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	Harry Bunbury	Sophia Nitschke
Organisation (where relevant)	Henry Boot Developments Limited	Twenty5 Planning Limited
Job Title (where relevant)		Senior Planner
Address, including Post Code		50/60 Station Road Cambridge CB1 2JH
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 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	No

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.

Draft Policy BG/UGF would require all major developments to achieve an Urban Greening Factor score of 0.3 for all commercial development.

The Natural England guidance 'Urban Greening Factor for England User Guide Green Infrastructure Framework Standards for England' (January 2023) states:

> *"UGF is a planning tool that focuses on the greening of urban areas, and it is recommended that it is applied through planning policy to areas and districts that are predominantly urban or suburban in character. Where appropriate its use can also be targeted to development sites and locations where the level of urban greening is a significant planning issue or requirement. This may include the redevelopment of brownfield or post-industrial sites in rural locations or the creation of garden communities that would be expected to provide a significant proportion of green infrastructure across the entire development."*

Whilst the principle of urban greening is supported, draft Policy BG/UGF applies a blanket requirement to all major developments regardless of site context. This risks imposing an unnecessary technical constraint, particularly on greenfield sites where substantial landscaping, green infrastructure, biodiversity enhancements and sustainable drainage measures are likely to be delivered as part of development proposals.

The Local Plan has not demonstrated why a fixed UGF score of 0.3 should apply uniformly to all commercial development regardless of site characteristics, operational requirements or the extent of green infrastructure already proposed.

In order to conform more closely with national policy and Natural England guidance, Policy BG/UGF should be amended so that it is targeted to development sites and locations where the level of urban greening is a significant planning issue, such as the redevelopment of brownfield sites and sites within the Green Belt. HBD confirms that the Site would deliver green infrastructure across the development offering both opportunities for biodiversity and successful placemaking.

Please provide a 100 word summary of your representation.

HBD supports the principle of urban greening but objects to Policy BG/UGF's blanket requirement for all major commercial development to achieve an Urban Greening Factor (UGF) score of 0.3. The policy is inconsistent with Natural England guidance, which recommends targeting UGF to locations where urban greening is a significant planning issue rather than applying it universally. The Local Plan has not demonstrated why a fixed score is justified across all development types and site contexts. The requirement may create unnecessary constraints on greenfield sites that already provide substantial landscaping, green infrastructure, biodiversity enhancements and SuDS. The policy should therefore be targeted and proportionate.

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 refer to the full representations submitted in support of this response.

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.

Amend Policy BG/UGF so that the Urban Greening Factor requirement applies only to site types and locations where urban greening is a significant planning issue, such as brownfield regeneration sites and other highly urbanised areas, rather than imposing a blanket 0.3 score requirement on all major commercial developments. This would better align the policy with Natural England guidance and allow site-specific green infrastructure provision to be considered on its merits.

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.

Participation at the Examination Hearing is necessary as the Local Plan is overall not considered to be legally compliant or sound. Attendance at the hearing sessions will provide an opportunity to explain these concerns in greater detail, respond to matters raised by the Inspector and other parties, and discuss the modifications required to make the Plan sound.

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