22nd September 2026

Greater Cambridge Planning Service

Andy Moffat

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Botanic House
100 Hills Road
Cambridge CB2 1PH

Dear Sirs,

Proposed Submission Greater Cambridge Local Plan (Regulation 19) consultation

Representations on behalf of The Police and Crime Commissioner for Cambridgeshire in relation to Policy S/C/PPS: Police Station, Parkside

Savills (UK) Ltd Planning Team is instructed by The Police and Crime Commissioner for Cambridgeshire (PCC) to make representations in support of Policy S/C/PPS as owner of the Site, to confirm that it is deliverable within the Local Plan period but to set out and seek minor but important changes to the wording of the policy to ensure that it is justified and effective.

The Local Plan is to be examined having regard to the National Planning Policy Framework 2024 which required that local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

> a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; 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 / or
> d) Consistent with national policy.

These representations therefore relate to these tests.

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Summary of representations:

The Police and Crime Commissioner for Cambridgeshire:

- Welcomes and supports the allocation of the site for redevelopment in Policy S/C/PPS;
- Welcomes the expansion of the allocation area to now reflect the title plan;
- Welcomes the important flexibility in potential uses included in the policy wording;
- Agrees that criteria c. and d. are sound;
- Contends that the Local Plan needs to explicitly recognise that the approximately 50 homes is not a maximum;
- Contends that the Local Plan needs to make clear that co-living may be acceptable on sites allocated for "homes", and where the requirements of Policy H/CO: Co-living are met;
- Contends that criteria a., e. and 2. need to be reworded in order to be sound; and
- Contends that criterion b. needs to be deleted to make the policy sound.

PCC **welcomes and supports the allocation of the site for redevelopment** in Policy S/C/PPS. It is surplus to requirements by the PCC, and provides the opportunity for a comprehensive redevelopment of a brownfield site in a highly sustainable location.

Allocation Site Area

The allocation area has been expanded subsequent to the Regulation 18 consultation in December 2025-January 2026 to now reflect the title plan for the site by including the site frontage, and this **is supported**.

Allocation Capacity

The allocation refers to a capacity for approximately 50 homes in a residential-led scheme. The Local Plan needs to explicitly recognise that this is not a maximum. The Proposed Submission Local Plan includes clear support for optimising density (paragraph 2.56), maximising supply (paragraph 2.59), no limit on individual scheme size (Policy S/SH) and higher density development that exceeds local prevailing densities on sites (Policy GP/DH), but it does not explicitly recognise that the approximately 50 homes is not a maximum.

The Proposed Submission Local Plan states at paragraph 9.91 that "Co-living developments respond to a housing need … Any Co-living developments will contribute towards meeting our housing requirement", and paragraph 9.80 states that "Development of Co-living units will be directed to the most sustainable areas of Greater Cambridge, well connected to active travel routes, public transport links and services". The Local Plan needs to make clear that co-living may be acceptable on sites allocated for "homes", and where the requirements of Policy H/CO: Co-living are met.

Change required: The Local Plan to explicitly recognise that the approximately 50 homes is not a maximum; and the Local Plan to make clear that co-living may be acceptable on sites allocated for "homes", and where the requirements of Policy H/CO: Co-living are met.

Allocation Policy Criteria

The criteria set out as 1. a., c., d., e. and 2. are generally supported, although changes are required to the precise wording of 1. a., e. and 2. to ensure that they are justified and effective. Criterion b. is not justified and needs to be deleted.

Taking each criterion in turn in detail:

Criterion a. Heritage Impact Assessment, together with views analysis, must be provided to demonstrate the potential impact of development on heritage assets and their setting including Buildings of Local Interest to ensure there are no adverse impacts as a result of development

The requirement for a Heritage Impact Assessment and views analysis to demonstrate the potential impact of development on heritage assets and their setting, including Buildings of Local Interest, is justified, effective and consistent with national policy.

The reference to no adverse impacts as a result of development is not justified or consistent with national policy as the NPPF 2024 expressly recognises that any harm to the significance of a designated heritage asset needs to be weighed against the public benefits of the proposal i.e. there may be circumstances where harm (or adverse impacts as referred to in the policy) are outweighed by the benefits of development and planning permission should be granted. Proposed Submission Local Plan Policy GP/HE: Historic environment relates to Heritage Statements Impact Assessment more generally, and does not include such a requirement – to ensure no adverse impacts – and instead recognises that the LPAs will balance the need for development with the conservation, enhancement and enjoyment of the historic environment. Criteria c. and d. of Policy S/C/PPS also refer to unacceptable adverse impacts.

Change required: Deletion of "to ensure there are no adverse impacts as a result of development" or change to "to ensure there are no unacceptable adverse impacts as a result of development".

Criterion b. Building heights should be limited to approximately four residential storeys

This criterion is not justified.

The introduction of this criteria is seemingly a response to the comments of Historic England (HE) at the Regulation 18 stage where HE stated:

> "The HIA recommends development is limited to around 4 residential storeys. This should be included in the policy".

The HIA referred to (the Greater Cambridge Shared Planning Greater Cambridge Skyline and Tall Buildings Strategy Strand 2: Heritage Impact Assessments) does though recognise (at 3.1) that:

> "It is to be noted, however, that the Heritage Impact Assessments were rapid / high level strategic assessments, rather than detailed site / project specific assessments and the level of assessment, analysis and reporting is therefore proportional. These assessments are to guide the appropriateness of site allocations within the Local Plan, to support the preparation of policy and inform future proposals for the site. They are not sufficient for supporting

planning applications and further detail is likely to be needed to assess impacts on heritage assets".

Whilst it is recognised that these rapid / high level strategic assessments are important to ensure that the minimum development identified as being needed in the Local Plan can be satisfactorily accommodated, they are not justifiable as the basis to limit the height of the development, as criterion b. would do.

Criterion a. requires a Heritage Impact Assessment, together with views analysis, to demonstrate the potential impact of development on heritage assets and their setting including Buildings of Local Interest, and criterion c. requires appropriate building heights. Along with the Development Management policies in the Proposed Submission Local Plan, including Policy GP/HE: Historic environment, this is sufficient to ensure that the necessary special regard is paid to the desirability of preserving the setting of listed buildings and special attention is paid to the desirability of preserving the character or appearance of the conservation area. Whilst those special regards needs to be paid, it is also relevant to note that Proposed Submission Local Plan Policy GP/HD on housing density provides support for higher density development that exceeds local prevailing densities in sustainable locations such as this. This provides further support for not prescribing the maximum number of storeys at this stage.

Change required: Delete criterion b.

Criterion c. Design must be sympathetic to the local 19th century building style of the local area, including appropriate building heights, to ensure no unacceptable adverse impacts on the setting and character of the Historic Core, Parker's Piece, the Kite and Central Conservation Areas, and the nearby listed buildings, including the Grade I listed Emmanuel College buildings and numerous Grade II listed buildings within the vicinity of the site

It is agreed that the design should be sympathetic to the local area to ensure no unacceptable adverse impacts, and this criterion is accepted as being sound. The inclusion of "unacceptable" adverse impacts is necessary and supported.

No change required.

Criterion d. Development must not cause any unacceptable adverse impacts on Strategic Viewpoint A (Castle View Mound, Shire Hall) and Strategic Viewpoint E (Limekiln Road)

It is agreed that the development should not cause any unacceptable adverse impacts, and this criterion is accepted as being sound. The inclusion of "unacceptable" adverse impacts is necessary and supported.

No change required.

Criterion e. Trees on the site that are protected by a Tree Preservation Order or by virtue of their location within The Kite Conservation Area must be retained and incorporated into the design and layout of any development proposal

Paragraph 5.58 of the Proposed Submission Local Plan states that:

> "The Councils recognise that in some specific instances felling of existing trees or hedgerows may be necessary to meet wider placemaking objectives. In order to determine whether felling or significant surgery to trees or hedgerows is acceptable, the amenity value of the tree(s) and/or hedgerows, their condition and potential lifespan will be weighed against the safety from removal, the protection of other important site features, or any more general benefits of a new development".

To be effective and consistent with this approach, the words "….(unless their removal is justified as part of a planning application)" should be added at the end of this criterion.

Change required: Addition of the words "….(unless their removal is justified as part of a planning application)" added at the end of this criterion.

Criterion 2. Ancillary complimentary uses such as offices or a hotel may be suitable as part of a residential-led scheme, provided there are no adverse impacts on residential amenity.

It is **welcome and important that this flexibility in potential uses is included as part of the policy wording** so as to ensure that a deliverable scheme can be developed at the detailed design stage.

Having regard to the wording on residential amenity, whilst the Local Plan is to be examined with respect to the NPPF 2024, it is relevant to note that the NPPF 2026 includes at L2 reference to:

> "….acceptable living standards for residents and neighbours in terms of access to daylight, sunlight, privacy and external amenity space."

and P3:

> "…development proposals should:…"not give rise to, or contribute to, an unacceptable level of access to daylight and sunlight for neighbouring residents and occupiers, or unacceptable levels of air, noise, artificial light, water, soil or other forms of pollution on or beyond the site. Adverse impacts of this nature should be avoided where possible, or else mitigated to an acceptable degree."

There should be no requirement to ensure there is no adverse impacts. Instead, the requirement needs to be that there are no unacceptable impacts on residential amenity.

Proposed Submission Local Plan Policy GP/QD: Achieving high quality development does not require that there are no adverse impacts on residential amenity. Instead, it seeks to protect the amenity of neighbouring uses and states that design should minimise adverse impacts including loss of privacy, overlooking, overshadowing, poor daylight/sunlight access, microclimate effects, artificial lighting, noise, vibration, fumes, odours, and other forms of pollution.

Change required: Change "provided there are no adverse impacts on residential amenity" to "provided there are no unacceptable impacts on residential amenity".

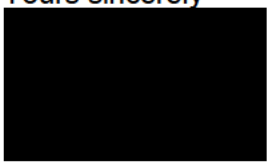
Summary

In summary, The Police and Crime Commissioner for Cambridgeshire:

- Welcomes and supports the allocation of the site for redevelopment in Policy S/C/PPS;
- Welcomes the expansion of the allocation area to now reflect the title plan;
- Welcomes the important flexibility in potential uses included in the policy wording;
- Agrees that criteria c. and d. are sound;
- Contends that the Local Plan needs to explicitly recognise that the approximately 50 homes is not a maximum;
- Contends that the Local Plan needs to make clear that co-living may be acceptable on sites allocated for "homes", and where the requirements of Policy H/CO: Co-living are met;
- Contends that criteria a., e. and 2. need to be reworded in order to be sound; and
- Contends that criterion b. needs to be deleted to make the policy sound.

The PCC requests the opportunity to appear before and be heard by the person(s) carrying out the examination on these matters in order to ensure that these points are fully understood and the necessary modifications to the Local Plan are made.

Yours sincerely



Andy Moffat
Planning Director and Head of Department