–63) requires policies on housing mix to be based on local housing need evidence, but the Plan does not present sufficient area-specific analysis.

Part 4 of the Policy sets out a requirements for proposals to be supported by a mix that takes into account local character, built form and up-to-date evidence of housing need. HO8(3) of the NPPF (2026) notes where affordable housing requirements are met or exceeded by a development proposal then a flexible approach should be taken to the application of development plan requirements for the bedroom mix of market provision – taking into account prevailing market conditions. We hence contend that part 4 is revised to explicitly state up-to-date evidence will only be required to inform the affordable housing mix provision and Tables 7 & 8 are revised to remove the housing mix preference for market housing. The policy should also be revised to reflect HO8(3) and state where affordable provision is met or exceeded a flexible, market led, approach to market provision will be supported.

Policy H/SS: Residential space standards and accessible homes

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy H/SS. The policy is unsound as it is not effective.

The Policy is unduly rigid and imposes fixed minimum private amenity space requirements for all dwellings.

Part 4 (e) sets out the required standards for balconies. Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners consider that proposals should be designed and determined on their own merits based on an appreciation of a site's context and surroundings. As such the policy should be reworded to simply state:

a. *Provide balconies that are designed as integral elements of the building's architecture.*

Part 4 (g) should be revised so that it does not introduce amenity space standards that are unduly onerous and go beyond those within the Building Regulations. As such the policy should reduce the minimum quantum of private external amenity space for ground floor apartments to $5m^2$. The policy should therefore read as follows:

g. Provide a minimum of $5m^2$ private external amenity space for ground floor apartments (irrespective of the number of bedrooms) immediately outside their living accommodation, with a minimum depth of 2500mm or

Part 4 (h) should be revised as to not unduly place unachievable requirements for private external amenity space for apartments based on the number of bedrooms. The requirement for an additional $1m^2$ per additional bedroom goes beyond the requirements of the Building Regulations and hence should be deleted from the draft policy in full.

Part 6 of the Policy requires a blanket NDSS/Cat2 does not allow for things such as Flats Over Garages (FOGs) due to accessibility requirements. This can impact place making. Not to mention, it increases the size of units and can price first time buyers out the market. This is considered onerous and goes beyond the requirements of the Building Regulations. Part 6 should hence be revised to provide for an appropriate amount of M4(2) compliant dwellings. We suggest 10% of the overall development being of M4(2) standard is appropriate.

The draft policy should be revised as outlined above to ensure it is both justified and consistent with national policy and guidance. In turn this will ensure residential development remains viable and is not subject to unduly onerous requirements.

Policy H/CB: Self and Custom Build homes

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy H/CB. The policy is unsound as it is not effective.

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners raise concern regarding the mandatory requirement for 5% self-build homes as part of all development proposals including 20 or more dwellings. This would be inconsistent with the Self-build and Custom Housebuilding Act, which focuses on demand registers, not quotas. Such a blanket approach across all developments is unjustified and self-build provision should only be sought on sites where there is a demonstrable need.

A flexible approach should instead be taken. That is, where appropriate, the Council will work with developers, registered providers, landowners and relevant individuals or groups to address identified local requirements for self and custom-build homes as identified in the Greater Cambridgeshire self and custom-build register.

Policy H/BR: Build to Rent homes

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy H/BR. The policy is unsound as it is not effective.

Reference to the wording '*harmful concentration*' within the policy is not deemed appropriate. Not only is this inherently subjective and open to inconsistent interpretation, but it has not been proven that build to rent has any impact on the character of a wider area in which it is located. The below sentence within the policy should therefore be deleted;

"Schemes will not be supported where they result in a harmful concentration of this type of development within the local area"

Policy I/CV: Cycle and vehicle parking

Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners **object** to Policy I/CV. The policy is unsound as it is not effective.

In terms of Part 2 (h), the requirement for cycle parking for residential development to be integrated "within the front of the house" is overly prescriptive and should be deleted. For example, there are many ways in which cycle parking can be designed and it may not always be the case that providing cycle parking at the front of a property is convenient or appropriate.

Summary

These representations have been prepared by Bidwells LLP on behalf of Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners in response to the Regulation 19 Consultation of the Proposed Submission Greater Cambridge Local Plan ('GCLP'). These representations relate to Land between Huntingdon Road and Histon Road, Cambridge (Darwin Green) ("the Site").

The continued allocation of the Site is supported in principle, subject to some changes to the wording of Policy S/HHR. Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners also wish to make objections, observations and minor changes to policy wording in relation to a number of development management policies.

Should you require any further information regarding the Site or these representations please do not hesitate to contact me.

Kind regards



Alison Wright
Partner