**Greater Cambridgeshire Council**
By email
to localplan@greatercambridgeplanning.org

**Date:** 25/09/2026

Dear Sir/Madam

**Greater Cambridge Local Plan – Regulation 19 Consultation**

Thank you for consulting Central Bedfordshire Council (CBC) on the Greater Cambridge Regulation 19 plan. We have provided comments below which we hope you will find helpful in finalising the Local Plan.

**Development Strategy Comments**

We generally support the vision and the seven strategic priorities for the plan, with the ultimate aim of a big increase in the quality of everyday life for all your communities. We particularly welcome the aims to meet your housing and economic needs alongside decreasing climate and environmental impacts by minimising carbon emissions and the reliance on the private car, creating thriving neighbourhoods, delivering infrastructure and green spaces; and safeguarding local heritage and landscapes.

**Housing**

We note that proposed Policy S/JH: New Jobs and Homes sets out the requirement for 48,069 new homes to meet the needs for the total population, reflecting the annual requirement for 2,289 dwellings. The policy continues to then specifically identify the number of pitches and plots required to accommodation needs of Gypsies, Travellers and Travelling Showpeople over the period 2024-2045, as well as the specialist accommodation needs for older people and people with disabilities and the number of units to meet the accommodation needs of students over the same period but does not explicitly state how many new market and affordable homes are to be delivered within the plan period. It is unclear why the breakdown includes some, but not all forms of accommodation that is to be provided, which makes it difficult to draw any comparison through the policy, of the relationship between the number of new homes and the number of new jobs to be provided across Greater Cambridge within the plan period.

**Employment**

The Submission Local Plan identifies the need for 73,300 jobs anticipated over the plan period, of which around 35,000 are identified to be office, R&D and industrial jobs.

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The EHEU converted these jobs into employment floorspace needs of almost 1,220,000sqm. The rest of the jobs forecast are in services and support uses such as shops, schools and healthcare.

The draft plan proposes to meet the jobs need through the delivery of:

- 302,600 sqm offices and 600,000 sqm of Research and Development (R&D) space; and
- 317,000 sqm of industrial / warehousing (Use Classes B2/B8).

The EHEU also recommends that to ensure a flexible employment land supply for office, R&D and industrial jobs, and encouraging growth in existing businesses and attracting inward investment, that a greater amount of employment floorspace is planned for than that associated with identified need, taking into account the needs of different employment sectors.

We note that the requirement for 1,220,000sqm of employment land does not correspond with the proposed employment land identified through the mixed use allocations, which equate to approximately 1,860,000 sq metres. We also note that Policy S/DS: Development Strategy omits in part 2.b.iii to include the amount of employment floorspace at Eddington, which the subsequent allocation policy sets out as 100,000sqm. Clarification is sought that this apparent over-provision of 640,000 sqm, is to accommodate the flexible employment land supply as mentioned above.

The above proposals have not deviated from those published and consulted upon in December 2025 and CBC would therefore reiterate our previous comments that whilst we recognise the desire for the Greater Cambridge area to capitalise on its strong growth sectors, and welcomes economic growth of neighbouring authority areas, particularly where there are opportunities for complementary economic growth within our own administrative area, we would have concerns about a level of growth that could detrimentally impact upon the ability of neighbouring authorities, such as Central Bedfordshire, to meet and deliver their own economic ambitions and growth aspirations.

The Draft Plan helpfully sets out clearly how much and where new housing growth will be delivered across the Greater Cambridge area in Table 2, but as mentioned in our Regulation 18 response, there does not appear to be the equivalent level of detail for where employment needs will be met

**Monitoring**

Central Bedfordshire Council suggests that the wording of criterion 1(g) of policy *S/MO Monitoring* is strengthened to ensure a clear commitment to ongoing cross-boundary engagement. The current wording states that Greater Cambridge will "consider undertaking cooperation with other local authorities, including through duty to cooperate". Given the importance of strategic planning matters that extend beyond administrative boundaries, and the requirement within the NPPF for effective engagement, the policy would benefit from requiring, rather than merely considering, cooperation with neighbouring authorities. This amendment would provide greater

certainty regarding the Council's commitment to collaborative working on strategic planning issues.

It is suggested that criterion 1(g) is amended to state that Greater Cambridge will "undertake cooperation with other local authorities" rather than "consider undertaking cooperation"

**Transport**

As documented in our response to the Regulation 18 plan, our main comments relate to the potential cross boundary impact cumulatively of the retained polices for Cambourne (S/CB) and Bourne Airfield (S/BN), alongside the new allocation at Cambourne North detailed under policy (S/CBN).

Whilst we support in principle the approach to allocated growth being heavily informed and supported by the location of existing and committed public transport schemes, the vision led approach to transport planning and associated approach to mitigation, we expect there to be impact from these sites from longer distance, car based trips, with particular concern being the volume and distribution of these trips towards cross boundary routes such as the A428 (for the A1) and more rural routes towards Potton and Sandy.

*Policy S/CBN Camborne North*

Whilst it is recognised that only 2,550 of the 13,000 new homes proposed at Cambourne North will come forward within the plan period, it is essential that the existing and future growth, and the implications on the wider area, are taken into consideration, with any required mitigation identified and planned for from the outset.

We have previously raised concern about the expected traffic flows on routes towards the CBC boundary in the context of our own committed growth and known capacity constraints on the A1 at Biggleswade and Sandy, and have requested additional information on traffic flows to allow us to take a more informed position on the likely impact of this large allocation within Central Bedfordshire.

Whilst appreciating this has no formal status in modelling terms for inclusion in a core scenario, we expressed the above concern and request for more information, also in the context of emerging proposals for Tempsford New Town, which will create further demands on the highway network in the area.

The submitted SoCGs identify CBC's request at Regulation 18 stage:

*'Central Bedfordshire Council, similarly,* ***sought a greater understanding of work undertaken to date to identify impacts of the proposed Cambourne North allocation on the local and strategic road network outside of the Greater Cambridge area****, and the mitigation identified to combat these impacts. Their representations noted that however, it is considered there an inevitable impact of the proposed allocation on the A1 corridor and local road network within Central Bedfordshire, which does not appear to be reflected within the impact assessment or Infrastructure Delivery Plan (IDP).'*

Having reviewed the documentation submitted in support of this allocation (namely the Cambourne North Addendum Transport Strategy Report) there is no clear representation of the expected flows on our sensitive routes within Central Bedfordshire, that has been expanded upon for us to review and comment on.

We note that the report states that *Increased traffic flows and delays are primarily concentrated on the internal development network and key nearby junctions, with limited additional impact on the surrounding local highway network*. It would be helpful if evidence of this 'limited additional impact' was provided to inform our position.

Whilst there is clear refinement to the modelling to identify impacts and mitigation in proximity to the site, the information presented to date, in our view does not yet satisfy the commitment made in the SoCG:

*'11.16 There is agreement between the Councils, Bedford Borough Council, Central Bedfordshire and Huntingdonshire District Council of the potential for substantive cross-boundary transport impacts as a result of Cambourne North. To manage this and address this potential impacts, neighbouring authorities (Huntingdonshire, Central Bedfordshire and Bedford Borough), Cambridgeshire County Council and National Highways have been invited to take part in ongoing workshops / meetings with the Councils' consultants around the transport modelling and strategy work, prepared by the Councils to support the allocation and demonstrate that transport impacts can be mitigated. Input has been sought on both the approach and the outputs produced at various stages. Refinement of this work will take place ahead of the submission of the Local Plan, involving the aforementioned parties, to ensure this (wherever possible, based on the information available) reflects anticipated impacts at the strategic scale and how these could be mitigated.'*

The IDP does not make any reference to the potential for cross boundary mitigation to be considered as plans emerge, and the policy wording of S/CBN as proposed does not offer a commitment to delivering further, cross boundary infrastructure if identified, for example if the trip budget is breached, which could make this more difficult to secure at planning application stage.

A logical place to involve neighbouring authorities would be to include them on the list of consultees under section 39 of the policy, to aid collaboration on the strategic and local transport mitigation plan. CBC would suggest the additional wording to part 39 of Policy S/CBN Camborne North:

39. To support delivery of the agreed masterplan, a strategic and local transport mitigation plan, supported by other studies as necessary, must be prepared by the developer in collaboration with local transport partners, East West Rail Company, ~~and~~ National Highways and neighbouring Local Authorities, for agreement with the Local Highways Authority and Local Planning Authority.

We welcome the ongoing involvement in the development of the scheme via the established Transport Officers Group and look forward to the continuation of this.

**Homes: Affordable Housing**

We have provided some high-level comments below in relation to the Housing policies proposed within the Greater Cambridge Local Plan which we hope will be useful.

Policy H/AH: Affordable Housing

Whilst the policy *H/AH: Affordable Housing* clearly sets out affordable housing requirements, it could benefit from stronger links to Policy H/HM: Housing Mix, which contains more detailed requirements relating to dwelling size, tenure and housing mix. Without a direct reference, users of the plan may not immediately recognise the relationship between the affordable housing requirements and the associated housing mix provisions.

Central Bedfordshire Council notes that the recently published National Planning Policy Framework has removed references to First Homes and First Homes Exception Sites. As a result, references to First Homes Exception Sites within policy *H/ES: Exception Sites for Affordable Housing* are no longer necessary and could be removed.

The policy could also benefit from greater clarity regarding the proportion of market housing that may be permitted on rural exception sites. Whilst it is recognised that a limited amount of market housing may be necessary to support viability, the policy could specify an upper threshold in order to maintain the primary purpose of rural exception sites as predominantly affordable housing developments.

Policy H/SS: Residential Space Standards and Accessible Home

This policy could benefit from extending accessibility requirements to relevant conversion schemes. Whilst it is acknowledged that some conversions may present physical constraints that limit the delivery of M4(2) or M4(3) standards, there may be instances where such standards can reasonably be achieved. Including conversions within the scope of the policy would maximise opportunities to deliver accessible accommodation and support wider housing objectives.

Policy H/CB: Self and Custom Build Homes

CBC welcomes the proposed approach set out within the policy, that at the end of the 12 month marketing period there is flexibility to continue marketing for a further period or transfer such homes to a Registered Provider, to ensure homes are delivered and remain occupied.

**Landscape Considerations**

We have provided some high-level comments below in relation to landscape across several policies proposed within the Greater Cambridge Local Plan which we hope will be useful.

To ensure consistency and robustness across the Local Plan, consideration should be given to incorporating landscape mitigation requirements within Policies J/NE, J/RE, J/VA, H/DC and H/GT where development may affect the Green Belt or wider countryside. In particular, policies should require landscaping measures that mitigate adverse landscape and visual effects whilst reflecting and respecting local landscape character. This would help ensure that development proposals contribute positively to the landscape and maintain the distinctive qualities of the surrounding environment.

Policy S/AMC/GT: Optimisation of Gypsy and Traveller Sites

Central Bedfordshire Council considers that criterion (d) of policy S*/AMC/GT: Optimisation of Gypsy and Traveller Sites* could benefit from stronger emphasis on landscape mitigation and local character. Whilst the current wording refers to improving the appearance and quality of the environment and minimising visual intrusion, it does not explicitly require landscaping to respond positively to local landscape character.

To provide greater clarity regarding expectations for site design and integration within the surrounding environment, it is suggested that the policy is amended to require landscaping that mitigates adverse landscape and visual effects whilst reflecting and respecting local landscape character.

Policy CC/RE: Renewable Energy Projects and Infrastructure

We note that the policy refers to tranquillity within criterion 1(a), however, the Greater Cambridge Landscape Sensitivity Assessment appears to focus on landscape sensitivity rather than tranquillity and views. It would be helpful to clarify whether additional evidence exists which assesses tranquillity and sensitive views, particularly where these may have implications beyond the Greater Cambridge boundary and into Central Bedfordshire.

In addition, criterion 2 of policy CC/RE would benefit from closer alignment with the recognised mitigation hierarchy. CBC suggest that the policy wording is amended to provide a clearer framework for managing environmental impacts associated with renewable energy development.

2. Proposals must seek to prevent, avoid or reduce adverse impacts during construction and operation, wherever possible before considering offsetting or compensation measures.

Policy BG/BG: Biodiversity and geodiversity

The Greensand Ridge is a distinctive “island” of significantly wooded sands and sandstone that rises prominently above the surrounding clay vales. With a toehold in both Buckinghamshire and Cambridgeshire, and stretching over 45 km, the vast majority of the 273 km2 of this attractive landscape is in Bedfordshire. The north eastern extent runs within the area of the Draft Greater Cambridge Local Plan but has not been included within the extent of the area to be considered, protected and enhanced. It is essential that policies ensure that development within the area does not have adverse effects which would have indirect landscape and visual effects within Central Bedfordshire.

Paragraph 5.3 refers to the Cambridgeshire and Peterborough Local Nature Recovery Strategy. Whilst support for this strategy is welcomed, consideration should also be given to neighbouring Local Nature Recovery Strategies where development proposals are located close to administrative boundaries. Cross-boundary ecological networks and habitats do not necessarily align with local authority boundaries.

Central Bedfordshire Council suggests that criterion 7 of policy BG/BG: Biodiversity and Geodiversity would benefit from recognising both direct and indirect impacts on biodiversity. This would ensure that all potential effects arising from development are appropriately considered and assessed.

Criterion 9 should also acknowledge sites located both within and outside the Greater Cambridge area where those sites satisfy published selection criteria. This would provide a more comprehensive and consistent approach to biodiversity protection.

In addition, criteria 9(c) and 9(d) could be strengthened by explicitly requiring developments to reflect existing landscape and river corridor characteristics, as well as protecting and enhancing important views to and from rivers.

Criterion 10 would benefit from recognising irreplaceable habitats located within adjoining local authority areas. Development proposals can have ecological effects beyond administrative boundaries, and policy wording should reflect the need to protect and enhance irreplaceable habitats both within Greater Cambridge and neighbouring authorities.

Policy *WS/HS Pollution Health and Safety*

To better reflect the potential for environmental impacts to extend beyond local authority boundaries, criterion (d) of the policy should be amended to acknowledge adjoining authorities. The policy could also helpfully recognise that wildlife, nature conservation interests and landscape character may be affected both within Greater Cambridge and in neighbouring areas. Incorporating this wider geographical perspective would support a more comprehensive assessment of development impacts.

Policy GP/PP: People and Place Responsive Design

The supporting principles under paragraph 7.6 would benefit from the addition of the word "reflect" to strengthen the relationship between development and local landscape character. Accordingly, it is suggested that the relevant principle is amended to read: "Protect, reflect and enhance landscape character." This would place greater emphasis on ensuring new development responds positively to the distinctive qualities of the existing landscape.

Central Bedfordshire Council suggests that criterion 1(d) within the policy is expanded to acknowledge potential impacts upon adjoining Local Authority character areas. Development proposals near administrative boundaries can influence landscape and settlement character beyond Greater Cambridge. The policy would therefore benefit from explicitly recognising the need to avoid undue adverse effects on adjoining authorities' character areas while enhancing the character of Greater Cambridge.

Policy GP/LC: Protection, Conservation and Enhancement of Landscape Character

Central Bedfordshire Council suggests that criterion 1(a) of the policy is amended to ensure that development proposals also consider indirect adverse effects upon landscape character outside the Greater Cambridge area, as landscape character areas frequently extend beyond administrative boundaries, and development can influence the character and perception of neighbouring landscapes.

Criterion (c) would also benefit from the inclusion of the word "protect" to reinforce the importance of safeguarding landscape features before seeking to respect, conserve and enhance them.

Consideration should also be given to protecting and enhancing tranquillity both within Greater Cambridge and in adjoining local authority areas, with the supporting text strengthened by referring to how tranquillity should be assessed using existing tools such as Landscape and Visual Appraisals, Health Impact Assessments and ecological surveys.

Paragraph 7.53 would also benefit from greater emphasis being included on cross-boundary landscape considerations. Major developments, in particular, should be encouraged to consider landscape character within neighbouring authorities where relevant. The supporting text could also explicitly require Landscape and Visual Appraisals to accompany major planning applications to help ensure that landscape considerations are embedded at an early stage of the design process and that impacts on adjoining landscapes are appropriately assessed.

We hope you find the above comments on the Regulation 19 Local Plan for the Greater Cambridge area helpful.

Yours sincerely



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