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	N/A	Julia Foster
Organisation (where relevant)	Urban&Civic plc	David Lock Associated Limited
Job Title (where relevant)	N/A	Managing Partner
Address, including Post Code	50 New Bond Street London United Kingdom W1S 1BJ	50 North Thirteenth Street Central Milton Keynes Milton Keynes Buckinghamshire United Kingdom MK9 3BP
Telephone	N/A	01908666276
Email address	N/A	JFoster@DavidLock.com

* 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 BG/BG: Biodiversity and Geodiversity
Proposed Submission Policies Map	N/A
Sustainability Appraisal	N/A
Habitats Regulations Assessment	N/A

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

Test	Yes / No
Legally compliant	Yes
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.

These representations are submitted by David Lock Associates on behalf of Urban&Civic (U&C). U&C now own the Barracks and Airfield site at Waterbeach, which forms a major part of the Waterbeach New Town allocation. Prior to the purchase of the site, U&C were development partners to the previous owners, the Defence Infrastructure Organisation.

As master developer, U&C are delivering the redevelopment of the Barracks and Airfield, primarily under Outline Planning Permission S/0559/17/OL (The OPP) (dated 25 September 2019). Outline Planning Permission for redevelopment is also in place on the remaining part of the allocation, in separate ownership.

U&C is proud of the progress made in delivering Waterbeach New Town and remains fully committed to realising its long-term vision.

The emerging Local Plan still has a very important role to play in this endeavour. The new Plan provides a vital driver. While the principle of the development is established and embedded in extant outline planning permissions across the whole site, there remain some significant challenges to accelerating delivery and achieving full build-out.

U&C objects to the requirement for all major development to provide a minimum of 20% biodiversity net gain, unless exempt under the Environment Act 2021. As drafted, the policy is inconsistent with UK Government legislation (which requires a minimum of 10%) and introduces a blanket constraint that may well frustrate necessary development. Particularly in circumstances when standalone applications are brought forward as a component part, or to support wider proposals, this is likely to have unintended consequences. For example, it may impede U&C's ability to secure permissions for enabling infrastructure other than through reserved matters or where the narrow limits of the current exemptions in the Environment Act 2021 cannot be met.

Please provide a 100 word summary of your representation.

Urban&Civic (U&C), master developer of Waterbeach New Town. U&C objects to the proposed requirement for all major development to deliver a minimum 20% Biodiversity Net Gain (BNG), as this exceeds the statutory 10% requirement. The policy could impose unnecessary constraints and create unintended consequences, potentially hindering enabling infrastructure and other standalone applications that are needed to support the comprehensive delivery of the wider development.

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.

N/A

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.

U&C suggests that the policy wording is amended to refer to a ‘target of 20% biodiversity net gain’ rather than a ‘minimum’ and to acknowledge circumstances when exceeding nationally set requirements may not be possible.

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	No

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

N/A

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