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Thursday 16 February 2023

To: Chairman – Councillor Dr. Tumi Hawkins  
Vice-Chairman – Councillor Katie Thornburrow  
All Members of the Joint Local Planning Advisory Group - Councillors  
Tim Bick, Peter Sandford, Shailer, Smith and Dr. Richard Williams

Dear Sir / Madam

You are invited to attend the next meeting of **JOINT LOCAL PLANNING ADVISORY GROUP**, which will be held in **VIRTUAL MEETING - ONLINE** at South Cambridgeshire Hall on **MONDAY, 27 FEBRUARY 2023 at 5.30 p.m.**

Yours faithfully  
**Liz Watts**  
Chief Executive

**Requests for a large print agenda must be received at least 48 hours before the meeting.**

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AGENDA		PAGES
1.	<b>Apologies for Absence</b> To receive Apologies for absence from Members of the Group	
2.	<b>Declarations of Interest</b>	
3.	<b>Minutes of the Previous Meeting</b> To authorise the Chair to sign the Minutes of the meeting held on 24 October 2022 as a correct record	3 - 4
4.	<b>Biodiversity and Green Spaces and Great Places</b>	5 - 214
5.	<b>Date of Next Meeting</b>	

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# Agenda Item 3

## **SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL**

Minutes of a meeting of the Joint Local Planning Advisory Group held on  
Monday, 24 October 2022 at 5.30 p.m.

**PRESENT:** Councillor Dr. Tumi Hawkins – Chair  
Councillor Katie Thornburrow – Vice-Chair

**Councillors:** Tim Bick Neil Shailer  
Simon Smith Peter Sandford

Officers in attendance for all or part of the meeting:

Laurence Damary-Homan (Democratic Services Officer), Ciaran Davis (Policy Planner), Jonathan Dixon (Planning Policy Manager), Caroline Hunt (Strategy and Economy Manager) and Jenny Nuttycombe (Principal Planning Policy Officer)

Councillors Jenny Gawthorpe Wood, Geoff Harvey, Pippa Heylings and Martin Smart were in attendance.

### **1. APOLOGIES FOR ABSENCE**

Councillor Dr Aidan Van de Weyer sent apologies for absence and was substituted by Councillor Peter Sandford.

### **2. DECLARATIONS OF INTEREST**

There were no Declarations of Interest.

### **3. MINUTES OF PREVIOUS MEETING**

With respect to Minute 4 of the meeting held on 08 September 2021, an amendment was made on page 3 where a bullet point for “Biodiversity and green spaces” was added to the list of new areas of policy highlighted in the presentation. With this amendment, the Group, by affirmation, authorised the Chair to sign the Minutes of the meeting held on 08 September 2021 as a correct record.

By affirmation, the Group authorised the Chair to sign the Minutes of the meetings held on 30 November 2021 and 08 October 2022 as a correct record.

### **4. STRATEGY AND SITES**

The Strategy and Economy Manager introduced the report and the Principal Planning Policy Officer presented the Strategy section of the report. Members discussed a number of topics.

Water resources and environmental impacts were discussed. Members raised queries about the levels and types of protection afforded to areas of environmental significance, such as chalk streams, and how acceptable levels of environmental harm was defined. Further discussion was held on water resources and the infrastructure requirements, as well as the necessity for comprehensive contingency plans, particularly around reservoirs, to be put into place. Concerns over the impact of climate change and existing levels of water extraction were raised. Officers offered insight into the necessity to evaluate water issues once Water Management Plans had been published by the relevant water companies and feedback had been given by other bodies, such as the Environment

Agency. Members were assured that they would be consulted on water strategies once the relevant information was available and assessments had been made.

Housing delivery was also discussed. To mitigate concerns over overdependence on strategic sites, it was requested that an overview of existing allocations and consents for new housing be brought forward alongside an analysis of projected trajectory of housing delivery- officers stated that this could be brought to a future meeting. The lag between the completion of housing developments and the linked supporting infrastructure was raised as a serious point of concern and the Group felt that it was imperative to coordinate the completion of infrastructure projects alongside housing development for the sake of good place building. The concerns of residents in existing communities being left behind by growth was raised and Members felt it was important that messaging around the Local Plan detail the benefits of growth as well as addressing concerns. Officers offered response to points raised and the Group noted that, with the session covering a broad overview, many issues would be addressed under more specific headings in future meetings.

The Strategy and Economy Manager presented an overview of the Sites section of the report and the Cambridge urban area sub section. The edge of Cambridge sub section was presented by the Policy Planner, new settlements was presented by the Planning Policy Manager and the Principal Planning Policy Officer presented the rural southern cluster sub section. Members raised a number of points.

The importance of good place making was stressed by the Group and it was suggested that urban design guidance and frameworks needed to be robust to provide a blueprint for developers, allowing for a reduction in the amount of required responses to developers regarding their urban design. Members noted the desires of residents to see improvements to protected open spaces implemented as part of the development process.

Affordable homes, infrastructure and links to the University in Eddington were discussed; Members stated that affordable homes for all would be desirable and noted that changes to the policy for the area from that in the Area Action Plan were likely to be forthcoming- officers informed the Group that they were awaiting updates from the University on their housing need.

Comments on village boundaries, as defined by Village Development Frameworks, and the desire for greater flexibility from some were noted by the Group. Members acknowledged the challenge of striking the balance between allowing development and also protecting existing communities. Officers highlighted the ongoing work on the housing delivery study and informed the Group that the comments from the consultations were being utilised in this process.

Members raised the need for effective transport links in rural areas and discussion over the impact and challenges of the East-West Rail development was held- the Group was informed that the East-West Rail project was still in the early stages.

## **5. DATE OF NEXT MEETING**

The Group was informed that the next meeting was to be held on Monday 21 November 2022.

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**The Meeting ended at 7.40 p.m.**

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# Agenda Item 4

<b>Report to:</b>	Joint Local Planning Advisory Group 27 February 2023
<b>Lead Members</b>	Lead Cabinet Member for Planning (South Cambridgeshire) – Cllr Dr Tumi Hawkins  Executive Councillor, Planning and Transport (Cambridge) – Cllr Katie Thornburrow
<b>Lead Officer:</b>	Joint Director of Planning and Economic Development

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## **Joint Local Planning Advisory Group Programme to Draft Local Plan – Fourth Session: Biodiversity and Green Spaces and Great Places**

### **Executive Summary**

1. Further member engagement is taking place to explore issues raised in the First Proposals feedback and help to inform development of the draft plan. This fourth session will be used to discuss feedback received on the Biodiversity and Green Spaces and Great Places chapters of the plan.

### **Key Decision**

2. No

### **Recommendations**

3. It is recommended that the advisory group:
  - a. offers views regarding issues raised in representations to the First Proposals in relation to Biodiversity and Green Spaces and Great Places chapters.

### **Reasons for Recommendations**

4. The Joint Local Planning Advisory Group provides an appropriate forum for consideration of issues raised in representations and can help steer development of the local plan.

## Details

### Background

5. South Cambridgeshire District Council and Cambridge City Council are working together to produce a joint local plan for the Greater Cambridge area. Plan making so far has involved significant stakeholder engagement and two main stages of public consultation.
6. The Greater Cambridge Local Plan First Proposals consultation was held between 1 November and 13 December 2021. In June and July 2022 members of both Councils received reports on feedback received and the full consultation results were published. A [report on the consultation](#) and all the results are available on the Councils' local plan website. In summary:
  - Approximately 4,100 comments were made on the First Proposals, by 625 different respondents (this includes comments received online or input having been received by other means e.g. email)
  - The quick survey received 5,551 answers or comments from 598 unique respondents
  - 41 new sites were received
  - 172 sites had new information submitted which in some cases included revisions to site boundaries.
7. Comments registered on the Councils' online consultation system can be viewed on our First Proposals website: [Greater Cambridge Local Plan - First Proposals](#). Responses to the quick questionnaire have been collated into a spreadsheet. This is available on our local plan webpage: [Greater Cambridge Local Plan](#) ([greatercambridgeplanning.org](http://greatercambridgeplanning.org)). Site information can be found on the Call For sites pages on our local plan webpage: [Greater Cambridge Local Plan](#) ([greatercambridgeplanning.org](http://greatercambridgeplanning.org)).
8. Following consideration of development strategy updates by [South Cambridgeshire's Cabinet](#) and [Cambridge's Planning and Transport Scrutiny committee](#) in January and February 2023, the next key member decisions in relation to the local plan, to be made by South Cambridgeshire District Council's Cabinet and the Cambridge City Council Executive Councillor for Planning Policy and Infrastructure following a Cambridge Planning and Transport Scrutiny Committee, will be a report in summer 2023 to consider the Draft Local Plan and approve for public consultation.

### Approach to JLPAG Meetings

9. Leading up to the next member decisions on the Local Plan further member engagement will now take place to explore issues raised in the First Proposals feedback and help to inform development of the draft plan. This will be via the Joint Local Plan Advisory Group (JLPAG), which was set up with the purpose of enabling such discussion.

10. A series of meetings of JLPAG is now taking place on an approximately monthly basis. Three sessions took place in 2022, and two sessions have been planned for 2023. Further information on the approach to these meetings was reported to and considered at the first session on 3 October 2022.
11. The first session considered the topics of vision and aims, and climate change. The second session considered the spatial strategy and sites. The third session considered the topics of wellbeing and social inclusion. All sessions were livestreamed and the recordings are available to view here: [Browse meetings - Joint Local Planning Advisory Group \(moderngov.co.uk\)](https://www.moderngov.co.uk/jlpag/meetings)

#### **Session 4: Biodiversity and Green Spaces and Great Places**

12. This session will consider the comments received relating to the Biodiversity and Green Spaces and Great Places chapters of the Local Plan. Summaries of the issues raised in representations are included as appendices to this report, with the full submissions available to view on the Councils' Local Plan website. The links in the section below show the relevant sections in the interactive version of the First Proposals.
13. At this session officers will provide a presentation setting out what the First Proposals suggested as the preferred policies, key feedback that was received, and the next steps officers are taking to explore the issues, moving towards development of the draft plan.
14. The Biodiversity and Green Spaces chapter of the Local Plan aims to ensure that developments support on and off-site enhancements for biodiversity, and to protect and link-up green spaces for nature, as well as provide more green spaces that are accessible to citizens.
15. The Great Places chapter of the Local Plan outlines how new development should deliver high quality design and make great places that people enjoy by enhancing local landscapes and raising climate ambition, whilst sensitively responding to the historic and built environment. Both policy groups attracted a significant number of comments from respondents. Below, the two policy areas are sub-divided to summarise what was proposed in the First Proposals consultation and hyperlinks are attached.

#### **Biodiversity and Green Spaces**

16. [Policy BG/BG: Biodiversity and geodiversity](#) – This policy will control the biodiversity impacts from development, including the approach to biodiversity net gain. It will also control development affecting sites of biodiversity and geodiversity importance. The policy will require development to achieve a minimum 20% biodiversity net gain.
17. [Policy BG/GI: Green Infrastructure](#) – This policy identifies the existing green infrastructure network and the strategic initiatives intended to enhance it and

addresses how development proposals should relate to green infrastructure. The policy will require all development proposals – appropriate to its type, scale, and location

18. [Policy BG/TC: Improving Tree Canopy Cover and the Tree Population](#) – This policy will preserve and protect Greater Cambridge's tree canopy cover, the tree population, and hedgerows amongst other things.
19. [Policy BG/RC: River Corridors](#) – This policy will control development that has an impact on river corridors of the River Cam. The policy will require development located along the River Cam and its tributaries to protect, enhance and restore natural features.
20. [Policy BG/PO: Protecting open spaces](#) – The policy will identify and protect open spaces, including village greens, parks, sports and recreation areas, allotments, community orchards and Protected Village Areas, and Local Green Space.
21. [Policy BG/EO: Providing and enhancing open spaces](#) – This policy will set out how new development should provide new and enhanced open space to meet the needs it generates. Open space and recreation provision will be required to be provided by new development, appropriate to the scale and location of the development. Provision will be onsite where appropriate, if not, financial contributions will be sought to help improve off site facilities.

## **Great Places**

22. [Policy GP/PP: People and place responsive design](#) – This policy will set a strategic vision for achieving high quality design in Greater Cambridge for both urban and rural areas. The policy will require all development proposals to demonstrate how they will sustain and enhance the unique qualities of the area and positively respond to the subtleties in the different landscape and settlement forms.
23. [Policy GP/LC: Protection and enhancement of landscape character](#) – This policy will set out how development should address landscape character and features in Greater Cambridge.
24. [Policy GP/GB: Protection and enhancement of the Cambridge Green Belt](#) – This policy will set the framework for consideration of development proposals in the Green Belt and if it supports the established local purposes of the Cambridge Green Belt. Enhancement of the Green Belt, such as for recreation and biodiversity, will also be supported.
25. [Policy GP/QD: Achieving high quality development](#) – This policy will set out the requirements for high design quality to be achieved by new developments, and alterations and extensions to existing development. It sets requirements for development proposals to demonstrate how they are designed with communities



in mind, create local connections, are climate-positive, and contribute and respond to local character.

26. [Policy GP/QP: Establishing high quality landscape and public realm](#) – The policy will set out the requirements for the quality of design of landscape and public realm proposals. Developers will be required to demonstrate how their proposals enable inclusive design of routes, enhance connectivity, respond to climate-change pressures, and integrate with local character.
27. [Policy GP/HA: Conservation and enhancement of heritage assets](#) – This policy will control development that involves or affects Greater Cambridge's historic buildings or structures, its historic places and historic shopfronts.
28. [Policy GP/CC: Adapting heritage assets to climate change](#) – This policy will set out how the environmental performance of heritage assets should be balanced against the need to protect and enhance the character and value of that asset.
29. [Policy GP/DND: Designated and Non-Designated Heritage Assets](#) – In their representations to last round of consultation, Historic England recommended that this policy be included. This policy will control development that involves or affects designated and non-designated heritage assets across Greater Cambridge.

### **Policies which were in Great Places that have been moved**

30. [Policy GP/PH: Protection of public houses](#) – This has been moved to the Wellbeing and Social Inclusion chapter and was discussed at JPLAG session 3.

### **Policies which have been added to Great Places**

31. [Policy H/HD: Housing density](#) – This has been moved from the Homes Chapter into Great Places and was discussed previously at JLPAG session 3.

### **Options**

32. There are no decisions being sought by this report, although Members views are invited.

## **Implications**

33. In the writing of this report, taking into account financial, legal, staffing, risk, equality and diversity, climate change, and any other key issues, the following implications have been considered:-

### **Financial**

34. There are no direct financial implications.

### **Equality and Diversity**

35. There is no decision to be made as part of this report. The development plans will each be subject to Equalities Impact Assessment at each stage during their development.

### **Climate Change**

36. There is no decision to be made as part of this report. Notwithstanding, development plans provide an opportunity to address the aspects of the environment that can be influenced by the planning system. These aspects will be considered by a range of evidence including via a Sustainability Appraisal as the plans are prepared. One of the big themes for the Greater Cambridge Local Plan identified in The First Proposals is climate change. Evidence has been produced to inform the plan, including a study on how the plan can assist with the journey towards net zero carbon.
37. This session also has a particular focus upon how biodiversity can be protected and enhanced.

### **Health & Wellbeing**

38. There is no decision to be made as part of this report. Notwithstanding, the vision and policies of the emerging Local Plan seek to improve wellbeing and support social inclusion.

### **Consultation responses**

39. One of the main purposes of this series of meetings is to further explore the significant amount of consultation feedback received to the Greater Cambridge Local Plan First Proposals.

## **Background Papers**

Background papers used in the preparation of this report:

[Terms of Reference of the Joint Local Planning Advisory Group](#)

[Greater Cambridge Local Plan – First Proposals consultation 2021](#)

[GCLP First Proposals Consultation Report 2022](#)

[Current Greater Cambridge Local Development Scheme](#)

[Agenda for Joint Local Planning Advisory Group \(session 1\) on Monday 3 October 2022 \(modern.gov.co.uk\).](#)

[Agenda for Joint Local Planning Advisory Group \(session 2\) on Monday 24 October 2022 \(modern.gov.co.uk\)](#)

[Agenda for Joint Local Planning Advisory Group \(session 3\) on Monday 21 November 2022 \(modern.gov.co.uk\)](#)

Development strategy updates considered by [South Cambridgeshire's Cabinet](#) and [Cambridge's Planning and Transport Scrutiny committee](#) in January and February 2023.

## **Appendices**

Appendix A: Summaries of Representations and Responses – Biodiversity and Green Spaces Chapter

Appendix B: Summaries of Representations and Responses – Great Places Chapter

## **Report Author:**

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## Appendix A: Summaries of Representations and Responses – Biodiversity and green spaces Chapter

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BG/GI: Green infrastructure .....	31
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BG/PO: Protecting open spaces .....	75
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Site related POS comments .....	91

## Biodiversity and green spaces

### Hyperlink for all comments

Open this hyperlink - [Biodiversity and green spaces](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

**Number of Representations for this section: 68**

### Notes

Whilst the webpage linked above effectively included only general comments on the Biodiversity and Green Spaces theme, some comments attached to this webpage relate to specific biodiversity and green spaces policies. These comments have been moved to the specific policy. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number\* (Name of respondent).

### Abbreviations

- PC= Parish Council      DC= District Council      TC= Town Council

### Executive Summary

The majority of comments provide broad support for the objectives and priorities for improved biodiversity was expressed within the representations from a range of individuals, organisations and developers, with comments that policies must be as strong as can be to protect and enhance existing green spaces and networks. Comments included that the area has good green spaces which add to the rural character, are a huge asset and should be protected from development, but that there is pressure on green spaces, often conflict between recreational use of green spaces and biodiversity, and that sufficient land should be provided for both. It was suggested the Objectives should include the 'Doubling Nature' ambition. A small number of comments raised concern about the

environmental capacity of the area, suggesting that the aims of this theme would be challenging to deliver, and suggesting that the development strategy did not accord with those aims.

**Table of Representations: Biodiversity and green spaces**

Summary of issues raised in comments	Comments highlighting this issue
Support the objectives and priorities for improved biodiversity.	<p><b>Individuals</b></p> <p>56820 (J Mead), 57674 (J Conroy)</p> <p><b>Public Bodies</b></p> <p>56912 (West Wickham PC), 57704 (Bassingbourn-cum-Kneesworth PC), 58421 (Linton PC), 59201 (Cambourne TC), 59919 (Fen Ditton PC)</p> <p><b>Other Organisations</b></p> <p>58505 (University of Cambridge), 59168 (Cambridgeshire and Peterborough Clinical Commissioning Group)</p> <p><b>Developers, Housebuilders and Landowners</b></p> <p>58312 (Hallam Land Management Limited), 58705 (Church Commissioners for England)</p>
RSPB supports general direction outlined. Objective should include doubling nature – councils have signed up to as part of the OxCamArc Environmental Principles.	59042 (RSPB Cambs/Beds/Herts Area)



Share and strongly support vision for biodiversity and green spaces. CBC's Vision 2050 shares Councils' determination to achieve highest standards of development, to integrate and deliver biodiversity enhancement.	58819 (CBC Limited, Cambridgeshire County Council and a private family trust)
Supports the aim. Aligns with one of our priorities (Strategy 2020-2025) to increase access to the outdoors, focusing on opportunities for people and nature to connect.	58949 (National Trust)
Support the Aim. Policies must provide for protection and enhancement of existing green spaces, networks and corridors, in urban areas, including provision for buffer zones.	57947 (E Davies)
Greater emphasis & protection of these when plans are considered.	59826 (Dry Drayton PC)
Essential not only for the environment but also mental health.	58028 (Great and Little Chishill PC)
Support aim to ensure enhanced biodiversity resource, with new and better green spaces. Better for people and the environment. Ambitions for Cambridge East align, providing significant green infrastructure.	58489 (Marshall Group Properties)
Overall policy direction is supported and welcomed. Essential policies are as strong as can be. Prioritise the protection of existing sites, emphasising mitigation hierarchy to give a clear statement of intent for any future developments. Assess development / infrastructure proposals before incorporate into plan.	58654 (Cambridge Past, Present & Future)
Would like a plan proposing improvements along the lines stated without necessarily waiting for any development proposals to come forward.	56824 (M Yeadon)

Often conflict between recreational use of green spaces and biodiversity. Green space is needed for people AND for wildlife. In areas of high density housing, sharing doesn't work.	56889 (J Prince)
City and area have good green spaces. Should be protected & not destroyed. No building on them, particularly in 2 mile radius of City centre. Most open spaces close to city have a rural touch and are a huge asset. Biodiversity could be broadened in some areas.	57252 (D Lott)
South Cambridgeshire is a green agricultural space. Building the odd park or nature reserve is no substitute.	56729 (Croydon PC)
Infographic: no mention of Local Geological Sites or Geological SSSI. A number of sites within area, designed to provide system of locally valued non-statutory sites (equivalent to Local Wildlife Sites but with wider remit).	57787 (R Nicholls)
Many developments will build on and take away well-established green open areas.	59225 (Teversham PC)
Serious environmental capacity issues, particularly in relation to intensification of pressures on green spaces.	60195 (J Preston)
Though the plan notes the need for biodiversity and green spaces, it contradicts this position by allowing proposals to release areas of green belt for development. Green Belt has been and is proposed to be eroded, ultimately destroying our village status.	57525 (Stapleford PC), 59115 (Great Shelford PC),
Should be explicit requirement for green separation between communities. Without it there is a high probability of piecemeal ribbon development in all areas outside the Green Belt.	58303* (M Claridge)

Concerned about flooding. Need to retain quality farmland for food security. Rising sea levels is likely to result in the loss of the Fens. Moving the WWTC to the green belt to facilitate growth is contrary to the goals of the plan. Concerned about approach to BNG.	59460 (S Buckingham)
Need a balanced approach to ensure other aims of Plan (i.e. delivery of homes and jobs) are not overly restricted by aims of biodiversity and green space protection and enhancement.	58989 (Metro Property Unit Trust)
Monitoring needs to be in place to support this policy.	57809 (Histon & Impington PC)
Objectives and policy approach supported. Welcome recognition that development can support on and off-site enhancements and can protect and provide new green spaces for nature. Proposed site can deliver green infrastructure / biodiversity enhancements.	<p><b>Developers, Housebuilders and Landowners</b></p> <p>58017 (Imperial War Museum/Gonville and Caius College), 58596 (Endurance Estates – Caxton Gibbet Site), 58788 (Wates Developments Ltd), 58914 (Phase 2 Planning), 58965 (North Barton Road Landowners Group), 58992 (Jesus College, a private landowner and St John's College), 59086 (Grosvenor Britain &amp; Ireland)</p>
Disingenuous and lacking transparency to not mention the relocation of Cambridge Waste Water Treatment Plant to Green Belt, to unlock a brownfield site for development that was imagined for a living/working community prior to the effects of the global pandemic.	58069 (Horningsea PC)
Objection to CBC: detrimental to ecology, loss of green recreational space and opportunities for walking when increasing population, increasing risk of flooding, noise and disturbance to domestic properties, increasing congestion on campus for little proven benefit.	57140 (A Barrett)

No comment	57386 (Huntingdonshire District Council)
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## BG/BG: Biodiversity and geodiversity

### Hyperlink for all comments

Open this hyperlink - [Policy BG/BG: Biodiversity and geodiversity](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

**Number of Representations for this section: 84**

### Note

- Some representations included in this summary of representations table have been moved from the Homes heading and also from the Biodiversity and Green Spaces theme chapter introduction section, as the comments were specific to biodiversity and geodiversity. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number\* (Name of respondent).

### Abbreviations

- PC= Parish Council      DC= District Council      TC= Town Council

### Executive Summary

Broad support for the policy principles was expressed within the representations from a range of individuals, organisations and developers, with comments including that preserving and enhancing biodiversity was important for health and wellbeing, carbon sequestration, place making, and benefits the economy. Comments suggested that the policy and objectives should be strengthened to guide development away from sensitive areas and refuse development that has adverse effects, and that buffer

zones are needed to protect wildlife beyond sites and create green corridors. Comments noted that the policy only relates to controlling the impact of developments not improving existing sites (which was considered a missed opportunity).

Many comments, particularly from related organisations, supported the proposal for 20% biodiversity net gain. Concerns were raised by some developers that the minimum 20% Biodiversity Net Gain (BNG) target was double the Environment Bill's proposed level of 10%, that it was not justified, too onerous and not achievable in all cases, and that there needs to be further consideration of viability and deliverability and flexibility to avoid stifling development. Some comments considered that the BNG approach can fail to deliver benefits if new ecosystems are substituted and green networks interrupted. Comments were received from developers promoting sites with the opportunity to deliver BNG. Other comments suggested that the 20% was not high enough, and a higher requirement should be included if doubling nature was to be achieved.

Concerns were raised by some individuals and community groups about how BNG will be calculated. Comments suggested a need for professionally accredited independent reports, and that the assessment should consider all important species, local and special characteristics, and adjoining nature sites.

Comments were expressed about off-site provision of biodiversity that the creation of larger networks will be beneficial to wildlife and support ecological resilience, that clear delivery mechanisms were required which could include purchasing credits, the need to

ensure developers deliver before occupation, and encouraging collaborative working with developers. Others commented that off-site provision might not provide benefits to local residents.

**Table of representations: BG/BG: Biodiversity and geodiversity**

Summary of issues raised in comments	Comments highlighting this issue
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<p>Support for the policy principles, including</p> <ul style="list-style-type: none"> <li>• Commitment to 20% BNG</li> <li>• Recognition of need to address recreational impacts</li> <li>• Increasing networks for wildlife and people</li> <li>• Intention to control biodiversity impacts from development.</li> <li>• TMLC have already delivered 46% at award winning Trumpington Meadows.</li> <li>• Recognition of a strategic GC Green Infrastructure Network to encourage biodiversity enhancement</li> <li>• Biodiversity crisis is severe and one of most affected areas in country due to pressure for development.</li> <li>• Reverse the decline and loss.</li> <li>• Welcome that Ox-Cam Arc Environmental Principals have informed the approach</li> <li>• Wider environmental net gains</li> <li>• Avoid impact to sites of biodiversity or geological importance</li> <li>• Councils signed up to 20% BNG with Ox-Cam Arc - ambition justified given low level of designated sites.</li> </ul>	<p><b>Individuals</b></p> <p>56821 (J Mead), 58867 (B Lockyer), 60128 (C Blakeley),</p> <p><b>Public Bodies</b></p> <p>56623 (Gamlingay PC), 58422 (Linton PC), 59203 (Cambourne TC), 59306 (Cambridgeshire and Peterborough Combined Authority), 59694 (Central Bedfordshire Council),</p> <p><b>Third Sector Organisations</b></p> <p>57956 (North Newnham Residents Association), 60757 (Cambridge and South Cambridgeshire Green Parties)</p> <p><b>Other Organisations</b></p> <p>57007 (The Wildlife Trust), 58608 (University of Cambridge), 58931 (Woodland Trust), 59047 (RSPB Cambs/Beds/Herts Area), 59297 (National Trust), 59725 (Environment Agency), 59977 (Natural England), 60463 (Anglian Water Services Ltd),</p> <p><b>Developers, Housebuilders and Landowners</b></p> <p>57380 (Colegrove Estates), 57903 (Martin Grant Homes), 58499 (Marshall Group Properties), 58763 (Trumpington Meadows Land Company), 58828 (CBC Limited, Cambridgeshire County Council and a private family), 60223</p>
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Summary of issues raised in comments	Comments highlighting this issue
	(Thakeham Homes Ltd), 60314 (Gladman Developments), 60514 (Taylor Wimpey UK Ltd), 60552 (Thakeham Homes Ltd). 60571 (Countryside Properties – Fen Ditton site),
Policy should set minimum target based on evidence, legislation and national guidance.	58219 (Countryside Properties UK Ltd)
Comments on the policy approach that: <ul style="list-style-type: none"> <li>• Need to ensure full assessment of impacts, mitigation and compensation, and address harmful developments</li> <li>• All developments must contribute to Suitable Alternative Natural Greenspace.</li> </ul>	58675 (Cambridge Past, Present & Future)
Strongly support 20% BNG – Cambridgeshire is one of most nature depleted counties, doubling nature would only bring County to the UK average, Cambridge Nature report identified habitats too small and fragmented, some new habitats will produce less biodiversity than expected, needs to be 50% to achieve doubling nature.	58675 (Cambridge Past, Present & Future)

Summary of issues raised in comments	Comments highlighting this issue
<p>20% BNG is ambitious, realistic and welcomed. Lack of clarity on procedures should overall progress fall short of target. Policy should prohibit off-site wherever possible to avoid loop holes with smaller developments to detriment of Parish/Neighbourhood Plans. Disappointing no locally defined metrics for assessing, including for developments encroaching on Green Belt. Recognition of recreational impact as a significant issue is welcome and should focus on proactive repair and maintenance.</p>	<p>59225* (Teversham PC)</p>
<p>Preserving and enhancing biodiversity and green space is important for health and wellbeing, as well as carbon sequestration. Makes the region a pleasant place to live, and hence benefits the local economy.</p>	<p>57776 (Carbon Neutral Cambridge)</p>
<p>Support John Meed's suggestions for strengthening the objectives of this policy [Attachment relates to John Meed's response to Policy BG/GI]</p>	<p>57943 (F Goodwille)</p>
<p>Residential development should avoid adverse impact on natural environment and deliver net gains for biodiversity in accordance with BG/BG.</p>	<p>59987* (Natural England)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Concerns with the minimum 20% BNG target, including:</p> <ul style="list-style-type: none"> <li>• Considered too onerous and not achievable in all cases.</li> <li>• Environment Bill is 10%, should not seek to double.</li> <li>• Further consideration needed of viability and deliverability.</li> <li>• No evidence to justify need for 20%</li> <li>• Expensive off-site contributions may be needed which would impact on design and viability of schemes</li> <li>• Financial and operational implications should be considered in evidence base.</li> <li>• Issue for all Local Authorities within Ox-Cam Arc. CBC keen to discuss how could be delivered and impacts this might have on site viability and delivery of key services and facilities.</li> <li>• NEC Ecology Study (2020) recommended 10%</li> <li>• Reword to aim for 20% with a minimum of 10% to be achieved</li> </ul>	<p>57173 (Southern &amp; Regional Developments Ltd), 57246 (European Property Venture – Cambridgeshire), 57380 (Colegrove Estates), 57385 (Persimmon Homes East Midlands), 57440 (Mission Street Ltd), 58357 (ARU), 58466 (Hill Residential Ltd and Chivers Farms – Hardington – Ltd), 58500 (BDW Homes Cambridgeshire &amp; The Landowners – Mr Currington, Mr Todd, Ms Douglas, Ms Jarvis, Mr Badcock &amp; Ms Hartwell), 58582 (Croudace Homes), 58608 (University of Cambridge), 58787 (Wates Developments Ltd), 58793 (Wates Developments Ltd), 58864 (Abbey Properties Cambridgeshire Limited), 58953 (St John’s College Cambridge), 58991 (Endurance Estates), 59124 (L&amp;Q Estates Limited and Hill Residential Limited), 59694 (Central Bedfordshire Council), 60152 (U&amp;I PLC and TOWN), 60159 (Home Builders Federation), 60314 (Gladman Developments), 60328 (Danial Bros Shefford Ltd), 60514 (Taylor Wimpey UK Ltd), 60571 (Countryside Properties – Fen Ditton site), 60583 (Martin Grant Homes), 60764 (U&amp;I Group PLC)</p>

<p>Concerns about calculating BNG and using the DEFRA metric, including:</p> <ul style="list-style-type: none"> <li>• BNG calculations can be fudged.</li> <li>• Excessively simplistic - only looking at habitat features, excluding species measurement.</li> <li>• Species and 'local and special characteristics' need to be considered</li> <li>• Does not include all important species, such as red listed swifts.</li> <li>• Include specific wording on what other measures will be used to assess BNG – mentioning swift boxes and bat boxes.</li> <li>• Realistic meaningful Preliminary Ecological Appraisals and BNG / mitigation proposals must be based on professionally accredited independent reports, within 1 year of application, cover 1km radius.</li> <li>• Adjoining designated nature sites must be included in assessments.</li> <li>• Revisit wording to accommodate changes to national metrics and biodiversity value</li> <li>• Measurement should take account of adverse effects of general disturbance, noise, light and domestic animals.</li> <li>• DEFRA metric 3.0 flawed, so should not be sole metric used.</li> <li>• Value should be placed on longevity of new communities and associated new habitats designed to be retained in perpetuity.</li> </ul>	<p>56799 (A Laurie), 56821 (J Mead), 57068 (Fulbourn Swifts Group), 57134 (North Newnham Res. Ass), 57372 (P Heath), 57373 (P Heath), 57440 (Mission Street Ltd), 57591 (R Pargeter), 57814 (J Pavey), 57903 (Martin Grant Homes), 57936 (L Buchholz), 57967 (V Morrow), 59920 (Fen Ditton PC), 60332 (Newnham Residents Association)</p>
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Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>Existing trees and hedgerows may be given high biodiversity value because of longevity, but it should be recognised older trees will eventually die.</li> <li>DEFRA's calculator 3.0 seems weighted in developer favour.</li> <li>4 metrics – size, distinctiveness, condition and strategic habitat - very subjective and measured in difficult to understand way. Excludes 'connectivity'.</li> <li>Concerns about how biodiversity is to be measured in a valid manner</li> <li>Object to use of land use categories for biodiversity potential calculations if actual species diversity and scarcity is of known important.</li> <li>Not very sensitive to some important biodiversity considerations</li> </ul>	
BNG fails twice as often as it succeeds even with a lower bar of no net loss. Developers are judge, jury and executioner. On site off-setting will not encourage many forms of wildlife and prone to disturbance from trampling or dog fouling.	60241 (Federation of Cambridge Residents' Associations)
Research suggests that Biodiversity Net Gain policies and measurement systems are widely unsuccessful in achieving their stated aims.	57994* (Cambridge Doughnut Economics Action Group)
'Doubling nature', BNG and Natural Capital Accounting are being used as bargaining chips by developers – no development means no funding for nature.	60241 (Federation of Cambridge Residents' Associations)

<p>Comments about BNG, including:</p> <ul style="list-style-type: none"> <li>• Vague unless parish specific percentages and target for City</li> <li>• Being used as ineffective compensation for irreplaceable loss of biodiversity and public amenity local to the development</li> <li>• BNG is good goal but nowhere close to ‘doubling nature’.</li> <li>• BNG has to be realistically evaluated and monitored.</li> <li>• Require evidence based BNG and funded management regimes for the development site, designated site and wider biodiversity area</li> <li>• Should not permit development that adversely impacts biodiversity on neighbouring sites</li> <li>• Need clearer provisions for protection of vulnerable sites from excessive numbers of visitors</li> <li>• Target is double the national and SPD – be confident that justification and impact of policy is fully evidenced, including viability.</li> <li>• Wording on ancient woodland and ancient tree protection should reflect NPPF para 175c.</li> <li>• Needs to align with upcoming Local Nature Recovery Strategy not just GI strategic objectives</li> <li>• Be clear BNG is in addition to mitigation hierarchy (NPPF para 180)</li> <li>• Recommend a natural capital evidence approach</li> <li>• Recommend ambitious maintenance requirements, in perpetuity.</li> </ul>	<p>56623 (Gamlingay PC), 56799 (A Laurie), 56891 (J Prince), 57368 (P Heath), 57373 (P Heath), 57988 (J Hall), 58608 (University of Cambridge), 58708 (Church Commissioners for England), 58931 (Woodland Trust), 59047 (RSPB Cambs/Beds/Herts Area), 59725 (Environment Agency), 59977 (Natural England), 60128 (C Blakeley), 60196 (J Preston), 60463 (Anglian Water Services Ltd)</p>
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Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• Focus on area measures to restore ecological networks, enhance resilience and provide overall increase in natural habitat and ecological features</li> <li>• Projects proposed to help achieve net zero need to be both delivered and safeguarded</li> <li>• Consider landscape scale connectivity BNG</li> </ul>	
Stress the importance of green space and biodiversity in Cambourne as part of the Western gateway GI corridor	59203 (Cambourne TC)
Baseline survey work will need to be sufficiently detailed to allow rigorous assessment. Without it risk of missing important elements of ecosystem and failing to set accurate baseline.	56821 (J Mead)
BNG calculations should be done by an accredited member of CIEEM. Need to factor in that new sites will not support same range of biodiversity as established sites, and ecosystems take long time to establish.	58767* (J Shanklin)
Policy more specific and onerous than OS21, so additional cost (to public purse) to compliance, with knock-on effect to developer contributions. Work with CCC and providers to explore how the education estate might deliver BNG.	57482 (ESFA – Department for Education)



Summary of issues raised in comments	Comments highlighting this issue
<p>Comments about off-site provision including:</p> <ul style="list-style-type: none"> <li>• No advantage for residents in local area in terms of biodiversity or connectivity.</li> <li>• Questionable whether nationwide benefits would be delivered.</li> <li>• Suggest developers are required to demonstrate BNG measures before occupation to incentivise BNG work.</li> <li>• Need to provide a delivery mechanism for off-site projects, including for smaller projects</li> <li>• Need a system similar to that for the District Licencing for Protected Species.</li> <li>• LPA should work proactively, positively, and collaboratively with landowners and relevant bodies to bring off-site enhancement measures forward to ensure benefit to the community.</li> <li>• Consider alternatives such as ‘credits’ being purchased from other donor sites in order to achieve appropriate levels.</li> </ul>	<p>57936 (L Buchholz), 57995 (Cambridge Doughnut Economics Action Group), 58499 (Marshall Group Properties), 58864 (Abbey Properties Cambridgeshire Limited), 58928 (bpha), 59762 (Endurance Estates), 60571 (Countryside Properties - Fen Ditton site), 60764 (U&amp;I Group PLC)</p>
<p>First Conversation consultation showed “very strong support for biodiversity net gain including use of off-site contributions” – I believe there was strong support for biodiversity net gain but would question if there is truly ‘strong support’ for off-site contributions.</p>	<p>57936 (L Buchholz)</p>

Summary of issues raised in comments	Comments highlighting this issue
How will GCSP ensure net gain offsetting targets are met due to the accelerated growth of WNT? How will it be monitored and manage to obtain “net gain”.	59846 (Waterbeach PC)
Please include the Wildlife Trust’s proposals for a Cambridge Nature Network in the Local Plan	59495* (D Seilly)
Policy should provide for establishing areas of "Important Natural Habitats" covering areas locally identified for wildlife / biodiversity value, which do not enjoy designated status. Would help proactively inform development decisions thereby avoiding introducing cost and delay when proposals are met with objections based on a site's high wildlife value. Requirements for designating INH would need to be tightly defined. Would complement but not conflict with designations under policy BG/PO.	57821 (J Pavey)
Welcome GI initiatives identified so far. Can help inform Local Nature Recovery Strategy in identifying valuable sites, sustainable land management and how loss/fragmentation of habitats should be avoided. Creation of larger networks will be beneficial to wildlife and support ecological resilience.	59725 (Environment Agency)
Assessment in Greater Cambridge Chalk Stream Project ignores opportunity to enhance streams and water courses, which could have a significant effect in increasing biodiversity.	58085* (Fulbourn Forum for community action), 58774* (Wilbraham River Protection Society)

Summary of issues raised in comments	Comments highlighting this issue
Surrounding land forms are part of and support biodiversity of designated sites. Need buffer zones (of set depth) within which no development is allowed to protect wildlife or habitats beyond the site and create green corridors.	56799 (A Laurie), 56821 (J Mead), 56891 (J Prince), 57134 (North Newnham Res. Ass), 57368 (P Heath), 57373 (P Heath), 57950 (E Davies)
Whilst off-site provision can offer value, concerned it is an easy opt out for developers, and justification for planners to remove land from Green Belt. Need clarity on Objective 3 - who would agree it, with what consultation and when in the process. Amend Objective 2 to Include additional wording on near-site improvement on adjoining land.	56821 (J Mead)
Strengthen policy wording to 'will not be permitted'. Where development is permitted, biodiversity, tranquillity, light, air, noise, amenity must measure 20% BNG across all affected sites.	57134 (North Newnham Res. Ass)
Replacement is not like for like and liable to deliver net loss if new ecosystems are substituted for established ones and green networks are interrupted.	57368 (P Heath)
Development management: need for pre-app discussions and early site visits to ensure all parties aware of site's characteristics and protection requirements.	57372 (P Heath)
First priority must be protection and conservation of existing biodiversity and geodiversity interests. All development should be subject to thorough assessment of impacts. Mitigation hierarchy should be followed with proof it will work. Secure mitigation and compensation in perpetuity.	58675 (Cambridge Past, Present & Future)

Summary of issues raised in comments	Comments highlighting this issue
Cambridgeshire has few nationally designated sites but many locally designated sites. More detail needed on how to measure and mitigate impacts on local sites.	58675 (Cambridge Past, Present & Future)
Enable wildlife sites and open spaces to be formally registered in name, so they can be on neighbour notification list.	57372 (P Heath)
No specific mention of ponds; can have significant beneficial effect on biodiversity.	57591 (R Pargeter)
Grateful to see the importance of geodiversity has been noted. Local Geological Site should have same protection and force as Local Wildlife Sites. There are a number of Geological Sites (SSSI and LGS) within the area.	57788 (R Nichols)
Using "Where Possible" says you are not serious and gives potential developers the option to not do it as it does not say "Must".	57810 (Histon and Impington PC)
Even where 20% BNG is demonstrated development should not be permitted if any nationally or locally designated species of concern will suffer loss of habitat or population impairment unless credible alternative habitat is provided, translocations undertaken if appropriate and funding secured for long-term protection & site maintenance is secured.	57814 (J Pavey)

Summary of issues raised in comments	Comments highlighting this issue
Be clearer that biodiversity objectives are about controlling development impacts, not improving biodiversity on existing sites. 20% gain is only being sought if nature is damaged as part of development on new sites. Policy will “seek wider environmental net gains” so perhaps there are greater ambitions - should be spelled out. Missed opportunity to set goals for increasing biodiversity overall.	57936 (L Buchholz)
Policies must protect and enhance existing green spaces and corridors in urban areas, especially adjacent to areas of major development. Developers underplay negative impacts such as loss of open space, effects of hard surfaces etc. Increasing green spaces for people is a necessary counter.	57956 (North Newnham Residents Association)
Refuse development that has adverse effects. More clarity needed on exceptions where public health benefits significantly outweigh.	58675 (Cambridge Past, Present & Future)
BNG must take account of full value of an affected site including any deliberate damage prior to development.	58675 (Cambridge Past, Present & Future)
Planning conditions must secure effective long-term management and monitoring.	58675 (Cambridge Past, Present & Future)
BNG conditions should include developer funds for monitoring and remedial action if required.	60003 (Steeple Morden PC), 60081 (Guilden Morden PC)
Adopting a green-washing approach to biodiversity. Best to leave natural environment undeveloped in its natural state. Take steps to improve biodiversity of unbuilt land with appropriate planting and management.	59580 (Campaign to Protect Rural England)

Summary of issues raised in comments	Comments highlighting this issue
Recommend policy acknowledges significance of invasive non-native species impacts on wildlife and environment.	59725 (Environment Agency)
Recognise the hierarchy of international, nationally and locally designated sites. Accompany with map of existing ecological network and enhancement opportunity areas to guide development away from sensitive areas and deliver BNG.	59977 (Natural England)
Creation of winter wet areas, water space and Suds designed to benefit enhanced biodiversity should be planned into developments at an early stage	60128 (C Blakeley)
Incorporate flexibility to achieve required BNG requirements by measures most appropriate to that site, including off-site, to ensure do not stifle development.	60223 (Thakeham Homes Ltd), 60552 (Thakeham Homes Ltd)
Clarity needed on what the concept of doubling nature means and how will it be measured.	60241 (Federation of Cambridge Residents' Associations)
Natural Capital Accounting is an untested concept. Monetary assessment of ecosystem services and stocks is inadequate and used to trade away environmental for economic assets with greater yield.	60241 (Federation of Cambridge Residents' Associations)
Dasgupta defines wealth as sum of natural, human and economic capitals and yields, and sustainability as the condition where this sum is either stable or increasing. Request Local Plan adopts Dasgupta definition of sustainability, not NPPF's false definition of 'sustainability', especially the false or under-valuation of natural capital.	60241 (Federation of Cambridge Residents' Associations)

Summary of issues raised in comments	Comments highlighting this issue
Give great prominence to green networks and allow for damage to designated sites from adjacent development	60332 (Newnham Residents Association)
Outputs must be 'sense-checked' by qualified ecologists. Concerns policy allowing off-setting off-site. New habitats created need explicit protection from development in perpetuity. Need strong statement that existing designated sites (with national or local designation) remain protected and undeveloped.	60757 (Cambridge and South Cambridgeshire Green Parties)
Avoid noise and light pollution near biodiversity due to negative impacts. Do not propose 20% net gain in locations where wildlife will not thrive. Developers reduce biodiversity baseline. More consistency needed between developments to provide and encourage more biodiversity.	56486* (A Coghlan)
Litter along roads and hedges must impact wildlife – developers should contribute to litter clean-up fund.	56486* (A Coghlan)
Note the ambitious target for 20% net gain. Support ambitions but this is double the target in Biodiversity SPD and national target. Should be proportionate to the potential of specific sites, recognising the limited potential on brownfield sites.	57205* (Abrdn), 57271* (Universities Superannuation Scheme – Commercial), 58206* (Universities Superannuation Scheme – Retail)

Summary of issues raised in comments	Comments highlighting this issue
Welcome requirement for net gain. Metrics take no account of disturbance factors. An interconnected distribution of havens remote from severe disturbance should be maintained. Ditches and hedgerows are important and should be protected. Business developments have greater potential for net gain as less disturbance, particularly outside working hours, and no domestic animals. Important sufficient space is set aside within such developments.	57590* (R Pargeter)
Support ambition for 20% BNG. Challenging to deliver given other constraints. Need clear mechanism for off-site provision, including directing it to locations where it will provide most value. Want to engage with GCSP on developing this mechanism.	58494* (Marshall Group Properties)
Policy should include minimum 50m buffer zones around all designated sites. Opportunity for BNG through Environmental Land Management Schemes, particularly for sites which currently have no buffer protection.	58757* (J Shanklin), 58761* (J Shanklin)
Any offsetting area needs to have a management plan and funding to enable that management to be carried out.	58775* (J Shanklin)
Metrics should consider all species of conservation concern, including rare and threatened species, not just protected.	58781* (J Shanklin)
Require surveys within last 5 years. Also consider overall habitat which may support a range of species that are not of individual significance.	58783* (J Shanklin)



Summary of issues raised in comments	Comments highlighting this issue
Amenity grassland can cover a wide variation from a monoculture of hard-wearing grass to species rich that is only apparent during periods such as “no mow May”. Often lawns of older properties retain many species that persist from when the lawn was created.	58785* (J Shanklin)
Biodiversity should be integrated into the whole landscape and should be included in all new developments, for example <ul style="list-style-type: none"> <li>• bee-friendly plantings,</li> <li>• wild flower meadows,</li> <li>• tree planting and space for woodland</li> <li>• fruit trees in public spaces</li> <li>• Local composting facilities</li> <li>• Space for wetlands – ponds, lakes and rivers</li> </ul>	59069* (Cambridge Sustainable Food CIC)
Insects are essential to all larger animals - Cambridge should become a pesticide free town.	56486* (A Coghlan)
No mention of pressure from the significant number of large housing developments on chalk stream network. Major omission that needs addressing. Disappointing not see to see any quantitative targets in this section.	59225* (Teversham PC)
Policy being contravened by allowing industrial scale development on Green Belt at Honey Hill. Lighting, construction traffic will disturb wildlife. Contamination risks to Quy Fen SSSI and flood risk being minimised by developer. BNG is meaningless. Wicken Fen Vision will be compromised.	57475 (C Martin)

Summary of issues raised in comments	Comments highlighting this issue
Any plan which does not include Honey Hill is a fake plan. Please tell the truth.	57536 (A Martin)
Support 20% BNG and seek to achieve at Cambridge East, on-site but off-site provision will also be required. Need for clearly identified mechanisms for achieving off-site BNG. Engage with GCSP.	58499 (Marshall Group Properties)
Proposing new habitat credit site at Steeple Morden to be available for off-setting BNG.	59741 (Henley Real Estate Developments Ltd)
Promoting site for development with opportunity to deliver BNG.	58219 (Countryside Properties UK Ltd), 58763 (Trumpington Meadows Land Company), 58787 (Wates Developments Ltd), 58828 (CBC Limited, Cambridgeshire County Council and a private family), 59762 (Endurance Estates)
University's Biodiversity Action Plan has vision to improve biodiversity on University estate and Greater Cambridge area to educate, inspire appreciation and encourages interventions, research and innovation.	58608 (University of Cambridge)
No comment	57390 (Huntingdonshire District Council)

## BG/GI: Green infrastructure

### Hyperlink for all comments

Open this hyperlink - [Policy BG/GI: Green infrastructure](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

**Number of Representations for this section: 87**

### Note

- Some representations included in this summary of representations table have been moved from the Homes heading as the comments were specific to green infrastructure. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number\* (Name of respondent).

### Abbreviations

- PC= Parish Council      DC= District Council      TC= Town Council

### Executive Summary

Broad support for the policy intention was expressed within the representations from a range of individuals, organisations and developers, with comments that multi-functional, connected, green infrastructure is a key part of a successful spatial strategy.

Comments also included that the policy direction was good but ambiguous and needed clarification, including how it relates to other Aims and policies within the Plan and to Natural England's Accessible Natural Greenspace Standards. Comments that green infrastructure doesn't respect boundaries, encouraging partnership working, and the need for clear funding mechanisms for delivery.

Some developers commented that the policy should be a recommendation not a requirement, should recognise some sites may not be able to deliver due to locational constraints, site size and viability, that development should not be opposed where reasonable steps have been taken to protect and incorporate GI. Some comments from individuals expressed concern how the policy would be delivered via the planning process to ensure contributions will invest in strategic initiatives, and that the policy approach did not include a standard for measurement or achieved performance of developments.

There was widespread support for the green infrastructure initiatives, with many comments about specific initiatives including suggested amendments to their boundaries, joining up with other initiatives such as National Trust's Wicken Fen Vision, and proposing other ecological measures for inclusion.

Comments suggested the policy should consider the additional recreational pressure arising from developments, encourage increased access to green spaces through joining up spaces, and that all homes without gardens must have easy access. Comments included that the policy lacked specific proposals for improving public access and connectivity, including for horse riding.

Table of representations: BG/GI: Green infrastructure

Summary of issues raised in comments	Comments highlighting this issue
Support for the policy	58425 (Linton PC), 60404 (Great and Little Chishill PC)
Supportive of the green infrastructure strategy, minimising land use for development.	59482* (Shepreth PC)
Strongly support this policy. As a Parish with several disconnected woodland areas would like to highlight the importance of linking natural habitats with diverse hedgerows or belts of trees.	56913 (Cllr D Sargeant, West Wickham PC)
Support approach and need for clear requirements for new development to support GI infrastructure provision. Accessibility and locational relationship of development to GI strategic areas should be a key consideration.	59054 (RSPB Cambs/Beds/Herts Area)
Identification of 14 strategic green infrastructure initiatives will assist delivery of Environment Bill mandatory 10% minimum biodiversity net gain where on-site provision cannot reach this level.	58679* (Vistry Group and RH Topham & Sons Ltd)
Strongly support policy. Welcome inclusion of 14 strategic GI priority areas and themes. Provision of significant strategic natural greenspace is essential and will need significant funding through new development. Use of Suitable Alternative Natural Greenspace standard at 8 Ha / 1000 population is a good start. Open space standards (BG/PO and BG/EO) woefully inadequate without corresponding strategic GI provision.	57008 (The Wildlife Trust)
Support policy. Two strategic GI initiatives append important landscape character areas in Huntingdonshire; Areas 5 & 8. Area 8 - suggest working together to protect and promote interconnectedness between the woodlands.	57392 (Huntingdonshire DC)

Summary of issues raised in comments	Comments highlighting this issue
<p>Support ambitious targets for green infrastructure provision. Marshall is developing ambitious plans that provides a high value biodiversity resource. Proposes to make green infrastructure multi-functional. Keen to enhance Eastern Fens. Would welcome Plan requiring all, or at least developments of a significant scale, to seek green infrastructure accreditation, for example through Building with Nature scheme.</p>	<p>58506 (Marshall Group Properties)</p>
<p>Support policy intention for development proposals to include green infrastructure, providing benefits for people, wildlife and planet.</p>	<p>58614 (University of Cambridge)</p>
<p>Support intent of policy, reference to Cambridgeshire Nature Network and adoption of standards for provision of GI. Protection of existing sites should be first priority. Support requirement for financial contribution, where cannot be provided on-site, to support existing and create new areas off-site. Would like to discuss Opportunity Mapping report.</p>	<p>58690 (Cambridge Past, Present &amp; Future)</p>
<p>Supports objective to enhance existing green infrastructure network and address how development proposals can link with green infrastructure. Aim for all development to include green infrastructure is beneficial for people of Greater Cambridge.</p> <p>‘Trumpington South’ is surrounded by extensive green infrastructure, includes 150 acre Country Park and River Cam corridor, to North West. Propose potential expansion by further 33%. Management could be integrated with Country Park.</p>	<p>58766 (Trumpington Meadows Land Company)</p>

Summary of issues raised in comments	Comments highlighting this issue
Green infrastructure is a key part of a successful spatial strategy. Welcome identification of Strategic Green Infrastructure Initiatives, and the statement that “Explicitly identifying these initiatives and their objectives in the Local Plan will not restrict development in the broad areas they cover.” Engagement with landowners in the identified areas will be essential.	58959 (St John’s College Cambridge)
Support the principle of the Strategic Green Infrastructure Initiatives and policy which requires delivery of on-site greenspace in new developments.	59296 (National Trust)
Support policy to require all development to include green infrastructure and protect/enhance water environments. Welcome list of initiatives. We consider ‘connectivity’ a key component; support references to ‘providing links’ and connecting wider ecological network. Existing habitats and green spaces within development footprints should be protected and incorporated where possible.	59726 (Environment Agency)
Welcome the comprehensive approach in developing the GI evidence base, including Opportunity Mapping and identification of 14 Strategic GI initiatives. Multifunctional benefits of GI are fully recognised, as well as links between GI provision and delivery of other strategic policy areas including wider natural environment, sustainable transport and social inclusion. These threads/links should continue through future drafts to ensure the value of GI for people and natural environment is fully reflected. Clear value in having funding mechanisms and a recognised GI standard in place.	59978 (Natural England)



Summary of issues raised in comments	Comments highlighting this issue
Support identification of 14 strategic GI initiatives and enhancing linkages between GI and open spaces to provide corridors for wildlife. Support use of a GI standard, particularly on larger developments. In particular early identification of GI and biodiversity assets and potential gains as an early part of design process and/or planning brief.	60127 (C Blakeley)
One of the key policies; identifies existing green infrastructure network and strategic initiatives intended to enhance it and addresses how development proposals should relate to green infrastructure. CEG fully support Councils' aims and ambitions in this regard. Policy should encourage increasing access to green spaces through a joined up green infrastructure approach.	60280 (Commercial Estates Group)
Support BG/GI seeking to protect and expand green (and blue?) infrastructure which benefits people, wildlife, and the planet.	60471 (Anglian Water Services Ltd)
Support for recognition of Pollinator corridors. Strategic Green Infrastructure should include protection and enhancement of chalk aquifer spring line.	60004 (Steeple Morden PC), 60082 (Guilden Morden PC)
We support the policy to protect and improve chalk streams.	57706 (Bassingbourn-cum-Kneesworth PC)
Welcome focus of Policy and support objectives and proposals. Initiative 3 - need to improve biodiversity of arable land across an important area of chalk farmland. Initiative 14 is lighter on content than others; problematic and have suggested ways could be strengthened through additional objectives.	56822 (J Meed)

Summary of issues raised in comments	Comments highlighting this issue
<p>Supports requirement for new developments to include GI and emphasis on River Cam corridor and Gog Magog hills and chalkland fringe. Stress importance of maintaining and improving Hobson's Brook/Vicar's Brook Green Corridor. Increase investment in assets such as Trumpington Meadows Country Park and Hobson's Park and protect them from development. Concern about water demand and risk to River Cam and Hobson's Brook from Nine Wells.</p>	<p>56975 &amp; 56976 (Trumpington Residents Association)</p>
<p>Any development at S/CBC/A detrimental to well-being of existing Queen Edith's residents. Policy should protect Nine Wells Nature Reserve, already under stress and being gradually degraded. Field between NWNR and railway line should be allocated for protection and enhancement.</p>	<p>57952 (F Goodwille), 58171 (S Kennedy)</p>
<p>Policy needs greater coherence as proposals and sites are not linked by an overarching policy that makes them ecologically contiguous. Existing green infrastructures around Babraham (unlinked) need to be more ecologically coherent and given greater protection. No 3 Gog Magog should extend to A11 to protect valuable riparian forest and flood plain habitats, include river (i.e. link with no1), as Granta tributary is over abstracted and being managed in a piecemeal fashion.</p>	<p>58155 (H Thomas)</p>
<p>Area 4 is described as Enhancement of the eastern fens. Appears to contradict proposed CWWTP relocation to that area. Policy requires new development to help deliver or support delivery of GI strategic initiative objectives. Putting development on an area of Green Belt contradicts this principle.</p>	<p>57514 (Save Honey Hill Group), 57619 (J Pratt)</p>

Summary of issues raised in comments	Comments highlighting this issue
Supported: Note S/NEC Policy will impact on aspirations for Enhancement of Eastern Fens GI as a result of required relocation of CWWTP to fulfil S/NEC policy identified as Honey Hill.	57675 (J Conroy)
Principle of enhancing existing green infrastructure is supported but clarity is required regarding proposed relocation of Waste Water treatment Works to green belt, which appears to conflict with Area 4, Enhancement of Eastern Fens.	58133 (M Asplin)
Contradicting policy by allowing CWWTP to be rebuilt in Area 4, an area intended to be enhanced, and part of Wicken Fen Vision. Will also compromise River Cam corridor.	59160 (C Martin)
'Enhancement of the Eastern Fens' initiative should be extended to include Wicken Fen vision. One of key delivery programmes for Natural Cambridgeshire 'doubling nature' vision. Green infrastructure is a cross boundary issue and initiatives should not stop at local authority boundaries. Acknowledge that delivery would require partnership working. By thinking across boundaries, we can create a network of greenspaces. National Trust committed to enhancing urban green spaces and linking access to countryside to create 20 green corridors (by 2030); identified Wicken Fen to Cambridge.	59296 (National Trust)
Unfortunate the Opportunity Mapping Final Report unavailable. North Cambridge Green Space should cover area south west of Histon - four woodlands with high levels of community use (two designated in Neighbourhood Plan); also meadows. Footpaths have high use for amenity. Opportunity to contribute to doubling nature.	57806 (J Pavey)

Summary of issues raised in comments	Comments highlighting this issue
Barton Road Riffle Range falls within Strategic Initiative 7. Would introduce constraints and potential incompatible uses that could place unreasonable restrictions on how MOD use the land. Strongly recommend boundary is amended.	57480 (Defence Infrastructure Organisation – MOD)
Couldn't see detail of maps. Essential policies and map identify the importance of green infrastructure provided by network of linked green spaces in West Cambridge, unique to the setting of city, for green wildlife corridor they provide. Policies need wording to 'Reinforce and enhance landscape and townscape'.	57954 (E Davies)
It is paramount Grantchester meadows be included as an integral part of Cambs green infrastructure. Has been left out of W Cambridge GI Buffer Zone. Create a conservation covenant across the Grantchester Meadow area to mitigate impacts of high pressure from recreational visitors; lack of public transport, no parking, no management of litter are directly damaging environment.	60488 (Grantchester PC)
The section will achieve the aim of the plan and should be supported. The importance of existing green space and biodiversity in Cambourne should be stressed especially as Cambourne is part of the Western gateway multifunctional green infrastructure corridor.	59205 (Cambourne TC)
Purpose of policy should be strategic and Western Gateway Multifunctional Green Infrastructure Corridor should be focused on strategic developments at Cambourne and Bourn Airfield.	56484 (V Chapman), 56493 (D & B Searle), 56502 (W Grain), 56520 (RJ & JS Millard)
Support Western Gateway proposal. Consider extending boundary to cover whole of parish up to Central Bedfordshire border.	56568 & 56624 (Gamlingay PC)

Summary of issues raised in comments	Comments highlighting this issue
<p>Map shows Land at St Peter's Street being within Western Gateway Multifunctional Green Infrastructure Corridor (WGMGIC) (8). WGMGIC covers a large area of land and should be focused on large strategic developments at Cambourne and Bourn Airfield. Unreasonable to cover the whole of Caxton.</p>	<p>58733 (R Grain)</p>
<p>National Trust's Wimpole Estate falls within Western Gateway and two pollinator corridors. Welcome discussions about working together to deliver greater connectivity to these spaces. We also fulfil 11, 13 and 14 of the dispersed green infrastructure initiatives and are keen to engage with partners.</p>	<p>59315 (National Trust)</p>
<p>Policy highlights areas considered appropriate for green infrastructure initiatives. With regards to promotion of land in Coton, area 7 (West Cambridge green infrastructure buffer – Coton Corridor) is relevant to land at Silverdale Close given it washes over the site. Policy should be drafted so as not to inhibit development within these areas and set out potential requirements to be included within such development.</p>	<p>60587 (Martin Grant Homes)</p>
<p>Strategic Initiative No 8: recommend extend to include Orwell Clunch pit and village. Collaboration with landowners could improve planting, providing a corridor for wildlife.</p>	<p>57127* (M Gould), 58451* (Orwell PC)</p>
<p>Area 8 - policy misses out half of Gamlingay ward which will create problems; excludes protected green sites at The Heath and The Cinques. Scope for cross border projects enhancing Acid Heath, stretches west to Potton and Sandy. (Gamlingay is part of The Greensand Ridge which has funding for enhancement work as part of Greensand Country). Gamlingay is in River Ivel catchment.</p>	<p>60366 (Gamlingay PC)</p>

Summary of issues raised in comments	Comments highlighting this issue
Only refers to cycling and walking not horse riding - discriminatory. Roman Road at Babraham is not a footpath. Good ideas regarding health and wellbeing. Supports protection of bridleways for soft surface users. Essential public access, links and enhancements to PROW and green spaces built into development conception not an afterthought. Urban greening and de-paving supports protection of rural grass paths.	56698 (British Horse Society)
It appears our bid (GO23) has not been properly considered in LUC work, and subsequently the strategic GI map and policy. Included in Neighbourhood Plan policies.	59759* (Foxton PC)
Call for Green Sites submission (Ref 53032) has not been properly considered. Superb opportunity to create new chalkland habitat, open to informal recreation, with enhanced hedgerows and woodland management.	57437 (Foxton PC)
Yes, but do not provide concrete busways or cycle lanes that disfigure the landscape.	56712 (Croydon PC)
Honey Hill is not mentioned. It will be destroyed if WWTP is moved, it goes against principle of doubling nature and net biodiversity gain. You can't have one without consequences of other.	57500 (A Martin)
Appraisal Scoping Report flagged risk associated specifically from phosphates and nitrates arising from development, agriculture and GARDENS. Use of chemical herb / pesticide, fertiliser in domestic gardens adjoining nature reserves should be accounted for in BNG and long term management to reduce pollution and impacts on flora and fauna and insects.	57135 (North Newnham Res. Ass)

Summary of issues raised in comments	Comments highlighting this issue
Policy appears more specific and onerous than OS21, but strategic outcomes are same. Request a degree of flexibility and pragmatism.	57483 (ESFA – Department for Education)
Should be a recommendation not a requirement. Developments should not be opposed where all reasonable steps have been taken to protect and incorporate green infrastructure. Useful to include further guidance in an SPD.	57095 (C King), 57297 (C Sawyer Nutt), 59152 (Endurance Estates), 60288 (Wheatley Group Developments Ltd), 60339 & 60350 (FC Butler Trust), 60361 (HJ Molton Settlement), 60373 (The Critchley Family), 60378 (S & J Graves), 60388 (D Wright), 60470 (P, J & M Crow)
It is definitely worth using an objective and professionally respected scheme to judge plans and proposals, and to measure performance.	57593 (R Pargeter)
Include protection of Geodiversity; many Strategic GI areas have geological dimension. Developers should be encouraged to facilitate any request from a suitably qualified group to view results of groundworks to identify and record any potential geological features exposed prior to them being covered / destroyed.	57790 (R Nicholls)
Some developments will have no gardens particularly urban areas. All homes with no gardens MUST have recreation space within a 5 minute (for example) walk.	57811 (Histon & Impington PC)
Policy should include specific reference to implementation of government's objective of protecting 30% of land for nature by 2030. It should embrace "wildbelt designation" concept in Wildlife Trust's "Planning A new way forward"	57816 (J Pavey)

Summary of issues raised in comments	Comments highlighting this issue
Strongly support increase in green infrastructure. Question how this will be embedded and upheld in the planning process. NEC falls short of ANGST standards. Wiggle room for allowing development which could overwhelm creation of new GI. Worry developers will opt for off-site benefits - how can we be sure contributions will invest in strategic initiative areas.	57937 (L Buchholz)
Green infrastructure is a good idea, especially in terms of creating wildlife corridors. How does plan meet Natural England's Accessible Greenspace Standards in terms of 100 hectares of greenspace for (for example) Northeast Cambridge?	57970 (V Morrow)
There is no absolute standard for measurement or achieved performance of developments.	57997 (Cambridge Doughnut Economics Action Group)
Council has agreed with Natural England to prepare a mitigation strategy for Therfield Heath SSSI, west of Royston. Additional recreational pressures arising from developments, particularly within SSSI Zones of Influence will need to be considered in the future.	58681 (North Hertfordshire DC)
Policy should recognise that some sites, given locational constraints, especially within City, may not be able to deliver enhancements envisaged and may not be viable.	58994 (Metro Property Unit Trust)
Policy requirement for all new development to help deliver or contribute to support delivery of the green infrastructure strategic initiative objectives. Policy conflicts with paragraph 57 of NPPF (planning obligations), particularly for small scale developments. Wording should be amended to reference major developments.	59171 (Silverley Properties)



Summary of issues raised in comments	Comments highlighting this issue
Consider how to work with private landowners to create more food growing spaces in central Cambridge (where allotment demand is greatest), bearing in mind two colleges already provide small allotments on outskirts of city.	59238 (D Fox)
Broadly welcome policy on Green Infrastructure; reference to reinforcing and enhancing landscape and townscape; consider the role it can play in conserving and enhancing historic environment. Helpful to highlight important synergy between historic and natural environment. Maintenance of spaces should also be considered to ensure remain high quality places. Landscape Character Assessment and Historic Landscape Characterisation should be used to inform future GI plans.	59672 (Historic England)
Comments included were: • Green space and more diversity	59713 (Caldecote PC)
Comments included were: • Farming community to [be] consulted.	59714 (Caldecote PC)
Waterbeach parish abuts Green Belt, green open space and river Cam corridor. Extremely important that designated and other protected areas be enhanced and not a means to compensate for lack of green space in high density settlements such as Cambridge North Eastern Fringe development. Important to protect abundant biodiversity and habitat in the parish. WPC request this matter is treated as a priority if development is accelerated in WNT and GC area.	59845 (Waterbeach PC)

Summary of issues raised in comments	Comments highlighting this issue
Broadly supportive but again concern that this is too general a concept that requires further precision.	59921 (Fen Ditton PC)
Green infrastructure appears extensively mapped and broad areas for projects identified. GI is a cross boundary matter as ecosystems do not stop at administrative boundaries; policies should enable development of green infrastructure across boundaries where relevant. Recommended the plan takes a positive stance towards contributing to aims of statutory Nature Recovery Strategies established by Environment Act 2021. While await secondary legislation to specify details, policies could still take a positive stance towards them pre-emptively.	59956 (Suffolk Council)
We fully recognise the benefits of open spaces as key aspect of the environment; fundamental to the character of an area. More conservation management staff are needed. Riparian pasture is essential to future of our green spaces. Tree planting and appropriate species selection is important, but greatest losses of habitat have been lowland florally rich grassland. This is a more appropriate target for river corridors than extensive tree planting.	60177 (Cam Valley Forum)
Flawed that green infrastructure and historic environment are considered separately. A holistic approach is essential – see NPPF definition of the historic environment.	60197 (J Preston)

Summary of issues raised in comments	Comments highlighting this issue
Need to identify a clear list of projects for NMU routes and public access which development should fund. Proposals are extremely vague and do not focus on specifics. They are well-meaning but toothless and we will finish up without ANY much-needed schemes being built into the Plan	60495 (Cambridge Local Access Forum)
Primary concern is lack of specific proposals for improving access and connectivity for people on foot, away from traffic. No areas are identified for safeguarding open space as access land. Does not address funding of paths and open access. Propose a list of proposals for inclusion.	59842 (Cambridge Group of Ramblers)
Policy wording states all development proposals will include green infrastructure appropriate to its type, scale and location. Further clarification should be provided to avoid any ambiguity.	60515 (Taylor Wimpey UK Ltd), 60572 (Countryside Properties – Fen Ditton site)
Policy is good but direction is ambiguous in explanation; needs clarification to avoid misinterpretation. Policy should clearly relate to Great Places/Climate Change. Unclear interaction with open space standards in BG/EO. Strongly advocate specific targets for provision of GI. Clarify that provision of green space should respect the Natural England Accessible Natural Greenspace Standards. Support that development should meet GI Standard in Building with Nature. Support list of strategic GI initiatives, Expanding Greater Cambridge's 'urban forest'. Pleased to see Allotments and Community Gardening listed.	60759 (Cambridge and South Cambridgeshire Green Parties)
Residential development should contribute towards delivery of Strategic Green Infrastructure initiatives.	59987* (Natural England)

Summary of issues raised in comments	Comments highlighting this issue
Active site allocations for green infrastructure should be made on the same scale as allocating land for housing/business/employment development.	56622* (Gamlingay PC)
Need clarity on Biodiversity and Green Spaces Topic Paper and Greater Cambridge Green Infrastructure Opportunity Mapping. Recommend the objectives in supporting documents be included within local plan to give them more weight.	56820* (J Mead)
Policy needs to recognise that dogs are not compatible with biodiversity. Some sites need to be designated as dog free, others will need limited public access.	58764* (J Shanklin)
Positive to see policy explore proposal for all significant developments to align to the Building With Nature standard. Will strengthen the framework for protecting green spaces identified in local neighbourhood plans, for example.	59225* (Teversham PC)
Not justified to reject the alternative approach to restrict development within respective GI strategic areas on the basis that these areas are too broad. To redress the balance wherein the value of GI is greater than that of new developments, the policy should be to define the strategic areas more specifically.	59225* (Teversham PC)

## BG/TC: Improving Tree Canopy Cover and the Tree Population

### Hyperlink for all comments

Open this hyperlink - [Policy BG/TC: Improving Tree Canopy Cover and the Tree Population](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

**Number of Representations for this section: 43**

### Abbreviations

- PC= Parish Council      DC= District Council      TC= Town Council

### Executive Summary

There was broad support for the objectives and priorities for improving tree canopy cover and tree population was expressed within the representations from a range of individuals, organisations and developers, noting the existing low level of tree cover in Cambridgeshire, with comments that policies must be robust to protect trees and to deliver enhancements through development. Comments were made proposing specific tree canopy cover requirements on all new development, with the inclusion of ongoing maintenance, and replacement of trees when felled. Comments noted the importance of planting the right tree species in the right

location. Comments were expressed by one parish that a community forest or strategic plan is needed with allocated sites within the district, linking existing ancient woodland habitats, providing wildlife corridors.

Concerns from some developers on the wording stated the policy was contradictory stating both that “all trees should be protected” and “only trees of value should be protected”, and that policy detail is vague and did not provide details on when its applied.

Additionally, there were requests for policy flexibility on tree removal due to disease, age or safety concerns.

Further responses requested a more flexible approach applied to the policy, balancing priority for tree planting with provision of sustainable development, suggesting an explicit policy direction toward “trees of value” rather than blanket protection and balancing tree removal against the benefits of bringing development forward.

#### **Table of Representations: BG/TC Improving Tree Canopy Cover and the Tree Population**

Summary of issues raised in comments	Comments highlighting this issue
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**Support/ Strongly Support Policy:**

- Objective 3, as relevant to improving the farmed landscape of Greater Cambridge.
- Objective should be strengthened about how achieved in practice
- Policy should be a requirement in all new development.
- establish specific requirements for tree canopy cover in new development areas and set targets for improving tree populations in the rest of the city.
- need to develop and maintain the tree/hedge network, and surrounding land
- Importance of maintaining trees once planted in new developments
- Include irrigation and maintenance of areas and trees
- Ensure additional tree cover is in suitable locations and provision of species resilient to anticipated climate change.
- should be recognised in some locations other habitats have priority over trees.
- current depletion of the chalk aquifer with dry summers adversely affecting tree health, mostly conifers. In favour of proposals like Cambridge Great Park.
- Policy inclusion of tree canopy, enhance river corridors, and protect and enhance open spaces. Include robust policy to deliver enhancements through development ensuring achievement of multi-functional benefits for climate change, biodiversity, water quality, access and green infrastructure. Tree planting needs to be targeted in appropriate locations and considered in the context of wider plans for nature recovery, not simply planting of trees and protecting / enhancing soils, particularly peat soils.
- Support, especially enhanced protection to existing mature trees.
- Support opportunity for rural field margins of agricultural land helping increase linkages, biodiversity gains and in specific places the creation of woodland belts in open countryside, green belt land and around villages.
- Urban areas, with existing trees there's need to plan replacement with adaptation

**Individuals**

56693 (J Meed), 57676 (J Conroy), 57939 (L Buchholz),  
57971 (V Morrow), 58924 (A Sykes),  
60129 (C Blakeley).

**Public Bodies**

56730 (Croydon PC), 57302 (Foxton PC),  
57394 (Huntingdonshire District Council),  
58426 (Linton PC), 60005 (Steeple Morden PC),  
60083 (Guilden Morden PC).

**Third Sector Organisations**

56977 (Trumpington Residents Association), 58618 (University of Cambridge), 58698 (Cambridge Past Present and Future).

**Other Organisations**

57014 (The Wildlife Trust), 59979 (Natural England), 60761 (Cambridge and South Cambridgeshire Green Parties)

**Developers, Housebuilders and Landowners**

59765 (Endurance Estates).



Summary of issues raised in comments	Comments highlighting this issue
<p>species to gradually adapt to a changing climate.</p> <ul style="list-style-type: none"> <li>• provide sufficient future tree cover to mitigate the urban heat island effect, provide shade and mitigate microclimatic effects.</li> <li>• Would require that best practices followed.</li> </ul>	
<ul style="list-style-type: none"> <li>• protect existing hedgerows and supporting surrounding land.</li> <li>• Plant new hedgerows/trees where appropriate</li> <li>• Improve maintenance by hedge owners, reduce spraying and incorrect cutting.</li> <li>• Hedges recognised as character of an area, streetscape or public realm in Conservation areas, cannot be removed for more parking of cars, bins or cycles.</li> <li>• Wooden or metal fencing not viable substitutes for natural hedges.</li> </ul>	57136 (North Newnham Residents Association)
The policy addresses aims contained in the vision.	59206 (Cambourne TC)
Forestry Commission report on the vital importance of improving, enhancing, protecting and preserving tree cover. This must be delivered everywhere in and around Cambridge, but especially where tree canopy cover falls below the meagre average for our area.	60211 (JV Neal)
Where trees felled or hedgerows removed, they should be replaced. Policy should recognise, preserve and protect Forestry Commission Woodland Priority Habitat Network, Natural England Priority Habitat Network Woodland and Natural England National Forest Inventory.	57707 (Bassingbourn-cum-Kneesworth PC)
This is a priority, and a proper evolving plan needs to be put in place	60405 (Great and Little Chishill PC)
Welcome the policy direction to “provide sufficient space above and below ground for trees and other vegetation to mature”. Strongly support that the first five bullet points are about “protecting” existing trees on a development site.	60761 (Cambridge and South Cambridgeshire Green Parties)
Cambridgeshire has low woodland compared to other counties – would be great value to create managed broadleaf woodlands near Cambridge.	56486* (A Coghlan)

Summary of issues raised in comments	Comments highlighting this issue
Be mandatory that already approved plans plant many trees on site. Include roads that are redeveloped, eg. Histon and Milton Roads. Consult & encourage residents to contribute to cost of planting more trees if funding an issue.	57252* (D Lott)
<p>Strategic plan required:</p> <ul style="list-style-type: none"> <li>• community forest/strategic plan needed, with allocated sites for tree belts/mini forests within the district.</li> <li>• propose necklace of mini forests surrounding parish linking existing ancient woodland habitats, providing wildlife corridors (8 Western Gateway area).</li> </ul>	56625 (Gamlingay PC)
<ul style="list-style-type: none"> <li>• More weight to be given to environmental benefits of Tree Protection Orders (TPO).</li> <li>• Hedgerows around developments should be protected from 'sanitisation', and wherever possible occasional trees along hedgerows should be preserved or replaced</li> <li>• Funding and compensation needed to enable 'Farmland near Balsham Wood' as a GI site.</li> </ul>	57594 (R Pargeter)
<ul style="list-style-type: none"> <li>• refer to use of native species (local provenance) for tree/hedge planting, subject to viability due to climate change.</li> <li>• plant scrub species recognising important habitat for farmland birds.</li> <li>• be clear woodland species not always appropriate nor desirable.</li> </ul>	57818 (J Pavey)
Beneficial to increase tree and woodland cover, but care should be taken determining how/if this approach is consistent with maximising net biodiversity gains	57905 (Martin Grant Homes)

Summary of issues raised in comments	Comments highlighting this issue
Should be an objective measure for tree canopy cover, a method of measurement. Forestry Commission suggest urban targets of 20% canopy cover in its website: <a href="https://www.forestresearch.gov.uk/tools-and-resources/fthr/tree-canopy-cover-leaflet/">https://www.forestresearch.gov.uk/tools-and-resources/fthr/tree-canopy-cover-leaflet/</a>	57998 (Cambridge Doughnut Economics Action Group)
Tree planting and additional tree canopy is extremely important, the policy should avoid cheap, poorly planned tree planting, wrong species planted in the wrong places, be consistent with the local ecological conditions and place emphasis to recover and restore existing woodland areas.	58162 (H Thomas)
Tree and hedgerow planting are fundamental part of the Cambridge East proposals including the green corridor, developed areas (including street trees), and carbon sequestration elsewhere in Cambridgeshire. Trees within the airfield occur rarely, there is significant potential for major gain.	58509 (Marshall Group Properties)
Supports the provision of new woodland within landscape lead masterplans for new development, Trumpington South being a significant opportunity for this.	58770 (Trumpington Meadows Land Company)
Apply policy to the S/EOC/GB2 development to maintain the green hedgerow and tree lined footpath along Worts Causeway.	57815 (D Lister)
Right tree right place	59057 (RSPB Cambs/Beds/Herts Area)
Poor tree canopy cover across Cambridgeshire – target of 19% is welcome. Disappointing not see to see more recent re-evaluation of wet woodland in evidence base. Greater need for targets to align to BNG and TC target. Need greater emphasis on improving quality and diversity.	59225* (Teversham PC)
Agree tree cover is an important issue and have taken advantage of some of the tree offers that have been around. Fail to see that Chalk Hills will support planting of numerous trees in our near area. Wandlebury have strong policy for tree planting and maintenance, moving towards meeting this need in our area.	57525* (Stapleford PC)

Summary of issues raised in comments	Comments highlighting this issue
Support but feel the policy should be stronger in encouraging provision of new woodland of locally appropriate species. Sees real opportunities in the south west of the area to create some great woodland, such as West Cambs Hundreds and towards Wimpole as per Cambridge Nature Network plans.	59070 (National Trust)
<ul style="list-style-type: none"> <li>• Requests more flexible approach applied to policy on trees.</li> <li>• Need to balance priority for tree planting with provision of sustainable development, tree protection should not be at the expense of the provision of housing.</li> </ul>	57174 (Southern & Regional Development Ltd), 57247 (European Properties Ventures (Cambridgeshire))
Policy detail is vague and does not provide details on when it will apply	60585 (Martin Grant Homes)
<p>Site specific constraints and other policy directions in emerging Plan, to allow the most efficient and sustainable development of sites.</p> <p>policy direction to be explicit that ‘trees of value’ should be protected as opposed to the blanket protection of all tree cover on sites.</p>	59003 (Metro Property Unit Trust)
<ul style="list-style-type: none"> <li>• current policy direction somewhat contradictory: one bullet states all trees should be protected; another suggests only trees of value should be protected</li> <li>• consider introducing additional flexibility allowing for instances of trees removal due to disease, age or safety concerns</li> <li>• Consider the removal of trees, in whole or part, in order for development to be brought forward; loss should be weighed against the benefits of the proposals</li> <li>• Questions necessity or justification of stipulating a tool such as iTree.</li> </ul>	59528 (Countryside Properties - Bourn Airfield), 60516 (Taylor Wimpey UK Ltd.), 60573 (Countryside Properties – Fen Ditton Site),
In managing the trees and hedgerows around the existing Milton WRC (as well as other sites) and looking to make significant provision as part of CWWTPR as shown by our Consultation, we have provided a good starting point for the development of the site through the NE Cambridge allocation	60464 (Anglia Water Services Ltd.)

## BG/RC: River Corridors

### Hyperlink for all comments

Open this hyperlink - [Policy BG/RC: River corridorshttps://consultations.greatercambridgeplanning.org/greater-cambridge-local-plan-first-proposals/explore-theme/biodiversity-and-green-spaces/policy-1](https://consultations.greatercambridgeplanning.org/greater-cambridge-local-plan-first-proposals/explore-theme/biodiversity-and-green-spaces/policy-1) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

**Number of Representations for this section: 39**

### Notes

- Some comments attached to this section relate to development strategy, climate change and specific site policies. These comments are presented at the end of the section. Where appropriate we will review placement of these comments in the final version of these representation summaries which will accompany the draft plan.

### Abbreviations

- PC= Parish Council      DC= District Council      TC= Town Council      PROWs: Public Rights of Way

### Executive Summary

Broad support for the policy direction was expressed within the representations from a range of individuals, public bodies, organisations and developers, in particular for policy to both manage development on and require development to conserve and enhance the River Cam corridor (with comment this is particularly important due to the corridor's role in the wider cityscape). Support for policy to protect/enhance/and restore natural features, and to support re-naturalisation. Comments that natural flood

management techniques should be encouraged and comment that large schemes which improve water quality or tackle flooding should have assumption in favour of development within plan.

Some comments suggested the policy direction is too general and needs more precision, including a clear definition to ensure it is enforceable. Comments included that the policy, and wider draft plan, should recognise the river corridor as an important heritage asset as well as an environmental asset, and consider townscape impacts including overshadowing by tall buildings. There was comment that there is need for integrated policy approach encompassing water resources, water quality, flood risk and recognising the role of green infrastructure. Some comments were made in support of the need to balance tourism, improving people's access to high quality green spaces and multiple uses of the river (and its corridor) whilst protecting the river environment and wildlife. Anglian Water proposed that they and the two Councils enter into a Memorandum of Understanding to support the landscape scale integrated water management case for new strategic water supply provision.

Other comments suggested the that the policy approach be extended to explicitly include: chalk streams (including those around Fulbourn and Great Wilbraham), the river Great Ouse Corridor, the Ivel tributary and Ivel drainage board area and brooks from the aquifer spring line, the Wilbraham River, the Rhee, the Granta and surrounding woodland around Babraham, and that protection of upper Cam valley should extend into Uttlesford.

**Table of Representations: GB/RC River Corridors**

Summary of issues raised in comments	Comments highlighting this issue
Broad support for policy.	<p><b>Individuals</b></p> <p>56690 (J Meed), 58134 (M Asplin), 58157 (H Thomas), 58932 (A Sykes),</p> <p><b>Public Bodies</b></p> <p>56626 (Gamlingay PC), 58427 (Linton PC), 59922 (Fen Ditton PC), 60006 (Steeple Morden PC), 60084 (Guilden Morden PC),</p> <p><b>Third Sector Organisations</b></p> <p>56978 (Trumpington RA), 58736 (Cambridge Past, Present &amp; Future), 60176 (Cam Valley Forum), 60766 (Cambridge and South Cambridgeshire Green Parties)</p> <p><b>Other Organisations</b></p> <p>57013 (The Wildlife Trust), 59058 (RSPB Cambs/Beds/Herts), 59673 (Historic England), 60446 (Anglian Water Services Ltd),</p> <p><b>Developers, Housebuilders and Landowners</b></p> <p>58513 (Marshall Group Properties)</p>



Summary of issues raised in comments	Comments highlighting this issue
<p>A policy to manage development that has an impact on river corridors and proposes to protect, enhance and restore natural features, supporting re-naturalisation is particularly important for Cambridge due to the role the following play in managing flood risk and provision of habitats:</p> <ul style="list-style-type: none"> <li>• Chalk Streams</li> <li>• Role of Rivers</li> <li>• Floodplains</li> </ul>	59727 (Environment Agency)
Support policy which protects river corridors by ensuring 'the location, scale and design of development, protects and enhances the character, visual amenity and historic significance of river corridors and connected locations, including in particular considering views to and from rivers'.	56510 (C Martin), 56731(Croydon PC), 57945 (L Buchholz), 57974 (V Morrow), 60130 (C Blakeley)
Rivers need protecting and enhancing	60406 (Great and Little Chishill PC)
Policy should include provision of appropriate setback of developments from rivers to provide sufficient space for flood waters as well as safeguarding the integrity of the riverbanks and the development itself. This is needed as rivers, unless they have been artificially straightened, move through their landscapes through natural processes of erosion and deposition. Although river migration occurs over long time periods, developments should be set back generously to account for this alongside climate change	59727 (Environment Agency)
Need to balance tourism with protecting river environment (noting need to work with landowners).	56978 (Trumpington RA)

Summary of issues raised in comments	Comments highlighting this issue
<p>Plan should not only include River Cam corridor (including south of city) and its tributaries but should also:</p> <ul style="list-style-type: none"> <li>• reference the Ivel tributary and Ivel Drainage Board area</li> <li>• enhance tributaries, for example Hobson's Brook</li> <li>• recognise the Wilbraham River as part of the River Cam corridor (see Submission Draft of the Fulbourn NP)</li> <li>• note that Steeple Morden has important tributary (The Rhee) from river Cam which flows through parish</li> </ul>	<p>56626 (Gamlingay PC), 56978 (Trumpington RA), 57071 (Fulbourn Swifts Group) 60006 (Steeple Morden PC)</p>
<p>Suggest the policy approach be extended to include the River Great Ouse Corridor (which passes through northern edge of plan area).</p>	<p>57396 (Huntingdonshire DC), 59058 (RSPB Cambs/Beds/Herts)</p>
<p>Under the Duty to Cooperate with Uttlesford DC protection of the upper Cam valley should extend into that District.</p>	<p>57931 (Ickleton PC)</p>
<p>Support the protection and restoration of the chalk aquifer and related chalk streams.</p>	<p>56826 (A Sykes) ,57071 (Fulbourn Swifts Group)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Need to not overlook both:</p> <ul style="list-style-type: none"> <li>the chalk streams around Fulbourn and Great Wilbraham that feed Little Wilbraham River (which flows into Quy Water and into the river Cam) as they support significant biodiversity within Fulbourn Fen Nature Reserve (SSSI).</li> <li>The drainage ditches to the east of Fulbourn which connect to the Little Wilbraham River (which flows past SSSI at Wilbraham Common) as this SSSI also supports significant biodiversity and in turn feeds reed bed at Wilbraham fen.</li> </ul> <p>These chalk streams and the Wilbraham River should be recognised as part of the River Cam corridor south east of Cambridge.</p>	57071 (Fulbourn Swifts Group)
<p>Policy should be broadened to explicitly include chalk streams and it should apply to nearby developments (i.e Biomedical Campus/Hobson's Brook nearby and adjoining).</p>	58932 (A Sykes)

Summary of issues raised in comments	Comments highlighting this issue
<p>Ensure appropriate support is given for projects to re-naturalise:</p> <ul style="list-style-type: none"> <li>• sections of River Great Ouse, protect floodplains and ensure that any nearby development protects and enhances the character of the river corridor.</li> <li>• the Cam by restoring flood plains and habitats, for example at Logan's Meadow, Stourbridge and Jesus Green. Such Projects should be prioritised because of their potential to benefit wildlife and water quality while helping reduce flood risk.</li> </ul>	57396 (Huntingdonshire DC), 60766 (Cambridge and South Cambridgeshire Green Parties)
<p>Policy should include recognition enhancement and protection for the brooks which emanate from the aquifer spring line and help feed the river system</p>	60006 (Steeple Morden PC)

Summary of issues raised in comments	Comments highlighting this issue
<p>Previously urged the planning designation of 'Riverscape Opportunity Areas' (via 2020 Green Infrastructure consultation response) extending at least 50 metres each side of the main rivers, streams and brooks within Greater Cambridge. Aim for these areas to encourage natural processes e.g. buffering watercourses (full list of aims included in full rep). Suggest four opportunities which should be sought within 'Riverscape Opportunity Areas' :</p> <ul style="list-style-type: none"> <li>• Vary mowing regimes in urban parks</li> <li>• Reintroduce meadow species on urban commons/parks</li> <li>• Recreate scrapes and ditches on riverine commons in Cambridge</li> <li>• Create further inlets and ponds to create new water habitats</li> </ul>	60176 (Cam Valley Forum)

Summary of issues raised in comments	Comments highlighting this issue
<p>Policy is flawed as:</p> <ul style="list-style-type: none"> <li>• Only references walkers and Cyclists</li> <li>• Should reference horse riding as definition of Active travel in CPCA Local Transport Plan includes it alongside cycling/walking</li> <li>• Contrary to the Equalities Act as majority of horse riders female</li> <li>• Cambridgeshire Rights of Way Improvement Plan states bridleway is fragmented, inadequate and in need of improvement</li> <li>• Contribution to Cambridgeshire Local Economy by equestrians is £100 million pa and a safe bridleway network supports this industry</li> </ul>	56700 (British Horse Society)
<p>Support the goal of improving people's access to high quality green spaces, but care must be taken that multiple uses of the river and its corridor do not threaten its environmental value. The possible damage to vital habitats by high numbers of visitors is recognised in the evidence document; Greater Cambridge Green Infrastructure Opportunity Mapping (2020)</p>	60766 (Cambridge and South Cambridgeshire Green Parties)
<p>If linkages are made which increase recreational pressure on nearby recreational and tourism locations, it may be wise to ask for impact assessments to address any adverse effects in relation to increased recreational pressure.</p>	57396 (Huntingdonshire DC)

Summary of issues raised in comments	Comments highlighting this issue
Policy should both recognize the Forestry Commission Keeping Rivers Cool areas (of which some of the areas proposed for development are in) and it should seek to mitigate the impact of development on water temperature.	57708 (Bassingbourn-cum-Kneesworth PC)
Support policies to control development that impacts the River Cam, especially with regard to protecting habitat and revitalizing chalk streams (both from a biodiversity and an over-abstraction of water point of view).	57945 (L Buchholz)
How do high rise blocks, (example under development is Novotel at Cambridge North Station), 'enhance visual amenity'?	59774 (V Morrow)
What plans are there to mitigate the effects of bright lighting on biodiversity?	59774 (V Morrow)
The River Granta (specifically the flood plain, riparian habitat) and surrounding mature woodland matrix around Babraham needs better protection.	58157 (H Thomas)
Policies that aim to protect and enhance rivers need to not be undermined by consequential effects of other development in new Local Plan i.e. water supply and quality).	58736 (Cambridge Past, Present & Future)
Encourage approach of Natural Flood management techniques (applied to ditches, drains and streams in catchments of River Cam & tributaries) and suggest this be added as item which can be supported by development proposals.	58736 (Cambridge Past, Present & Future)

Summary of issues raised in comments	Comments highlighting this issue
There are multiple potential benefits of Natural flood management	59727 (Environment Agency)
The draft plan should have an assumption in favour of application for large scale schemes (such as treatment wetlands) which improve water quality or tackle flooding	58736 (Cambridge Past, Present & Future)
Would like to see the river corridor recognised as an important heritage asset (as well as environmental asset) in the wording of the draft plan.	58736 (Cambridge Past, Present & Future)
Floodplain restoration opportunity in both Gt River Ouse Corridor and Cam catchment (EA currently undertaking a Gt Ouse Flood Storage & Conveyancing study looking at further opportunities for this).	59058 (RSPB Cambs/Beds/Herts)
The River Cam corridor represents a crucial defining role in the city and surrounding area, part of the setting of the City. It is an important aspect of the historic environment and this inter-relationship needs to be referenced in the policy. Suggest policy should require development to conserve and enhance the River Cam corridor in particular its role in the wider cityscape.	59673 (Historic England)
River Cam Corridor initiative does not mention the historic environment, historic environment designations, or conservation area appraisals.	60198 (J Preston)



Summary of issues raised in comments	Comments highlighting this issue
No consideration of historic / characteristic uses and land management. The whole river corridor from Byron's Pool to Baits Bite should be safeguarded as the corridors historic uses are vital parts of the historic and cultural as well as landscape character of Cambridge.	60198 (J Preston)
Grantchester Meadows, one of the key river corridor historic and cultural spaces, is the only vital section of the corridor currently without Conservation Area designation. It is threatened by visitor pressures and the possible removal of the grazing cattle which are vital to traditional water meadow management.	60198 (J Preston)
Need to have integrated policy approach encompassing water resources, water quality, flood risk and recognising the role of green infrastructure. Although the value of green infrastructure and river corridors is recognised in policy BG/GI and BG/RC, it is worthwhile including it as part of the integrated water management policy.	59727 (Environment Agency)
Tall buildings can have an adverse effect if located too close to a watercourse by introducing overshadowing impacts and artificial lighting which disrupts natural diurnal rhythms of wildlife such as bats	59727 (Environment Agency)
Concerned too general a concept that requires further precision.	59922 (Fen Ditton PC)
Policy will need precise and clear definition to ensure that it is enforceable	60766 (Cambridge and South Cambridgeshire Green Parties)

Summary of issues raised in comments	Comments highlighting this issue
Support the restoration of natural features and use of GI to support the alleviation of flooding risk.	60130 (C Blakeley)
Support the delivery of the continuous Cam Valley Trail	60130 (C Blakeley)
Insufficient information on the proposed Cam Valley Trail, this prevents useful comment.	56826 (A Sykes), 58932 (A Sykes)
Promotes river corridors as an amenity for recreation as if rivers are in good health and can take increased human pressure. However, because of low river flows, our water quality status is 'poor' in the upper Cam corridor. Summer Cam runs pretty much with only treated sewage effluent. On the tiny Mel river (tributary of the Rhee) the summer flow pulses with the periodic discharge from their local sewage treatment works. Water testing shows bulk of E coli in the river Cam comes from these treated effluent sources.	60176 (Cam Valley Forum)
<p>The plan should fully map a 'nature recovery network' which:</p> <ul style="list-style-type: none"> <li>• has set targets for improvement</li> <li>• includes aquatic elements (drains, streams, rivers, lakes and ponds) at the same time as identifying new large scale areas for habitat creation</li> <li>• includes woodlands and areas for natural regeneration</li> <li>• provides opportunities for linking all above</li> </ul>	60176 (Cam Valley Forum)

Summary of issues raised in comments	Comments highlighting this issue
Rural access provides health benefits but wildlife (presently limited by pollution, habitat and biodiversity losses) are also vulnerable and need more protection.	60176 (Cam Valley Forum)
Pressures on open spaces with public access along corridors are already hard to manage & considerable but sites like Trumpington Meadows show positive change a possibility.	60176 (Cam Valley Forum)
No mention of environmental capacity issues or recognition that there may be capacity limits to growth or access by either/both local people and visitors (impacts of punt operators on Cam, etc).	60198 (J Preston)
As part of Anglian Water's Statement of Common Ground with the two councils, would welcome support in Price Review 2024 submissions for our case for greater investment in river health in AMP8 (2025-2030). Want stronger governance of overall river health.	60446 Anglian Water Services Ltd)
Propose Anglian Water and the two Councils enter into a Memorandum of Understanding to support the landscape scale integrated water management case for new strategic water supply provision which could serve existing and new communities and business in the Cambridgeshire and wider East of England area. The strategic schemes will underpin the long-term environmental gains sought on water resource planning by policy BG/RC.	60446 Anglian Water Services Ltd)
Policy is incompatible with current GCP CSET plans.	58157 (H Thomas)

Summary of issues raised in comments	Comments highlighting this issue
Policy difficult to implement in Babraham if Research Campus removed from Greenbelt. This would cause fragmentation of landscape which would leave fragments under pressure from over development.	58157 (H Thomas)
Planning applications (including current) should be reviewed if they encroach on policy.	58427 (Linton PC)
Cambridge East proposals have limited direct benefits as no river corridor affected but the proposal may have indirect benefits; such as recharging the groundwater aquifer (which may have wider water catchment benefits, including for chalk steams).	58513 (Marshall Group Properties)
Cambridge WRC relocation project will seek to deliver at least 10% biodiversity net gain; this could include green infrastructure improvement on the Cam (given planned increases in discharges of recycled water) and green infrastructure biodiversity net gains in the eastern Fens. The relocation project will enable us to consider options for improvement on the Cam in accordance with draft policy BG/RC.	60473 Anglian Water Services Ltd)
Cambridge Waste Water Treatment Plant Relocation Project (CWWTPR), if sited on Honey Hill, will impact on those using footpaths in this area, due to the scale of the structure (development will be visible from River Cam Corridor) and the odour coming from the site.	56510 (C Martin), 57492 (C Martin), 57577 (Save Honey Hill Group), 57625 (J Pratt), 57677 (J Conroy)

Summary of issues raised in comments	Comments highlighting this issue
Rebuilding CWWTPR on flat fen landscape is at odds with this policy and will be visible from many Public Rights of Way (PROWs) in this area.	57492 (C Martin)
Supportive of the approach to protect, enhance and restore River Cam and its tributaries. River Granta is such a tributary and runs along the northern edge of site Land north of Cambridge Road, Linton. Development of the site could help achieve policy approach.	60517 (Taylor Wimpey UK Ltd)
Policy S/NEC should reflect that both the current proposed development under the policy and the green belt site proposed for the relocation of the current operational Waste Water Treatment Work, will be clearly visible from the River corridor and surrounding landscape.	58134 (M Asplin)
If policy S/NEC is fulfilled, then new housing development will be highly visible and impact the River Cam corridor landscape.	57577 (Save Honey Hill Group), 57625 (J Pratt), 57677 (J Conroy)
Welcomes guidance for integrating development into the landscape but concern raised regarding NE Cambridge which is already intruding on the river corridor visual amenity.	57945 (L Buchholz)
Thought should be given to flood risk and prevention in relation to development.	57812 (Histon & Impington PC)

Summary of issues raised in comments	Comments highlighting this issue
<p>Suggest a moratorium on large development proposals in the upper Cam valley (Stapleford to the boundary with Essex) until impacts of developments (including cumulative impacts) given permission in recent years or planned for in this and the adopted Local Plan are properly considered following the rollout of such developments. E.g., Huawei, Genome Campus, Sawston housing, Unity Campus, Whittlesford Parkway Area. This is essential to protecting the River Cam and surrounding landscape.</p>	<p>57931 (Ickleton PC)</p>
<p>Streams at the springs adjacent to the Fulbourn Nature Reserve east of the village which have historically maintained wetland within the Fulbourn Fen Nature Reserve (SSSI) are often dry due to the depleted water table level. This largely due to the scale of water abstraction from the underlying aquifer by the Cambridge Water Company from the Fleam Dyke Pumping Station, which is not considered to be a long-term sustainable solution to protect the biodiversity of the local flora and fauna.</p>	<p>57071 (Fulbourn Swifts Group)</p>

## BG/PO: Protecting open spaces

### Hyperlink for all comments

Open this hyperlink - [Policy BG/PO: Protecting open spaces](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

**Number of Representations for this section: 54**

### Notes

### Abbreviations

- PC= Parish Council      DC= District Council      TC= Town Council      RA= Resident Association
- NPPF=National Planning Policy Framework      ESFA= Education and Skills Funding Agency

### Executive Summary

Broad support for the policy intention was expressed within the representations from a range of individuals, organisations, and public bodies. Comments were received that policy needs to be considered against competing policy requirements, that it needs to address the future stewardship of open space and recognise its value in reducing recreational pressures on vulnerable sites and the heritage value of sites. Comments were made that the policy should recognise that open spaces are historic and part of the historic environment (not just viewed in terms of green infrastructure). A number of comments were made by individuals and parish councils regarding the impacts of development on landscape and open space in specific locations.

Table of Representations: BG/PO Protecting open spaces



Summary of issues raised in comments	Comments highlighting this issue
Support Policy	<p><b>Individuals</b></p> <p>56691 (J Meed), 56812 (M Colville), 57946 (L Buchholz), 57976 (V Morrow), 60131 (C Blakeley),</p> <p><b>Public Bodies</b></p> <p>56627 (Gamlingay PC), 57934 (Ickleton PC), 58429 (Linton PC), 59210 (Cambourne TC), 59923 (Fen Ditton PC), 60007 (Steeple Morden PC), 60085 (Guilden Morden PC), 60407 (Great and Little Chishill PC)</p> <p><b>Third Sector Organisations</b></p> <p>56678 (The Ickleton Society), 56979 (Trumpington RA), 57080 (Fulbourn Swifts Group),</p> <p><b>Other Organisations</b></p> <p>57010 (The Wildlife Trust), 58631 (University of Cambridge), 59059 (RSPB Cambs/Beds/Herts Area), 59099 (National Trust),</p>
Object to Policy 67 which is unduly restrictive in that it states a specific distance within which replacement facilities should be located.	56847 (Gonville & Caius College)

Summary of issues raised in comments	Comments highlighting this issue
Should identify important ecological areas which can be augmented, connected and protected from development. E.g. City and County Wildlife sites and pockets of special habitat in Conservation Areas. Registration of Open spaces as neighbourhood sites.	57137 (North Newnham RA)
Lack of sheltered areas for sports and lightning which is impacting a huge number of people	57605 (L Cucurachi)
Criteria for designation of Local Green Space are quite restrictive and therefore policy-makers should consider other options for protecting existing open space just outside the development framework valued by the community. Existing Local Green Spaces, Protected Village Amenity Areas and Important Countryside Frontages should be retained. Two sections of The Causeway, Bassingbourn-cum-Kneesworth are an important connection between the street scene and the East Anglian Chalk landscape and should be considered for ICF designation.	57712 (Bassingbourn-cum-Kneesworth PC)
Support the proposals which exclude any development in Little Linton and the land between Little Linton and Linton. The settlements of Linton and Little Linton have historically had distinct identities. New development in the area would disrupt the historic open landscape, destroying the separation and damaging the individual character of each settlement. Land in this area is a valuable environmental resource, which should be protected. The direction of future development to other more sustainable locations is appropriate and will ensure that Little Linton and Linton retain their identity.	57841 (S Nickalls), 57872 (A Nickalls), 57916 (S Foulds), 57925 (H Lawrence-Foulds), 57958 (C Mackay)

Summary of issues raised in comments	Comments highlighting this issue
Policy 67 needs strengthening to reflect environmental location; environmental aspects of open space are inherent to the location of the space itself and cannot/ should not be relocated; needs to create buffer areas around wildlife sites as per Wildlife Trust and national standards	57884 (North Newnham RA), 57961 (E Davies), 58176 (H Brown)
There are no all-weather skateparks in Cambridge. Existing skateparks lack lights and rain coverings. Currently skating is summer-only sport. More skateparks are needed in the north of Cambridge.	57990 (J Humphrey), 58108 (G Gardner), 58111 (K Enright)
Impact of LED lighting on natural open spaces, sports fields and clubs, green belt, urban fringes and residential areas needs to be reviewed. A more balanced provision is needed with better technical cowls and restricted times.	58299 (North Newnham RA)
Support policy. Do not support loss of open space where applied to private benefit. The policy needs to address the future stewardship of open space and recognise its value in reducing recreational pressures on vulnerable sites and the heritage value of sites.	58751 (Cambridge Past, Present & Future)
Consideration needed for competing policy requirements	59012 (Metro Property Unit Trust)
Clarify allotment protection including sites with statutory protection requiring government approval for disposal. All allotments should be declared statutory.	59245 (D Fox)

Summary of issues raised in comments	Comments highlighting this issue
The department welcomes Policy 67's approach towards education sites. It recommends that on education sites, the loss of open space is considered on the basis of whether it is still needed (as demonstrated by the applicant) and what mitigations are proposed, such as enhanced quality of remaining open space or more inclusive accessibility.	57484 (ESFA Department for Education)
Policy should allow for an appropriate assessment on the basis of need for the site/its use against which a planning application can be assessed. The policy should reflect the wording of NPPF paragraph 99 and allow for qualitative criteria, in order to allow an appropriate assessment to the merits of each individual case.	59537 (Gonville & Caius College)
No mention that open spaces are historic and part of the historic environment. Should consider their significance as a whole, not just in terms of green infrastructure	60199 (J Preston)
Give great prominence to green networks and allow for the benefits of only visual accessibility.	60333 (North Newnham RA)
Lack of direction and information associated with this Policy - impossible to comment on.	60769 (Cambridge and South Cambridgeshire Green Parties)
Development at Cambridge East will not have an impact on existing accessible open spaces but plenty of opportunity to create new spaces.	58518 (Marshall Group Properties)
Contrary to this policy is destruction of Green Belt at Honey Hill. Proximity to villages of Fen Ditton, Quy, Horningsea and Teversham where there has been lack of consultation.	57496 (C Martin), 57505 (A Martin)

Summary of issues raised in comments	Comments highlighting this issue
The relocation of the Cambridge Waste Water Treatment Plant to an area of Green Belt does nothing to protect open spaces.	58070 (Horningsea PC)
Agree with this policy in principle. However, the achievement of Policy S/NEC: North East Cambridge, appears to contradict this policy as the development on Cambridge North East Area is predicated on the relocation of the Cambridge Waste Water Treatment Plant to an area of Green Belt.	57517 (Save Honey Hill Group), 57620 (J Pratt), 57678 (J Conroy), 58135 (M Asplin), 59217 (C Martin)
No Comment	57400 (Huntingdonshire District Council)

## BG/EO: Providing and enhancing open spaces

### Hyperlink for all comments

Open this hyperlink - [Policy BG/EO: Providing and enhancing open spaces](#)> then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

**Number of Representations for this section: 52**

### Abbreviations

- PC= Parish Council      DC= District Council      TC= Town Council      BDG= Biodiversity Net Gain

### Executive Summary

General support for the policy direction from a range of individuals, organisations, developers, and public bodies, with new provision of open spaces widely supported.

Comments regarding the application of this policy for new development included those suggesting that: the policy should be applied on a site-by-site basis; smaller developments should ensure provision of open space; onsite provision not off-site financial contributions should be required; new dwellings should have provision for food growing space (this point was also supported in response to the quick questions); open space should be provided within reasonable walking distance of residents' homes; standards should continue to differentiate between Cambridge City and South Cambridgeshire to reflect the differences between the two areas; SUDs should not be treated as open space; and open space should include provision for biodiversity. A few developer comments wanted more clarity regarding the specific policy requirements.

Broader comments about open spaces included: Cambridge and South Cambridgeshire Green Parties suggested that the policy direction under BG/GI should also be applied to BG/EO, and that multifunctionality should not reduce amount of overall public

space; Historic England comments highlighted how open spaces can form an important part of the setting of heritage assets; support for provision of allotments, concern relating to multi-storey buildings which risk dominating open space and affecting the character of Cambridge; requests for provision of new skateparks and growing spaces; and requests that open space was provided to meet the needs of equestrians. A few developers identified that their site would provide open space to meet needs.

Table of Representations: BG/EO: Providing and enhancing open spaces



Summary of issues raised in comments	Comments highlighting this issue
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Support Policy	<p><b>Individuals</b></p> <p>56692 (J Meed), 57626 (J Pratt), 58136 (M Asplin), 60132 (C Blakeley),</p> <p><b>Public Bodies</b></p> <p>58432 (Linton PC), 60008 (Steeple Morden PC), 60086 (Guilden Morden PC), 60408 (Great and Little Chishill PC),</p> <p><b>Third Sector Organisations</b></p> <p>56980 (Trumpington RA), 58776 (Cambridge Past, Present &amp; Future), 60770 (Cambridge and South Cambridgeshire Green Parties)</p> <p><b>Other Organisations</b></p> <p>57011 (The Wildlife Trust), 58636 (University of Cambridge),</p> <p><b>Developers, Housebuilders and Landowners</b></p> <p>(58777) Trumpington Meadows Land Company, 58832 (CBC Limited, Cambridgeshire County Council and a private family trust), 59300 (National Trust), 60520 (Taylor Wimpey UK Ltd),</p>
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Summary of issues raised in comments	Comments highlighting this issue
We fully support policies that aim to increase greenspace provision and access, whilst also helping to meet biodiversity objectives.	59072* (RSPB Cambs/Beds/Herts Area)
All new homes should have provision for food growing and everyone should have access to growing spaces. All new community buildings should offer space for cooking, eating, sharing and learning about food.	59079* (Cambridge Sustainable Food CIC)
Access to open spaces must be available to all users including equestrians. This policy excludes equestrians. Policy should include equestrians if it includes cyclists unless there is good reason for their exclusion e.g. central urban areas.	56699 (British Horse Society)
Policy needs to be balanced with less development, if possible.	56732 (Croydon PC)
<ul style="list-style-type: none"> <li>• Allocation of new sites is needed.</li> <li>• Public access needs to be included in planning decision making from the outset.</li> </ul>	56628 (Gamlingay PC)
No new housing should be shoe-horned into existing villages. New developments of greenfield sites NEVER result in a net increase in open spaces.	56813 (M Colville)
On many new housing developments, the landscaping close to homes tends to consist mainly of miniature ornamentals, which are often of little value for nature and are cut back so hard in maintenance regimes that they provide little green vegetation to enhance the appearance of the limited open space.	57086 (Fulbourn Swifts Group)
Open Space Standards will be required to be reviewed through the Local Plan to reflect the differences between the City with its urban character and the more rural environment of the villages.	57175 (Southern & Regional Developments Ltd), 57248 (European Property Ventures - Cambridgeshire),

Summary of issues raised in comments	Comments highlighting this issue
<p>There must be no reduction in the previous plan's requirement for both informal and formal open space per 1000 new residents.</p> <p>New open spaces including allotments MUST be created especially where developments have no gardens. These should be within a reasonable walking distance (15 minutes) but 5 minutes for open spaces generally.</p>	57813 & 57876 (Histon & Impington PC)
<ul style="list-style-type: none"> <li>• There should be lower limits so that smaller developments also meet the limit allocations, to ensure piecemeal developments avoid not providing open spaces.</li> <li>• Developers should not be permitted to double-count open spaces that are intended to meet two functional and incompatible criteria. Eg. the play area and a [SUDS] rainwater catchment area, the play area is often submerged for large portions of the year.</li> </ul>	58004 (Cambridge Doughnut Economics Action Group)
<p>The Open Space standards should continue to differ between Cambridge and South Cambridgeshire to reflect the differences between these areas.</p>	60520 (Taylor Wimpey UK Ltd), 60574 (Countryside Properties - Fen Ditton site)
<p>Policy direction should be applied on a site-by-site basis. Development proposals for enhanced, or rationalised facilities may already have open space or recreational facilities and capacity elsewhere.</p>	59013 (Metro Property Unit Trust)
<p>The policy should acknowledge the requirements for providing BNG when calculating the typologies of open space provision.</p>	57387 (Persimmon Homes East Midlands)
<ul style="list-style-type: none"> <li>• Development should provide onsite provision and not off-site financial contributions.</li> <li>• Other spaces should include green jogging and cycle routes for their high value for both recreation and transport.</li> </ul>	57817 (D Lister)

Summary of issues raised in comments	Comments highlighting this issue
Off-site open space S106 contributions has resulted in residents of new developments being denied access to green areas adjacent to their homes. Residents of Mill Park flats in Cambridge were told Section 106 money had been spent improving facilities at Coleridge recreation ground at half mile walk away.	59257 (F Gawthrop)
Support however further clarity is required about how this is calculated and what will be expected on-site.	59767 (Endurance Estates)
Greater clarification is needs about the Open Space requirements for site allocation inform site capacities and viability.	60574 (Countryside Properties - Fen Ditton site)
Policy should explicitly refer to enhancing biodiversity as a component of open space provision for their health, ecological and recreational benefits.	57822 (J Pavey)
<ul style="list-style-type: none"> <li>• Open spaces risk being dominated by multi-story buildings.</li> <li>• An essential part of the character of Cambridge stems from its lack of high-rise buildings and careful earlier planning controls, for example along the tow-path in Chesterton where, for a long period, single storey houses only were permitted.</li> </ul>	57979 (V Morrow)
<ul style="list-style-type: none"> <li>• Skateparks would be a great way to provide play space for children and teenagers, as well as many adults.</li> <li>• More skate-able facilities (particularly covered) would have tremendous positive spill over on the youth of the city who feel particularly isolated and bored during winter months.</li> </ul>	57996 (J Humphrey), 58113 (G Gardner)
Policy should encourage connections between opportunities for multi-functional use and potential links with Green Infrastructure targets and biodiversity enhancement.	59063 & 59067 (RSPB Cambs/Beds/Herts Area)

Summary of issues raised in comments	Comments highlighting this issue
It is important to have high standards for the provision of open spaces especially for sport.	59211, 59214 & 59220 (Cambourne TC)
Demand continues to outstrip supply for allotments, a new higher target level of provision should be included in the plan, to account for current, new and future growth in demand, within and outside the city.	59288 (D Fox)
Open spaces can form an important part of the setting of heritage assets. Both providing and enhancing such spaces is very much linked to the conservation and enhancement of the historic environment. This should be referenced in the policy and supporting text.	59674 (Historic England)
Need to consider other spaces, e.g. market square & Quayside. Need to: <ul style="list-style-type: none"> <li>• manage existing pressures,</li> <li>• avoid harmful intensification of use, and</li> <li>• ensure that new development does not increase these pressures, e.g. the river corridor..</li> </ul>	60200 (J Preston)
Policy wording should be amended to the effect that new open spaces will be required where justified.	60520 (Taylor Wimpey UK Ltd)
<ul style="list-style-type: none"> <li>• Open spaces should be managed to maximise biodiversity. The policy direction under BG/GI should also apply here.</li> <li>• Multi-functionality should not be used as an opportunity to reduce the overall amount of open space made available.</li> <li>• Should SUDS be treated as open space?</li> <li>• Current open space standards should be treated as a minimum requirement.</li> </ul>	60770 (Cambridge and South Cambridgeshire Green Parties)
A simpler route to obtaining planning permission for community orchards and allotments is required.	59225* (Teversham PC)

Summary of issues raised in comments	Comments highlighting this issue
Welcome recognition that wellbeing and open spaces are linked, particularly a focus on formal sports pitches. No mention of partnerships with major charities. No mention of support for grass roots clubs and this omission should be rectified.	59225* (Teversham PC)
Should be greater planned allotment provision. Growing unmet demand, outstrips supply. Provide flexible open space capable of conversion in future.	59227* (D Fox)
<ul style="list-style-type: none"> <li>Open spaces already exist on the Honey Hill land that is Green Belt</li> <li>No operational need to move the Cambridge Waste Water Treatment Plant (CWWTP) to Honey Hill.</li> <li>The public has the right to robustly question whether this relocation is a nationally significant infrastructure project when in fact there is already a fully functioning sewage works in place.</li> </ul>	58071 (Horningsea PC)
No comment	57402 (Huntingdonshire District Council)

### Site related open space comments

Summary of issues raised in comments	Comments highlighting this issue
Policy S/NEC: North East Cambridge, appears to contradict this policy. Unclear where this is recognised within the Plan to allow informed land use decisions to be made.	58136 (M Asplin)
Fulfilment of S/NEC Policy through relocation of CWWTP to the Green Belt would be completely contrary to this Policy.	57626 (J Pratt), 57679 (J Conroy)
Land off The Lawns, Cambridge HELAA site 40425	56847 & 59537 (Gonville & Caius College)
Note the potential for Trumpington Meadows Country Park and Hobson's Park being designated as Local Green Spaces.	56979 (Trumpington RA)
Proposed <b>Important Countryside Frontage</b> on The Causeway.pdf	57712 (Bassingbourn-cum-Kneesworth PC)
Access to the Local Green Space Gamlingay First School Playing Fields (Green End, Gamlingay SG19 3LF) is currently restrictive and difficult for residents (owner Cambridgeshire County Council) Access rights to any public green space needs to be specified in the planning permission.	56629 (Gamlingay PC)
<ul style="list-style-type: none"> <li>Small green spaces provided throughout development increase the amounts of physical activity that residents carry out and, and that these spaces are supportive of good mental health and wellbeing.</li> <li>MGH propose new green infrastructure as part of the proposals at North Cambourne, where significant areas of the site will be used for green space in conjunction with sport, recreation, natural habitats and biodiversity offsetting.</li> </ul>	57906 (Martin Grant Homes)



Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• Cambridge East proposals align with the Local Plan requirements, with significant formal, such as sports pitches and urban squares, and informal, such as new accessible 'countryside' in the green corridor, proposed.</li> <li>• The greenspace is to be dispersed, occurring throughout the development and within the developed areas themselves.</li> <li>• The ambition is to ensure that where appropriate green spaces are multi-functional.</li> </ul>	58520 (Marshall Group Properties)
<p>Trumpington South can provide double the open space requirements, this will:</p> <ul style="list-style-type: none"> <li>• enhance access to existing open space provision in the Trumpington Meadows Country Park.</li> <li>• augment the strong landscape setting to the City established as part of the Trumpington Meadows project.</li> <li>• provide major additional recreational opportunities for people of all ages and abilities and</li> <li>• help to integrate new and existing communities at Trumpington.</li> </ul>	(58777) Trumpington Meadows Land Company
<p>The provision of high-quality open space that enhances the Campus' integration with Cambridge is one of the main aims of the Spatial Vision. The Campus expansion into the identified Area of Major Change represents an excellent opportunity to provide and enhance access to open space for all Campus users and visitors, especially if integrated into other existing initiatives and provision.</p>	58832 (CBC Limited, Cambridgeshire County Council and a private family trust)

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## Appendix B: Summaries of Representations and Responses – Great Places Chapter

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## GP: Great Places

### Hyperlink for all comments

Open this hyperlink - [Great places](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

**Number of Representations for this section:** 35

### Notes

- The representation 57180 (Southern & Regional Developments Ltd) has been incorrectly placed here.
- The representation 57255 (European Property Ventures – Cambridgeshire) has been incorrectly placed here.

### Abbreviations

- PC= Parish Council      DC= District Council      TC= Town Council

### Executive Summary

Many individuals, public bodies, third sector organisations and developers expressed support for the aims of the Great Places policies.

A number of respondents emphasised the importance of including policies which will protect Cambridge's historic environment. Cambridge Past, Present and Future commented that the Local Plan needs to not only focus upon historic assets, but also recognise the historic significance of the whole of Cambridge and ensure that its historic setting is protected from cumulative impacts. Historic England (HE) provided a detailed representation, in which they expressed concerns about the density and height of some of the site proposals and the need for Heritage Impact Assessment to be carried out to inform the next stage. HE also

noted the need to have policies covering designated and non-designated historic assets, heritage at risk, historic shopfronts, and tall buildings. Comments also noted that Great Places are more than just about the design of buildings but creating communities with access to services, facilities, nature and open spaces.

Some comments considered that development proposed would impact negatively on the delivery of the goals set out in this chapter. A few developers commented that the sites that they were proposing would fulfil the aims of the policies. Several commentators emphasised the importance of delivering facilities and infrastructure to ensure that new development results in great places.

In terms of the additional survey questions which were attached to this round of consultation, in the responses to Q.13 (which relates to the aspirational vision for Greater Cambridge) there was a strong aspiration to preserve Greater Cambridge's historic buildings and wider heritage and a critical comment of GCSP's approach to urban design of new settlements.

#### **Table of representations: Great Places**

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
General support for the Greater Places chapter.	<b>Individuals</b> 57683 (J Conroy),

Summary of issues raised in comments	Comments highlighting this issue
	<p><b>Public Bodies</b></p> <p>56751 (Croydon PC), 58447 (Linton PC), 59246 (Cambourne TC), 59698 (Central Bedfordshire Council)</p> <p><b>Third Sector Organisations</b></p> <p><b>Other Organisations</b></p> <p>58824 (University of Cambridge),</p> <p><b>Developers, Housebuilders and Landowners</b></p> <p>57909 (Martin Grant Homes), 58019 (Imperial War Museum/Gonville and Caius College), 58317 (Hallam Land Management Ltd), 58547 (Marshall Group Properties), 58853 (CBC Limited, Cambridgeshire County Council and a private family trust), 58947 (Phase 2 Planning),</p>
Strongly advocate the Councils' aim of sustaining the unique character of Greater Cambridge and complementing it with beautiful and distinctive development, creating a place where people want to live, work and play.	58718 (The Church Commissioners for England)
Agree that Great Places intersect with other themes within the Local Plan.	58818 (Cambridge Past, Present and Future)

Summary of issues raised in comments	Comments highlighting this issue
Notes the description in the Plan that a great place is one that locates jobs near to homes, not the other way round.	56985 (Trumpington Residents Association)
The Plan does not meet its objectives of delivering high quality and well-designed places across both the rural and urban area as the focus for new development is not in the rural areas.	57180 (Southern & Regional Developments Ltd)
The Plan does not meet its objectives of delivering high quality and well-designed places across both the rural and urban area as the focus for new development is not in the rural areas.	57255 (European Property Ventures – Cambridgeshire)
Central Cambridge is a beautiful area and new development must not be permitted that detracts and destroys it. Modern developments do not mix well with historic buildings.	57290 (D Lott)
Extensions to existing and new homes and businesses must be high quality and reflect local architecture.	57290 (D Lott)
It is essential the landscape character is maintained and not enhanced beyond its natural beauty.	57290 (D Lott)
The Green Belt should be protected.	57290 (D Lott)

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Summary of issues raised in comments	Comments highlighting this issue
Heritage conservation and enhancement should be prioritised over growth and new development. This includes, wherever possible, preserving heritage assets from damage from climate change.	57290 (D Lott)
Only protect public houses with genuine historic value	57290 (D Lott)
No comment	57412 (Huntingdonshire District Council)
The proposed allocation in Stapleford will destroy the landscape character of the village, conserve high quality landscape or the public realm and will not protect and enhance the Green Belt.	57532 (Stapleford Parish Council)
The fulfilment of Policy S/NEC through relocation of the Waste Water Treatment Plant will be at odds with a number of the policies in this Great Places chapter such as Green Belt, protection of conservation areas and heritage assets and Public Rights of Way.	57683 (J Conroy)
The Local Plan should seek to rebalance community infrastructure in identified underserved areas to benefit new and existing communities.	57836 (D Lister)
Land North of Cambourne (HELAA Site 40114) Endorse the approach in national policy that development will be led	57909 (Martin Grant Homes)



Summary of issues raised in comments	Comments highlighting this issue
through local design codes that involve local residents and stakeholders in a transparent way, including on key sites such as North Cambourne.	
Land North of Cambourne (HELAA Site 40114) North Cambourne will require improved connectivity and permeability to existing and new communities.	57909 (Martin Grant Homes)
Land North of Cambourne (HELAA Site 40114) Consolidation of development at Cambourne and creating a settlement of scale with associated facilities and infrastructure can assist the aims of making great places.	57909 (Martin Grant Homes)
Land North of Cambourne (HELAA Site 40114) Cambridgeshire has a great track record in delivering well-designed new neighbourhoods, which is now being reinforced through the nation design guide and updates to the PPG and in the future, the NPPF. The GCSP will need to be well resourced to ensure development proposals are well considered and maximise benefits.	57909 (Martin Grant Homes)
The semi-rural and distinctive characteristics of parts of Cambridge, such as the West Cambridge Conservation Area, should be formally recognised and protected.	57964 (E Davies)

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Summary of issues raised in comments	Comments highlighting this issue
Land east of M11, West of Duxford, Duxford and Land at Duxford (HELAA site 40095) A large part of improving the setting of this historically important site is to relocate necessary commercial and operational activity to the East and West ends of the site, away from the best preserved and most significant central site.	58019 (Imperial War Museum/Gonville and Caius College)
Land east of M11, West of Duxford, Duxford and Land at Duxford (HELAA site 40095) Proposals to expand Duxford Village with homes, community facilities and country park would support a work life balance for proposed Avtech employment site.	58019 (Imperial War Museum/Gonville and Caius College)
Support the principle of Historic buildings being updated to extend their life, provided it does not alter their appearance.	58048 (Histon & Impington PC)
The Nine Wells Development was meant to provide a soft edge to Cambridge. Developing this area would now mean the southern edge of the city will no longer be a great place.	58169 (S Kennedy)

Summary of issues raised in comments	Comments highlighting this issue
<p>Land at Cambridge Airport, Newmarket Road, Cambridge (HELAA site 40306 and OS270) Cambridge East will be a place in its own right but integrated within Cambridge. The creation of great places is embedded at the heart of the vision for the site and the scale and significance of the site provides an opportunity to implement place making.</p>	<p>58547 (Marshall Group Properties)</p>
<p>Land north and south of Cambridge Rd, Eltisley (HELAA site 51668) The vision for the site will create a new place where people and nature can co-inhabit the landscape sustainability.</p>	<p>58718 (The Church Commissioners for England)</p>
<p>DA 69 1 5 A great place is somewhere which sits well within its landscape</p>	<p>58818 (Cambridge Past, Present and Future)</p>
<p>The Great Places paper refers to heritage assets but does not recognise that Cambridge is an asset of worldwide significance which meets UNESCO's Outstanding universal Value criteria for World Heritage Status. The draft Local Plan should recognise the vital role the built and natural heritage and character plays in making the city a great place.</p>	<p>58818 (Cambridge Past, Present and Future), 60202 (J Preston), 60779 (Cambridge and South Cambridgeshire Green Parties)</p>

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Summary of issues raised in comments	Comments highlighting this issue
The structure of the consultation creates a risk that there is not adequate consideration and valuation of the historic city in its historic landscape setting. The historic landscapes and open spaces form part of the historic environment, not green infrastructure.	58818 (Cambridge Past, Present and Future), 60202 (J Preston), 60779 (Cambridge and South Cambridgeshire Green Parties)
Cambridge's special character will be put under significant pressure by the scale of growth proposed, impacting on the built fabric and spaces of a medieval market town. There are fundamental conflicts between growth, environmental capacity and the city's special character.	58818 (Cambridge Past, Present and Future), 60202 (J Preston), 60779 (Cambridge and South Cambridgeshire Green Parties)
<p>Concerned that the evidence base does not include an assessment of the cumulative impacts on the historic centre and what the likely impacts of this might be. The Strategic HIA baseline notes that future growth has the potential to strengthen and reinforce the city's characteristics, enabling the city to meet key aims without undermining its economic identity but there is no evidence to support this statement.</p> <ul style="list-style-type: none"> <li>The Historic Environment Baseline Study should have been undertaken to inform the First Proposals.</li> </ul>	58818 (Cambridge Past, Present and Future), 60202 (J Preston), 60779 (Cambridge and South Cambridgeshire Green Parties)

Summary of issues raised in comments	Comments highlighting this issue
<p>Cambridge South (Cambridge Biomedical Centre) – East (HELAA site OS214) / Land at Granham's Road, Cambridge (HELAA site 40138) / Cambridge Biomedical Campus possible new extension (HELAA site OS217) The growth of the CBC will create an exemplary neighbourhood and extension to Cambridge, creating a great place in line with the CBC Vision 2050.</p>	<p>58853 (CBC Limited, Cambridgeshire County Council and a private family trust)</p>
<p>Land west of Station Road, Meldreth (HELAA site 40088) and Land east of Station Road, Meldreth (HELAA site 40089) Whilst the proposed policy towards the enhancement of landscape character is supported, it is important to recognise that there are variations within broad landscape character areas. Therefore the policy should enable site specific circumstances to be taken into account when assessing the visual impact of a development proposal.</p>	<p>58947 (Phase 2 Planning)</p>
<p>Land north of Barton Road and Land at Grange Farm, Cambridge (HELAA site 52643) The masterplan that has been prepared as part of the site promotion takes into</p>	<p>58969 (North Barton Road Landowners Group)</p>

Summary of issues raised in comments	Comments highlighting this issue
account the significance and setting of the identified heritage assets and landscape character.	
There is little reference to Modern Methods of Construction including the use of off-site manufacture. Given the volume of house building proposed, there will be economies of scale to implement off-site manufacturing factories. There should therefore be a consideration to this for the design policies.	58993 (bpha)
Cambridge South - Cambridge Biomedical Campus (HELAA site 40064) Great places are likely to be achieved through policies if comprehensive planning is enabled at a sufficient scale, that can provide a range of facilities and integrate development within a strong landscape framework. Cambridge South can achieve exemplary development.	59005 (Jesus College working with Pigeon Investment Management and Lands Improvement Holdings, a private landowner and St John's College)
Great places should be designed and built for people and food and promote growing spaces. Provision in new development should include space for start up food businesses that enhance local choice, utilise local produce and provide jobs and training. This will also help create	59087 (Cambridge Sustainable Food CIC)

Summary of issues raised in comments	Comments highlighting this issue
community cohesion and promote wellbeing, equality and resilience.	
Support high quality design which understands and responds to the wider determinants of health and promotes healthy and green lifestyle choices through well designed places.	59193 (Cambridgeshire and Peterborough Clinical Commissioning Group)
Concerned about heritage sites and conservation areas which need to be reviewed to ensure protection of the many great places in the district.	59233 (Teversham PC)
Preservation of the rural character and identify of villages is essential to the quality of life and therefore object to disproportionate development that damages such character and identity.	59484 (Shepreth PC)
Development must be carefully managed to protect the areas rich architectural and cultural heritage. Therefore full consideration should be given to the historic environment, including site allocations and policy criteria for sites, as well as a robust and clear suite of historic environment and other policies that seek to both protect and enhance the historic environment.	59689 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
<p>Pleased that an initial high level historic environment assessment has been undertaken as part of the HELAA. However more work needs to be undertaken and welcome a commitment to undertake Heritage Impact Assessments. These should be prepared prior to the draft Local Plan, be proportional and follow the 5 step methodology set out within HEAN 3. Further advice is set out on which sites should undertake a HIA and how to undertake them.</p> <p>Concern is noted about the weighting given to some of the key characteristics and aspects of setting of Cambridge including views in the Strategic HIA Baseline Report.</p>	59689 (Historic England)
<p>Proposals for North East Cambridge are very high density and also quite tall. Previous advice letters in relation to this site and emerging AAP should be referred to.</p>	59689 (Historic England)
<p>The number of dwellings now being proposed at East Cambridge represents a significant increase in density from the 2006 Plan.</p>	59689 (Historic England)
<p>Have concerns regarding the densities and heights on the edge of Cambridge sites. Development at very high densities/heights have the potential to impact on the</p>	59689 (Historic England)



Summary of issues raised in comments	Comments highlighting this issue
overall setting of the historic city. HIAs should give careful consideration to the issue of development and site capacity and height.	
Support the intention to include a policy for the Historic Environment. This should cover both designated and non-designated heritage assets and be in line with the NPPF set within a local context.	59689 (Historic England)
Should also include a policy for Heritage at Risk and a policy for historic shopfronts.	59689 (Historic England)
Support proposals for a design policy but think it would be better to separate tall buildings into a stand alone policy.	59689 (Historic England)
Pleased that tall buildings and skyline will be addressed through policy. Any evidence to inform this policy should consider HEAN 4 and consider the impact on the historic environment. This will help inform any update to Cambridge Local Plan Policy 60 and Appendix F.	59689 (Historic England)
It would also be helpful to commission Historic Landscape Characterisation work for inform this Plan and future growth in the area.	59689 (Historic England)

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Summary of issues raised in comments	Comments highlighting this issue
Historic England – Ox Cam research work is being undertaken and will be shared with the Councils to help inform plan preparation.	59689 (Historic England)
In preparing the draft Local Plan, it is encouraged that the knowledge of local conservation officers, archaeologists and local heritage groups is drawn on.	59689 (Historic England)
The themes from the Cambridgeshire Quality Charter for Growth covering the four “Cs” of Community, Connectivity, Climate and Character is a sensible approach consistent with the National Model Design Code.	59698 (Central Bedfordshire Council)
Proposal for GB1 and GB2 should be reviewed against the proposed policy to establish high quality landscape and public realm.	59782 (B Hunt)
The draft Plan also fails to recognise the historic relationships between Cambridge as a market town, its market, and its productive hinterland.	60202 (J Preston)
The evidence base for Great Places is inadequate, and the proposals are premature pending a thorough review of the success or failure of existing policies.	60202 (J Preston)

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Summary of issues raised in comments	Comments highlighting this issue
Great places have a compelling blend of community, nature, and beauty however Cambridge is destroying all of these, and rapidly creating poor quality spaces.	60779 (Cambridge and South Cambridgeshire Green Parties)
New neighbourhoods need additional community spaces to encourage cohesion and local friendships, including independent shops rather than supermarkets.	60779 (Cambridge and South Cambridgeshire Green Parties)
There should be spaces for people to interact with nature and spaces only for nature. New developments should provide high quality open spaces and facilities, which will support a number of areas including wellbeing.	60779 (Cambridge and South Cambridgeshire Green Parties)
Beauty is a part of the heritage of Cambridge, both in the natural world but also through architecture. New developments are not of the standard required to maintain the city's unique characteristics. Development should be paused until the planning system can support appropriate means to heal the damage already done.	60779 (Cambridge and South Cambridgeshire Green Parties)

**Table of representations: Policy GP (Site-specific comments)**

Summary of issues raised in comments	Comments highlighting this issue
In relation to GP/GP, commented no parking on Silver Street Bridge and Silver Street should also be a priority for public realm improvement.	57143 (North Newnham Resident Association 2 <sup>nd</sup> comment)

## GP/PP: People and place responsive design

### Hyperlink for all comments

Open this hyperlink - [Policy GP/PP: People and place responsive design](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

**Number of Representations for this section:** 40

### Abbreviations

- PC= Parish Council      DC= District Council      TC= Town Council

### Executive Summary

Many individuals, public bodies and developers expressed general support for policy GP/PP.

Some respondents argued that policies need to avoid creating repetitive buildings such by as requiring varied height and massing, and that a policy that is applicable to Greater Cambridge shouldn't dilute the details relating to the special character of Cambridge. A few landowners suggested that developments which demonstrated a high standard of design should be fast-tracked through the planning application process.

There were different perceptions about what the scope of the policy should be; a few of landowners argued that design codes should not be imposed on smaller developments where other mechanisms could achieve similar outcomes. Similarly, a few developers argued that the phrasing of the policy should be altered so that new development only needed to respond to local design contexts rather than the architecture of the Greater Cambridge area. On the other hand, the Cambridge Doughnut

Economics Action Group argued that the policy was too narrowly focussed upon aesthetics, when actually a more holistic approach was required to promote things such as connected, participatory collective spaces.

Historic England questioned whether one policy relating to design would be sufficient, whereas a few respondents queried whether having two policies was necessary. Developers such as Abdn argued that the policy needed to include sufficient flexibility for well-designed and high-quality buildings even if they are taller than the surrounding townscape. Contrastingly, Historic England and others argued that great care needs to be taken to protect Cambridge's skyline, views, and approaches and that the Local Plan should be informed by a Tall Building and Skyline study.

Many commentators noted the need to engage with local communities to improve the design of developments and when creating design codes. The British Horse Society argued that greater attention needs to be paid to designing for non-motorised forms of transport and developments should maximise opportunities to link and enhance with existing Public Rights of Way. Some developers commented that their sites could fulfil the policy and one respondent argued that the relocation of the waste water treatment plant to Honey Hill would contravene this policy.

In terms of the additional survey questions which were attached to this round of consultation, in response to Q.7 (southern rural cluster) and Q.9 (villages) respondents suggested including more public benches and picnic tables, a changing art space, and creative features to make new development attractive places. There was also an expressed desire for new development to designed for children and for new development to reflect village character. For Q.4 (Cambridge North-East), many comments emphasised the need for North-East Cambridge to have a good centre with amenities, for it to be a 'micro-city' within the city, or to incorporate a 'new' architectural style. Similar comments were expressed for Q.3 (Cambridge East) with some respondents requesting that the design uses a precedent of 'Garden City' design or include architecture which celebrates its aviation heritage.

## Table of representations: Policy GP/PP: People and place responsive design

Summary of issues raised in comments	Comments highlighting this issue
<p>General support for the principle of the policy, and intention to set a strategic vision for achieving high quality design.</p>	<p><b>Individuals</b></p> <p>60134 (C Blakeley), 60390 (D Wright),</p> <p><b>Public Bodies</b></p> <p>56633 (Gamlingay PC), 58449 (Linton PC), 59249 (Cambourne TC), 60011 (Steeple Morden PC), 60088 (Guilden Morden PC),</p> <p><b>Other Organisations</b></p> <p>58858 (University of Cambridge), 59675 (Historic England), 59981 (Natural England),</p> <p><b>Developers, Housebuilders and Landowners</b></p> <p>57211 (Abrdn), 57273 (Universities Superannuation Scheme (USS) – Commercial), 58211 (Universities Superannuation Scheme (USS) – Commercial), 58228 (Countryside Properties (UK) Ltd), 59022 (Metro Property Unit Trust), 60290 (Wheatley Group Developments Ltd), 60371 (The Critchley Family), 60525 (Taylor Wimpey UK Ltd)</p>

Summary of issues raised in comments	Comments highlighting this issue
Community engagement through Parish Councils is required to take full account of resident's views, local character, referring to village design guides and Neighbourhood Plan policies.	56633 (Gamlingay PC), 60134 (C Blakeley)
Policy on quality design is contradicted by proposed relocation of WWTP to Honey Hill. It will impact local communities' health with pollution from traffic and sewage.	56513 (C Martin)
Non-motorised user access is essential in design concept for: <ul style="list-style-type: none"> <li>• Walkers</li> <li>• Cyclists</li> <li>• Equestrian</li> </ul>	56704 (British Horse Society)
Developments should maximise opportunities to link and enhance existing Public Rights of Way (PROW).	56704 (British Horse Society)
Policy needs to comply with Cambridge Rights of Way Improvement Plan (ROWIP) strategies.	56704 (British Horse Society)



Summary of issues raised in comments	Comments highlighting this issue
Measures should be taken to avoid creating repetitive/ monotonous/ homogenisation building styles (encourage variation in heights, types, scale and massing).	57101 (C King), 57306 (C Sawyer Nutt), 59172 (Endurance Estate), 60341 (F.C. Butler Trust), 60380 (S & J Graves), 60390 (D Wright)
General support for Design codes/guides but these should not be imposed on smaller scale developments where other mechanisms can achieve similar outcomes (e.g., parameter plans).	57101 (C King), 57306 (C Sawyer Nutt), 59172 (Endurance Estate), 60341 (F.C. Butler Trust), 60371 (The Critchley Family), 60380 (S & J Graves), 60390 (D Wright), 60466 (Peter, Jean & Michael Crow)
Other alternative frameworks for developers to be directed to could include the National Design Guide (10 characteristics of well-designed place).	59172 (Endurance Estate), 60290 (Wheatley Group Developments Ltd), 60341 (F.C. Butler Trust), 60371 (The Critchley Family), 60380 (S & J Graves), 60390 (D Wright), 60466 (Peter, Jean & Michael Crow)
Developments which can demonstrate a high standard of design should be fast tracked through the application process.	59172 (Endurance Estate), 60290 (Wheatley Group Developments Ltd), 60380 (S & J Graves), 60341 (F.C. Butler Trust), 60390 (D Wright), 60466 (Peter, Jean & Michael Crow)
Local community should be consulted throughout the process of developing design codes/guides.	57101 (C King), 57306 (C Sawyer Nutt), 59172 (Endurance Estate), 60290 (Wheatley Group Developments Ltd), 60380 (S & J Graves)

Summary of issues raised in comments	Comments highlighting this issue
Conservation Area Appraisals must be updated.	57138 (North Newnham Residents Association)
Conservation Areas must be better referenced in the LP as a primary source for context on built and natural Heritage.	57138 (North Newnham Residents Association)
Impacts from new developments must be accurately portrayed with: <ul style="list-style-type: none"> <li>• Heights of trees accurately shown in drawings</li> </ul>	57138 (North Newnham Residents Association)
Where possible site visits should be undertaken by planners and decision makers when deciding new developments.	57138 (North Newnham Residents Association)
A critical analysis is needed with visuals of unsuccessful tall building skylines and eroded long views.	57138 (North Newnham Residents Association)
Consideration should be given to ensuring sufficient flexibility for well-designed and high quality buildings even if they are taller than the surrounding townscape. High quality taller landmark buildings can have a positive impact on their setting by adding to the townscape and should be allowed for in the policy.	57211 (Abrdn), 57273 (Universities Superannuation Scheme (USS) – Commercial), 58211 (Universities Superannuation Scheme (USS) – Commercial), 58228 (Countryside Properties (UK) Ltd), 58786 (Trumpington Meadows Land Company (TMLC) – joint venture

Summary of issues raised in comments	Comments highlighting this issue
	between Grosvenor Britain & Ireland (GBI) and Universities Superannuation Scheme (USS))
Design needs to reflect existing character of the built environment especially in villages.	57721 (Bassingbourn-cum-Kneesworth PC), 60290 (Wheatley Group Developments Ltd)
Design should seek to prevent and mitigate crime and anti-social behaviour.	57721 (Bassingbourn-cum-Kneesworth PC)
<p>Policy focus is on features and characteristics of developments that respond to local context or specific functional needs of minority groups. These are aesthetic or function-specific interpretations of 'people-responsive' and place. To stop narrow focus, policy needs to consider:</p> <ul style="list-style-type: none"> <li>• More holistic approach</li> <li>• Community needs/life needs</li> <li>• Activities</li> <li>• Promotion of connected, coherent, participatory collective spaces.</li> </ul>	58011 (Cambridge Doughnut Economics Action Group)

Summary of issues raised in comments	Comments highlighting this issue
Needs public consultation to gain an insight into what people want.	58033 (Great and Little Chishill PC), 60290 (Wheatley Group Developments Ltd)
High quality design is essential: <ul style="list-style-type: none"> <li>including design in affordable housing.</li> </ul>	58049 (Histon & Impington PC),
Design of access to new developments is poor (e.g., pedestrian links between GB1/GB2 and amenities in Queen Edith's).	58076 (B Marshall)
Support for the inclusion of design criteria across the themes of community, connectivity, climate and character (reflecting the Quality Charter for Growth).	58228 (Countryside Properties (UK) Ltd), 59675 (Historic England)
Land West of London Road, Fowlmere – delivery of scheme will enhance the character of Greater Cambridge by using sustainable construction methods to support the climate emergency.	58807 (Wates Developments Ltd)
To be consistent with national policy, Policy GP/PP should include wording such as “taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites”.	59596 (National Grid)

Summary of issues raised in comments	Comments highlighting this issue
Welcome reference to National Design Guide and National Model Design Code.	59675 (Historic England)
Historic environment is a key aspect of Great Places. Encourage provision for the historic environment throughout the plan not just in heritage focused policy e.g., draw on opportunities offered by the historic environment and reflect local character and distinctiveness to create high standards of design.	59675 (Historic England)
The Building Better Building Beautiful Commission report may help shape policy in this area.	59675 (Historic England)
Is work on tall buildings to inform policy still happening? Support current Policy 60 and Appendix F of the 2018 Local Plan, however, could be further supplemented to indicate areas which may or not be suited to taller buildings.	59675 (Historic England)
The skyline of Cambridge is an important characteristic of the city with long distance views from the elevated land to the south and west, as well as from the flatter fenland to the north and east. Care should be taken over building heights with policy informed by a Tall Building and Skyline study. Guidance to refer to 'Tall Buildings Advice Note 4': <a href="#">Tall Buildings   Historic England</a> .	59675 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
Using one policy to cover all aspects of design and tall buildings may be too ambitious. May be more useful to have a separate policy for tall(er) buildings.	59675 (Historic England)
Support for the establishment of a Place and Design Quality Panel to conduct a site typologies study to understand, protect, utilise and enhance the valued characteristics of different areas in the plan, with the intention of using this information to raise design standards.	59981 (Natural England)
Seek for the provision of existing Policy 60 (tall buildings) to be retained and strengthened.	60213 (J. V Neal)
Unusual to have two separate policies on design – is this necessary?	60341 (F.C. Butler Trust), 60380 (S & J Graves)
The opening of the policy wording states ‘the policy will require all applicants to demonstrate how their proposals sustain and enhance the unique qualities of the Greater Cambridge area and the subtleties in the different landscape and settlement forms’. This suggests that all developments will need to address the qualities of Greater Cambridge through development, which is unachievable and unreasonable. Suggestion that this wording is	60525 (Taylor Wimpey UK Ltd), 60582 (Countryside Properties – Fen Ditton site)

Summary of issues raised in comments	Comments highlighting this issue
amended to 'as appropriate to the local context of the development site'.	
Important that developments respond to local context rather than Greater Cambridge character by stating 'as appropriate to the local context of the development site'.	60582 (Countryside Properties – Fen Ditton site)
Concerned that combining the local plans will dilute the detail relating to special character of the city.	60780 (Cambridge and South Cambridgeshire Green Parties)
Need to maintain and increase clarity on local characterisation.	60780 (Cambridge and South Cambridgeshire Green Parties)
Discussion needed on giving protection to views and approaches.	60780 (Cambridge and South Cambridgeshire Green Parties)
Construction quality is not good with homes having poor insulation and soundproofing. Should use Local Plan 2018 to allow for improvements to policy on poor building forms.	60780 (Cambridge and South Cambridgeshire Green Parties)
No comment.	57413 (Huntingdonshire District Council)

## GP/LC: Protection and enhancement of landscape character

### Hyperlink for all comments

Open this hyperlink - [Policy GP/LC: Protection and enhancement of landscape character](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

**Number of Representations for this section:** 45

### Abbreviations

- PC= Parish Council      DC= District Council      TC= Town Council

### Executive Summary

Many respondents generally supported the policy direction.

Some suggestions were made to the policy wording including requests for more clarity to identify what makes green gaps 'important'. Some respondents identified areas of particular landscape value that should be protected such as the green corridors around the River Cam, River Great Ouse, Hobson's Brook and West Cambridge and the landscape south of Cambridge Biomedical Centre around White Hill. A few developers and landowners wanted the policy to allow for the consideration of development on its own merits and asked that the policy recognised the positive impact that development can have upon the character of landscapes.



There were also requests for new developments to retain and enhance landscape features that have particular value, rather than retain all landscape features.

Cambridge Past, Present and Future argued that similar Local Plan policies had not been effective at protecting the setting of Cambridge from the cumulative impact of development and that the policy should require the planting of trees early to improve the screening of the city. The Campaign to Protect Rural England (CPRE) also expressed a wish that the policy would prevent visually intrusive developments occurring. Contrastingly, Metro Property Unit Trust argued that the policy needed to ensure that the protection of trees is measured against other elements of the proposal. North Newnham Residents Association provided a number of comments relating to how the policy should protect and enhance hedges.

Historic England (HE) commented that views from the south and east of the city are being underplayed as a characteristic of the city and suggested that Heritage Impact Assessment should look at this issue. HE also argued that the policy should ensure that new development positively responds to Cambridge's historic landscape. Natural England stated that locally designated landscapes should be identified within the plan and given policy protection.

Some respondents argued that specific site proposals in the First Proposals would not be in line with this policy, in particular sites at Babraham, Sawston, and there was reference to Anglian Water's proposal at Honey Hill. Developers such as TOWN, argued that the policy will need to recognise the strategic objectives of the North East Cambridge Area Action Plan and avoid imposing conditions that could unreasonably restrict development.

Some respondents including some Parish Councils argued that Important Countryside Frontages (ICFs) are an important policy tool for protecting villages, whereas other respondents saying they were an unnecessary additional layer of constraint to development. Some respondents asked for additional ICFs , whereas other respondents asked for ICFs to be removed.

In terms of the additional survey questions, there were a high number of representations in response to Q.4 (Cambridge North-East) which supported the protection of existing natural and landscapes, or provision of new green spaces. In response to Q.7 (southern rural cluster), Q.8 (villages), Q.13 (aspirational vision for Greater Cambridge), there were some representations which

expressed support for protecting Greater Cambridge's landscape and there were concerns that new development could harm existing landscapes.

**Table of representations: Policy GP/LC: Protection and enhancement of landscape character**

Summary of issues raised in comments	Comments highlighting this issue
<p>Support</p> <p>Page 138</p>	<p><b>Individuals</b></p> <p>57966 (E Davies), 58137 (M Asplin), 58163 (H Thomas), 60135 (C Blakeley),</p> <p><b>Public Bodies</b></p> <p>56634 (Gamlingay PC), 56914 (Cllr. David Sargeant/ West Wickham PC), 57414 (Huntingdonshire DC), 57722 (Bassingbourn-cum-Kneesworth PC), 57941 (Ickleton PC), 58455 (Linton PC), 59926 (Fen Ditton PC), 60012 (Steeple Morden PC), 60089 (Guilden Morden PC), 60409 (Great and Little Chishill PC),</p> <p><b>Third Sector Organisations</b></p> <p>56677 (The Ickleton Society), 56986 (Trumpington Residents Association), 57556 (Save Honey Hill Group), 58831 (Cambridge Past,</p>

Summary of issues raised in comments	Comments highlighting this issue
<div data-bbox="91 740 136 922" data-label="Page-Header">Page 139</div>	<p data-bbox="1088 256 2024 344">Present &amp; Future), 60781 (Cambridge and South Cambridgeshire Green Parties)</p> <p data-bbox="1088 416 1402 448"><b>Other Organisations</b></p> <p data-bbox="1088 472 2092 560">59581 (Campaign to Protect Rural England), 59676 (Historic England), 59982 (Natural England),</p> <p data-bbox="1088 632 1767 663"><b>Developers, Housebuilders and Landowners</b></p> <p data-bbox="1088 687 2092 887">58791 (Trumpington Meadows Land Company a joint venture between Grosvenor Britain &amp; Ireland and Universities Superannuation Scheme), 59026 (Metro Property Unit Trust), 60526 (Taylor Wimpey UK Ltd), 60584 (Countryside Properties - Fen Ditton site)</p>
<p data-bbox="91 959 696 991">Support policy, but with caveats, including:</p> <ul data-bbox="136 1015 1016 1382" style="list-style-type: none"> <li data-bbox="136 1015 1016 1326">• This policy makes reference to the need for protecting ‘important green gaps’ but other than reference to Longstanton and Northstowe these are not defined. The Council should identify what is likely to make a green gap ‘important’, taking into account the scope for landscape enhancements as part of new development.</li> <li data-bbox="136 1350 1016 1382">• Should include the River Great Ouse corridor in this policy.</li> </ul>	<p data-bbox="1088 959 1995 1158">56901 (RWS Ltd), 57414 (Huntingdonshire DC), 59676 (Historic England), 60526 (Taylor Wimpey UK Ltd), 60584 (Countryside Properties - Fen Ditton site) 60781 (Cambridge and South Cambridgeshire Green Parties)</p>

Summary of issues raised in comments	Comments highlighting this issue
<div data-bbox="91 667 136 852" data-label="Page-Header">Page 140</div> <ul style="list-style-type: none"> <li>• Policy wording should read ‘non-designated’ rather than ‘undesigned’ heritage assets.</li> <li>• The third bullet point is suggested to be amended to state that developments will be required to ‘retain and enhance landscape features within new developments that positively contribute to the quality and character of the area, wherever possible’. The wording as it currently stands suggests that any landscape features on sites should be retained and enhanced, whereas the proposed amendment ensures that features of limited value may be appropriately removed, or indeed where features of value may need to be removed, for example to facilitate access. The proposed wording is consistent with that currently set out under Policy GP/QP.</li> <li>• It is also noted that the policy makes reference to the need for protecting ‘important green gaps’. The only green gap referenced is Longstanton and Northstowe and therefore it is assumed the policy should be updated to refer to a singular gap.</li> </ul>	

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>Policy doesn't consider how overdevelopment is changing the landscape. Parks can get saturated with walkers, litter, etc, and overuse tangibly changes the landscape's character.</li> </ul>	
<p>Policy should continue to allow for the consideration of development on its own merits, alongside any potential impacts recognising that development can bring benefits in the context of landscape character.</p>	<p>58508 (BDW Homes Cambridgeshire &amp; The Landowners Mr Currington, Mr Todd, Ms Douglas, Ms Jarvis, Mr Badcock &amp; Ms Hartwell)</p>
<p>Considering the suitability of sites for development it will be important that consideration is given to any other known changes in landscape character as a result of development such as infrastructure improvements or other committed developments.</p>	<p>60584 (Countryside Properties - Fen Ditton site)</p>
<p>Generally support the protection of special and valued landscapes but have concerns that:</p> <ul style="list-style-type: none"> <li>The proposed policy direction does not provide a suitably balanced approach and could stop sustainable development in the countryside coming forward when needed.</li> </ul>	<p>60315 (Gladman Developments)</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>The justification for and inclusion of Important Countryside Frontages needs to be robustly evidenced and the policy needs to provide the necessary flexibility at the edge of villages.</li> </ul>	
<p>One of the challenges is that trees are needed to screen developments and maintain the green edge to Cambridge and its villages. However, it can take at least 30 years before meaningful screening occurs. The policy has not been effective at protecting the setting of Cambridge from the cumulative impact of development. Therefore, would like to see the policy require the planting of large trees so that the time taken for them to provide screening is reduced</p>	58831 (Cambridge Past, Present & Future)
<p>Development should not only respond to Landscape Character but also historic landscape characterisation – by having a better understanding of the historic landscape enables better, more informed decisions to be made about future development.</p>	59676 (Historic England)
<p>We welcome references to the views of the city, although we have some concerns that views from the south and east of the city are</p>	59676 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
being underplayed– we contend that these are more than minor contributing characteristics to the setting of the City. The Strategic HIA should therefore look carefully at views from the south and east.	
Natural England considers World Heritage Sites designated for their natural interest, local landscape designations and Inheritance Tax Exempt land to be locally valued. Therefore, these areas should be identified and included on policy maps showing locally designated landscapes (identified by LPAs and their communities) along with any 'Protected views'.	59982 (Natural England)
Any locally designated landscapes, e.g., Areas of Greater Landscape Value, should be identified within the plan and given appropriate policy protection to protect and enhance them and to ensure that development reflects their distinctive character.	59982 (Natural England)
Existing retained policies from the South Cambridgeshire Local Plan NH/1, NH/2 and NH/13 and policy 8 of the Cambridge Local Plan should be reviewed and updated in the light of the updated	59982 (Natural England)

Summary of issues raised in comments	Comments highlighting this issue
landscape character assessment to ensure they reflect the most recent baseline evidence.	
Policy direction will require the protection of trees of value and/or where the overriding planning balance of any development proposals outweighs their (trees) protection.	59026 (Metro Property Unit Trust), 59136 (Metro Property Unit Trust 2 <sup>nd</sup> comment)
<div data-bbox="89 667 145 853" data-label="Text"> <p>Page 14 59026</p> </div> <p>It is suggested that for clarity the Council should identify what is likely to make a green gap 'important', taking into account the scope for landscape enhancements as part of new development.</p>	59177 (Silverley Properties Ltd)
Concerned that some of the developments that have already occurred around Cambridge are visually intrusive and, in some cases, aesthetically unappealing. We would not want to see these mistakes repeated.	59581 (Campaign to Protect Rural England)



Summary of issues raised in comments	Comments highlighting this issue
CPRE does not believe that the draft Local Plan is adhering to these principles, particularly in the case of proposals to remove several sites from the Green Belt.	59581 (Campaign to Protect Rural England)
<p>It is considered that the land off Home End does not meet the definition of Important Countryside Frontage. Characteristics of this site have changed significantly since the Important Countryside Frontage was first designated but the designation has never been subject to review.</p> <p>Page 145 It is requested that the Important Countryside Frontage designation at Land off Home End in Fulbourn is deleted because the characteristics of the site means it does not meet the definition for such a designation.</p>	57124 (KG Moss Will Trust & Moss Family)
There are a variety of designations that prevent or limit the opportunity for development in Fulbourn. It is considered that the Important Countryside Frontage designation adds a further policy layer preventing the delivery of development in those villages where it applies.	57124 (KG Moss Will Trust & Moss Family)

Summary of issues raised in comments	Comments highlighting this issue
<p>It is important to consider the cumulative effect of developments and incremental change. Too often this has been neglected in the past and permission for one development has set a precedent for subsequent applications. The Important Countryside Frontages previously identified are important to the settings of villages and should be continued on the same basis as in the current Local Plan.</p>	<p>56677 (The Ickleton Society)</p>
<p>Cambridge Town Council requests that there should be protection of Cambridge Country parks written into the policy. This should offer greater protection to the essential open spaces that gives Cambridge its character and landscape setting within the countryside.</p>	<p>59255 (Cambridge TC)</p>
<p>Need to ensure protection of landscape setting of villages and penetration of countryside gaps as an important element of character.</p> <p>This is important for those villages with a predominantly linear form.</p>	<p>60012 (Steeple Morden PC), 60089 (Gulden Morden PC)</p>

Summary of issues raised in comments	Comments highlighting this issue
This is difficult when large areas are going from agriculture to housing settlements	56752 (Croydon PC)
Green corridors are especially important in West Cambridge as they are important to visual amenity, character and setting of city and policy should ensure its protection.	57966 (E Davies)
South-facing sections of The Causeway, Bassingbourn-cum-Kneesworth with views over open fields towards Therfield Heath SSSI should be considered for designation as ICFs.	57722 (Bassingbourn-cum-Kneesworth PC)
The remaining green gaps around Oakington should be protected because of the impact of Northstowe.	56893 (J Price)
<p>The Association has comments related to hedges:</p> <ul style="list-style-type: none"> <li>• Protect and enhance all existing hedges as boundary treatments.</li> <li>• Replacement of hedges with wooden fencing or wire is unacceptable in Conservation Areas.</li> <li>• Hedges on the older Urban fringes are an essential part of the green wildlife matrix into cities. Pressure for space by colleges home owners are removing them to</li> </ul>	57139 (North Newnham Residents Association)

Summary of issues raised in comments	Comments highlighting this issue
<p>make space for bins, cycle parking and car parking. This should not be allowed.</p> <ul style="list-style-type: none"> <li>• New developments must aspire for living hedges of at least 2 metres for each house boundary markers and site boundaries.</li> <li>• Plastic hedging is not acceptable.</li> </ul>	
<p>Stress the importance of the River Cam and Hobson's Brook green corridors and the landscape south of CBC around White Hill.</p>	56986 (Trumpington Residents Association)
<p>There are a variety of designations that prevent or limit the opportunity for development in Fen Ditton, including the Green Belt, the Conservation Area, Listed Buildings, and Local Green Space. The Important Countryside Frontage designation adds a further policy layer preventing the delivery of development in those villages where it applies.</p>	57107 (J Francis)
<p>The Core Site at North-East Cambridge will require a number of buildings that are taller than may otherwise be commonly found in the north of Cambridge. The masterplan for the Core Site will take great care in how its development edges interface with the</p>	60156 (U&I PLC and TOWN)

Summary of issues raised in comments	Comments highlighting this issue
landscape and setting of nearby settlements, as well as adjoining 'bad neighbour' uses currently in existence. The policy will need to recognise the strategic objectives of NEC AAP and avoid imposing conditions that could unreasonably restrict development.	
Over-intensification of use is a major threat to landscape character	60203 (J Preston)

**Table of representations: Policy GP/LC Protection and enhancement of landscape character (Site-specific comments)**

Summary of issues raised in comments	Comments highlighting this issue
In relation to GP/LC, it is requested that the Important Countryside Frontage designation on Ditton Lane and High Ditch Road in Fen Ditton is reviewed because it does not meet the definition for this designation. It is considered that the Important Countryside Frontage should be deleted in this location.	57107 (J Francis)

Summary of issues raised in comments	Comments highlighting this issue
<p>It is considered that a suitably designed development located at the southern part of the land off Ditton Lane in Fen Ditton would protect and retain the character of the site frontage, protect the setting of heritage assets, and provide additional landscaping at the site boundary. This approach would allow for some small-scale growth at Fen Ditton to meet housing and identified affordable housing needs.</p>	<p>57107 (J Francis)</p>
<p>It is requested that the Important Countryside Frontage designation at land off Home End in Fulbourn is deleted because the characteristics of the site means it does not meet the definition for such a designation.</p>	<p>57124 (KG Moss Will Trust &amp; Moss Family)</p>
<p>Fullfilment of S/NEC policy through location of CWWTPR contravenes policy- GP/LC as development at this site has been identified as being of 'very high harm' (First Proposals Green Belt Study, 2021). Damages the setting of important conservation areas. Industrial scale development absolutely out of place in the local landscape which is open and flat. No amount of planting will hide the industrial plant.</p>	<p>57501 (C Martin), 57686 (J Conroy)</p>
<p>GP/LC supported in general. but its aims are not reflected throughout the Local Plan due to failure to consider the consequential impact of</p>	<p>57556 (Save Honey Hill Group), 57622 (J Pratt) 58137 (M Asplin)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>the NECAAP on Green Belt and corresponding Landscape Character Areas as a result of relocation of the Waste Water Treatment Plant.</p> <p>If the emerging Greater Cambridge Local Plan is to retain an appropriate level of credibility, the consequential effects of the proposed NECAAP and corresponding CWWTPR should be considered within the Local Plan to assess the impacts under policy GP/LC and included in the Greater Cambridge Strategic Heritage Impact Assessment (2021) Policy GP/HA.</p> <p>Page 151</p>	
<p>Proposed WWTP relocation would result in a major industrial plant located in Landscape Character Area 6A, including towers planned to 20m-26m high surrounded by circular bund and fencing on top with a combined height of circa 11m. Clearly in breach of Policy NH/2 of 2018 South Cambridgeshire Local Plan and presumably its proposed successor, Policy GP/LC.</p>	<p>57556 (Save Honey Hill Group), 57622 (J Pratt) 58137 (M Asplin)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>In relation to policy GP/LC, it is currently incompatible with some other policies in the Local Plan currently, notably the development of housing H1/b (148 houses built using unsuitable materials that have created an eyesore for South Cambridgeshire villages of Sawston and Babraham) and H1/c (planned additional 418 houses, which is far too high a density and will create a greater negative visual impact). This needs to be made consistent, otherwise there will be a conflict of policies.</p>	58163 (H Thomas)
<p>Land West of London Road responds positively to Important Countryside Frontage designated along London Road. Site provides an opportunity to create a gateway into settlement, providing transition between wider settlement and village. Delivery of a village park will reinstate the countryside frontage and aligns with the principle of designation. Land to the West of London Road is bound by a mature hedgerow belt which dissects the Site from the wider</p>	58820 (Wates Development)



Summary of issues raised in comments	Comments highlighting this issue
<p>countryside. The Site does not have long distant views to the countryside.</p>	
<p>In relation to policy GP/LC, three site submissions within the parish of Babraham would contravene the policy. These sites include a “small” one of 70 further houses as an extension of the next phase build adjacent to Sawston on the opposite side of the road to the current build; a submission to remove all of Babraham Institute land from the Green Belt, and the submission from Cheveley Farms for 3,500 houses.</p>	<p>58821 (Amanda Ogilvy- Stuart)</p>
<p>In relation to policy GP/ LC, whilst Land South of Newington, Willingham may form a gap in an otherwise developed frontage, it is considered to be within the confines of the village and as discussed earlier in this representation, could not be considered an important gap or of any significant value in landscape terms.</p>	<p>59177 (Silverley Properties Ltd)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>In relation to GP/LC, the Core Site at North-East Cambridge will need to be planned to a high density in order to fully achieve the strategic objectives of the NEC AAP, as well as to hit the quantum of development required under Homes England's Housing &amp; Infrastructure Fund. This will require a number of buildings that are taller than may otherwise be commonly found in the north of Cambridge. The masterplan for the Core Site will take great care in how its development edges interface with the landscape and setting of nearby settlements, as well as adjoining 'bad neighbour' uses currently in existence. The policy will need to recognise the strategic objectives of NEC AAP and avoid imposing conditions that could unreasonably restrict development.</p>	<p>60156 (U&amp;I PLC and TOWN)</p>
<p>It is considered that a suitably designed development could be delivered at land off Home End in Fulbourn to retain the character of the site frontage, protect the setting of heritage assets, and provide additional landscaping at the site boundary. This approach would</p>	<p>57124 (KG Moss Will Trust &amp; Moss Family)</p>

Summary of issues raised in comments	Comments highlighting this issue
allow for some small-scale growth at Fulbourn to meet housing and identified affordable housing needs.	

## GP/GB: Protection and enhancement of the Cambridge Green Belt

### Hyperlink for all comments

**Open this hyperlink** - [Policy GP/GB: Protection and enhancement of the Cambridge Green Belt](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

**Number of Representations for this section:** 65

### Abbreviations

- PC= Parish Council      DC= District Council      TC= Town Council

### Executive Summary

General support was expressed for the policy direction from a wide range of respondents.

Some respondents, including the Wildlife Trust and National Trust, supported protecting the Green Belt, but want it to play a more positive role for recreation, biodiversity and tackling climate change. A member of the public questioned whether Green Belt policies were still relevant and suggested that development should be considered in the Green Belt in locations that have good public transport connections. Some comments criticised the possibility of Green Belt land being released for busways and East-West Rail. The Campaign for the Protection of Rural England argued that some of the proposals in the Local Plan did not fulfil the historic purpose of Cambridge's Green Belt. Some respondents objected to any development in the Green Belt, even for developments of national significance.

There were a number of comments relating to the Green Belt Assessment. Some respondents asserted that any sites which were designated a 'very high', 'high' or 'moderate high' harm rating in the Green Belt Assessment should also receive a 'red' harm rating in the Housing and Economic Land Availability Assessment. A number of developers critiqued the results of the Green Belt Assessment and asked for clearer justification of its results.

Many developers argued that their site in the Green Belt should be considered for development. Some developers asked for land to be identified in the rural area for Green Belt land release to ensure that the viability of the rural areas is enhanced. Croydon Parish Council commented that there is danger of having urban area, then Green Belt and then urban sprawl outside of the Green Belt. Some individuals and campaign groups considered that the plan's proposals could have negative impacts on the Green Belt, and considered that the plan had not properly consider these impacts. This included the relocation of CWWTP to Honey Hill. Some comments questioned the effectiveness of existing Green Belt polices and pointed to examples of recent development occurring in Green Belt land.

The Cambridge Doughnut Economics Action Group (CDEA) asked for the Plan to clearly demand alternative sites of at least equal size and environmental benefit if land is taken out of the Green Belt. Jesus College and CDEA asked for the Plan to more clearly explain the forms of development that would and would not constitute inappropriate development in the Green Belt. Gladman Developments suggested that the policy should not simply duplicate national policy as set out in the NPPF.

In terms of the additional survey questions, there were a high number of representations which emphasised the importance of protecting the Green Belt. The representations appeared in response to Q.3 (Cambridge East), Q.4 (Cambridge North East), Q.5 (Addenbrookes), Q.8 (villages with public transport links and services), Q.9 (kinds of housing, jobs, facilities, opens spaces in these

villages), Q.10 (sites which should be included), Q.13 (aspirational vision for Greater Cambridge). In the answers to these survey questions, some respondents objected to the proposed developments on the grounds that they would harm the Green Belt. There were also few representations which expressed a desire to build on the Green Belt and these representations appeared in response to Q.3 (Cambridge East), Q.4 (Cambridge North East), and Q.13 (aspirational vision for Greater Cambridge).

#### Table of representations: Policy GP/GB: Protection and enhancement of the Cambridge Green Belt

Summary of issues raised in comments	Comments highlighting this issue
<div>Page 158</div> <p>General support for the policy</p>	<p><b>Individuals</b></p> <p>56472 (M Starkie), 56814 (M Colville), 57689 (J Conroy), 57718 (C Harding), 57968 (E Davies), 58138 (M Asplin), 58898 (R Mervart), 60204 (J Preston)</p> <p><b>Public Bodies</b></p> <p>56635 (Gamlingay PC), 57723 (Bassingbourn-cum-Kneesworth PC), 57795 (Coton PC),</p>

Summary of issues raised in comments	Comments highlighting this issue
	<p><b>Third Sector Organisations</b></p> <p>56834 (Save Honey Hill Group), 56987 (Trumpington RA), 58839 (Cambridge Past, Present and Future),</p> <p><b>Other Organisations</b></p> <p>59181 (National Trust), 59582 (CPRE), 59983 (Natural England)</p>
<p>The Plan does not take into account the relocation of the Cambridge Waste Water Treatment Plant to Honey Hill which is in the Green Belt in order to allow development at North East Cambridge on a brownfield site. There is no reference to this in Policy S/NEC. The existing works is fully functioning and could be upgraded.</p> <p>The relocation to Honey Hill will have a detrimental impact on:</p> <ul style="list-style-type: none"> <li>• open space (contrary to policy BG/PO, BG/EO)</li> <li>• recreation</li> <li>• amenity for residents</li> <li>• views of Cambridge</li> <li>• good quality agricultural land</li> <li>• rich mix of fauna</li> </ul>	<p>56472 (M Starkie), 56509 (C Martin), 56834 (Save Honey Hill Group), 57422 (C Martin), 57606 (J Pratt), 57689 (J Conroy), 58072 (Horningsea Parish Council), 58138 (M Asplin), 58341 (C Lindley), 60237 (FeCRA)</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• close to SSSI at Quy Fen</li> <li>• within National Trust's Wicken Fen Vision</li> </ul>	
There is danger of having urban area, then Green Belt and then urban sprawl outside of the Green Belt.	56752 (Croydon PC)
Any development of land in the Green Belt will diminish achievement of its primary purpose to prevent communities in the environs of Cambridge merging into one another and the city.	56814 (M Colville)
<p>The 'harm rating' from the Green Belt assessment must be recorded in the HELAA assessment as red, amber or green or else the Green Belt is ignored in comparison to other areas which do attract flag ratings.</p> <p>Any site receiving 'Very High', 'High' or 'Moderate High' harm rating should receive a red flag.</p>	56814 (M Colville), 57718 (C Harding), 58898 (R Mervart)
Stress the importance of the Green Belt to the south of the city including land to the south of Addenbrooke's Road and CBC, plus the river corridor and Hobson's Brook corridor. Concerned about the threat of the CBC proposals and if Site 056 had been approved.	56987 (Trumpington Residents Association)



Summary of issues raised in comments	Comments highlighting this issue
<p>Support positive role of the Green Belt for recreation and biodiversity. Green Belt also has an important role in tackling climate change and reduce risk of flooding in urban areas.</p> <p>For Cambridge to grow sustainably more positive use of the GB must be made, such as:</p> <ul style="list-style-type: none"> <li>• including proposals within the Cambridge Nature Network.</li> <li>• Planting trees to develop areas of deciduous woodland, orchards and scrubland</li> </ul>	<p>57028 (The Wildlife Trust), 58507 (J Pavey), 59181 (National Trust), 60136 (C Blakeley), 60465 (Anglian Water Services Ltd)</p>
<p>The evidence base documents – Green Belt Assessment, Landscape Character Assessment and Green Infrastructure Opportunity Mapping recommendations identify opportunities for Green Belt enhancement where Green Belt is released for development. These same opportunities should be realised where development is (of necessity) progressed in the Green Belt through schemes advance through planning applications and other consenting procedures.</p>	<p>60465 (Anglian Water Services Ltd)</p>
<p>East West Rail's proposal is a 10m embankment that will damage the Green Belt and shouldn't be supported. The GCP public transport improvements to Cambourne would have much less GB damage.</p>	<p>57044 (W Harrold)</p>

Summary of issues raised in comments	Comments highlighting this issue
Consider that additional land should be identified in the rural area for moderate levels of Green Belt release to ensure that the viability of the rural areas is protected and enhanced.	57181 (Southern and Regional Developments Ltd), 57257 (European Property Ventures (Cambridgeshire))
No comment	57415 (Huntingdonshire District Council)
Development in the Green Belt is only ever appropriate for uses other than housing eg re-wilding or supplying access to green spaces	57718 (C Harding), 58898 (R Mervart)
Oppose the GCPs preferred off-road busway route through the Green Belt on one of the most visible high points overlooking the City when existing infrastructure exists.	57795 (Coton PC)
Support maintenance of existing Green Belt boundary on west of Cambridge between city and M11.	57968 (E Davies)
Current policies seem to have little protective effect. The plan should list specific exceptional circumstances that might allow further destruction of the Green Belt and should more clearly demand alternatives of at least equal size and environmental benefit in the area if more land is taken out of the Green Belt.	58012 (Cambridge Doughnut Economics Action Group)
Building on the Green Belt should always be a last resort. Green Belt is often an easy option but not the best.	58050 (Histon and Impington PC)
The Green Belt should be protected and not released for large developments like the expansion of the Cambridge Biomedical	58086 (D Lister)

Summary of issues raised in comments	Comments highlighting this issue
Campus when demand could be met through investment within the current campus boundary.	
The policy should be clear on the forms of development that would not constitute inappropriate development in the Green Belt like current policy NH/9 in South Cambridgeshire Local Plan. Paragraph 149 of the NPPF confirms that exceptions to inappropriate development can include limited infilling of villages.	58100 (Jesus College), 60258 (Jesus College)
Make the policy stronger as the proposed GCP CSET scheme is planned in the Green Belt, despite there being an option outside the GB. This reveals the GB status to be meaningless.	58160 (H Thomas)
Maintain high quality agricultural land around Cambridge to feed Greater Cambridge from local sources and provide opportunities for farmers markets, local sustainable food initiatives and community forest gardens.	58160 (H Thomas)
Concerned that some historic buildings were omitted during the assessment, despite the fact they could potentially contribute towards the historic setting of Cambridge.	58839 (Cambridge Past, Present and Future)
Concern that recent developments and those in the First Proposals do not protect valuable green space. Two areas of concern around Great Shelford:	59157 (Great Shelford Parish Council)

Summary of issues raised in comments	Comments highlighting this issue
<p>1) The green finger between Great Shelford and the A1307 that extends from Gog Magog Hills into Cambridge to Botanical Gardens</p> <p>2) The area of Stone Hill between Cambridge Road, Great Shelford and the River Cam.</p> <p>These sites are threatened if not directly by a slow creep of developments towards these areas.</p>	
<p>The review of the Green Belt is welcomed as there is a compelling need to release Green Belt land to provide the opportunity for sustainable development. However, the results of the 2021 Green Belt Assessment provide significantly different assessments for a number of parcels (CHI 1-4, FU1, FU19, TE6-9) compared to previous evidence in 2012 Inner Green Belt Boundary Study. A much clearer and more robust justification for the change in classification is needed.</p> <p>It is also noted that the vast majority of inner Green Belt parcels around Cambridge have been identified as 'High Harm' and such a blanket conclusion does not appear to reflect the differences in context around the city.</p>	<p>59292 (Endurance Estates), 59543 (Cheffins), 60269 (The White Family and Pembroke College)</p>

Summary of issues raised in comments	Comments highlighting this issue
The First Proposals Local Plan is not adhering to the established local purposes of the Cambridge Green Belt, particularly in the case of proposals to remove several sites from the Green Belt. Concerned that some of the developments that have occurred around Cambridge are visually intrusive and in some cases aesthetically unappealing and don't want to see these mistakes repeated.	59582 (CPRE)
Welcome the proposal to include the 3 established local purposes of the Cambridge Green Belt. These 3 purposes combined with the NPPF policy on Green Belts, are still important today and should influence key decisions regarding development in the Green Belt.	59677 (Historic England)
How does this fit in with the settlement boundaries?	59827 (Dry Drayton PC)
Oppose development intrusion into the Green Belt. Development 'creep' even for 'nationally significant' development should be resisted.	59854 (Barrington PC)
This is critically important. Green Belt should be rigorously protected.	59927 (Fen Ditton PC), 60410 (Great and Little Chishill PC)
It is time to question if this national policy is still relevant to Greater Cambridge. Where locations have good public transport especially rail or future rail access there is a good case to consider special circumstances judgment. Further Green Belt assessments should	60136 (C Blakeley)

Summary of issues raised in comments	Comments highlighting this issue
consider sustainable development and the extension of Green Belt beyond current boundary to prevent coalescence of villages there.	
The Green Belt is not fit for purpose because it ignores historic environment designations and landscape character constraints. The Green Belt was set up to protect the setting of the historic University city.	60204 (J Preston), 60237 (FeCRA), 60782 (Cambridge and South Cambridgeshire Green Parties)
The proposed Local Plan is ripping chunks out of the Green Belt, so it's impossible to take this policy seriously. The Green Belt assessments are inadequate because they don't include historic environment, such as conservation area designations.	60782 (Cambridge and South Cambridgeshire Green Parties)
The Cambridge Biomedical Campus expansion will have serious landscape impacts on open countryside towards the Gogs and will damage the setting of the city with its beautiful chalk downland views. It will hugely impact the character and biodiversity of the nature reserve at Ninewells and farmland birds.	60237 (FeCRA)
The Green Belt policy must not simply duplicate national policy as set out in the NPPF. The release of Green Belt should not be the primary source of developable land when other suitable and sustainable sites are available outside the Green Belt. Growth should be dispersed across the settlement hierarchy and along sustainable transport	60316 (Gladman Developments)

Summary of issues raised in comments	Comments highlighting this issue
corridors such as Melbourn to Cambridge. Sites submitted at Section 10 of the report which would not require loss of Green Belt and are well served by public transport..	
Anglian Water welcomes the inclusion of wording in Policy GP/GB which aims to support and secure enhancement of the Green Belt, such as for recreation and biodiversity. The evidence base documents identify opportunities for Green Belt enhancement where Green Belt land is released for development. Anglian Water would support recognition that these same opportunities should be realised in instances where development is (of necessity) progressed within the Green Belt under schemes advanced through planning applications and other consenting procedures	60475 (Anglian Water Services Ltd)

**Table of representations: Policy GP/GB: Protection and enhancement of the Cambridge Green Belt (Site-specific comments)**

Summary of issues raised in comments	Comments highlighting this issue
Land adjacent Spring House, Church Lane, Sawston	57022 (H Kent)

Summary of issues raised in comments	Comments highlighting this issue
<p>This land should be allowed to come forward as an infill residential plot for a self-build opportunity. The site does not fulfil any of the five purposes of the Green Belt and the GB boundary should be amended. Supporting evidence and plan submitted.</p>	
<p>Land to the north and east of Barrington Road, Foxton (HELAA site 40412) and land to the south-east of Cambridge Road, Foxton (HELAA site 40408)</p> <p>These are deliverable and sustainable sites that do not contribute to the five purposes of the Green Belt and should be released and allocated for development as they will assist in delivering varied and balanced housing supply to meet the rising housing needs.</p>	57518 (R2 Developments Ltd)
<p>Land off Station Road, Harston</p> <p>This is considered appropriate infill development in the context of para 149 of the NPPF. The proposed development for residential would respect immediate character and retain openness of the Green Belt and would be a moderate extension to the village and suitable infill development.</p>	58100 (Jesus College)
<p>Land parcel CH10 (South of Cottenham) in the Greater Cambridge Green Belt Assessment. HELAA reference 40296.</p>	58229 (Christ's College)



Summary of issues raised in comments	Comments highlighting this issue
<p>This parcel scores low harm against the purposes of the Green Belt in the Green Belt Assessment and a further assessment is provided as an attachment. Request that the site is released from the Green Belt and designated as open countryside outside the village's Development Framework to provide a more logical and defensible GB boundary and to respond to the new development along Oakington Road.</p>	
<p>Fulbourn Hospital site</p> <p>Seek a change to the Green Belt boundary to exclude land in the northern part of the Fulbourn Hospital site (northern part of CH15), having regard to the existing built up character of the site and its relationship to Tesco's and Capital Park. Plan shows suggested revision to boundary.</p>	58243 (Cambridgeshire and Peterborough NHS Foundation Trust)
<p>Land West of Beach Road, Cottenham (HELAA site 59409)</p> <p>A Green Belt review is provided to show that this parcel of land should be removed from the Green Belt for residential development as it would not prejudice the purposes of Cambridge's Green Belt.</p>	58510 (BDW Homes Cambridgeshire and The Landowners)
<p>Land at Ambrose Way, Impington (HELAA site 40392)</p> <p>A Green Belt appraisal is provided to support the case for release of land at this site for residential development.</p>	58539 (Martin Grant Homes)

Summary of issues raised in comments	Comments highlighting this issue
<p>Land to the East of the Airport, Cambridge</p> <p>If land is to be released from the Green Belt to accommodate future needs, land to the east of the Airport is a primary candidate due to the accessibility of the site and the excellent sustainability benefits that could be generated. The rating of 'very high' level of harm in the Green Belt Assessment is not wholly accurate or consistent with previous GB reviews and should be re-considered.</p>	<p>58553 (Marshall Group Properties)</p>
<p>Land east of Cambridge Road, Hardwick (HELAA site 40414)</p> <p>A Green Belt Review is provided in support of releasing the site from the outer edge of the Green Belt. This looks at the Greater Cambridge Green Belt Assessment where the site falls within parcel HA4 and considers that the site is a lower level of harm than that in the Assessment.</p>	<p>58589 (Hill Residential Ltd and Chivers Farms (Hardington) LLP)</p>
<p>Land north of M11 and west of Hauxton Road, Trumpington (HELAA site 40048)</p> <p>TMLC considers the site has been incorrectly scored in the Greater Cambridge Green Belt Assessment and consider that it is suitable for development . Also see full response to Policy S/EOC.</p>	<p>58794 (Trumpington Meadows Land Company, a joint venture between Grosvenor Britain and Ireland and Universities Superannuation Scheme)</p>
<p>Cambridge Biomedical Campus</p>	<p>58857 (CBC Ltd, Cambridgeshire County Council and a private family trust)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Support the recognition that land may be taken out of the Green Belt adjacent to the Campus to meet local, regional and national healthcare, biomedical and research and development needs. The expansion of the campus satisfies national policy tests for removal of Green Belt land in exceptional circumstances. Development is to be landscape-led with investment in landscaping, biodiversity and green infrastructure which can enhance the setting of Cambridge.</p>	
<p>Land west of Oakington Road, Girton (HELAA site 40329)</p> <p>The Council's Green Belt Assessment should be reviewed. Parcel GI8 should be re-assessed as 2 individual parcels with a split across the Beck Brook. The land between Beck Brook and Oakington Road will create considerably less harm than the overall parcel given the containment in visual terms.</p>	58885 (Abbey Properties Cambridgeshire Limited)
<p>Land West of Impington</p> <p>The Green Belt status of land west of Impington should be protected so that it remains a separate village surrounded by fields and not swallowed up by Cambridge. Proposals for a large development are out of character and will increase traffic through a quiet residential</p>	58935 (R Donald)

Summary of issues raised in comments	Comments highlighting this issue
area. Land is prone to flooding and will increase flood risk to existing homes and put strain on GP practice.	
<p>Greenhedge Farm, Stapleford</p> <p>The site should be removed from the Green Belt. Supporting evidence is provided which considers the site's contribution to the purposes of the Green Belt. The Greater Cambridge Green Belt Assessment also shows that the release of Parcel GS10 would have a low level of harm.</p>	58996 (Peterhouse)
<p>Sites at Great Shelford</p> <p>The categorisation of sites in the Green Belt Assessment at Great Shelford is supported, particularly the acknowledgement that the release of HELAA site 40413 at Cambridge Road, Great Shelford would have a negligible/low impact on the function of the Green Belt. Sites of medium or high harm should not be released and protected from development. Exceptional circumstances to release a specific site should not exist in situations where an alternative site at the same settlement has a lower level of harm and is suitable and available for development.</p>	59035 (Great Shelford (Ten Acres) Ltd)
Land at Whittlesford	(59132) Grosvenor Britain and Ireland

Summary of issues raised in comments	Comments highlighting this issue
<p>The proposals at Whittlesford will protect and enhance the Green Belt as described in Section 6 of the main representation and shown in the Design Vision and Environmental Appraisal appendices.</p>	
<p>Land west of Station Road, Fulbourn (HELAA site 40293)</p> <p>Largely agree with Greater Places policies but believe Land west of Station Road, Fulbourn represents an excellent location for sustainable development. Benefits of this location are: frequent public transport and proximity to bus stop, proximity to proposed Fulbourn Greenway, would help to enable a sustainable large village to grow, well-contained site on three sides which has limited contribution to Green Belt purposes</p>	<p>59312 (Countryside Properties)</p>

## GP/QD: Achieving high quality development

### Hyperlink for all comments

**Open this hyperlink** - [Policy GP/QD: Achieving high quality development](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

**Number of Representations for this section:** 45

### Abbreviations

- PC= Parish Council      DC= District Council      TC= Town Council

### Executive Summary

Many respondents expressed support for the policy.

A few developers specifically welcomed the policy's encouragement of mixed-use proposals. Croydon Parish Council expressed their desire to keep the landscape rural and the Trumpington Residents Association stressed the importance of delivering high quality buildings and enforcing planning conditions.

Some comments highlighted the need for planning to avoid creating bland developments. There were many suggestions to improve the policy, some included introducing additional architectural design standards, on-street parking provision, Passivhaus standards, crime prevention measures. Some respondents stated that design codes should reflect local building typologies, topography and that the policy should ensure that the use of previously developed or underutilised sites in the urban area can be maximised. Some comments stated that design guides shouldn't be imposed on small developments where other mechanisms could achieve similar

outcomes. One developer stated that if a development meets the policy's objectives, the policy should ensure that this carries significant weight in the determination of the proposal.

Some respondents questioned whether it is unusual to have two design policies in the Local Plan and whether it could be covered in one policy. The Wildlife Trust also asked that the Building with Nature standards referred to in policy BG/GI are formally incorporated as a requirement into this policy or GP/QP. Historic England asked for a separate policy relating to tall buildings. Other respondents noticed that parking is referenced twice in the policy under 'climate-positive' and 'local character' and it does not need to be repeated. Some respondents asked for clarification to be provided within the policy as to what is regarded as 'significantly taller' to understand when additional assessment will be required.

Some developers supported the policy and asserted that their sites could deliver the policy's objectives. Other comments highlighted specific sites or proposals that they considered would not meet the policy objectives.

In terms of the additional survey questions, there were a high number of representations which emphasised the importance delivering high quality development. Such representations can be found in response to Q.3 (Cambridge East), Q.4 (Cambridge North-East), Q.5 (Addenbrookes), Q.6 (Cambourne), Q.7 (southern rural cluster), Q.9 (kinds of housing, jobs, facilities, or open spaces in villages) and Q.13 (aspirational vision for Greater Cambridge). In answer to Q.12 (what should we prioritise when planning homes for the future?), 64% of respondents expressed a desire for safe streets where children can play outside, 30% expressed a desire for accessibility and adaptability for wheelchair users and 51% expressed a desire for secure cycle parking.

## Table of representations: Policy GP/QD: Achieving high quality development

Summary of issues raised in comments	Comments highlighting this issue
<p>General support for the policy</p> <p>Page 176</p>	<p><b>Public Bodies</b></p> <p>56636 (Gamlingay PC), 60013 (Steeple Morden PC), 60090 (Guilden Morden PC), 59928 (Fen Ditton PC)</p> <p><b>Third Sector Organisations</b></p> <p>58842 (Cambridge Past, Present &amp; Future)</p> <p><b>Developers, Housebuilders and Landowners</b></p> <p>58514 (BDW Cambridgeshire &amp; The Landowners), 58859 (CBC Limited, Cambridgeshire County Council and a private family trust), 60157 (U &amp; I PLC and TOWN), 60527 (Taylor Wimpey UK Ltd), 60586 (Countryside Properties – Fen Ditton Site)</p>
Support the policy, but hard to achieve if houses are to be affordable, especially when climate factors are added in.	56754 (Croydon PC)
Support, but many would prefer the landscape to remain rural as it is and not urban	56755 (Croydon PC 2 <sup>nd</sup> comment)



Summary of issues raised in comments	Comments highlighting this issue
Support, but stress importance of build quality and inability of council's to intervene and enforce planning conditions when developers build sub-standard homes. This is based on experience of Southern Fringe where quality has been poor.	56988 (Trumpington Residents Association)
Draft policy seems focussed on external appearance and not on 'liveability'.	56988 (Trumpington Residents Association)
The Building with Nature standards referred to in policy BG/GI are formally incorporated as a requirement into this or another appropriate policy such as GP/QP.	57030 (The Wildlife Trust)
<p>Good design is subjective, yet the planning system has allowed the dominance of bland housing estates. Therefore, additional guidance should be introduced to instruct development beyond vague advice about being 'in-keeping' with the existing local aesthetic to avoid monotony. Possible measures to address this include:</p> <ul style="list-style-type: none"> <li>• Design guides are acceptable on large schemes to address this. However, it can take time to adopt design guides, in the interim developers could be signposted to alternative frameworks.</li> </ul>	57013 (C King), 60291 (Wheatley Group Developments Ltd), 60342 (F.C. Butler Trust), 60353 (F.C Butler Trust duplicate comment), 60372 (The Critchley Family), 60381 (Stephen & Jane Graves), 60391 (David Wright), 60467 (Peter, Jean & Michael Crow)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>Schemes which demonstrate a high standard of design should be fast-tracked.</li> <li>Robust community engagement should also be required.</li> </ul>	
Additional measures to avoid monotony could include introducing a minimum number of individual house types appropriate to the scale of development.	57013 (C King), 60342 (F.C. Butler Trust), 60353 (F.C Butler Trust duplicate comment), 60381 (Stephen & Jane Graves), 60391 (David Wright), 60467 (Peter, Jean & Michael Crow)
Is it unusual to have two design policies in the Local Plan, is it necessary?	60342 (F.C. Butler Trust), 60353 (F.C Butler Trust duplicate comment), 59678 (Historic England), 60381 (Stephen & Jane Graves)
Design guides shouldn't be imposed on small developments where other mechanisms can achieve similar outcomes.	57013 (C King), 60342 (F.C. Butler Trust), 60353 (F.C Butler Trust duplicate comment) 60381 (Stephen & Jane Graves) 60467 (Peter, Jean & Michael Crow)
The design guide is misleading, there needs to be a photographic, accurate record of poor development to provide guidance for future planning on what to avoid. The chosen visual examples in design guides were worryingly bland examples with too many houses	57141 (North Newnham Resident Association)

Summary of issues raised in comments	Comments highlighting this issue
crammed with unrealistic expectations that everyone can walk/ cycle to education/ schools etc. within five miles.	
It is important to include a policy on design with the GCLP that accords with paragraph the NPPF.	57182 (Southern & Regional Developments Ltd), 57259 (European Property Ventures- Cambridgeshire), 58799 (Trumpington Meadows Land Company)
The ambition to introduce mixed-use proposals is welcome. Most uses can be sensitively co-located and therefore it is requested that co-location of uses is supported in policy GP/QD.	57215 (Abrdn), 57274 (Universities Superannuation Scheme- Commercial), 58212 (Universities Superannuation Scheme- Commercial 2 <sup>nd</sup> comment)
Page 179 No comment	57416 (Huntingdonshire DC)
Support the policy, but consider that on-street parking should be taken into consideration so residents can park near homes without obstruction the roadway or having to rely on remote garage blocks.	57724 (Bassingbourn-cum-Kneesworth Parish Council)
There is a need to assess the impact of new developments and build to the standards of Passivhaus homes.	58458 (Linton PC)
There should be a requirement that steps to enhance biodiversity are required in development plans. This would complement and enhance	58486 (J Pavey)

Summary of issues raised in comments	Comments highlighting this issue
policies relating to achieving biodiversity gain. There is no explanation why the reported comment that "The potential for planting and biodiversity should be maximised" has been disregarded.	
Where these objectives can be demonstrated, the policy should make clear that this will carry significant weight in the consideration of the proposal.	58514 (BDW Cambridgeshire & The Landowners)
Support policy direction, but it should link to Policy CC/NZ and buildings should be designed with climate mitigation in mind.	58842 (Cambridge Past, Present & Future)
Use of design codes specific to a local area is critical and should reflect local building typologies and topography. The design codes should be flexible to reflect the fact that building construction methods	(59008) bpha

Summary of issues raised in comments	Comments highlighting this issue
are changing towards the objective of carbon neutrality. A Greater Cambridge design code would be welcome.	
Policy direction should make reference to existing built form on site/s, especially in respect to impact on neighbouring buildings and space to ensure that the use of previously developed or underutilised sites in the urban area can be maximised.	59074 (Metro Property Unit Trust), 59139 (Metro Property Unit Trust duplicate comment)
<p>Supportive of the aspiration to achieve high quality design through development which accords with its own ethos and approach to development. Clarifications are needed:</p> <ul style="list-style-type: none"> <li>the need to successfully integrate waste, recycling and parking is referenced twice in the policy under ‘climate-positive’ and ‘local character’ which does not need to be repeated under the same policy.</li> <li>Clarification should be provided within the policy as to what is regarded as ‘significantly taller’ to understand when additional assessment will be required.</li> </ul>	59529 (Countryside Properties – Bourn Airfield)
Welcome the bullet points on local character, but there should be greater reference to the historic environment. It is confusing having	59678 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
two design policies separated in the Plan – GP/PP and GP/QD. It is also confusing as they address similar issues, i.e. tall buildings. It would be helpful if they were together.	
Consider having a separate tall building policy.	59678 (Historic England)
Policy GP/QD could benefit by also referring to building orientation to maximise the opportunities for renewables.	59696 (Central Bedfordshire Council)
The policy should link to section 12 Paragraph 130 (f) of the NPPF (2021)	59941 (Cambridgeshire Constabulary)
Security and Crime prevention measures should be considered at the earliest opportunity as an integral part of any initial design for a proposed development. Developers should, at an early stage, seek consultation and advice from the Police Designing out Crime Officers at Cambridgeshire Police Headquarters on designing out crime.	59941 (Cambridgeshire Constabulary)

Summary of issues raised in comments	Comments highlighting this issue
The policy should link to the 'Secured by Design' principles and ensure that development proposals improve safety. The full list of principles is listed in the comment.	59941 (Cambridgeshire Constabulary)
Can you promise to do this?	60411 (Great and Little Chishill PC)
<p>Anglian Water supports the policy and is promoting integrated water management such as the reuse of rainwater on developments (Policy GP/QD). Anglian Water supports the requirements for SuDS on developments. The role of SuDS in improving water quality through intercepting points of pollution should also be referenced to in support of the policy.</p>	60455 (Anglian Water Services Ltd)
<p>A couple of clarifications are needed on the wording of the policy:</p> <ul style="list-style-type: none"> <li>The need to successfully integrate waste, recycling and parking is referenced twice in the policy under 'climate-positive' and 'local character' which does not need to be repeated under the same policy.</li> </ul>	60527 (Taylor Wimpey UK Ltd), 60586 (Countryside Properties)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>In relation to the policy's mention of 'significantly taller' buildings, clarification should be provided about what would count within this categorisation as 'taller'.</li> </ul>	
<p>Clarification needed in relation to what "major schemes should share a native 3-D file for assessment" actually means. Ideally computer model images should be viewed on planning portal by consultees prior to approval. However the issue is that the Planning Portal is a big obstacle to community engagement.</p>	60783 (Cambridge and South Cambridgeshire Green Parties)
<p>The frontages policy is important but needs to go further. Neighbours often have views onto the backs of development, the design has to be great quality from all viewpoints.</p>	60783 (Cambridge and South Cambridgeshire Green Parties)
<p>Quality seems to have been compromised on many new developments, with the S106 money or a new park not making up for poor-quality design. There needs to be a detailed higher standard of design.</p>	60783 (Cambridge and South Cambridgeshire Green Parties)



**Table of representations: Policy GP/QD: Achieving high quality development (sites)**

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
Support the policy GP/QD but notes that the fulfilment of Policy S/NEC through relocation of CWWTP to Honey Hill is contrary to this policy.	57690 (J Conroy)
Support the policy GP/QD ; the Masterplan proposals accompanying these representations demonstrate the potential to deliver these objectives through the development of Land of Beach Road.	58514 (BDW Cambridgeshire & The Landowners)
In relation to GP/QD, Marshall has a strong interest in creating a high quality development in Cambridge East (S/CE) and wishes to work with the GCSP to develop design principles and a design process that can inform a positive Local Plan policy for the site.	58558 (Marshall Group Properties)
Shares the key design aims of the policy and includes information about how the CBC Vision 2050 (Policy S/CBC) accords with this vision.	58859 (CBC Limited, Cambridgeshire County Council and a private family trust)

## GP/QP: Establishing high quality landscape and public realm

### Hyperlink for all comments

**Open this hyperlink** - [Policy GP/QP: Establishing high quality landscape and public realm](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

**Number of Representations for this section:** 28

### Notes:

- Parts of 57142 (North Newnham Resident Association) comment do not make sense.

### Abbreviations

- PC= Parish Council      DC= District Council      TC= Town Council

### Executive Summary

Many respondents expressed general support for the policy.

There were various suggestions to improve the policy. Many comments focussed upon improving the quality and experience of public spaces through the introduction of Home Zones, Low Traffic Neighbourhoods and the principles of the 15-Minute City. Trumpington Residents Association (TRA) and others commented on the quality of the existing streetscape, the capacity of the streets and spaces within the city and their overall maintenance. Cambridge and South Cambridgeshire Green Parties argued that footways need to be more porous for pedestrians but also protect them from motorised vehicles. The same respondent asked how the Local Plan will treat anti-terror architecture.

Metro Property Unit Trust suggested narrowing the policy's scope to ensure that developments should just be landscape-led, but also respond to other design, land-use and landscape considerations. Contrastingly, the Royal Society for the Protection of Birds Cambridgeshire/ Bedfordshire/ Hertfordshire Area suggested expanding the scope of the policy to include local landscape and habitats and the need to prevent the introduction of new, or expansion of existing invasive species. The Wildlife Trust considered that the Building with Nature standards referred to in Policy BG/GI should be formally incorporated as a requirement into this policy or another appropriate policy such as GP/QD. A few developers questioned how the last bullet point of the policy, 'appropriate types of open space' will be tested, measured, and applied.

In terms of the additional survey questions, in relation to Q.7 (southern rural cluster) and Q.9 (kinds of housing, jobs, facilities, or open spaces to include in villages) there were a number of suggestions, including an expressed desire for new development to be designed for children and a wish to make new development reflect village character. In relation to Q.4 (Cambridge North-East), a high number of respondents expressed a desire for green spaces, tree, etc. to be included in the design of the site. Similar aspirations were expressed in response to Q.5 (Addenbrookes), Q.6 (Cambourne), Q.7 (southern rural cluster), Q.9 (kinds of housing, jobs, facilities, or open spaces to include in villages) and Q.13 (the broad aspirational vision for Greater Cambridge). In terms of enhancing connectivity, respondents expressed support in relation to Q.3 (Cambridge East), Q.4 (Cambridge North-East), Q.6 (Cambourne), Q.7 (the southern rural cluster), Q.9 (the villages) and Q.13 (the broad aspirational vision for Greater Cambridge). There were particularly detailed representations expressing a desire to improve connectivity in Addenbrookes which was linked to Q.5 (Addenbrookes).

Table of representations: Policy GP/QP: Establishing high quality landscape and public realm

Summary of issues raised in comments	Comments highlighting this issue
<p>General support for policy</p>	<p><b>Individuals</b> 57691 (J Conroy),</p> <p><b>Public Bodies</b> 56637 (Gamlingay PC), 56756 (Croydon PC), 57725 (Bassingbourn-cum-Kneesworth PC), 59929 (Fen Ditton PC), 60014 (Steeple Morden PC),</p> <p><b>Third Sector Organisations</b> 56989 (Trumpington Residents Association),</p> <p><b>Other Organisations</b> 59077 (RSPB Cambs/ Beds/ Herts Area), 59679 (Historic England),</p> <p><b>Developers, Housebuilders and Landowners</b>  57216 (Abrdn), 58213 (Universities Superannuation Scheme Retail), 58826 (Wates Developments Ltd), 58865 (CBC Limited, Cambridgeshire County Council and a private family trust), 59530</p>

Summary of issues raised in comments	Comments highlighting this issue
	(Countryside Properties - Bourn Airfield), 60158 (U&I PLC and Town), 60528 (Taylor Wimpey UK Ltd), 60588 (Countryside Properties- Fen Ditton site)
Developers need to fulfil their planning obligations in relation to paths, infrastructure, and public realm facilities, which have not been delivered in Cambridge's southern fringe. Questioned whether financial penalties should be levied on developers if they do not meet their obligations.	56989 (Trumpington Residents Association)
Need for proper 'home zones' with a 20 mph speed limit from the outset of a development due to concerns that it can take years before 20 mph policy is implemented.	56989 (Trumpington Residents Association)
The Building with Nature standards referred to in Policy BG/GI should be formally incorporated as a requirement into this policy or another appropriate policy such as GP/QD.	57029 (The Wildlife Trust)
No comment	57417 (Huntingdonshire DC)
Commented 'Inappropriate and controversial degradation of historical character'- unclear what this is referring to	57142 (North Newnham Resident Association)
Commented in relation to bus lanes and bus shelters, review the good and bad ones, and improve cleaning maintenance.	57142 (North Newnham Resident Association)

Summary of issues raised in comments	Comments highlighting this issue
Cycle ways, markers and floor-scape must look attractive, fit in with context and be safe and appealing to use.	57142 (North Newnham Resident Association)
No cobbles or sets should be removed in historic core floor-spaces.	57142 (North Newnham Resident Association)
Bike racks should be visually assessed in historic core and not over dominate historic areas.	57142 (North Newnham Resident Association)
Licensed stall holders who operate on listed bridges should have their contracts reviewed	57143 (North Newnham Resident Association 2 <sup>nd</sup> comment)
Questioned whether there should be a policy on removing or reducing plastics, such as flags, notices, art schemes, from the city centre.	57143 (North Newnham Resident Association 2 <sup>nd</sup> comment)
Further release of green belt land, in addition to the land already committed in the Local Plan, would be detrimental to the biodiversity of the area	58170 (Dr. S Kennedy)
Under the first bullet point of the 'Enhanced connectivity' policy, it is suggested that the policy could be expanded to include local landscape and habitats as well as public realm.	59077 (RSPB Cambs/ Beds/ Herts Area)
Under the second bullet point of the policy 'Response to climate', they suggest including the need to prevent the introduction of new, or expansion of existing invasive species.	59077 (RSPB Cambs/ Beds/ Herts Area)

Summary of issues raised in comments	Comments highlighting this issue
Developments should not only be landscape led, but should respond to design, land-use and landscape considerations which links to the aim to deliver balanced planning decisions.	59078 (Metro Property Unit Trust)
In relation to the last bullet point of the policy, it was questioned how 'appropriate types of open space' will be tested, measured and applied.	59530 (Countryside Properties - Bourn Airfield), 60528 (Taylor Wimpey UK Ltd), 60588 (Countryside Properties – Fen Ditton site)
For streetscape improvements, it was recommended to refer to Historic England's 'Streets for All' publications.	59679 (Historic England)
It would be helpful for proposals for GB1/2 to be reviewed against the GP/QP policy.	59783 (B Hunt)
Commented that there are serious issues of street capacity.	60205 (J Preston)
Questioned whether the policies can be promised and maintained.	60412 (Great and Little Chishill PC)
In relation to Policy BG/EO, it was questioned whether certain thresholds and types of open space provision will be required dependent upon the scale of development.	60528 (Taylor Wimpey UK Ltd)
More thought needs to be given to making footways porous for pedestrians but protecting them from motorised vehicles. This could be achieved through provision of inset bays. Linked to this, the Party want to see implementation of Low Traffic Neighbourhoods, progressing the Making Space for People SPD and 15 minute neighbourhoods.	60784 (Cambridge and South Cambridgeshire Green Parties)

Summary of issues raised in comments	Comments highlighting this issue
Cited problem in Cambridge of drivers going to one main shopping centre and cited example of Oxford Local Plan which had sought to decentralise traffic by offering multiple shopping centres.	60784 (Cambridge and South Cambridgeshire Green Parties)
Asked how the Local Plan will treat anti-terror architecture, such as the barrier on King's Parade. If it is a permanent fixture it should form part of consultations within the Local Plan.	60784 (Cambridge and South Cambridgeshire Green Parties)

**Table of representations: Policy GP/QP: Establishing high quality landscape and public realm (Site-specific comments)**

Summary of issues raised in comments	Comments highlighting this issue
In relation to GP/QP, commented that there is a require to review damaging light schemes, such as Burrells Walk	57142 (North Newnham Resident Association)
The fulfilment of S/NEC Policy through the relocation of CWWTP to Honey Hill would be contrary to this policy (GP/QP)	57691 (J Conroy)



## GP/HA: Conservation and enhancement of heritage assets

Hyperlink for all comments

Open this hyperlink - [Policy GP/HA: Conservation and enhancement of heritage assets](#)

<https://consultations.greatercambridgeplanning.org/greater-cambridge-local-plan-first-proposals/explore-theme/great-places/policy-gpqp-establishing>> then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 36

### Abbreviations

- PC= Parish Council      DC= District Council      TC= Town Council

### Executive Summary

Broad support for the policy was expressed within the representations from a range of individuals, public bodies, third sector organisations and developers.

Respondents comments include that the policy should include buildings recorded in Cambridgeshire's Historic Environment Record, it is too focused on City without reference to Conservation areas in villages, and should recognise that new development can enhance heritage assets and that protecting access to heritage assets would help to improve well-being.

Historic England (HE) provided a substantial comment to this policy which included various suggestions. Key elements include that the Councils should provide a positive strategy for the historic environment, that there should be additional policies for: designated and non-designated heritage assets, heritage at risk, and historic shopfronts, that the Councils should create and manage a local heritage at risk register, and that Heritage Impact Assessments are prepared for site allocations. Other parties considered more could be done to recognise the value of heritage beyond designated heritage assets.

In relation to the Strategic Heritage Impact Assessment (SHIA), HE had concerns regarding how Cambridge's setting has been defined and measured, and suggest revisiting parts of this assessment. Some respondents including CPPF expressed a number of concerns, such as perceiving it to omit discussion of Conservation Areas Appraisals and the potential impact of growth on these Areas, omitting assessment of the cumulative impacts of growth on the historic centre, and ignoring previous research. These respondents recommended a third-party, holistic overview is needed and suggest using HE's Historic Places Panel.

Some respondents argued that the Conservation Areas policy should be reviewed to give greater control over significant changes within a coherent area, and some respondents wanted a full set of up to date Conservation Area Appraisals, including for villages and approach roads from all directions into Cambridge, major towns and villages in the area.

Other comments included the importance of the policy aligning with the NPPF, and a view that current policy wording is ambiguous in relation to archaeology, that Local Geological Sites and Geological Special Sites of Scientific Interest often have a historic and heritage aspects, and these should be included in the assessment. A few respondents raised questions in relation to the effectiveness of existing policies. A few respondents raised site specific comments expressing concern about the heritage impacts of new development including the relocation of the WWTP, and development in Little Linton.

In the additional survey questions, some respondents expressed a desire to protect heritage assets in relation to Q.13 (the broad aspirational vision for Greater Cambridge). In response to Q.4 (Cambridge North-East), a few respondents expressed concerns about the potential impact upon the historic setting of the site. Preservationist sentiments were also expressed in response to Q.7 (southern rural cluster). Similar concerns were expressed in relation to Q.8 (level of development in the villages), Q.9 (kinds of houses, jobs, facilities, or open spaces to be included in the villages), and Q.13 (the broad aspirational vision for Greater Cambridge) and the need to preserve the beauty and character of villages.

#### Table of representations: Policy GP/HA: Conservation and enhancement of heritage assets

Summary of issues raised in comments	Comments highlighting this issue
Support policy	<p><b>Individuals</b></p> <p>57693 (J Conroy), 57969 (E Davies), 58140 (M Asplin)</p> <p><b>Public Bodies</b></p> <p>56638 (Gamlingay PC), 56915 (West Wickham PC/ Cllr. David Sargeant), 60091 (Guilden Morden PC)</p> <p><b>Third Sector Organisations</b></p> <p>60785 (Cambridge and South Cambridgeshire Green Parties)</p>

Summary of issues raised in comments	Comments highlighting this issue
	<p><b>Developers, Housebuilders and Landowners</b></p> <p>57219 (Abrdn), 58215 (Universities Superannuation Scheme)</p>
<p>Support policy, but:</p> <ul style="list-style-type: none"> <li>• The scope is not wide enough. It appears to concentrate on heritage sites in the city without reference to some of the protected conservation areas in villages</li> <li>• The policy should not only include listed buildings but also those recorded on Cambridgeshire's Historic Environment Record. Conservation areas should be respected and maintained per SCDC policy NH/14.</li> <li>• Need to complete Conservation Area Assessments for villages</li> <li>• In some cases, new development or redevelopment can enhance heritage assets and this should be recognised in the policy.</li> </ul>	<p><b>Individuals</b></p> <p>56475 (M Starkie),</p> <p><b>Public Bodies</b></p> <p>57726 (Bassingbourn-cum-Kneesworth PC), 59930 (Fen Ditton PC), 60015 (Steeple Morden PC)</p> <p><b>Developers, Housebuilders and Landowners</b></p> <p>58215 (Universities Superannuation Scheme), 57219 (Abrdn)</p>
<p>Fails to consider anything other than designated heritage assets. No consideration of heritage significance of Cambridge as a whole, or of the heritage significance of undesignated buildings, spaces, and intangible heritage.</p>	<p>60206 (J Preston) 60785 (Cambridge and South Cambridgeshire Green Parties) 58860 (Cambridge Past, Present &amp; Future)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>The Heritage Impact Assessment is not fit for purpose. There is no mention of any Conservation Area appraisal apart from the Historic Core, and no cumulative assessment of significance and issues identified in these Appraisals</p>	<p>60206 (J Preston) 60785 (Cambridge and South Cambridgeshire Green Parties)</p>
<p>Ensure positive strategy for historic environment throughout the plan. A good strategy will offer a positive, holistic approach throughout the whole plan whereby the historic environment is considered as an integral part of every aspect of the plan, being interwoven within the entire document.</p>	<p>59680 (Historic England)</p>
<p>Policy recommendations include</p> <ul style="list-style-type: none"> <li>• Strategic policy for the historic environment setting out an overall strategy for the pattern scale and quality of development, and make sufficient provision for the conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.</li> <li>• Create policies for heritage assets designated and non-designated heritage assets which align with national policy</li> </ul>	<p>59680 (Historic England)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>legislation. HE also encourages policy for assets which might potentially be designated during the plan period.</p> <ul style="list-style-type: none"> <li>• Include policy for Heritage at Risk, as there is currently no policy in the plan for such heritage.</li> <li>• HE also recommend the creation and management of a local Heritage at Risk register for Grade II listed buildings.</li> <li>• Include policy for Historic Shopfronts</li> <li>• Prepare HIAs for site allocations.</li> </ul>	
<p>Detailed heritage impact assessments for the site allocations should follow the 5 step methodology set out in our HE Advice Note 3.</p> <ul style="list-style-type: none"> <li>• The appraisal approach should not just focus on distance or intervisibility of a site, but also go into detail about opportunities for enhancement and cumulative effects of the site on the historic environment.</li> <li>• If the HIA concludes that development in the area could be acceptable, the findings of the HIA should inform the Local Plan policy.</li> </ul>	59680 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>HE welcome the opportunity to discuss the scope of this next stage of HIA to ensure that the right sites are covered and in a proportionate way.</li> </ul>	
<p>HE have concerns regarding some aspects of the baseline of the Strategic Heritage Impact Assessment, including:</p> <ul style="list-style-type: none"> <li>The weighting given to some of the key characteristics and aspects of setting of Cambridge including views.</li> <li>HE have some concerns about the way in which some aspects have been defined as important/critical and others contributory of minor.</li> <li>HE suggest re-visiting the different setting elements of the SHIA</li> </ul>	59680 (Historic England)
<p>Coton Parish Council is concerned that the heritage aspects of the setting of the American Cemetery are being ignored by the GCP. They are especially concerned that proposals to build a tarmac bus road across the south side of the hill would irreparably damage the landscape around the cemetery.</p>	57797 (Coton PC)

Summary of issues raised in comments	Comments highlighting this issue
Local Plan policy should ensure that it establishes the highest possible safeguards for the protection of all heritage assets, historic places and important landscapes.	59304 (National Trust)
Gog Magog and the chalk hills are heritage assets.	59280 (Great Shelford PC)
Protecting public access to heritage assets encourages better well-being and the more assets encourages public rights of way including permissive footpaths.	59280 (Great Shelford PC)
A third-party, holistic overview is recommended, to try to resolve some of these key strategic issues. In relation to heritage, growth is seriously threatening what makes Cambridge Special. It is recommended that Historic England's Historic Places Panel are invited to visit Cambridge and provide strategic recommendations which can inform the Local Plan.	58860 (Cambridge Past, Present & Future) 60206 (J Preston)
Current policy wording is ambiguous in relation to archaeology. It is suggested that the policy wording is amended to state that 'the policy will also require the appropriate treatment of archaeology, where	60529 (Taylor Wimpey UK Ltd) 60589 (Countryside Properties - Fen Ditton site)



Summary of issues raised in comments	Comments highlighting this issue
development proposals have the potential to impact archaeological remains or deposits.'	
The Councils need to ensure the policy reflects the national policy (NPPF 2021, paragraphs 199-204) and aligns with these varying tests.	60317 (Gladman Developments)
By not developing villages we would protect our heritage. Conservation should be a key and important priority.	60413 (Great and Little Chishill PC)
<p>Comments include:</p> <ul style="list-style-type: none"> <li>• Considers that the historic environment has been considered too narrowly and should be widened to include wellbeing and culture.</li> <li>• The conflict between growth and environmental capacity of the historic built environment and special character must be recognised as a key challenge for the draft Local Plan. It should have been considered at the start of the Great Places chapter.</li> <li>• The Local Plan should clarify the role and the heritage of the market square as a historic centre of the city.</li> </ul>	58860 (Cambridge Past, Present & Future) 60206 (J Preston) 60785 (Cambridge and South Cambridgeshire Green Parties)

Summary of issues raised in comments	Comments highlighting this issue
<div data-bbox="91 667 136 850" data-label="Page-Header">Page 202</div> <ul style="list-style-type: none"> <li>Concerned that the evidence base does not include an assessment of the cumulative impacts on the historic centre and what the likely impacts of this might be – without this it is impossible to reach a judgement.</li> <li>Paragraph 3.2.4 of the Strategic HIA states that growth will support Cambridge's characteristics, but we cannot find evidence to support this statement.</li> <li>The "Strategic Heritage Impact Assessment" references a "Vu-City" model for assessing the impacts of tall buildings. This modelling should made available for the public to see and assess.</li> </ul>	
<p>There are serious questions in relation to the effectiveness of existing policies. Example of Mill Road Library is cited, it was excluded from redevelopment of depot. It was an excellent opportunity to protect and enhance a heritage asset, which would not have been missed had the City complied with its own Local Plan policy regarding heritage assets. It has been refurbished, but not incorporated into the development, and is now a public building being offered for private sale.</p>	<p>58860 (Cambridge Past, Present &amp; Future) 60206 (J Preston)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Concerns are raised as to the validity of the Heritage Impact Assessment (2021). Perceived flaws include:</p> <ul style="list-style-type: none"> <li>• The Baseline Study does not assess and record the SIGNIFICANCE, as opposed to weighting, of the City as a whole or of any undesignated areas within and around it. This is because the study only considers the setting of designated heritage assets, rather than taking a holistic strategic view.</li> <li>• Needs to show more knowledge of city's history + policies</li> <li>• It confines itself to measuring impact on historic assets, rather than considering the dynamic of the city as a whole + potential impact of growth.</li> <li>• It seems to ignore the approach of the 2006 Historic Core Appraisal</li> <li>• Doesn't mention Conservation Area Appraisal apart from the Historic Core Appraisal + no cumulative assessment of significance and issues identified in these appraisals.</li> <li>• The HIA identifies Conservation Area Appraisals as data to inform the assessment. However, not all the conservation areas have a CAA and therefore there is a gap in the available data.</li> </ul>	<p>58860 (Cambridge Past, Present &amp; Future) 60206 (J Preston) 60785 (Cambridge and South Cambridgeshire Green Parties)</p>

Summary of issues raised in comments	Comments highlighting this issue
<div data-bbox="91 667 136 852" data-label="Page-Header">Page 204</div> <ul style="list-style-type: none"> <li>• The Baseline study does not mention the Suburbs and Approaches Studies.</li> <li>• The Baseline study does not consider the strategic extent, designations, i.e. the extent to which Cambridge's historic or cultural landscape is protected.</li> <li>• Study fails to assess the significance of Cambridge as a whole.</li> <li>• The “view” photos don’t show the “eye-catching” impact on a viewer’s perception of a contrasting feature such as a tall building in a landscape.</li> <li>• For the options involving development in and adjacent to Cambridge, it assumes that most problems can be resolved by Design, completely ignoring environmental capacity issues. What if any detailed assessment has been made of the wider visual impacts of tall buildings on the North-East Cambridge site?</li> <li>• No consideration of impact of transport and traffic upon historic environment, which will be needed to support growth.</li> </ul>	

Summary of issues raised in comments	Comments highlighting this issue
Local Geological Sites and Geological SSSI often have a historic and heritage aspects. These should be included in the assessment.	57791 (Dr R Nicholls)
No comment	57418 (Huntingdonshire DC)
<p>The major existing University developments at Eddington and West Cambridge, which are proposed for acceleration, have significantly changed the character of North Newnham, with consequent effects on water management and dense urban development on the edge of the West Cambridge Conservation Area. Maintaining and strengthening Conservation Area policy protection is even more important to preserve the West Cambridge Conservation Area from inappropriate development. Policy 67 does not afford sufficient protection.</p>	57889 (North Newnham Residents Association)
Figure 6.2 Cultural heritage, page 48 – map shows conservation areas are listed the buildings in circling the proposed site of the CWWTP on greenbelt which appears to negate the policy.	56904 (Save Honey Hill Group)

Summary of issues raised in comments	Comments highlighting this issue
<p>In relation to Conservation Area policies,</p> <ul style="list-style-type: none"> <li>• That the Policy should be reviewed to give greater control over significant changes within a coherent area.</li> <li>• A priority is to update Conservation Area Appraisals, using planning experts and community forums.</li> <li>• A priority is to have a full set of Conservation reports on approach roads from all directions into Cambridge and major towns and villages in County.</li> </ul>	<p>56990 (Trumpington Residents Association) 57144 (North Newnham Resident's Association), 57969 (E Davies)</p>

**Table of representations: Policy GP/HA: Conservation and enhancement of heritage assets (Site-specific comments)**

Summary of site related issues raised in comments	Comments highlighting this issue
<p>The objective of Policy GP/HA will be contravened by the requirement of Policy S/NEC North East Cambridge to relocate the Waste=Water Treatment plant to an area of Green Belt. Conservation areas and</p>	<p>56904 (Save Honey Hill Group)</p>

Summary of site related issues raised in comments	Comments highlighting this issue
heritage sites will be compromised by the juxtaposition of a large industrial plant.	
<p>In relation to GP/HA, CWWTPR to Green Belt compromises this policy. Significant impact to heritage assets exist in this area. The development would represent totally inappropriate industrial development at this location, blighting views from network of PRowS and views to the villages and into Cambridge. The impact would be intensified by open landscape</p>	57497 (C Martin), 57617 (J Pratt), 57693 (J Conroy)
<p>In relation to GP/ HA, the proposals are supported which exclude any development in the area of Little Linton. New development in the area would disrupt the historic open landscape, destroying the separation and damaging the individual character of each settlement as well as cause harm to a valuable environmental resource. The direction of future development to other more sustainable locations is appropriate and will ensure that Little Linton and Linton retain their identity.</p>	57842 (S Nickalls) 57873 (A Nickalls), 57917 (S Foulds) 57930 (H Lawrence- Foulds) C Mackay (57960)

Summary of site related issues raised in comments	Comments highlighting this issue
In relation to GP/HA, there appears no reference to the corresponding Green Belt dependency for Policy S/NEC, which therefore appears selective and should be considered more fully in the study for the options relating to S/NEC.	58140 (M Asplin)



## GP/CC: Adapting heritage assets to climate change

Hyperlink for all comments

Open this hyperlink - [Policy GP/CC: Adapting heritage assets to climate change  
https://consultations.greatercambridgeplanning.org/greater-cambridge-local-plan-first-proposals/explore-theme/great-places/policy-gpqp-establishing](https://consultations.greatercambridgeplanning.org/greater-cambridge-local-plan-first-proposals/explore-theme/great-places/policy-gpqp-establishing) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 14

### Abbreviations

- PC= Parish Council      DC= District Council      TC= Town Council

### Executive Summary

Broad support for the policy was expressed within the representations from a range of individuals, public bodies, organisations and developers. Histon and Impington PC supported the policy on the condition that retrofitting improvements don't harm heritage assets. Linton PC questioned the need for old buildings to adapt and argued that modern changes could harm the buildings. Comments included the need for clarity regarding what interventions are necessary to end heritage assets reliance on fossil fuels, that the policy should relate to all buildings of traditional construction and should relate to policy CC/NZ.

Cambridge Past, Present & Future stated that it would be useful to provide clear guidance on the appropriate location of solar panels on heritage assets and buildings within conservation areas. Gamlingay Parish Council stated that more support is needed to help residents with listed buildings retrofit temporary fittings to roof structures.

Historic England (HE) broadly support the policy but provided comments including that it should articulate the significant carbon output that is produced when demolishing old buildings and policies should recognise the benefits of sympathetic restoration and retrofitting historic buildings. HE noted that listed buildings, buildings in Conservation Areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of Building Regulations where compliance would unacceptably alter their character and appearance. HE noted that traditional buildings can be impacted by climate change to a greater degree than modern buildings and linked a number of publications to help guide the draft policy.

In terms of the additional survey questions, in relation to Q.4 (Cambridge North-East) and Q.13 (aspirational vision for Greater Cambridge) some respondents expressed a preference for retrofitting properties over creating new development.

#### Table of representations: Policy GP/CC: Adapting heritage assets to climate change

Summary of issues raised in comments	Comments highlighting this issue
General support for policy	<p><b>Public Bodies</b></p> <p>56757 (Croydon PC), 56916 (Cllr. David Sargeant), 57727 (Bassingbourn-cum-Kneesworth PC), 59932 (Fen Ditton PC)</p> <p><b>Other Organisations</b></p> <p>59681 (Historic England),</p> <p><b>Developers, Housebuilders and Landowners</b></p> <p>58020 (Imperial War Museum/ Gonville and Caius College),</p>

Summary of issues raised in comments	Comments highlighting this issue
More support and work needed to provide a positive framework for residents with listed buildings, enabling them to retrofit temporary fits to roof structures.	56639 (Gaminlgay PC)
Support considering measures that improve the energy efficiency of listed buildings.	56916 (Cllr Sargeant)
No comment	57419 (Huntingdonshire DC)
State that enabling growth on their site will provide direct support for protection, adaptation and preservation of their heritage assets by mitigating climate change impacts.	58020 (Imperial War Museum/ Gonville and Caius College)
Support, as long as heritage is not damaged by retrofitting improvements.	58051 (Histon & Impington PC)
If the buildings have lasted this long, why do they need to adapt? Insulation and modern materials can lead to decay and dampness in listed buildings.	58460 (Linton PC)
It would be useful for the policy and/ or the supporting text to provide clear policy on the appropriate location of solar panels on heritage assets/ on buildings within conservation areas.	58866 (Cambridge Past, Present & Future)
Support the acknowledgement in emerging policy of the need for heritage assets to be adapted for climate change, however it would be helpful to have greater definition regarding what interventions are necessary to end	58873 (University of Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
heritage assets reliance on fossil fuel. Bath and Oxford provide good examples.	
<p>Broadly support the policy direction. Historic England also offers the following advice:</p> <ul style="list-style-type: none"> <li>• By caring for and reusing our heritage assets, energy and carbon dioxide can be saved through better maintenance, management, and energy efficiency measures.</li> <li>• It is important to articulate an evidence-based case for the importance of the historic environment in respect of the embodied carbon value of historic buildings. It is important to emphasise the positive contribution that retaining and reusing old buildings can make, along with the sustainability of old materials and design.</li> <li>• A sustainable approach to climate change mitigation measures should secure a balance between benefits such development delivers and the environmental costs it incurs.</li> <li>• Policies should seek to limit and mitigate any cost the historic environment. When considering energy efficiency measures, the</li> </ul>	59681 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
<p>benefits of alternative options should be weighed against impact on heritage assets.</p>	
<p>Historic England recommends incorporating their suggestions into policy wording:</p> <ul style="list-style-type: none"> <li>• Policies should recognise sustainability over the long-term; historic buildings represent a significant investment of expended energy.</li> <li>• Demolishing represents a significant reinvestment of embodied energy.</li> </ul> <p>Planning policies should encourage &amp; recognise the benefits of sympathetic restoration/retention/refurbishment/retrofit of historic buildings, rather than demolition and replacement.</p> <p>In their comment, Historic England attached a document outlining several publications that might be helpful when drafting the policy.</p>	<p>59681 (Historic England)</p>
<p>Historic England note Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with</p>	<p>59681 (Historic England)</p>

Summary of issues raised in comments	Comments highlighting this issue
energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance.	
Special considerations under Part L of the Building Regulations are given to locally listed buildings, buildings of architectural and historic interest within Registered Parks and Gardens and within the curtilages of Scheduled Monuments. Buildings of traditional construction more readily absorb moisture and allow for its evaporation. Therefore, these buildings can be impacted by climate change to a greater degree than modern buildings. In relation to this point Historic England recommends some its publications when writing the policy and these are included in the attached document.	59681 (Historic England)
This policy is good and supported, but should relate to all buildings of traditional construction and needs some updating. It needs direct read-across to CC/NZ.	60207 (J Preston), 60786 (Cambridge and South Cambridgeshire Green Parties), 58866 (Cambridge Past, Present & Future)