BIDWELLS

Your ref: S/RRA/CR
Our ref: Land to the west of Cambridge Road, Melbourn
DD: [redacted]
E: [redacted]
Date: 24/09/2026

Greater Cambridge Shared Planning
South Cambridgeshire Hall
Cambourne Business Park
Cambridge
CB23 6EA

Dear Sir/Madam

REGULATION 19 PROPOSED SUBMISSION GREATER CAMBRIDGE LOCAL PLAN CONSULTATION

VISTRY STRATEGIC LAND

LAND WEST OF CAMBRIDGE ROAD, MELBOURN – REF. S/RRA/CR

These representations have been prepared by Bidwells on behalf of Vistry Strategic Land (hereafter 'Vistry') in response to the Regulation 19 Consultation of the 'Proposed Submission' Greater Cambridge Local Plan ('GCLP'). 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.*

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

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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 material consistency of draft polices with the NDMPs set out within the NPPF (2026).

Site Allocations

S/RRA/CR: Land to the west of Cambridge Road, Melbourn

Vistry **objects** to Policy S/RRA/CR as currently worded.

Summary

Vistry supports the allocation of the site for around 125 dwellings but objects to elements of Policy S/RRA/CR that lack clarity. It considers the requirement for a "masterplan-led approach" ambiguous and potentially onerous for a site of this scale, seeking confirmation that a concept plan submitted at application stage would suffice. Vistry also requests clearer wording on active travel connections, specifying pedestrian and cycle links rather than the broader term "active travel". Subject to these minor amendments, Vistry supports the site's allocation and its contribution to housing delivery in Melbourn.

Representation

Vistry supports the broad intent of Policy S/RRA/CR, which allocates the Site for residential development, including a stated capacity for approximately 125 dwellings.

However, Vistry objects to the ambiguity of some of the draft wording, as follows:

The draft policy wording at sub-section 1 states that development proposals *"must demonstrate"* how they will meet the requirements listed from (a) to (g). Hence, it is important that all criteria are explicit and clear.

Criteria 1(a) requires that *"through a masterplan led approach, the site must integrate with Melbourne's existing and proposed built form, including Melbourn Science Park"*. Whilst we appreciate and agree with the intent of integrating the proposed development with the existing built form of the village, the requirement for a 'masterplan led' approach is considered to be ambiguous given the scale of development proposed for the Site. The draft policy does not detail if involvement and approval from the Council is required prior to the submission of an application. Vistry would typically undertake pre-application engagement with the Council, other statutory consultees (where relevant) and the local community in advance of submitting a formal application for planning permission. However, we would consider it onerous for the Applicant to be required to prepare and submit for approval a masterplan for the Site, in advance of any application. This would be considered excessive for a site of circa 125 dwellings.

Vistry requests that point 1(a) of Policy S/RRA/CR is revised and reworded as follows:

> *"a) Through a masterplan led approach* ***at application stage, including a concept plan to include the principles of access, land use and landscape strategy****, the site must integrate with Melbourn's existing* ~~***and proposed***~~ *built form, including Melbourn Science Park;"*

Criteria 1(g) requires the provision of *"active travel connections to the Melbourn Greenway, Melbourn Science Park and the centre of the village."* Again, whilst supporting the intent of this limb of the policy,

which is to promote sustainable and active travel use, we consider that the wording should be clearer. 'Active travel' could potentially include a wide range of travel modes, including horses or a variety of wheeled forms. We are of the view that the existing local infrastructure adjacent to the Site provides opportunities for promoting walking, running and cycling.

Vistry requests that point 1(g) of Policy S/RRA/CR is revised and reworded as follows:

> *"Provide **~~active travel~~ pedestrian and cycle** connections to the Melbourn Greenway, Melbourn Science Park and the centre of the village."*

Notwithstanding the above minor requested amendments to the wording of the draft policy, Vistry supports the allocation of the Site for residential development to support the delivery of new housing within the settlement of Melbourn.

Changes Required

- Clarify that the required masterplan-led approach can be delivered at the planning application stage through a concept plan, rather than requiring a separate masterplan approval process.
- Confirm that any masterplan submission is proportionate to the scale of development (circa 125 dwellings) and does not create an onerous pre-application requirement.
- Amend Criterion 1(g) to replace the broad term "active travel connections" with "pedestrian and cycle connections".
- Retain the policy's overall objective of promoting sustainable travel while providing greater clarity and certainty for implementation.

Development Management Policies

CC/SD: Sustainable Development and the Climate Emergency

Vistry **objects** to Policy CC/SD.

Summary

We object to Policy CC/SD, as its rigid sustainability statement criteria exceed national policy requirements and threaten scheme viability. We request flexibility by adding 'where appropriate' to Sustainability Assessment criteria, recognizing that requirements must be bespoke to scheme scale. Specifically, we challenge the net zero operational carbon requirement in point 2(b) as unsupported by Building Regulations or NPPF (2026). Additionally, we note point 2(f) lacks definitions on 'nature-based solutions' and raises serious concerns that the Council's Local Plan Viability Appraisal fails to model the substantial build costs imposed by criteria 2(a)–(i), rendering the policy unsound.

Representation

Vistry **objects** to Policy CC/SD.

The introduction of 'where appropriate' should be included into point 2 when introducing the criteria that Sustainability Assessments should address. The policy needs to be sufficiently flexible to reflect the range of development proposals anticipated to come forward in the Authority Area across the plan period. It should be recognised that Sustainability Statements will be bespoke to the scheme they support and as such it may not be necessary or appropriate to address all elements from (a)-(i).

The inclusion of point 2(b) is considered onerous and goes beyond national policy requirements. Whilst Vistry 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 of development.

Vistry query the inclusion of point 2(f) (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.

We 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 2(a)-(i).

At present the policy is not considered to be positively prepared and threatens to undermine the 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).

CC/DC: Designing for a changing climate

Vistry **objects** to Policy CC/DC.

Summary

Key policy criteria are loosely worded, unquantified, and ambiguous, rendering the policy unjustified and ineffective. Specifically, we consider that the requirement for 'albedo' in point 2(a)[i] lacks technical quantification, which risks creating inconsistency and confusion during application determination unless explicitly defined or removed. Furthermore, Bellway contends that the mandate to 'minimise internal heat generation' in point 2(a)[iii] provides no clear standards or baseline metrics for developers to adhere to. Without precise numerical parameters, the draft policy fails to provide clear guidance and risks being redundant.

Representation

With regards to *"albedo"* (2(a)[i]) it is requested this must be quantified to avoid ambiguity and inconsistency when preparing applications for development proposals. Without quantification the inclusion of *"albedo"* should be removed from the policy to avoid introducing an unnecessary and undefined requirement for applicants to adhere to.

Further point 2(a)[iii] is considered too loosely worded with no clear definition of the requirements to *"minimise internal heat generation"*. Without quantifying a requirement, the draft policy risks being redundant and not providing clear guidance on the expectations of the Council with regards to internal heat generation.

As currently worded the draft policy is not considered to be effective or justified and risks being ambiguous and ineffective.

Changes Required

- Quantify the technical requirement for 'albedo' in Point 2(a)[i], or remove the term from the policy.

- Provide a clear, quantified definition for the requirement to 'minimise internal heat generation' in Point 2(a)[iii].

CC/NC: Net Zero carbon new buildings

Vistry **objects** to Policy CC/NZ.

Parts Parts A and B impose energy performance standards that significantly exceed national requirements, including Passivhaus and LETI Net Zero benchmarks. These targets risk imposing onerous costs and technical constraints on development, particularly for volume housebuilders. The requirement for CIBSE TM54 modelling duplicates existing energy assessments undertaken through BREEAM. The policy lacks robust evidence demonstrating that these standards are deliverable, viable, and will not adversely affect housing supply. In light of PM13 of the NPPF (2026), any standards exceeding national requirements should be fully justified. The policy should be revised to align with national standards and a proportionate, evidence-based approach.

Summary

The requirement for new development to achieve net zero operational emissions is considered onerous and goes beyond the requirements of the Building Regulations. In addition, the requirement of achieving net zero in all new development has not been given due consideration in terms of viability within the Viability Report and hence threatens to challenge the deliverability of residential development across the Authority Area.

Further, with regards to Part A (Space Heating) the requirement for dwellings to achieve a space heating demand of 15-20kwH per meter 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.

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 meter 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.

It is also understood that the Building Regulations Part L 2025 Update/Future Homes Standard is due to include specific EUI targets once published. As EUI targets will be published in this legislation, it is suggested they are removed to ensure that local plan policy complies with NPPF 2026 Policy PM13 (Setting Standards) and the now withdrawn PPG 1, which states that planning policies should not replicate matters already addressed by Building Regulations. 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 advised the policy is revised accordingly to take account of the now adopted position with regards to setting standards.

Furthermore, the table below compares the 2025 and 2040 EUI targets set out in the UK Net Zero Carbon Buildings Standard and demonstrates that the EUI requirements exceed existing targets, with no flexibility to allow dwellings to benefit from a transitional period ahead of 2040.

Use	Draft Local Plan	2025 EUI Target	2040 EUI Target
Dwellings (Flats)	35 kWh/sqm/year	40 kWh/sqm/year	35 kWh/sqm/year
Dwellings	35 kWh/sqm/year	45 kWh/sqm/year	35 kWh/sqm/year

Table 1. EUI Targets in UKNZCBS versus draft local plan.

As a consequence of the above considerations we request the draft policy is removed from the GCLP in full. At present the policy is not considered to be either justified nor in line with national policy and hence cannot be considered sound.

Changes Required

- Revise the policy to account for targets that are consistent with the Building Regulations and national policy and guidance.

C/WE: Water Efficiency

Vistry **objects** to Policy C/WE.

Summary

The setting of a two-tiered water consumption threshold (80 l/p/d for 100+ dwellings vs. 90 l/p/d for <100 dwellings) is arbitrary, unjustified, and legally/operationally unworkable. Scheme size does not dictate individual occupant water usage, and restricting usage to 80 l/p/d relies on domestic water reuse/recycling, which currently lacks statutory legislative framework and poses legal concerns in evidence base addendums. Furthermore, 80 l/p/d restricts household fixtures, harming marketability. Bellway advocates for a uniform, achievable standard of 90 l/p/d across all residential development and requests clarifying that water butts are only required for houses, not flats.

Representation

In the first instance it is unclear why different water efficiency standards have been set for developments of 100+ and less than 100 dwellings. This is an arbitrary threshold and does not reflect the practical operations of modern residential development. The size of a scheme is unlikely to have a bearing or influence on the individual household usage of water, and nor should it. As currently worded this aspect of the draft policy is considered unjustified and hence not sound.

Vistry recognises that Cambridge and the surrounding region is under water stress and the Cambridge Water Scarcity Group, alongside other bodies, has been established to explore the delivery of solutions to the constrained water supply in the region. This is evidenced in the Joint Statement on addressing water scarcity in Greater Cambridge. We also recognise the proviso the NPPF (2026) makes that in exceptional circumstances (including areas of water stress) there is reason to introduce consumption standards greater than those prescribed by national policy or within the Building Regulations.

Notwithstanding this, it is considered that setting a different requirement for water consumption in developments over 100 dwellings is overly onerous, unjustified and ultimately unenforceable during the operational lifetime of developments. Internal water use is largely determined by occupant behaviour and individual dwelling specifications, rather than the overall scale of a development. Residents cannot reasonably be expected to use less water simply because they live in a larger scheme. Furthermore, we consider the limitation of water consumption of 80/l/p/d may negatively impact customer experience and reduce the desirability and marketability of new build dwellings. Such requirement would in effect prevent

house builders from offering facilities such as baths, higher capacity washing machines and more powerful showers.

The Council's own evidence base notes there are still concerns on the legal implications of using reclaimed water for domestic purpose which should they not be amended may have implications on the policy's effectiveness (Cambridge Area Water Supply Evidence, Addendum 2026).

While the draft policy states water reuse / recycling is subject to amendments in relevant legislation we contend that until such point there is clarity and legislative backing on such matters the Authority should not be seeking to require residential development to achieve 80/l/p/p/d, which is both unjustified and unachievable.

As drafted, the policy risks being arbitrary and may fail the tests of justification and effectiveness. It should either apply a consistent, evidence-based standard across all residential development or provide clear evidence explaining why a higher requirement is appropriate only for larger schemes.

We hence advocate that a singular requirement of 90/l/p/d should be sought for new dwellings within Greater Cambridge which would reflect both an ambitious target that reflects the water resource challenges the Authority and facing and one which is both achievable and will not threaten the viability or operational function of residential development in the Authority. We therefore suggest the following amended wording:

a. **Residential development must achieve a water usage of no more than 90 litres/person/day. To achieve this level, some form of water reuse or recycling will be necessary. Proposals that seek to deliver levels of water usage below this level are encouraged.**

As currently drafted the policy requires all new dwellings to be provided by a water butt. We consider the policy should be reworded to acknowledge this is unlikely to be feasible of flats / apartments and as such should make explicit reference that water butts should only be required for new dwellinghouses.

Changes Required

- Replace the dual water efficiency standards (80 l/p/d and 90 l/p/d) with a single, uniform requirement of no more than 90 litres/person/day across all residential developments.
- Reword policy text to: 'Residential development must achieve a water usage of no more than 90 litres/person/day. To achieve this level, some form of water reuse or recycling will be necessary. Proposals that seek to deliver levels of water usage below this level are encouraged.'
- Explicitly clarify that the requirement for water butts applies exclusively to new dwellinghouses, excluding flats and apartments.

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

Vistry **objects** to Policy CC/IW.

Summary

Policy CC/IW contains several requirements that are overly prescriptive, insufficiently justified, and risk undermining development viability and deliverability. Requirements for zero discharge from rainfall events up to 5mm, mandatory permeable hard surfacing, and green or brown roofs on all flat roofs exceed established guidance and fail to account for site-specific constraints. Criterion 6(a) places

responsibility on developers to demonstrate wastewater capacity, despite this being a statutory function of the water company. These requirements risk increasing costs, delaying development, and threatening housing delivery. The policy should be amended to provide greater flexibility and align with national policy and statutory responsibilities.

Representation

Point 4(b) requires development to result in no discharge from a developed site for rainfall depths up to 5mm of any rainfall event. This blanket required is considered onerous and does not reflect the individual nature of different sites where topography, solid soil composition and infiltration rates all affect discharge rates. Furthermore, this requirement goes beyond that set out within the SuDS Manual (2015) which is considered the most up to date and reliable guidance with regards to SuDS. As currently worded the draft policy hence risks being both unjustified and inconsistent with national policy. It is hence recommended that point 4(b) is deleted from Policy CC/IW.

Point 4(e) requires all hard surfaces to be permeable wherever practicable. Vistry wishes to highlight the considerable build costs such a requirement will have and needs to be reflected within the Local Plan Viability Assessment. Such a requirement could threaten the viability of residential development and as such is considered unjustified and not sound as currently worded. It is suggested point 4(e) is deleted from the policy as currently drafted.

Point 4(f) requires all flat roofs to be either green or brown. This blanket requirement goes beyond the requirements of the Building Regulations and is hence considered overly onerous to apply such requirement in all conditions where it may not be viable, appropriate or achievable. 4(f) is hence considered unjustified as currently worded. We suggest the policy should be reworded to express the desirability for flat roofs to be green / brown but not required. Our suggested rewording of 4f is as below:

a. **The Authority will encourage the integration of green / brown roofs into developments with flat roofs where appropriate and viable.**

Point 6(a) as currently worded sets out that development must demonstrate there is capacity for wastewater treatment and adequate wastewater conveyancing infrastructure to serve the whole development, or an agreement is in place to ensure the provision of necessary infrastructure prior to the occupation of development. Vistry considers that this requirement is in direct contradiction of the duties bestowed on Anglian Water under S37 and 94 of the Water Industry Act (1991) and in essence would circumvent Anglian Water's statutory requirement to service new development and ensure there is wastewater capacity.

It is not sound for the Authority to ask developers to demonstrate capacity which is subject to other regulatory regimes and beyond the control of a prospective applicant and is consequently inappropriate to include a policy in the GCLP requiring an applicant to assess capacity or otherwise of the water company to provide connections. As worded in the draft policy, this represents an attempt to place duty on applicants for things they are not legally responsible for.

As currently worded 6(a) has the potential to prevent development from being delivered, should Anglian Water object or refuse to agree to infrastructure delivery and hence undermines the deliverability of the entire GCLP. The policy as currently worded is hence unjustified, not consistent with national policy and threatens the soundness of the GCLP. We therefore request that 6(a) is deleted entirely from the policy.

Changes Required

- Delete Point 4(b) (zero discharge requirement for rainfall up to 5mm).

- Delete Point 4(e) (requirement for all hard surfaces to be permeable wherever practicable).
- Reword Point 4(f) to read: 'The Authority will encourage the integration of green / brown roofs into developments with flat roofs where appropriate and viable.'
- Delete Point 6(a) entirely to remove unlawful proof of wastewater infrastructure capacity burdens on applicants.

CC/CE: Supporting a circular economy and sustainable resource

Vistry **objects** to Policy CC/CE.

Summary

The policy contains several requirements that are insufficiently justified, inconsistent with national policy, and risk placing unnecessary burdens on development. The requirement to reduce embodied carbon lacks clear parameters, creating uncertainty over implementation and viability. Requiring full justification of demolition conflicts with permitted development provisions and places excessive weight on carbon considerations beyond NPPF requirements. Embodied carbon should be considered alongside other material planning considerations, instead of as a determining factor. Mandatory submission of Circular Economy Statements for larger residential schemes is onerous and exceeds national information requirements. CC/CE should therefore be amended to provide greater flexibility and consistency.

Representation

Point 1 requires all development proposals to *"proportionately"* take opportunities to reduce the development's embodied carbon content. As currently worded the policy is considered too vague and does not set any clear defined parameters or boundaries for schemes to meet. Without clear boundaries, it is unclear if this policy requirement will threaten the viability of development.

Point 2 requires any proposals that involve demolition to be accompanied by full justification for demolition. This requirement does not reflect the provisions made under The Town and Country Planning (General Permitted Development (England) Order 2015 which under Class B sets out the Permitted Development rights for demolition of a building. Requiring full justification for demolition of a building to be provided would hence be inconsistent with the legislative procedure for building demolition set out within Class B. As currently worded, the draft policy is hence considered unjustified and inconsistent with national policy. It is hence recommended that Point 2 is reworded to promote the retention, reuse and renovation of existing buildings where possible, but remove the detailed justification requirements set out in sub points a-d, allowing development proposals to come forward and demolition justified on their own merit. This would allow embodied carbon to be taken into the planning balance in the same manner in which other material considerations are.

Furthermore, Point 2(d) requires proposals for demolition and construction of a new building to deliver significant benefits that outweigh carbon savings that would arise from the building being repaired or reused. In isolation this requirement is considered onerous we argue carbon savings should not be the only determining factor in determining the acceptability of demolition and redevelopment of a site. Embodied carbon and carbon savings is a material consideration and should be factored into the planning balance as with any other material consideration for example the safety of the building, the economic viability of renewing a building or its contribute to the environment. Further it is noted the policy as currently worded goes beyond the requirements with regards to carbon and development as set out in the NPPF (2026). For the purposes of determining application proposals Policy CC2 (Mitigation of climate change) states substantial weight should be given to the benefits of improving the energy

efficiency of existing buildings and the use of renewable carbon sources. CC2 does not, nor does it anywhere else in the NPPF (2026) require that development only be approved where benefits would outweigh the carbon savings. It is hence considered the policy as currently worded is materially inconsistent with NPPF (2026) and would hence only be afforded limited weight in the determination of future applications.

Point 2d should hence be deleted from the policy in full.

Changes Required

- Define clear parameters and boundaries in Point 1 regarding embodied carbon reduction expectations.
- Reword Point 2 to encourage building retention/renovation while deleting detailed justification sub-points (a)–(d) to align with Class B Permitted Development rights.
- Delete Point 2(d) entirely so embodied carbon is weighed within the normal planning balance rather than acting as a strict requirement.

CC/CS: Supporting land-based carbon sequestration and carbon sinks

Vistry **objects** to Policy CC/CS.

Summary

Part 7 requires all major development proposals to seek opportunities to enhance carbon sequestration potential of their proposals through green infrastructure or new habitat creation. In taking the definition of 'major development' (Appendix E: Glossary) which aligns within that set out within the Town and Country Planning (Development Management Procedure) (England) Order 2015 this requirement is considered very onerous. The requirements set out within CC/CS go beyond any provisions set out within the NPPF (2026) NDMPs and as such we consider is unnecessary and unjustified.

In addition to the wealth of other polices within the draft Local Plan that deal with green infrastructure, biodiversity net gain and open space it is unclear why this policy Is necessary. We therefore advocate the policy should be deleted or significantly revised to read as follows:

> **7. The demonstration of meaningful carbon sequestration where there is a significant net gain within a proposal through nature based solutions will be a material consideration in the decision-making process.**

Changes Required

- Delete Policy CC/CS or significantly revise Part 7 to read: '7. The demonstration of meaningful carbon sequestration where there is a significant net gain within a proposal through nature based solutions will be a material consideration in the decision-making process.'

BG/BG: Biodiversity and geodiversity
Vistry **objects** to Policy BG/BG.

Summary

The proposed requirement for 20% Biodiversity Net Gain (BNG) on major development is unsound as it is not sufficiently justified, evidenced or demonstrated to be deliverable. The Environment Act 2021 establishes a clear statutory requirement for 10% BNG, and there is no compelling evidence within the Plan evidence base to justify a blanket increase to 20%. Furthermore, it is unclear whether the viability implications of a 20% requirement have been adequately assessed alongside other policy costs. The policy should therefore be amended to require qualifying development to achieve the statutory minimum 10% BNG in accordance with national legislation.

Representation

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.

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 within the Evidence Base 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 including additional standards which the draft Plan seeks.

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.

Changes Required

- Amend Policy BG/BG to remove the 20% BNG requirement for major developments, reducing the requirement to the statutory 10% BNG threshold under the Environment Act 2021.

BG/GI: Green and Blue Infrastructure
Vistry **objects** Policy BG/GI.

Summary

Clarification is sought regarding the scope, content and purpose of the proposed Green Infrastructure Plan and Statement, including whether these documents are intended to form part of, or sit alongside, the Design and Access Statement. As drafted, the requirement lacks sufficient detail and it is unclear what additional information would be provided beyond that already secured through a Design and Access Statement. Furthermore, a Green Infrastructure Plan is not identified within the application information requirements set out in Annex C of the NPPF (2026). Accordingly, the requirement is unjustified and should be deleted from Point 2 of the policy.Representation

Clarification is sought on the details required by a 'Green Infrastructure Plan' and Statement and whether or not this would 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.

Furthermore, we note a Green Infrastructure Plan or equivalent document is not listed within the Information Requirements set out in Annex C of the NPPF (2026). We therefore advocate this requirement for all major development is unjustified and inconsistent with national policy and hence Point 2 should be deleted from the policy.

Changes Required

- Delete Point 2 of Policy BG/GI, removing the standalone requirement for major developments to submit separate Green Infrastructure Plans and GI Statements.

BG/UGF: Urban Greening Factor
Vistry **objects** to Policy BG/UG.

Summary

We object to Policy BG/UGF, advocating for its total deletion from the Local Plan. Achieving 10% Biodiversity Net Gain under the Environment Act 2021 is already an effective, established measure for securing ecological enhancements on development sites. Adding a mandatory Urban Greening Factor target (e.g. 0.4 for residential developments) introduces an unnecessary, untested burden. There are serious viability concerns, noting that the Local Plan Viability Assessment does not appear to evaluate the cumulative cost impact of UGF alongside extensive sustainability policies, making the policy unjustified and inconsistent with national policy.

Representation

We consider the achievement of 10% BNG secured via the Environment Act (2021) to be an appropriate measure to achieve developments which deliver an appropriate amount of environmental and ecological enhancements. Vistry query whether the urban greening factor has been taken into account within the Viability Assessment or practically within developments, 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) and or undeliverable.

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

We hence advocate that Policy BG/UGF is deleted from the GCLP.

Changes Required

- Delete Policy BG/UGF in full from the GCLP

BG/TC: Tree Canopy Cover and the Tree Population

Vistry **objects** to Policy BG/TC.

Summary

We raise concern with Point 6 in BG/TC as currently worded which requires that development "must contribute" to the maintenance of planted trees and hedgerows. We consider that maintenance is already secured where appropriate by Landscape Management and Maintenance Plans which can be secured via condition where appropriate. This is often monitored and secured via a management company, with no "contribution" required. We suggest the following amended wording: "Development which includes the planting of trees and/or hedgerows should ensure their long-term maintenance, which will be secured via planning conditions and/or obligations as appropriate."

Representation

Specifically, we raise concern with point 6 as currently worded which requires that development "must contribute" to the maintenance of planted trees and hedgerows. We consider that maintenance is already secured where appropriate by Landscape Management and Maintenance Plans which can be secured via condition where appropriate. This is often monitored and secured via a management company, with no "contribution" required.

We suggest the following amended wording:

> 6. **Development which includes the planting of trees and/or hedgerows should ensure their long-term maintenance, which will be secured via planning conditions and/or obligations as appropriate.**

Changes Required

- Amend Point 6 of Policy BG/TC to read: '6. Development which includes the planting of trees and/or hedgerows should ensure their long-term maintenance, which will be secured via planning conditions and/or obligations as appropriate.'

BG/EO: Providing and Enhancing Open Space

Vistry **objects** to Policy BG/EO.

Summary & Representation

Vistry specifically objects to the terminology of *"food growing space"* which is used within the draft policy. This is not defined and as such is not clear what the Authority is seeking in terms of food growing space provision. To ensure the GCLP is positively prepared and in line with national policy, the term should be

replaced with 'allotments' which is industry standard and the terminology used within the NPPF (2026) as opposed to food growing space. In altering the wording to 'allotment' would ensure the policy is consistent in terms of its request and terminology within the NPPF (2026).

Changes Required

- Replace 'food growing space' with 'allotments' throughout policy BG/EO.

WS/NC: Meeting the Needs of Growing Communities

Vistry **objects** to Policy WS/NC.

Summary

Policy WS/NC requirements that duplicate other Local Plan policies, place unjustified obligations on developers, and create uncertainty around viability and delivery. It argues that community needs assessments should be the responsibility of the Council through the Local Plan and Infrastructure Delivery Plan rather than developers. Concerns are also raised regarding potential double-counting of contributions through CIL and Section 106 obligations, reliance on untested sports facility strategies, and the ambiguous requirement for facilities to be delivered in "early phases" of development. Amendments are sought to ensure the policy is justified, clear, flexible and viability-tested.

Representation

With regards to point 4 we object to the repetition of the requirement for the submission of a Needs Assessment for residential sites over 200 dwellings, which is also set out in in Policy BG/EO. This repetition is considered unnecessary and should be removed to ensure the Local Plan is concise and avoid undue repetition.

Point 4 states that proposals for residential developments of 200 or more dwellings (or multiple smaller sites that cumulatively exceed this threshold), as well as employment developments over 5,000 m², must be informed by detailed assessments of community needs and include strategies to address those needs. It is understood that these assessments should be prepared by the Authority as part of their Local Plan and associated Infrastructure Delivery Plan, and the responsibility should not fall on developers to determine which community needs a development should meet and introduces significant uncertainty.

Point 5 states that developments that do not generate an onsite demand for indoor and outdoor community and cultural facilities will be required to contribute to offsite provision via CiL. It is noted as of September 2026, CiL has not yet been adopted with examination scheduled for Q4 2026. Notwithstanding this point, it is not clear that contributions via CiL to such facilities have been accounted for within the Viability Assessment. Vistry hence raises query as to whether such contributions will also be sought for via S106 obligations as well. There should be no double-counting of provision across CIL and S106.

Point 7 sets out that residential development must contribute towards indoor and outdoor sports facility informed by needs identified in the Indoor Sports Facility Strategy, Playing Pitch Strategy, and Outdoor Courts and Rinks Strategy or any successor document. We raise concern with this, given it is understood the aforementioned documents are not subject to any scrutiny, formal review and are understood to not comprise the evidence base that will support the emerging GCLP through Examination. As such, the identified required contributions within these documents may be unjustified and not reflect an evidenced approach to identifying needs for such facilities generated by developments and introduce future obligations which have not been financially tested. We hence request that point 7 is reworded to read as follows:

"7. Residential development may contribute towards both indoor and outdoor sports facilities including ancillary uses such as changing facilities appropriate to the scale and location of the development and where justified and which could include provision off-site via financial contributions towards publicly accessible provision."

Point 11 refers to the implementation of services and facilities in "early phases" of development. We raise concern with the current drafted terminology, as 'early phases' is ambiguous and lacks clarity and clear definition for developers on when 'early phases' is. We therefore suggest in order to ensure sufficient flexibility the policy should be reworded to adopt a case by case basis for the delivery of services and facilities and allows the timing of infrastructure to be aligned with the cash-flow and peak debt of individual developments. Appropriate mechanisms already exist for securing the delivery of such items in the form of S106 agreements and conditions. Therefore, the policy should be reworded to this effect.

As currently worded the policy is ambiguous, creating uncertainty that will place an additional and unwarranted adverse financial burden on development, challenging viability. We therefore contend the policy is revised as set out above to ensure the Local Plan is justified.

Changes Required

- Remove the duplicated requirement for a community Needs Assessment, as it is already covered by Policy BG/EO.
- Delete the requirement for developers to identify and address community needs, which should be informed by the Local Plan and Infrastructure Delivery Plan.
- Clarify that community facility contributions will not be double-counted through both CIL and Section 106 obligations.
- Amend Point 7 so residential development **may** contribute to sports facilities where justified, proportionate, and appropriate to the scale and location of development.
- Remove reliance on untested sports facility strategies that are not part of the examined evidence base.
- Replace the reference to delivery in "early phases" with a flexible, case-by-case approach linked to development phasing and viability.
- Revise the policy to reduce ambiguity, improve certainty, and ensure development viability is not adversely affected.

WS/HS: Pollution, Health and Safety

Vistry **objects** to Policy WS/HS.

Summary

Point 7 requires all major and minor planning applications to submit an Air Quality Statement. This blanket requirement is onerous, disproportionate and insufficiently targeted, failing to reflect the scale, nature and likely air quality impacts of individual proposals. The policy is therefore not justified. Point 7 should be amended as follows:

> **"Where appropriate, major and minor planning applications will be required to submit an Air Quality Assessment."**

Point 8 requires major development proposals to "minimise" emissions. WS/HS should clarify the meaning of "minimise", the mitigation expected, and how compliance will be assessed to ensure it is effective and justified.

Representation

Point 7 requires all major and minor planning applications to submit an Air Quality Statement. Such sweeping application requirement is considered onerous and does not take into account the individual circumstance, scale and effects of development proposals. The draft policy as worded is hence not justified. Vistry requests that the policy should be reworded to read as follows:

1. **Where appropriate major and minor planning applications will be required to submit an Air Quality Assessment.**

Point 8 requires major development proposes to *"minimise"* emissions. Clarity is sought on what 'minimise' means and the extent to which will be sought by the Council. To ensure the policy is justified and effective further details on what is expected of development proposals should be provided and thereafter tested.

Changes Required

- Reword Point 7 to read: 'Where appropriate, major and minor planning applications will be required to submit an Air Quality Assessment.'
- Define and clarify the exact scope and parameters of 'minimise' in Point 8.

GP/QD: Achieving High Quality Development

Vistry **objects** to Policy GP/QD.

Summary

Policy GP/QD is objected to in relation to Points 2(h) and 2(i). Point 2(h) requires security measures such as Hostile Vehicle Mitigation (HVM) without spatial guidance, effectively applying a blanket requirement across all developments regardless of context. Point 2(i) mandates landscape-supported route permeability, which directly conflicts with HVM measures such as physical barriers and bollards. These competing criteria should be reviewed by the Council to remove internal policy conflicts. Point 2(h) should also be reworded so HVM measures are required only where appropriate and supported by clear guidance to maintain scheme deliverability.

Representation

Point 2(h) requires design to integrate security measures such as Hostile Vehicle Mitigation. Within the policy there is no guidance on where this will require and as currently worded appears to apply this approach as a blanket across development. This is considered problematic and does not take into account the specific circumstances, setting and contexts of individual developments and can have an adverse effect on a residential environment through the introduction of hard landscape features within developments. 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.

Point 2(i) requires permeability of spaces and routes through development that must be supported by hard and soft landscaping. Vistry raises concern of potential conflict between points g. (requiring Hostile Vehicle Mitigation Measures) which often include bollards and barriers and point h. which notes landscape design should enhance permeability. It is suggested a review of the policy and competing points raised by points g and h should be undertaken to ensure development remains deliverable and the requirements placed on developers is clear. This would ensure the policy is effective and justified.

Changes Required

- Reword Point 2(h) to state that Hostile Vehicle Mitigation (HVM) measures are required only 'where appropriate', backed by clear guidance.

- Review and resolve internal policy conflicts between HVM barrier mandates (Point 2h) and site permeability requirements (Point 2i).

GP/QP: Establishing High Quality Landscape and Public Realm

Vistry **objects** to Policy GP/QD.

Summary

Point 1(b)(vi) of Policy GP/QP requires on-street parking to be inset, necessitating expanded footways and is objected to. This is because this requirement is excessively onerous and goes beyond established guidance such as Manual for Streets. Inset parking creates unnecessary land take, excessive infrastructure costs, and may be contextually inappropriate on many residential layouts. The policy should be amended to state that inset parking is encouraged rather than mandatory, ensuring flexibility, justification, and consistency in the Local Plan with national design policy, while also avoiding unnecessary development burdens.

Representation

Point 1(b)(vi) requires on street parking to be inset which will necessitate an expanded footway for pedestrian movements. We raise concern that this is an overly onerous requirement that goes beyond design guidance such as the Manual for Streets. Such requirements represent an unnecessary land and onerous land take, creating additional unwarranted infrastructure costs for development. Development proposals should be designed and developed with regards to their contextual setting and determined in such respect as well. As such development should not be blanket required at a Local Plan level to provide inset parking where it may be wholly inappropriate.

We hence advocate that the policy is revised to read as follows:

> **I. Parking should not reduce the functionality of open spaces, and if on-street parking is proposed inset parking will be encouraged. An expanded footway will be required for pedestrian movements when not occupied;**

The amendment detailed above would ensure the GCLP is both justified and reflective on national guidance and policy.

Changes Required

Amend Point 1(b)(vi) to read: 'vi. Parking should not reduce the functionality of open spaces, and if on-street parking is proposed inset parking will be encouraged. An expanded footway will be required for pedestrian movements when not occupied'

GP/HE: Historic Environment

Vistry **objects** to Policy GP/HE.

Summary

The representation objects to Part 2(b) of Policy GP/HE on the basis that it is overly prescriptive and inconsistent with the balanced approach required by national planning policy and heritage legislation. The use of the word "must" suggests an absolute requirement to conserve or enhance heritage assets in all circumstances, potentially restricting appropriate sustainable development. The representation argues that decision-making should allow planning judgement that weighs heritage considerations against the scale of harm, site-specific circumstances and public benefits. Amendments are therefore sought to ensure the policy aligns with the NPPF, NDMPs and statutory duties relating to the historic environment.

Representation

Part 2(b) is overly prescriptive and not fully consistent with national policy or the statutory framework for decision-making in the historic environment. The use of the word *"must"* risks precluding high-quality, sustainable development by implying an absolute requirement to conserve or enhance heritage assets in all circumstances, rather than allowing for a balanced planning judgement.

National policy and legislation require decision-makers to have special regard to the desirability of preserving heritage assets, while weighing this against the scale of harm, site context and public benefits.

Policy GP/HE should therefore be amended to adopt more proportionate wording that reflects this balanced approach, consistent with the NDMPs set out within NPPF (2026), notably HE5 – HE10 and statutory duties.

Changes Required

- Remove or amend the word **"must"** in Part 2(b) to avoid imposing an absolute requirement.
- Introduce more proportionate wording that allows for balanced planning judgement.
- Ensure the policy reflects the statutory approach of weighing heritage impacts against public benefits and site-specific circumstances.
- Align the policy with the National Development Management Policies (NDMPs) and NPPF (2026) heritage provisions.
- Ensure consistency with statutory duties relating to heritage assets.
- Avoid policy wording that could unnecessarily constrain high-quality and sustainable development.
- Revise the policy so it reflects a balanced, justified and nationally compliant approach to heritage decision-making.

H/HM: Housing Mix

Vistry **objects** to Policy H/HM.

Summary

Policy H/HM Point 4, requiring market and affordable housing mixes to be dictated by local character and housing need evidence, is objected to. We note that NPPF (2026) Policy HO8(3) mandates a flexible, market-led approach to market housing mix where affordable housing requirements are met or exceeded. Point 4 should be revised so that rigid housing need evidence applies strictly to affordable

provision, removing market mix preferences from Tables 7 & 8, and explicitly embedding NPPF HO8(3) flexibility for market dwellings.

Representation

Point 4 sets out a requirement 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 point 4 is revised to explicitly state up-to-date evidence will only be required to inform the affordable housing mix provision and Tables 7 and 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.

Changes Required

- Amend Point 4 so that up-to-date housing need evidence applies exclusively to affordable housing mix.
- Remove market housing mix preferences from Tables 7 and 8.
- Align policy with NPPF (2026) HO8(3) to support a flexible, market-led approach for market housing when affordable obligations are met.

H/SS: Residential Space Standards

Vistry **objects** to Policy H/SS.

Summary

Policy H/SS is objected to. Mandating Nationally Described Space Standards (NDSS) for market housing exceeds Building Regulations and restricts buyer choice; NDSS should apply only to affordable housing. We request deleting Point 2 to avoid repeating NDSS text. For balcony standards (Point 4e), simplified design wording is also requested. For ground floor private amenity space (Point 4g), we ask to reduce minimum quantum from 10m² to 5m². The extra 1m² per bedroom requirement for upper apartments (Point 4h) should be deleted, and universal M4(2) accessibility (Point 6) should be replaced with a 10% target.

Representation

Point 1 requires all new residential units to meet the Nationally Described Space Standards (NDSS). This requirement goes beyond Building Regulations and Vistry raises concern this removes the opportunity for individual requirements and preferences to be accommodated as residential units are built. Particularly with regards to private dwelling provision, Vistry has sought to meet prospective buyers requirements and desires, which do not always align with the NDSS. As such it is recommended the draft policy is revised to state that only affordable provision must achieve the NDSS.

We also raise concern at the length of the draft policy, which unnecessarily repeats the requirements of the NDSS. This risks making the policy too convoluted and difficult to navigate. We suggest point 2 is

removed in full as there is no need to repeat the standards; which may be updated rendering the point irrelevant during the lifetime of the GCLP.

Point 4(e) sets out the required standards for balconies. We 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;**

Point 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**

Point 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.

Point 6 requires all new dwellings to be of M4(2) standard. This is considered onerous and again goes beyond the requirements of the Building Regulations. Point 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.

<u>Changes Required</u>

- Amend Point 1 so NDSS compliance applies exclusively to affordable housing.
- Delete Point 2 (repetition of NDSS standards) entirely.
- Reword Point 4(e) to: 'Provide balconies that are designed as integral elements of the building's architecture.'
- Amend Point 4(g) to reduce minimum private amenity space for ground floor apartments to $5m^2$.
- Delete Point 4(h) (extra $1m^2$ amenity space per additional bedroom).
- Amend Point 6 to mandate Building Regulations M4(2) standards for 10% of dwellings rather than 100%.

H/CB: Self and Custom Build Homes

Vistry **objects** to Policy H/CB

Summary

Policy H/CB, mandating that all developments with 20+ dwellings reserve 5% of plots for self/custom build housing, is objected to. We argue that a blanket quota across all sites is unjustified and conflicts with the Self-build and Custom Housebuilding Act, which bases provision on local demand registers rather than fixed percentages. Extending this quota to flatted developments as 'custom-finish' units provides no meaningful benefit, as developers already offer customer choices in standard delivery models. Instead, this requirement imposes disproportionate viability and deliverability burdens, particularly on higher-density residential developments.

Representation

We object to the mandatory requirement for 5% self-build homes as part of any development. 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. This would be inconsistent with the Self-build and Custom Housebuilding Act, which focuses on demand registers, not quotas.

The current wording of the draft policy requires that even flatted developments must provide 5% custom-build units. While the supporting text clarifies that self-build flats would be delivered as custom-finish units, these are often already incorporated by developers as part of standard delivery models. As such, the requirement does not result in any meaningful additional benefit but instead places an unnecessary and disproportionate burden on developers, particularly in higher-density schemes where viability and deliverability already constrained by the requirements of the draft Plan.

Changes Required

- Remove the mandatory 5% self/custom build plot quota across major sites, replacing it with a demand-led approach based on local self-build registers.
- Exclude flatted and higher-density residential developments from custom-build requirements.

I/ST: Sustainable Transport and Connectivity

Vistry **objects** to Policy I/ST.

Summary & Representation

Point 4 refers to developers of *"larger developments"*. This terminology is inconsistent and provides no clarity on what qualifies as a 'larger development' leaving this open to interpretation. To ensure consistency the policy should explicitly define a threshold for what will be considered 'larger development'.

This will ensure the policy is effective, clear and sound.

Changes Required

- Amend Point 4 of Policy I/ST to explicitly define the development threshold/quantum for what constitutes a 'larger development'.

I/CV: Parking Standards

Vistry **objects** to Policy I/CV.

Summary

We object to Policy I/CV because the emerging Local Plan contains no defined vehicular parking standards, relying instead on bespoke Transport Assessments. We argue that this omission creates ambiguity, uncertainty, and delays during application determination. Minimum parking standards should be established by the Council to ensure consistency and alignment with national policy.
Additionally, Point 7 requiring EV charging strategies for 'large-scale major sites' is objected to as it does not define 'large-scale'. We request setting explicit development quantum thresholds to determine when EV charging strategies are required.

Representation

The policy, and the GCLP as a whole, does not include any vehicular parking standards and rather leaves this as a matter to be dealt with by the applicant through a *"vision-led Transport Assessment"*. We raise concern that lack of guidance will lead to ambiguity and uncertainty on Authority requirements when developing design of developments. This is likely to lead to delays during the determination process where discrepancies are found between the applicant and Council's previously unknown aspirations. We consider that minimum parking standards should be provided by the Authority.

The inclusion of vehicular parking standards within the Local Plan would ensure it is justified and consistent with national policy.

Point 7 refers to *"large-scale major sites"*. No definition of 'large-scale' is provided, leading to ambiguity on where EV charging strategies will be required. It is therefore requested that the policy should set a defined development quantum threshold where EV strategies should be required if this is even required over and above Building Regulations.

Changes Required

- Incorporate explicit minimum vehicular parking standards within the Local Plan.
- Define a clear development quantum threshold in Point 7 for 'large-scale major sites' to specify when EV charging strategies are required.

I/CM: Construction Management

Vistry **objects** to Policy I/CM.

Summary

We object to Policy I/CM regarding Points 2(k) and 5(a). Point 2(k) requires CEMPs and DMPs to demonstrate commitment to a Considerate Constructors Scheme, which is overly onerous and beyond the standard scope of construction management plans; We request deleting Point 2(k). Point 5(a) requires temporary haul roads to be formally agreed by the Local Planning Authority, effectively creating an unnecessary duplicate consenting regime. We assert that haul road details are properly addressed within standard CEMPs, requesting the complete deletion of Point 5(a).

Representation

Point 2(k) requires DMPs, CEMPs and DCEMPs to demonstrate commitment to a Considerate Constructors Scheme or Considerate Contractors Scheme. This is considered overly onerous and goes beyond the typical scope of such documents. It is requested that Point 2(k) is deleted from the draft policy.

Point 5 in effect seeks the creation of a separate consenting regime for temporary haul roads, with 5(a) introducing the requirement for them to be agreed by the Local Planning Authority. Vistry wishes to identify that this is a matter to be addressed within a CEMP and the Authority should avoid introducing any other unnecessary consenting regime for such roads. We therefore advocate point 5(a) is deleted from the policy in full.

Changes Required

- Delete Point 2(k) (mandatory commitment to Considerate Constructors Scheme).
- Delete Point 5(a) (separate LPA approval requirement for temporary haul roads).

Summary

This response forms Vistry's formal representations to the Greater Cambridge Local Plan Regulation 19 Consultation with specific regard to their land interests at Land to the west of Cambridge Road, Melbourn (S/RRA/CR) and also a number of the Development Management policies.

Should you have any queries please do not hesitate to contact me.

Kind regards



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