Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	**Personal details ***	**Agent's details (if applicable)**
Name		Victoria Lowe
Organisation (where relevant)	Woolsington One Ltd	Claremont Planning Consultancy
Job Title (where relevant)		Principal Planner
Address, including Post Code	c/o Agent	Somerset House, 37 Temple Street, Birmingham, B2 5DP
Telephone		[redacted]
Email address		[redacted]

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy GP/QD
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As outlined in Section 5.9 of the attached supporting Representations Report, the overall aim of Policy GP/QD to secure development that is distinctive, contextually appropriate and of a high design quality is supported. Notwithstanding this, the policy is considered to largely repeat the objectives and requirements which are already addressed within Policies GP/QS and GP/PP. Paragraph 132 of the National Planning Policy Framework emphasises that local plans should provide a clear design vision and set out expectations with sufficient certainty so that applicants understand what is likely to be acceptable. The current approach does not achieve this given the duplication of design requirements across several policies. Therefore the Plan should be amended to consolidate Policies GP/QD, GP/QS, GP/PP and GP/QP into a single overarching design policy that establishes a comprehensive framework for achieving high quality development.

Please provide a 100 word summary of your representation.

Policy GP/QD supports the delivery of high quality development that responds to local character and context. Concerns are raised that the policy overlaps significantly with Policies GP/QP, GP/PP and GP/QS which address many of the same design principles and objectives. A more effective approach would be to consolidate these requirements into a single comprehensive design policy to establish a clearer framework for applicants in accordance with Paragraphs 132 and 16 of the Framework.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see the enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy GP/QD should be modified to remove duplication with Policies GP/QS, GP/QP and GP/PP and consolidate the various design related requirements into a single comprehensive design policy. In accordance with Paragraph 132 of the Framework, the Local Plan should establish a clear design vision and expectations for development. The Plan should therefore be amended by merging Policies GP/QD, GP/QS, GP/PP and GP/QP into a single overarching policy addressing design quality.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to attend the hearing sessions to discuss concerns regarding the clarity of Policy GP/QD and its relationship with other design policies in the Plan. Participation at the hearing sessions will enable discussion of the potential overlap between these policies in order to identify a more streamlined approach through the consolidation of design requirements is necessary to ensure the Plan is effective.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy H/AH
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As outlined in Section 5.12 of the attached supporting Representations Report, Policy H/AH is not supported because it requires all affordable housing provision to be delivered on site and prescribes a fixed tenure mix without sufficient flexibility to respond to site specific circumstances and changing housing needs over the Plan period. The delivery of affordable housing is supported yet there may be circumstances where off site provision may be preferable and this option should therefore be permitted where robust justification is provided. Similarly, the policy should recognise that housing needs and market conditions may evolve over time and support a departure from the prescribed tenure mix where this is supported by up to date evidence, including future Housing and Economic Development Needs Assessment or alternative site specific evidence that may justify provision of a different mix of tenures.

Please provide a 100 word summary of your representation.

Policy H/AH is supported in principle but is considered overly restrictive in requiring all affordable housing to be provided on site and in prescribing a fixed tenure mix. Greater flexibility should be incorporated to allow off site provision where justified and to enable the delivery of alternative tenure mixes where this supported by up to date evidence of local housing needs.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see the enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy H/AH should be modified to provide greater flexibility in the delivery of affordable housing. The requirement for all affordable housing to be delivered on site should be amended to state that on site provision would be the preferred approach, but that off site provision or commuted sums may be accepted where robust justification demonstrates that an alternative approach would better meet affordable housing needs or result in a more effective development outcome. The prescribed affordable housing tenure mix should also be amended to allow deviation from this where supported by up to date evidence of local housing need, including subsequent Housing and Economic Development Needs Assessments that are published by the Councils or equivalent evidence. These modifications would be necessary to ensure that the policy is capable of supporting the delivery of affordable housing throughout the Plan period.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd requests to attend the hearing sessions Policy H/AH. Attendance at this hearing session is considered to be necessary so that the approach taken to affordable housing delivery by the Local Plan can be refined through developer input. This is essential given the concerns raised regarding the prescriptive approach that is presently proposed to be taken to the format of affordable housing delivery and the resulting tenure mix.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy BG/GB
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As outlined in Section 5.4 of the attached supporting Representations Report, Policy BG/GB is not considered sound in its current format. The requirement for major developments to deliver a 20% biodiversity net gain has not been robustly justified in accordance with national policy and guidance, specifically Paragraph 006 (Reference ID: 74-006-20240214) of the Planning Practice Guidance which confirms that plan-makers should not seek a higher percentage of net gain than the statutory objective unless the uplifted requirement is justified with regards to the local need for a higher percentage, identification of opportunities for a higher percentage, and any impacts of this on the viability of development. Although the evidence base identified opportunities for enhanced green infrastructure provision, the principal justification for the proposed uplift relies on the Cambridgeshire Doubling Nature Vision which sets out an aspirational vision rather than a robust assessment of local need for a higher mandatory net gain requirement. Additionally, no clear evidence has been provided to demonstrate that that the viability implications of a 20% requirement have been fully assessed and as such, the proposed uplift has not been adequately justified. Policy BG/GB should be amended to require compliance with the 10% BNG requirement, and identify any further uplift to be achieved by new developments as aspirational. This amendment is necessary to ensure that the Local Plan can be considered consistent with Paragraph 16 of the Framework and the supporting Planning Practice Guidance.

Please provide a 100 word summary of your representation.

Policy BG/GB's requirement for major developments to achieve 20% Biodiversity Net Gain (BNG) exceeds the statutory 10% requirement. This uplift has not been adequately justified in line with Planning Practice Guidance. Furthermore, no r viability evidence has been provided to demonstrate that the achievement of this requirement would not unduly constrain the viability of new developments. The policy should therefore be amended to require the statutory 10% BNG, with any further uplift to be identified as aspirational only.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see the enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy BG/GB should be modified to remove the requirement for major developments to achieve a 20% Biodiversity Net Gain (BNG) and instead require compliance with the statutory minimum 10% BNG requirement unless and until robust evidence demonstrates a locally specific need for a higher target and confirms that this would not adversely affect development viability. This will be necessary to ensure that the policy is justified and consistent with national policy and guidance, including Paragraph 16 of the National Planning Policy Framework and Paragraph 006 of the Planning Practice Guidance.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to attend the hearing sessions to raise concerns regarding the evidence base and justification underpinning Policy BG/GB, specifically the requirement for major development to deliver a 20% Biodiversity Net Gain (BNG). The proposed uplift above the statutory 10% requirement is not considered to be supported by sufficient evidence of local need as required by national policy and guidance and Woolsington One Ltd seek to raise their concerns regarding the impact of the proposed 20% net gain requirement on the viability of development.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy S/DE
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As set out in Section 4.4 of the attached supporting Representations Report, Policy S/DE is not supported whereby it seeks to restrict the delivery of development outside of the defined settlement boundaries. This is considered likely to frustrate housing delivery at sustainable rural settlements such as Swavesey, and the achievement of the neighbourhood area housing requirement for Swavesey that is apportioned by the Local Plan. The proposed settlement boundary is tightly drawn around the existing built form and, in the absence of a progressing neighbourhood Plan, there is limited opportunity for the settlement's identified housing requirement to be met. The policy should therefore be amended to allow suitable sites adjoining settlement boundaries to come forward where they contribute towards meeting identified housing needs to improve the effectiveness of the Plan and support the delivery of sustainable growth.

Please provide a 100 word summary of your representation.

Policy S/DE is too restrictive and will frustrate housing delivery at sustainable rural settlements such as Swavesey. The policy restricts development outside settlement boundaries, failing to recognise that in the absence of a Neighbourhood Plan for the area, there is no alternative mechanism for the neighbourhood area housing requirement that is identified by the Local Plan to be met. The policy should therefore be amended to allow deliverable sites adjoining settlement boundaries to come forward where they contribute towards meeting identified housing needs.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see the enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy S/DE should be amended to allow sustainable sites adjoining settlement boundaries to come forward where they contribute towards meeting identified housing needs which will be necessary to ensure that the Plan is effective and capable of delivering the level of growth required within the rural area. The policy should be revised to state that development adjacent to defined settlement boundaries will be supported where it represents a sustainable extension to the settlement and helps meet identified housing requirements.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to participate in the hearing sessions to discuss the soundness of Policy S/DE and the restrictions placed on development outside defined settlement boundaries. Attendance is necessary to explain why greater flexibility is required to allow deliverable site adjoining settlement boundaries to come forward. Woolsington One Ltd wishes to demonstrate why sites such as the land east of Bosworth End, Swavesey, should be positively considered as part of an effective strategy for meeting housing need within the rural area.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy CC/DC
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As outlined in Section 5.1 of the attached supporting Representations Report, it is considered that this Policy requires amendment to provide for greater flexibility in its application. The requirement that developments 'must' reflect the cooling hierarchy conflicts with national policy provided at Paragraph 164 of the Framework which instead provides that developments 'should' be planned for in ways that help to reduce greenhouse gas emissions through its location, orientation and design. The policy also duplicates guidance that is already contained with the Council's adopted Sustainable Design and Construction SPD, contrary to Paragraph 16 of the Framework. In order to avoid the unnecessary duplication of policy, the detailed requirements set out within the draft Policy should be simplified and the Policy should instead refer applicants and decision makers to the adopted Sustainable Design and Construction SPD.

Please provide a 100 word summary of your representation.

Policy CC/DC is considered to be overly prescriptive, and goes beyond the requirements of national planning policy with respect to the climate change mitigation and adaptation measures that developments are expected to implement. The Policy duplicates guidance already contained within the Council's adopted Sustainable Design and Construction SPD, resulting in conflict with Paragraph 16 of the Framework.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see the enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy CC/DC should be amended to provide greater flexibility and avoid duplication of existing guidance. The requirement that developments 'must' reflect the cooling hierarchy should be revised to state that development 'should' reflect the cooling hierarchy where appropriate to align more closely with national policy. The detailed guidance currently contained within the policy should be removed and replaced with a reference to the Council's adopted Sustainable Design and Construction SPD to ensure the Plan is justified and consistent with national policy.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to participate in the hearing sessions to discuss the soundness of Policy CC/DC. Attendance at the hearing sessions is necessary to explain why greater flexibility is required to ensure consistency with national policy; and also to assist in the identification of where the detailed requirements identified by the policy would be more appropriately addressed through supplementary guidance.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy GP/QP
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As outlined in Section 5.10 of the attached supporting Representations Report, the overall aim of Policy GP/QP is considered to largely repeat the objectives and requirements which are already addressed within Policies GP/QS and GP/QD. Paragraph 132 of the National Planning Policy Framework emphasises that local plans should provide a clear design vision and set out expectations with sufficient certainty so that applicants understand what is likely to be acceptable. The current approach of providing multiple policies relating to design and climate change does not achieve this effectively and instead results in the unnecessary duplication of policy, contrary to Paragraph 16 of the Framework. The Local Plan should be amended to consolidate Policies GP/QD, GP/QS, GP/PP and GP/QP into a single overarching design policy that establishes a comprehensive framework for achieving high quality development.

Please provide a 100 word summary of your representation.

Concerns are raised that the policy overlaps significantly with Policies GP/QP, GP/QD and GP/PP of the Local Plan which address many of the same design principles and objectives. In order to achieve compliance with national planning policy, and remove the unnecessary duplication of policy throughout the emerging Local Plan, it is recommended that the design policies proposed by the Local Plan are consolidated into a single overarching design policy.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy GP/QP should be modified to remove duplication with Policies GP/QS, GP/PP and GP/QD and consolidate the various design related requirements into a single comprehensive design policy. In accordance with Paragraph 132 of the Framework, the Local Plan should establish a clear design vision and expectations for development. The Plan should therefore be amended by merging Policies GP/QD, GP/QS, GP/PP and GP/QP into a single overarching policy addressing design quality.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to attend the hearing sessions to discuss concerns regarding the clarity of Policy GP/QP and its relationship with other design policies in the Plan. Participation at the hearing sessions will enable discussion of the overlap between these policies and whether a more streamlined approach through the consolidation of design requirements is necessary to ensure the Plan is effective and consistent with national policy.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy H/ES
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As outlined in Section 5.13 of the attached supporting Representations Report, Policy H/ES is supported in that it facilitates the delivery of rural exceptions sites adjoining the defined development extent of Minor Rural Centres such as Swavesey. However, objection is raised to the requirement in Part (a) that the identified need for affordable housing should be expected to persist in the long term. This requirement is not contrary to Paragraph 82 of the Framework which only requires rural exception sites to address identified local housing needs. Moreover, the Councils should be seeking to support rural exception schemes which address identified local needs for affordable housing at the time of submission, regardless of whether such needs are envisaged to persist in the longer term. It is therefore requested that the draft Policy text is amended to remove this requirement.

Please provide a 100 word summary of your representation.

Policy H/ES is supported in principle but the requirement to demonstrate that affordable housing need will persist in the long term is not justified as this goes beyond national policy. The policy should be amended so that is it consistent with the requirements of Paragraph 82 of the Framework, which requires demonstration of the need for the development at the time of the application's submission.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see the enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

The requirement in Part (a) should be removed which states that the identified affordable housing need must be expected to persist in the long term to ensure that the policy is consistent with national policy and supports the effective delivery of rural exception sites. Paragraph 82 of the Framework requires rural exception sites to address identified local housing needs but does not require applicants to demonstrate that such needs will continue indefinitely.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to attend the hearing sessions to discuss concerns regarding the effectiveness and consistency of Policy H/ES with national policy. Woolsington One Ltd wish to raise concerns regarding the implication of the proposed policy approach of requiring exception site proposals to demonstrate that need for the development will endure on the delivery of rural exception schemes.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	HELAA
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As noted in Section 6.1 of the accompanying Representations Report, the assessment of Woolsington One Ltd's promoted site 115329 within the 2026 Housing and Economic Land Availability Assessment (HELAA) does not provide a robust or proportionate reflection of the site's development potential. Despite detailed representations submitted at the Regulation 18 stage, the site continues to be assessed as having an overall 'red' suitability rating. In particular the 'red' score for landscape considerations appears to rely on Landscape Officer comments dating from 2023, with no evidence that the matters raised in previous representations have been reassessed. This is concerning given that earlier Landscape Officer comments from 2021 acknowledged that some limited development could be accommodated on the site, subject to the retention of the Important Countryside Frontage and appropriate landscape mitigation along the eastern boundary of the site. These comments demonstrate that the site is not subject to an absolute landscape constraint and that development could be delivered in an acceptable manner through a sensitive layout and mitigation strategy. The landscape assessment should therefore be amended from 'red' to 'amber' to more accurately reflect the evidence.

The HELAA also assesses the site as 'amber' in relation to adopted development plan policies, flood risk, ecology, site access, noise, vibration and odour, and contaminated land. However, the assessment itself acknowledges that any impacts arising from these matters can be appropriately addressed through mitigation measures at the design stage or through the imposition of planning conditions. Given that these issues are capable of resolution and do not represent fundamental constraints to development, the current scoring overstates the limitations affecting the site. The assessment should therefore be reviewed and amended to identify these criteria as 'green' where mitigation has been demonstrated to be achievable.

Please provide a 100 word summary of your representation.

The 2026 Housing and Economic Land Availability Assessment (HELAA) does not provide an accurate assessment of Woolsington One Ltd's promoted site's (115329) suitability for development. The site's 'red' landscape score relies on outdated comments and fails to reflect earlier conclusions that development could be accommodated with appropriate mitigation. The Important Countryside Frontage designation is not an absolute constraint and should result in an 'amber' rather than 'red' rating. Additionally, several criteria including flood risk, ecology, site access, noise, vibration, odour and contamination land are scored 'amber' despite the assessment confirming that impacts can be mitigated. The HELAA should be revised to provide a more balanced and evidence based assessment of the site.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see the enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

The HELAA should be revised to provide a more balanced assessment of Woolsington One Ltd's promoted site at Boxworth End, Swavesey (Site ref. 115329). The site's landscape score should be amended from 'red' to 'amber' as previous Landscape Officer comments confirmed that development could be accommodated on the site with appropriate mitigation and retention of the Important Countryside Frontage. In addition, the 'amber' ratings for other development plan matters should be reviewed since the assessment confirms that these issues can be adequately mitigated. These changes are considered necessary to ensure that the evidence base is justified and accurately reflects the site's development potential, as is required in order for the Local Plan to be found sound at examination in relation to the provisions of Paragraph 36 of the Framework.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to attend the hearing session in relation to the Housing and Economic Land Availability Assessment (HELAA) and the assessment of Woolsington One Ltd's promoted site (115329). Participation is necessary to discuss Woolsington One Ltd's concerns regarding the methodology and conclusions of the HELAA, particularly the site's overall suitability rating and the assessment of landscape impacts. The hearing sessions will provide an opportunity to explain why the evidence supports a more favourable assessment of the site and why the identified constraints can be appropriately mitigated, ensuring the evidence base is capable of supporting a sound Local Plan.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy S/RRA/BBP
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As outlined in Section 4.6 of the attached supporting Representations Report, Policy S/RRA/BBP is supported through its allocation of land at Buckingway Business Park for employment development which will strengthen the local economy and reinforce Swavesey's role as a Minor Rural Centre. However, the Plan should also provide for additional housing growth at the settlement to complement the proposed employment opportunities. The Council's objective to reduce car dependency would be better achieved by delivering new homes in close proximity to employment locations, allowing residents to live and work within the same community. Suitable opportunities for sustainable housing growth exist at Swavesey, including Woolsington One Ltd's promoted site on land east of Boxworth End, which is located within convenient walking and cycling distance of Buckingway Business Park. By allocating additional housing land at Swavesey would support the vitality of the settlement and contribute towards meeting local housing needs.

Please provide a 100 word summary of your representation.

The allocation of employment land at Buckingway Business park under Policy S/RRA/BBP is supported as this allocation will contribute towards the economic vitality of Swavesey and support its role as a Minor Rural Centre. The Plan should also provide for additional housing growth as the settlement to complement the proposed employment development. By directing new homes to location which are close to employment opportunities, the need to travel is reduced and sustainable patterns of development are supported. Suitable opportunities exist at Swavesey, including Woolsington One Ltd's promoted site east of Boxworth End which is within walking and cycling distance of Buckingway Business Park.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see the enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy S/RRA/BBP should be amended to recognise the relationship between employment growth and housing delivery at Swavesey by supporting additional housing development in sustainable locations close to Buckingway Business Park. This is necessary to ensure the Plan promotes sustainable patterns of development by reducing the need to travel. The supporting text should be amended to identify housing allocations, such as Woolsington One Ltd's promoted site at Swavesey, in order to complement the economic growth that is proposed to be delivered at the settlement.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to participate in the hearing sessions to discuss the soundness of Policy S/RRA/BBP and the relationship between the proposed employment allocation and additional housing growth at Swavesey. In particular, Woolsington One Ltd considers that the Plan misses an opportunity to provide additional housing in a sustainable location that would support new employment opportunities at Buckingway Business Park and help reduce the need to travel. Attendance at the hearing sessions would allow Woolsington One to provide input on how a more balanced approach to homes and jobs can be achieved and why suitable sites, including their promoted site at Swavesey, should be considered to support the sustainable growth of the settlement.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy S/MO
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As outlined in Section 4.5 of the attached supporting Representations Report, Policy S/MO is not supported in its current format due its reliance on monitoring and future reviews to address potential deficiencies in housing delivery, rather than ensuring sufficient flexibility is built into the Plan from the outset. Given the Plan's reliance on large strategic allocations and new settlements, there is a significant risk that delays or under delivery of the strategic allocations proposed could result in the Local Plan's housing requirement not being met. It is not considered that the Councils have shown due regard to the opportunity presented by suitable sites within the rural area to contribute to delivering new housing to meet the eLP's housing requirement, and the benefits of such growth in supporting the vitality of rural communities.
. Opportunities such as Woolsington One Ltd's promoted site at land east of Boxworth End, Swavesey, should be positively considered as they could contribute to housing delivery early in the plan period.

The identification at part g. of the policy that the Council would consider seeking to address deficiencies through cooperation with other local authorities under the duty to cooperate is not supported. The enclosed Representations Report identifies concerns that the Duty to Cooperate has not been satisfied in the Plan's preparation to date, with insufficient evidence provided to demonstrate that meaningful engagement has been undertaken with neighbouring authorities to understand any cross boundary issues to be addressed by the eLP. It is maintained that the Duty to Cooperate and assistance from neighbouring authorities should not be identified as a fallback in the event that the eLP does not perform as envisaged by the Councils, but instead that the Duty to Cooperate and engagement with neighbouring authorities should have been positively undertaken to inform the preparation of the eLP from the outset.

Please provide a 100 word summary of your representation.

The Local Plan's reliance on large strategic allocations and new settlements means that greater flexibility must be built into the strategy through additional housing allocations and a wider range of deliverable sites, to ensure that the Local Plan's housing requirement can still be met in the event that the delivery of strategic sites is delayed. Cross boundary issues should have been identified and addressed during plan preparation such that the reliance on assistance from neighbouring authorities as a fallback in the event the Local Plan does not perform as envisaged is not supported.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy S/MO should be amended to remove the identification of the Duty to Cooperate as a fallback in the event that the Local Plan does not perform as expected. These changes are necessary to ensure the Plan is effective and capable of maintaining housing delivery if strategic allocations underperform, and provides the positive approach that is required by Paragraph 36 of the Framework.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, considers it necessary to participate at the examination hearings to discuss the soundness of Policy S/MO and the proposed monitoring framework. In particular, concerns relate to the Plan's reliance on the Duty to Cooperate as a fallback position in the event that the Local Plan does not perform as envisaged. Attendance will enable these concerns to be fully examined and will provide an opportunity to discuss the role that additional deliverable sites can play in improving the effectiveness of the Plan's housing strategy.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy CC/NZ
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As outlined in Section 5.2 of the attached supporting Representations Report, Policy CC/NZ is not supported since the requirement for all new development to achieve net zero operational emissions exceeds current and emerging building regulations requirements and has not been supported by sufficient evidence to demonstrate that development will remain viable. As such, the Policy is contrary to Paragraph 36 of the Framework as it does not provide an appropriately justified strategy. The evidence base supporting the consultation includes a Policy Cost Analysis Report for the net zero policy, which identifies that the policy's implementation would result in a cost uplift of between 6-7% in the construction of terraced and semi-detached houses. However, no consideration of how these uplifted build costs would affect the viability of new development has been provided. This directly conflicts with the December 2023 Written Ministerial Statement whereby the Local Plan and its evidence base fails to demonstrate how development would remain viable following the Policy's implementation.

Please provide a 100 word summary of your representation.

Policy CC/NZ is not supported because it requires all new development to achieve net zero operational emission which exceed current and emerging building regulations and the evidence base contains insufficient evidence to demonstrate that the implications of meeting the uplifted requirements have been robustly considered.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy CC/NZ should be amended to align with current and emerging national buildings regulations requirements This is necessary to ensure that the Plan is justified as required by Paragraph 36 of the Framework.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to participate in the hearing sessions to discuss the soundness of Policy CC/NZ. In particular to express their concerns relating to the requirement for all new development to achieve net zero operational emissions, which exceeds current and emerging building regulations requirements without sufficient evidence to demonstrate that the policy implications will not adversely impact on development viability. Attendance at the hearing sessions is necessary to explain why the policy should be aligned with national requirements or supported by robust viability evidence to ensure that it does not adversely affect the delivery of housing and other development required by the Plan.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy S/JH
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As noted in Section 4.1 of the attached Representations Report, Policy S/JH is not supported in its current form as it fails to provide a sufficiently robust, positively prepared and justified strategy for meeting Greater Cambridge's housing needs over the long term. The proposed plan period of 2024-2045 does not adequately reflect the requirements of national policy for plans containing strategic scale developments, including new settlements and city districts, which require a longer term vision that recognises extended delivery timescales. The Council should therefore amend Policy S/JH and its supporting text to establish a clear long term spatial vision extending beyond 20545. Furthermore, the proposed housing requirement of 48,069 dwellings only meets the standard method requirement and provides no flexibility should allocated sites fail to come forward as anticipated. Given the Plan's reliance on large strategic allocations, the housing requirement should be increased to include greater buffer than the 8.2% that is currently proposed. The Plan should also demonstrate that housing requirements have been informed by meaningful engagement with neighbouring authorities and clearly identify whether any unmet housing need from adjoining areas must be accommodated within Greater Cambridge.

Policy S/JH should also be amended to ensure that specialist housing needs for older people and people with disabilities are planned for in addition to, rather than within, the minimum housing requirement. The standard method calculation does not specifically account for these needs, and their inclusion within the overall requirement represents an approach that is contrary to the guidance provided at Annexe D of the Framework. To improve flexibility and resilience, the Policy should be amended to identify that the specialist housing requirements are to be met in addition to the overarching housing requirement identified. In order for the eLP to be found sound at examination, Paragraph 36 of the Framework is clear that the eLP must provide a strategy which as a minimum seeks to meet the area's objectively assessed housing need, and furthermore, the Planning Practice Guidance is clear that the standard method for calculating housing need represents a starting point when preparing a housing requirement.

In order to provide a robust and positively prepared strategy, it is considered essential that the eLP's housing requirement is uplifted to plan for the delivery of a greater level of growth to ensure that there is a level of contingency built into the Local Plan's strategy, and that this also addresses requirements for specialist housing. It is noted that the eLP's spatial strategy concentrates upon delivering new homes within, or adjacent to the main urban area of Cambridge through strategic urban extensions. Rather than further intensifying this strategy to meet any uplifted housing requirement; the Councils should recognise that there are suitable, available, and achievable sites located within the Cambridgeshire rural area that should be positively considered for allocation. This is evident in respect of Woolsington One's promoted site at Swavesey which benefits from a location that is immediately adjacent to a sustainable rural settlement and provides an opportunity to deliver approximately 50 new residential dwellings. Moreover, the promoted site is immediately available for development such that there are no constraints to the site being brought forward for delivery in the early years of the Plan period.

Please provide a 100 word summary of your representation.

Policy S/JH is not capable of being found sound as currently drafted. The housing requirement of 48,069 homes represents the minimum number of homes to be planned for, as set out by Paragraph 36 of the Framework. The housing requirement incorrectly includes provision for specialist housing, which instead should be identified as being delivered in addition to the standard method requirement. The Plan also does not clearly demonstrate how unmet housing needs from neighbouring authorities have been considered and fails to provide sufficient flexibility in the event that the delivery of strategic sites is delayed.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy S/JH should be amended to provide a longer term spatial vision beyond the proposed 2024-2045 plan period; increase the housing requirement above the minimum standard method figure of 48,069 to include an appropriate contingency buffer; demonstrate how any unmet housing needs arising from neighbouring authorities have been considered and addressed; require specialist accommodation to be delivered in addition to the general housing requirement; and allocate additional deliverable sites within sustainable rural settlements, including the promoted land at Swavesey in order to provide a robust housing requirement that is underpinned by proportionate evidence, as required by Paragraph 36 of the Framework. These changes are necessary to ensure that the Plan is positively prepared and consistent with national policy.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning on behalf of Woolsington One Ltd request to attend hearing sessions to raise their fundamental concerns regarding the soundness of Policy S/JH and the housing strategy underpinning the Greater Cambridge Local Plan. In particular, concerns relate to the proposed housing requirement, which provides little flexibility above the minimum standard method requirement and the inclusion of specialist housing needs within the overall housing requirement, contrary to national guidance provided at Annexe D of the Framework. It is also considered that the discounting of smaller sustainable and deliverable sites, including the promoted land at Swavesey, is not considered justified given the contribution such sites could make to maintaining housing supply. Attendance at the hearing sessions is therefore necessary to explain why additional allocations are required and why amendments to Policy S/JH are needed to ensure the Plan is positively prepared and consistent with national policy.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy GP/PP
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As outlined in Section 5.8 of the attached supporting Representations Report, Policy GP/PP is supported in principle as it seeks to ensure that development responds positively to local character, context and distinctiveness. Despite this, concerns are raised regarding certain elements of the policy. Part 1(a) requires development proposals to encourage local groups to prepare Neighbourhood Plans that establish locally specific design principles. This is not considered appropriate as the preparation of a Neighbourhood Plan is a matter for local communities and is outside the influence and control of developers or applicants. There is no obligation for communities to prepare Neighbourhood Plans and, therefore, development proposals should not be expected to facilitate or encourage their preparation. it is essential that this element of the policy is removed to ensure that development proposals are not identified as being in conflict with the policy simply by virtue of the fact that a Neighbourhood Plan for the area has not been progressed.

Concern is also raised regarding Part 1 (c). which requires development to support the climate emergency response. Whilst this objective is supported in principle, the Local Plan already contains a comprehensive framework of climate change supported by the Greater Cambridge Sustainable Design and Construction SPD. The inclusion of an additional climate related requirement within Policy GP/PP duplicates matters addressed elsewhere in the Plan, contrary to Paragraph 16 of the Framework. The policy should be amended by removing the reference to encouraging the preparation of Neighbourhood Plans and deleting Part 1 (c), ensuring that the policy remains focused on design quality, is clear and effective in its application, and avoids unnecessary duplication of other Local Plan requirements.

Please provide a 100 word summary of your representation.

The requirement for development proposals to encourage local groups to prepare neighbourhood Plans is not justified or appropriate, as the preparation of these plans sits outside the control of applicants and developers. The policy results in an unnecessary duplication of the suite of climate change policies contained within the Local Plan, contrary to Paragraph 16 of the Framework.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy GP/PP should be modified to remove the requirement for development proposals to encourage local groups to prepare Neighbourhood Plans, as this falls wholly outside of a developer's control. Part (c) of the Policy should be removed as it duplicates policy contained elsewhere in the Local Plan.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to attend the hearing sessions to discuss concerns regarding the implementation of Policy GP/PP. It is considered necessary to examine whether the policy is sound in requiring development proposals to encourage the preparation of Neighbourhood Plans, despite this being a matter that falls entirely out of the jurisdiction of applicants and developers. Participation at the hearing sessions will enable discussion of the practical consequences of these requirements for development proposals; specifically at Woolsington One Ltd's promoted site at Boxworth End, Swavesey.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy BG/PO
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As outlined in Section 5.7 of the attached supporting Representations Report, Policy BG/PO is supported in principle as it seeks to protect designate open spaces as identified by the Policies Map. However, objection is raised to Part 1 of the policy which extends the same level of protection to undesignated areas of open space. This approach is not justified and introduces uncertainty into the development management process. Through the preparation of the Local Plan and its supporting evidence base, the Council has undertaken as assessment of open spaces and identified those areas that warrant protection. Paragraph 103 of the Framework is clear that policies relating to open space, sport and recreation facilities should be informed by robust and up to date assessments. It is therefore inappropriate for the policy to apply equivalent protection to sites that have not been subject to this assessment process and are not identified on the Policies Map. The policy should be amended so that protection applies only to those open spaces formally designated within the development plan.

Please provide a 100 word summary of your representation.

Concern is raised regarding the approach in Part 1 of the policy which would afford protection to additional undesignated areas of open space where they are considered to meet the relevant assessment criteria. The Council has already undertaken work to identify the open spaces that merit protection and these designated areas are shown on the Policies Map. As such, it is considered inappropriate for equivalent policy safeguards to be applied to sites that have not been formally assessed and identified as warranting protection at the application stage.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy BG/PO should be modified to remove the provision within Part 1 that extends policy protection to undesignated areas of open space that are considered to meet the criteria for designation. This modification is necessary to ensure the policy is justified by providing certainty as to which areas of land are protected and by ensuring that policy designations are supported by an up to date evidence base. The reference within the policy to protecting undesignated open spaces that may meet the designation criteria should be deleted to provide greater certainty for decision makers and applicants.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to attend the hearing sessions. It is I considered necessary to examine the basis for extending policy protection to undesignated areas of open space that have not been identified through the Local Plan evidence base. The policy has implications for the assessment of development sites, including Woolsington One Ltd's promoted site at Boxworth End in Swavesey, as it introduces uncertainty regarding the protection of open space outside the formal plan making process and participation at the hearing sessions will enable discussion of the practical implications of this approach.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy GP/LC
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As outlined in Section 5.11 of the attached supporting Representations Report, Policy GP/LC is objected to as it designates the western frontage of Woolsington One Ltd's promoted site at Boxworth End, Swavesey as an Important Countryside Frontage. The promoted site does not fulfil the purposes of the designation as it is enclosed by established development on three sides and does not provide a meaningful rural break between separate parts of the settlement. Furthermore, the policy fails to recognise that appropriately designed development can be accommodated whilst preserving the contribution of important frontages through measures such as landscape buffers, structural planting and the retention of views towards the wider countryside. The policy should therefore be amended to remove the Important Countryside Frontage designation from Woolsington One Ltd's promoted site and introduce greater flexibility to enable suitable development where the key characteristics and functions of the frontage can be retained and enhanced through sensitive design.

Please provide a 100 word summary of your representation.

Woolsington One Ltd objects to the designation of the western boundary of their promoted site at Boxworth End, Swavesey as an Important Countryside Frontage. The site does not perform the role identified by the policy as it is enclosed by existing development on three sides and does not provide a significant rural break within the settlement. The designation therefore fails to reflect the site's actual relationship with the surrounding built form and should be amended to remove the designation.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy GP/LC should be modified to remove the Important Countryside frontage designation from the western boundary of Woolsington One Ltd's promoted site at Boxworth End, Swavesey, as the site does not fulfil the purposes identified for such designation. This modification will be necessary to ensure that the policy is based on an accurate assessment of the site's characteristics and contribution to landscape character. Part 2 of the policy should also be amended to provide greater flexibility where development proposals can demonstrate that the key functions of an Important Countryside Frontage can be maintained through sensitive design measures.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	Yes / No
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to attend the hearing sessions to discuss concerns regarding the application of Policy GP/LC, particularly the designation of the western boundary of Woolsington One Ltd's promoted site at Boxworth End, Swavesey as an Important Countryside Frontage. The policy has direct implicants for the future development potential of the site and it is considered necessary to examine whether the designation accurately reflects the site's relationship with the surrounding settlement, and to identify amendments to be made to the policy that would facilitate the sensitive development of sites that are impacted by this designation.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy H/SS
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As outlined in Section 5.14 of the attached supporting Representations Report, the identification within Policy H/SS of the eLP that all new homes will be expected to comply with the Nationally Described Space Standards is supported and will assist in ensuring that new residential dwellings provide a good standard of living accommodation for their residents. Part 2 of the draft policy however restates the requirements set out within the Government's Technical Housing Standards. This represents an unnecessary duplication of policy, contrary to Paragraph 16 of the Framework and should be removed.

Please provide a 100 word summary of your representation.

The requirement that all new homes comply with the Nationally Described Space Standards is supported. However, Part 2 of Policy H/SS unnecessarily repeats requirements already established within the Government's Technical Housing Standards and should be deleted to avoid duplication and ensure consistency with Paragraph 16 of the Framework.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy H/SS should be amended by deleting Part 2 which duplicates requirements already contained within the Government's Technical Housing Standards. This modification is necessary to avoid unnecessary repetition and ensure consistency with Paragraph 16 of the Framework. Compliance with the Nationally Described Space Standards should remain but the detailed national requirements should not be repeated within the Local Plan.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to attend the hearing sessions to discuss concerns regarding the effectiveness and clarity of Policy H/SS. It is considered necessary to examine whether the inclusion of requirements that duplicate the Government's Technical Housing Standards is justified and consistent with national policy.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy H/CB
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As outlined in Section 5.15 of the attached supporting Representations Report, it is considered that the requirement within Policy H/CB for at least 5% of homes on schemes of 20 or more dwellings to be provided for self or custom build housing is excessive. The delivery of these plots is likely to be challenging for smaller developments to achieve. It is identified within the Council's Housing Topic Paper (2025) that there is s total demand for 700 self and custom build plots within Greater Cambridge, however this will be a far outstripped supply if the proposed 5% requirement is applied to all developments of 20 dwellings or more. It is instead considered to be more appropriate to identify the proportion of self-build plots which larger site allocations of 100 or more dwellings will be expected to provide. This change will contribute towards establishing sustainable and mixed communities on allocated sites and will also assist in providing certainty to developers.

Please provide a 100 word summary of your representation.

Policy H/CB's requirement for 5% self or custom build provision on developments of 20 or more dwellings is considered excessive and may affect the viability and delivery of small and medium sized schemes. Applying the requirement across all qualifying developments could significantly exceed the identified demand for 700 plots in Greater Cambridge. A more appropriate approach would be to require self build provision only on larger sites of 100 or more dwellings, helping to create sustainable mixed communities whilst providing greater certainty for developers.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy H/CB should be modified so that the requirement to provide self and custom build housing applies only to larger residential developments of 100 or more dwellings rather than all schemes of 20 or more dwellings. The proposed 5% requirement is considered excessive for small and medium sized sites and could adversely affect their viability and deliverability. Focusing provision on larger sites would better align supply with the identified need to support the delivery of sustainable and mixed communities, ad provide a greater deal of certainty for developers. Accordingly, Policy H/CB should be amended to require an appropriate proportion of self and custom build plots only on developments of 100 or more dwellings.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to participate at the hearing sessions in relation to Policy H/CB. The proposed requirement for at least 5% of homes on developments of 20 or more dwellings to be delivered as self or custom build plots has implications for the viability and deliverability of residential development, including Woolsington One Ltd's promoted site at Boxworth End, Swavesey. The hearing sessions will provide an opportunity to discuss these concerns and the challenges that such a requirement would present to the viability of development.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy S/SH
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As set out in Section 4.3 of the attached supporting Representations Report, Policy S/SH is supported in its identification of Swavesey as a Minor Rural Centre, recognising its relatively high level of services, facilities and accessibility. However, the proposed restriction limiting windfall development to sites within the development boundary and imposing a maximum scheme size of 30 dwellings is neither justified nor supported. A maximum of 30 dwellings is considered to be arbitrary and no clear evidence has been presented to explain why this threshold is appropriate. As such, the Policy as currently drafted conflicts with Paragraph 36 of the Framework. The Plan also identifies a housing requirement of 55 dwellings within the Swavesey Neighbourhood Area, however in the absence of an emerging Neighbourhood Plan, the policy approach adopted by Policy S/SH will frustrate the delivery of suitable sites, such as Woolsington One Ltd's site at Swavesey that could otherwise come forward for development to meet the apportioned neighbourhood area requirement . Given that the development boundary is tightly drawn around the existing built form, there is limited opportunity for the settlements' housing requirement to be achieved through sites within the boundary alone. Policy S/SH should be amended to provide greater flexibility for sustainable growth in Minor Rural Centres. The maximum scheme size restriction should be removed, and the policy should allow suitable and sustainable sites adjacent to development boundaries to be considered for development there they contribute towards meeting identified housing needs.

Please provide a 100 word summary of your representation.

Policy S/SH appropriately identifies Swavesey as a Minor Rural Centre, however, the restriction of windfall development to sites within the development boundary and the maximum scheme size of 30 dwellings are not justified. The policy should be amended to remove the 30-dwelling cap and allow sustainable sites adjoining development boundaries to contribute towards meeting local housing needs.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy S/SH should be amended to remove the arbitrary restriction limiting windfall development in Minor Rural Centres to a maximum of 30 dwellings and to allow sustainable sites adjoining development boundaries to come forward where they contribute towards meeting identified housing needs. This modification is considered necessary to ensure that the Plan is justified. The current approach is inconsistent with the identified requirements for 55 dwellings within the Swavesey Neighbourhood Area, particularly given that the Swavesey Neighbourhood Plan is no longer being progressed. These amendments would support housing delivery and allow sites such as the land east of Boxworth End, Swavesey, to come forward to deliver the neighbourhood area housing requirement in the absence of a Neighbourhood Plan.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	Yes / No
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to participate in the hearing sessions to discuss the soundness of Policy S/SH and the approach taken towards housing growth in Minor Rural Centres. In particular, concerns relate to the justification for restricting windfall development to within development boundaries and imposing a maximum scheme size of 30 dwellings, despite Swavesey's recognised sustainability credentials and identified housing requirement. Attendance at the hearing sessions is necessary to explain why greater flexibility should be provided for sustainable sites adjoining development boundaries. Woolsington One Ltd also wishes to discuss the suitability of the promoted land east of Boxworth End, Swavesey and why such sites should be considered as part of a more effective and positively prepared strategy for meeting hosing needs within the rural area.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy I/ST
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As noted in section 5.16 of the accompanying Representations Report, Policy I/ST seeks to promote sustainable transport and connectivity through new developments, which is supported in accordance with Paragraph 110 of the Framework. However, Part 3 of the draft Policy text identifies that developments will only be permitted where they do not have an unacceptable impact on transport and highway safety. This part of the Policy must be amended, whereby the proposed wording presently conflicts with Paragraph 116 of the Framework which is explicit that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe. This amendment should be implemented to ensure that the Draft Plan is capable of being found sound at Examination in accordance with Paragraph 36 of the Framework which requires that Local Plans must be consistent with national policy.

Please provide a 100 word summary of your representation.

Policy I/ST's support for sustainable transport and connectivity is welcomed but Part 3 must be amended to ensure consistency with national policy as the current wording conflicts with Paragraph 116 of the Framework by suggesting that development should be refused where transport impacts are unacceptable, without reference to severity. The policy should instead reflect that development should only be prevented or refused where there would be an unacceptable impact on highway safety or severe cumulative impacts on the road network.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy I/ST should be amended to ensure consistency with Paragraph 116 of the National Planning Policy Framework and to ensure that the Plan is sound. The current wording of the policy is not aligned with national policy which is clear that development should only be prevented or refused on highways grounds where there would be an unacceptable impact on highway safety, or where the residual cumulative impacts on the road network would be severe.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to attend the hearing session relating to Policy I/ST in order to identify concerns regarding the consistency of the policy with national planning policy. In particular, the hearing sessions will provide an opportunity to discuss the proposed wording of Part 3 of the policy to ensure that an appropriate policy wording can be identified that is consistent with national policy. Participation is considered necessary to ensure that the policy is justified, consistent with national policy and capable of being found sound at Examination.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy S/DS
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

Policy S/DS adopts an overly restrictive approach to the distribution of growth by concentrating the majority of development within and around Cambrdige, strategic urban extensions and new settlements, whilst limiting the contribution that rural villages can make towards meeting housing needs. Whilst the objective of directing development to sustainable locations is supported, the proposed strategy does not appropriately balance this objective with the need to support thriving rural communities and ensure that all parts of Greater Cambridge benefit from growth, which is identified in the strategic objectives of the Local Plan The approach is considered inconsistent with paragraphs 82 and 93 of the Framework which supports sustainable growth in rural areas to maintain and enhance their vitality.

The Plan also acknowledges that it will not meet the Framework's requirement for at least 10% of housing to be delivered on sites of less than one hectare, relying instead on future windfall development to address this shortfall. This approach is contrary to Paragraph 73 of the Framework which specifically requires that small sites are identified by the development plan and does not provide for a reliance on windfall development to achieve this. The justification provided as to why this requirement cannot be met is not robust and instead relies upon an incorrect perception that sustainable growth cannot be delivered within the rural areas. Greater consideration should instead be given to allocating suitable sites within sustainable villages. Villages such as Swavesey are capable of accommodating proportionate growth due to their range of local services, facilities and public transport connections. Development opportunities, including Woolsington One Ltd's promoted site east of Boxworth End, Swavesey, demonstrate how growth in rural settlements can support housing delivery and reduce the need to focus development exclusively within the most urban parts of Greater Cambridge. The spatial strategy should therefore be revised to allow a greater contribution from sustainable rural settlements.

Please provide a 100 word summary of your representation.

The proposed development strategy places excessive emphasis on concentrating growth within and around Cambridge whilst significantly limiting the role of rural villages in meeting housing needs. This approach conflicts with national policy objectives that support sustainable growth in rural areas and the vitality of rural communities. Sustainable villages such as Swavesey are capable of accommodating additional growth to support housing delivery. The Council's justification as to why the 10% small sites requirement cannot be met has been insufficiently evidenced and the reliance on windfall development is contrary to Paragraph 73 of the Framework.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy S/DS should be amended to allow a greater proportion of housing growth to be directed towards sustainable rural villages, including through the allocation of additional small and medium sized sites at sustainable rural settlements. The current strategy places excessive reliance on growth around Cambridge through strategic urban extensions and does not adequately reflect national policy support for sustainable rural development or provide sufficient certainty that the 10% small sites requirement will be met. Amending the policy to enable appropriate growth in villages with good access to services and public transport, such as Swavesey and ensure the Plan is positively prepared and justified.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to attend the hearing sessions in relation to Policy S/DS and the overall development strategy. Participation is necessary to ensure that Woolsington One Ltd can express their fundamental concerns regarding the soundness of the Plan's approach to growth in rural areas and the extent to which the strategy aligns with national policy objectives for supporting sustainable rural communities. The hearing sessions will provide an opportunity to demonstrate to the Inspector how sustainable villages such as Swavesey can accommodate additional growth and contribute towards housing delivery, whilst supporting local services and the creation of balanced communities across Greater Cambridge.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy BG/TC
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As outlined in Section 5.6 of the attached supporting Representations Report, Policy BG/TC is not supported insofar as Part 2 requires replacement planting where the felling of existing trees or hedgerows is proposed as part of development. This requirement unnecessarily duplicates controls already secured through the statutory Biodiversity Net Gain (BNG) requirements. All qualifying developments are currently required to deliver a minimum 10% BNG and where trees or hedgerows are lost, the biodiversity metric requires habitats to be replaced habitats of the same or higher distinctiveness. As a result, there is already a legislative mechanism in place to secure appropriate mitigation and replacement for the loss of trees and hedgerows. The inclusion of a separate replacement planting requirement within Policy BG/TC is inconsistent with Paragraph 16 of the National Planning Policy Framework which seeks to avoid the repetition of policy that already applies to a specific area. The policy should therefore be amended to remove the specific replacement planting requirement and instead rely on the statutory BNG framework to secure the appropriate replacement and enhancement of affected habitats.

Please provide a 100 word summary of your representation.

Woolsington One Ltd is concerned that Part 2 of Policy BG/TC introduces an additional requirement for replacement planting where trees or hedgerows are removed, despite existing legislation already requiring habitat losses to be appropriately compensated. The proposed approach risks duplicating controls that are addressed through separate statutory processes, and the policy should therefore be streamlined to focus on outcomes in order to remain consistent with national policy.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy BG/TC should be modified to remove the requirement in Part 2 for replacement planting where the loss of existing trees or hedgerows is proposed as part of a development. This modification is necessary to avoid the duplication of statutory environmental requirements. Part 2 of the policy should be amended to ensure that development proposals seeks to retain existing trees and hedgerows wherever practicable and incorporate measure to protect and enhance the site's tree canopy cover and green infrastructure network. Where the loss of trees or hedgerows is unavoidable, mitigation and compensation measures should be addressed through the statutory Biodiversity Net Gain process and other relevant legislative requirements. These amendments would maintain appropriate protection for trees and hedgerows whilst ensuring the policy remains aligned with the wider regulatory framework.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to attend the hearing sessions to discuss concerns regarding the justification and effectiveness of Policy BG/TC. The policy is not considered to be supported by sufficient evidence demonstrating why additional replacement planting requirements are necessary where existing statutory mechanisms already provide for the enhancement of habitats affected by development. The policy has direct implications for the delivery and design of Woolsington One Ltd's promoted site at Boxworth End, Swavesey and it is therefore considered that participation at the hearing sessions will enable discussion of the practical implications of the policy and the impact that it may have on the effective delivery of sustainable development.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy BG/UGF
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As outlined in Section 5.5 of the attached supporting Representations Report, Policy BG/UGF is not supported since it requires all major development outside the Cambridge Defined Development Extent to achieve an Urban Greening Factor (UGF) of 0.5 without adequately demonstrating how this requirement relates to the statutory requirement to deliver a minimum 10% Biodiversity Net Gain (BNG). The UGF was developed as a voluntary tool to encourage urban greening and green infrastructure provision, whereas BNG is a statutory requirement focused on measurable biodiversity outcomes. Features that contribute positively to a UGF score do not necessarily maximise biodiversity gains, and vice versa. Requiring developments to satisfy both standards without clear justification may create competing objectives and constrain the delivery of sustainable development.

The policy should therefore be amended to recognise the voluntary nature of the UGF and encourage developments to aspire to achieve the identified UGF targets where feasible and viable, as opposed to imposing a mandatory requirement.

Please provide a 100 word summary of your representation.

The requirement for all major developments outside the Cambridge Defined Development Extent to achieve a mandatory Urban Green Factor (UGF) score of 0.5 is objected to in principle. The UGF was developed as a voluntary tool to encourage urban greening and requiring compliance with both UGF and BNG standards will increase costs and constrain development delivery. The policy should be amended so that developments are encouraged to achieve the identified UGF scores where feasible and viable.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy BG/UGF should be modified to remove the mandatory requirement for all major developments outside the Cambridge Defined Development Extent to achieve an Urban Green Factor (UGF) score of 0.5 and instead encourage development proposals to seek to achieve this target where feasible and viable. This will be necessary to ensure that the policy is justified by recognising the voluntary nature of the UGF as a design tool to avoid potential conflict with the statutory requirement to deliver a minimum 10% BNG. Applicants should demonstrate how opportunities for urban greening have been maximised alongside the delivery of BNG and other environmental objectives and should seek to achieve an UGF score of 0.5 or higher where appropriate. This amendment would provide appropriate flexibility and ensure that development is not unduly constrained.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to attend the hearing sessions to discuss concerns regarding the justification and effectiveness of Policy BG/UGF. The policy is not considered to be supported by sufficient evidence demonstrating why a voluntary tool developed to encourage urban greening should be applied as a mandatory development requirement. It has direct implications for the delivery and design of Woolsington One Ltd's promoted site at Boxworth End and it is therefore considered that participation at the hearing sessions will enable discussion of the practical implications of the policy.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Vision and Strategic Priorities
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As set out in Sections 3.1 and 3.2 of the supporting Representations Report, the Vision for Greater Cambridge is supported insofar as it recognises the importance of responding to climate change. However, the Vision is not considered positively prepared because it focuses predominantly on environmental objectives and does not adequately reflect the central purpose of the Local Plan. Paragraph 15 of the Framework requires Local Plans to provide a positive vision for the future of an area and address the social, economic and environmental priorities. The Vision should therefore be amended to include a clear commitment to delivering sufficient housing and providing the infrastructure and services required to meet the needs of existing and future communities. In particular, the Vision should expressly state that the Plan will provide enough homes to meet Greater Cambridge's identified needs.

The Strategic Priorities are broadly supported however; the wording throughout is ambigous and lacks the precision necessary to provide a clear framework for the Plan. The "Homes" priority should be strengthened to confirm that the Council will meet, and where appropriate exceed the identified housing needs through the delivery of a flexible range of housing sites and a mix of housing types, sizes and tenures. The priority should also explicitly refer to meeting the needs of older people, people with disabilities and other groups with specific housing needs. These amendments would ensure that the Vision and Strategic Priorities are aligned and would provide a clearer and more effective basis for achieving the Plan's housing objectives.

Please provide a 100 word summary of your representation.

The Vision for Greater Cambridge does not adequately reflect the wider purpose of the Local Plan and should provide a more balanced vision that addresses the area's social, economic and environmental priorities as necessary to support sustainable development.

The Strategic Priorities are broadly supported but are currently too vague. The "Homes" priority should be strengthened to commit to meeting identified housing needs through a flexible supply of sites and a range of housing types, sizes and tenures.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

The Vision for Greater Cambridge should be amended to provide a balanced vision for the area that addresses social, economic and environmental priorities in a holistic manner to promote the achievement of sustainable development. The Vision should also explicitly refer to meeting the identified housing needs, delivering affordable and other specialist housing, supporting economic growth, creating sustainable communities and ensuring the timely provision of infrastructure. The Strategic Priorities should also be revised to provide greater clarity and precision to confirm that the Council will plan for at least their identified housing needs and deliver a range of housing types, sizes and tenures to meet the needs of all sections of the community.

The proposed amendments would ensure that the Vision and Strategic Priorities provide a clear and balanced framework for guiding development and meeting the area's social, economic and environmental needs. These modifications are considered necessary to ensure that the plan is positively prepared and consistent with national policy.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning on behalf of Woolsington One Ltd request to attend hearing sessions to discuss the soundness of the Vision and Strategic Priorities of the Greater Cambridge Local Plan. It is considered that the current Vision does not adequately address the delivery of housing and infrastructure, despite these being key elements of a positively prepared Local Plan. Attendance at the hearing sessions is necessary to explain why amendments are required to ensure that the Vision and Strategic Priorities provide a clear and effecting framework for meeting greater Cambridge's housing and development needs. Such matters are central to the consistency of the Plan with national policy and its ability to be found sound at examination.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy CC/WE
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Please see the accompanying representations report.

As outlined in Section 5.3 of the attached supporting Representations Report, Policy CC/WE is not currently supported since it requires developments of less than 100 dwellings to achieve a water efficiency standard of 90 litres per person per day, which goes significantly beyond current and emerging building regulations requirements. While the need to address water scarcity in Greater Cambridge is recognised, the Council has not provided sufficient evidence to justify this requirement or demonstrated that it can be achieved without affecting development viability. The supporting text refers to the use of water efficient fixtures, fittings and water recycling measures, but no robust evidence has been provided to show that these measures alone can consistently achieve the proposed standard. The policy should therefore be amended to align with national requirements or be supported by clear evidence demonstrating that the proposed standard is justified.

Please provide a 100 word summary of your representation.

Policy CC/WE is not supported because it requires developments of fewer than 100 dwellings to achieve a water efficiency standard of 90 litres per person per day; significantly more than the requirements set out in current and emerging national standards. The need to address water scarcity in Greater Cambridge is recognised but the Council has not provided sufficient evidence to justify this requirement or demonstrate that it can be achieved without affecting development viability.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please see enclosed Representations Report

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Policy CC/WE should be amended to align with current and emerging national water efficiency standards unless the Council can provide robust evidence demonstrating that the proposed 90 litres per person per day is achievable and viable. This modification is necessary to ensure that the Plan is robust and justified. The policy should be revised to require compliance with national water efficiency standards as a minimum, while encouraging higher standards where these can be demonstrated to be practical and viable. Alternatively, if the Council wishes to retain the 90 litres per person per day target, it should provide clear technical and viability evidence to justify this requirement and demonstrate that it will not adversely affect the delivery of development.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Claremont Planning, on behalf of Woolsington One Ltd, requests to attend hearing sessions to raise concerns regarding the evidence and justification underpinning Policy CC/WE. Whilst the importance of addressing water scarcity in Greater Cambridge is recognised, the requirement for development to achieve a water efficiency standards of 90 litres per person per day significantly exceeds current and emerging national standards. The Council has not provided sufficient evidence to demonstrate that this requirement is achievable or that it can be delivered without adverse impacts on development viability.

The policy is therefore not considered to be based upon proportionate evidence and is not justified by the supporting technical work, and the approach taken by the Council will need to be scrutinised and informed by developer feedback through the hearings. In the absence of clear evidence demonstrating the deliverability and viability of the proposed standard, Policy CC/WE is not considered to be consistent with national policy and should be amended to align with national requirements or supported by further evidence.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes