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 CC/SD: Sustainable Development
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 the major part of the Waterbeach New Town allocation. Prior to the purchase of the site, U&C were a development partner 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 question whether it is appropriate that <u>all</u> applications will be required to submit a sustainability statement without any consideration of the type of development or the context, such as where large-scale development is delivered in phases, and sustainability is addressed strategically. Many elements listed in the Policy would be intrinsic to detailed proposals, complying with site-wide requirements, or simply irrelevant.

In this circumstance, the policy approach is likely to impose unnecessary burden on the preparation of planning applications and upon planning officers, might impact supporting infrastructure or enabling works and in turn might impact delivery.

U&C have also found that establishing sitewide and key phase level strategies are an effective mechanism for establishing appropriate sustainability targets (including those

related to climate) - subsequent detailed applications are required to demonstrate conformity with such strategies, and U&C is able to steer housebuilders and developers to achieve the targets. Therefore, U&C suggest that the policy is amended to acknowledge that where sitewide or phased sustainability strategies are in place already, a conformity statement may be appropriate rather than a standalone sustainability statement.

The draft Policy also requires Circular Economy reporting. Devising an effective approach at outline stage is very challenging in relation to the economy; it is far more relevant to detailed proposals. The Policy should be expanded to define what is required in relation to different scales and forms of development in this respect, particularly if the expectation is that it will apply to outline proposals and strategic scale development. There is otherwise a risk that information adds little value to the early stages of planning.

Please provide a 100 word summary of your representation.

Urban&Civic (U&C), master developer of Waterbeach New Town, raises concerns regarding the draft Sustainable Development Policy. U&C questions the requirement for all applications to submit a sustainability statement, regardless of development type, scale or context, as this could create unnecessary burdens and potentially delay delivery. U&C considers site-wide and phased sustainability strategies to be a more effective mechanism for strategic developments and recommends allowing conformity statements where such strategies are already in place. Concerns are also raised regarding circular economy reporting, particularly at outline stage, and the need for clearer, proportionate requirements.

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 suggest that the draft Policy is amended so that the flexibility applied to minor applications is extended to major applications where matters are dealt with in phases and, in addition, a conformity statement may be more appropriate than a repeat Sustainability Statement.

The supporting text should be expanded to make clear what is required (would be an appropriate, ‘proportionate’ response) in relation to Circular Economy, at each stage of the planning process.

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