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 I/ID: Infrastructure and Delivery
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 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.

The Greater Cambridge Local Plan succeeds in articulating a positive vision and ambition for a substantial scale of growth. The Development Strategy is heavily dependent upon maintaining delivery across existing, large site commitments and introduces several new allocations of significant scale. The Plan acknowledges the substantial infrastructure challenges that already exist across the Plan area and the degree to which they multiply with additional proposals, over and above that already committed.

U&C is fully invested in sustaining the success of Greater Cambridge and playing its part in this success, by delivering Waterbeach New Town, under the extant outline planning permission. Committed sites, in delivery, are still very much part of the considerations relevant to whole plan viability. Waterbeach, like others, is a phased development reliant upon a monitor and manage approach to infrastructure delivery. This means that the

scope and cost of infrastructure requirements continue to evolve and will compete for investment across the Plan period. A simple assumption that permission assures delivery and the infrastructure commitment is defined and funded is not the case.

U&C has no direct interest in the new, major allocations that are promoted within the Plan. U&C can nevertheless offer significant knowledge and experience in delivering strategic scale development across Cambridgeshire and in other locations. Delivery of strategic sites is materially different and more complex than smaller scale development. This is now recognised in national planning policy through the inclusion of a definition of Strategic Sites in the recently published National Planning Policy Framework (NPPF). The Framework also tailors policy approaches to reflect the need for flexibility in the consenting and delivery of such developments, recognising the significant infrastructure requirements they support and the extended timescales over which they are brought forward. While the new NPPF is not material to this Local Plan, it underlines the relevant and unequivocal point.

Despite good intent, U&C remains concerned that the evidence base supporting the emerging Local Plan has not adequately distinguished or appraised the potential cumulative impact of the Policy demands within the Plan and the infrastructure burden on very large sites. South Cambridgeshire District Council and U&C have extensive experience, over many years, of delivering new communities. It is not easy. The Local Plan, at present, seems to suggest otherwise. Deliverability is invariably secured from pragmatic and careful consideration of viability and priority. It involves flexibility and compromise by all stakeholders. The Plan seems to suggest there is no need for this. It is implicit in virtually all the policies that precede Policy I/ID that all policy expectations and infrastructure requirements can be met. This is misleading; it is not founded upon the evidence as it stands or recent, shared experience of delivering large, complex development proposals across Cambridgeshire.

The Plan demands that every development proposal meets very high expectations across sustainability, design, urban greening, Biodiversity Net Gain (BNG), community infrastructure and a wide range of community and housing needs, including affordable housing and affordable employment space. Cumulatively, the cost burden of these Policies is significant. There is very little comfort that the impact of these demands has been fully tested and translated into robust capacity assumptions for floorspace and homes, or considered in terms of the consequences for character and form. Where expectations go beyond national standards, guidance or current good practice (such as 20% BNG or a 0.5% urban greening factor and tree cover), the implication is potentially significant in terms of developable area, on large sites. This requires detailed sensitively testing, large site by large site, to be confident of deliverability.

Securing effective, integrated transport solutions for Cambridgeshire is a priority for virtually every component of the Development Strategy. The Transport Strategy (which at present is not even in final form) lacks detail and commitment. Firm proposals need to be added to the Local Plan, with scope, costs, funding, timing and actions understood.

The transport position presented in the IDP provides no evidence to demonstrate the transport interventions needed can and will be secured. Identified schemes are not scoped or costed or even directly related to the policy proposals. The NPPF (2024) paragraph 35 is clear, stating that 'Plans should set out the contributions expected from development' and policies that demand contributions 'should not undermine the deliverability of the plan. This is only possible if the full infrastructure costs are understood and the cumulative impact of policy demands is properly accounted for a site level.

CIL presents an opportunity to better address strategic transport needs, but the approach to assigning CIL, forward funding in anticipation of CIL collection and how it combines with Section 106 Contributions and other funding streams, is not clearly explored in the Infrastructure Delivery Plan.

A 'whole plan' approach to viability (and a simple per unit apportionment of anticipated Section 106 costs) is potentially a valid approach across a plan area reliant on many smaller and medium-sized allocations and where any individual proposal is unlikely to be critical to the Development Strategy or greatly dependent upon shared, strategic infrastructure. That is not the case in Greater Cambridge. Large sites and new communities are critical to the Development Strategy.

The viability position presented does not acknowledge the limitations of the Infrastructure Delivery Plan nor the work that is incomplete. Yet it is concluded that the Plan as a whole is deliverable. This seems a very premature conclusion given the absence of essential information and site-by-site appraisal.

Only under Policy I/ID is the scope for site-specific viability acknowledged, and this is without recognition that the infrastructure burden alone will virtually always necessitate negotiation of priorities on large schemes, very often because of the transport mitigation ask. The Policy places the burden of proof entirely upon the developer, when it is entirely appropriate that the developer should be satisfied that major Local Plan Allocations are intrinsically viable and deliverable. If this approach succeeds, the need to balance and prioritise will only be revealed when a planning application is made. This means the developer bears the full brunt of objection, having 'failed' against policy expectation. Communities then have unrealistic expectations and are likely to be disappointed. This does nothing to build confidence, trust and support for the Plan or subsequent allocations or indeed the many benefits of large-scale, rather than piecemeal development.

Please provide a 100 word summary of your representation.

Urban&Civic (U&C), master developer of Waterbeach New Town, raises concerns regarding the Infrastructure and Delivery Policy. U&C considers that the evidence base does not adequately assess the cumulative impact of policy requirements and infrastructure burdens on strategic-scale developments. The Plan places substantial demands on development, including sustainability, biodiversity, design, housing and community infrastructure, without sufficient evidence that these can be achieved alongside major infrastructure obligations. U&C is also concerned about uncertainty surrounding transport infrastructure funding and delivery, the viability evidence underpinning the Plan, and the limited recognition of the flexibility and prioritisation required to deliver large-scale developments successfully.

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.

To address the concern expressed in the representation, U&C are not able to simply offer amendments to the wording of this Policy or the many other policies across the Plan which establish requirements that go to development costs and value and, therefore, viability and deliverability. Providing assurance that the Plan and each major policy proposal within it is deliverable requires completion and augmentation of the evidence base. The appropriate clarification of the priorities and parameters for considering and establishing commitments as opposed to aspirations, to inform the redrafting of this Policy and potentially those that relate directly to it must follow.

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